

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DT 07-011

VERIZON NEW ENGLAND, INC., BELL ATLANTIC COMMUNICATIONS, INC., NYNEX LONG DISTANCE CO., VERIZON SELECT SERVICES, INC., AND FAIRPOINT COMMUNICATIONS, INC.

Transfer of Assets to FairPoint Communications, Inc.

**OFFICE OF CONSUMER ADVOCATE'S
NOTICE OF RESERVATION OF RIGHTS CONCERNING
VERIZON'S RESPONSES TO REBUTTAL DATA REQUESTS**

The Office of Consumer Advocate (OCA) hereby notifies the N.H. Public Utilities Commission (Commission), Verizon New England, Inc. (Verizon NE), Bell Atlantic Communications, Inc., NYNEX Long Distance Co., and Verizon Select Services, Inc. (collectively, Verizon), the other parties and Commission Staff that the OCA reserves its rights to compel the responses of FairPoint to certain rebuttal data requests. In support, the OCA states the following:

1. The procedural schedule in this docket provides for the filing today of motions to compel responses to disputed rebuttal data requests.
2. In addition to ten "General Objections," Verizon specifically objected in whole or in part to seven of the OCA's rebuttal data requests.
3. Within its written objections, however, Verizon agreed to provide a response to all of the disputed rebuttal data requests.
4. Verizon's responses are due after the deadline for filing this motion to compel.
5. In agreeing to accept, for the time being, Verizon's offer to provide responses to its disputed rebuttal data requests, the OCA does not waive its rights to compel further

responses to these data requests if Verizon's voluntary responses are insufficient or incomplete.

6. As such, the OCA reserves these rights and hereby notifies the Commission, Verizon, other parties and Staff of this reservation of rights.

Respectfully submitted,

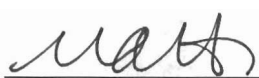


Meredith A. Hatfield
Rorie E. P. Hollenberg
Office of Consumer Advocate
21 S. Fruit St., Ste. 18
Concord, N.H. 03301
(603) 271-1172
meredith.hatfield@puc.nh.gov
rorie.hollenberg@puc.nh.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was forwarded this day to the parties by electronic mail.

September 28, 2006



Meredith A. Hatfield