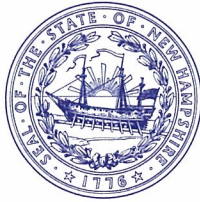


THE STATE OF NEW HAMPSHIRE

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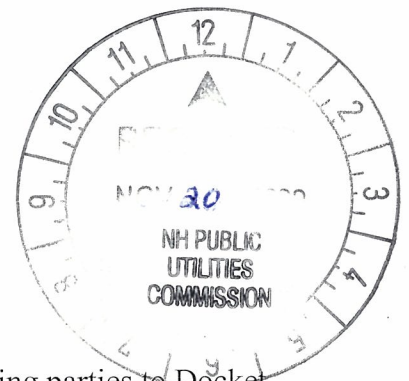
OFFICE OF THE CONSUMER ADVOCATE
21 S. FRUIT ST., SUITE 18
CONCORD, NEW HAMPSHIRE 03301-2429

November 20, 2008

Debra Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301

NHPUC NOV20'08 PM12:03

**Re: DT 07-011 Verizon New England/FairPoint Communications
Cutover Readiness Hearing**



Dear Ms. Howland:

We write in response to your letter of November 14, 2008 allowing parties to Docket No. DT 07-011 to file written submissions to be considered at the hearing scheduled for November 25, 2008. We understand that the purpose of the hearing is to consider FairPoint's readiness for cutover on January 30, 2009.

The OCA has reviewed Liberty's November 12, 2008 Report, FairPoint's Provisional Notice of Cutover Readiness and Rebuttal, and FairPoint's Supplemental Statement Concerning Notice of Cutover Readiness. I also attended the Technical Session held on November 17, 2008 in Kittery, Maine.

At this time the OCA does not have argument or factual information to present to the Commission. However, we concur with concerns expressed by some CLECs regarding Liberty's assessment that as of November 12, 2008 FairPoint had not yet satisfied CLEC testing-related readiness criteria. We also have concerns about issues raised by Liberty regarding staffing and training, and we were surprised to learn at the technical session that FairPoint recently put a hiring freeze in place. We also note that although much work has been done over the past few months with respect to CLEC issues, the OCA learned this week that some of that work has included issues that will impact retail customers. For example, we recently became aware that FairPoint has been developing a "Wholesale Cutover Communication Plan," with input from the CLECs and the Staffs of the three states. This communication plan seems to address many issues that will also impact retail customers including ordering, billing, repairs and emergencies. These issues are critical to FairPoint's ability to provide services to customers during and beyond cutover. It is our hope that the



Commission will require FairPoint to continue to work closely with Liberty and the parties on cutover issues, including customer communications about the embargo and “dark” periods during cutover, and that work on these types of issues will include participation by all parties.

We also wish to reserve our rights to cross examine witnesses at the hearing on November 25, 2008, including any new information which we understand that Liberty Consulting will be presenting at the hearing.

On a procedural note, we thank the Commission for posting documents in the case on its website so that they are accessible to parties in the docket and to the public. We hope that the Commission will continue to post all filings on its website for Docket No. DT 07-011, or a new docket as the Commission sees fit.

Thank you for the opportunity to provide these comments. We appreciate the work that Liberty Consulting and the Commission Staff is performing to ensure that FairPoint is ready for cutover.

Respectfully,



Meredith A. Hatfield
Consumer Advocate

cc: DT 07-011 service list via electronic mail