

Hatfield, Meredith

From: ellen.m.cummings@verizon.com
Sent: Friday, April 13, 2007 6:17 PM
To: agree@metrocast.net; alan.s.cort@verizon.com; alexandra.blackmore@us.ngrid.com; alinder@nhla.org; allwacj@nu.com; Noonan, Amanda; amandl@smithduggan.com; antonuk@libertyconsultinggroup.com; aprior@fairpoint.com; asaunders@shaheengordon.com; brian@destek.net; bstafford@gstnetworks.com; bthayer@bayring.com; cannata@libertyconsultinggroup.com; charlesking@optonline.net; cjohnson@globe.com; cpollart@rubinrudman.com; crand@gstnetworks.com; c_miller@ncia.net; dwinslow@utel.com; eatongm@nu.com; ellen.m.cummings@verizon.com; epler@unitil.com; erle.b.pierce@verizon.com; Ross, F. Anne; fcoolbroth@devinemillimet.com; gent@otel.us; gkarnedy@ppeclaw.com; gkennan@onecommunications.com; gregg.strumberger@level3.com; hybscrt@psnh.com; hybscrt@psnh.com; jamesg_white@cable.comcast.com; jcilley@aol.com; jclark@nhaficio.org; jeremy@segtel.com; jmonahan@dupontgroup.com; Carmody, Jody; john.f.nestor.iii@verizon.com; judy.messenger@paetec.com; karen.m.melanson@verizon.com; karen.potkul@xo.com; Mullholand, Kath; kathnh@comcast.net; kbarker@kelleydrye.com; Traum, Ken; kforbes@shaheengordon.com; kmiller@dtclawyers.com; Fabrizio, Lynn; mark@markdelbianco.com; mclancy@covad.com; melanie.gates@leg.state.nh.us; Hatfield, Meredith; mjohnston@shaheengordon.com; nbrockway@aol.com; njacobson@onecommunications.com; nolinka@nu.com; pfundstein@gcglaw.com; pphillips@ppeclaw.com; rciandella@dtclawyers.com; rmihalic@murthalaw.com; rmunnely@murthalaw.com; Hollenberg, Rorie; rpena@boulderattys.com; rtulk@fairpoint.com; rtuttle@fairpoint.com; rustyb313@verizon.net; sasawyer@cox.net; sbosley@nc.rr.com; scnelson@gsinet.net; scott.j.rubin@gmail.com; sheila.gorman@verizon.com; slinn@fairpoint.com; smbaldwin@comcast.net; smwoodland@ch.cityofportsmouth.com; Merrill, Steve; steven.camerino@mclane.com; Sdandley@dscicorp.com; Stacey_Parker@cable.comcast.com; thansel@covad.com; vickroy@libertyconsultinggroup.com; victor.delvecchio@verizon.com; whamilton@aarp.org; wleach@fairpoint.com

Subject: 04-13-07 NH 07-011: FairPoint / VZ App. - VZ Objections to OCA Data Requests

Attached please find Verizon's Objections to the Office of Consumer Advocate's First Set of Data Requests in docket NH 07-011.
Thank you.

(See attached file: 04-14-07 NH 07-011 VZ Cvr Ltr-OCA.pdf)(See attached file: 04-14-07 NH 07-011 VZ Objections OCA Set 1.pdf)

Ellen Cummings
State Regulatory Planning
(617) 743-4645

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-4 Please specifically identify any and all differences between the petitions filed by Verizon and FairPoint in New Hampshire, Maine and Vermont. For each such difference, please include a citation to the page and, if appropriate, line number(s).

REPLY: Objection. The request for a line-by-line comparison of the petitions filed in New Hampshire, Maine and Vermont seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Verizon, and therefore is unduly burdensome. The request also seeks information that is not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-5 Provide a complete copy of Verizon's business plan for the years 2004, 2005, 2006, 2007, and 2008.

REPLY: Objection. The request for copies of Verizon's business plans is overbroad and calls for information that would be unduly burdensome to produce because it seeks information on Verizon companies that are not parties to the proceeding and operations other than in New Hampshire. The request also seeks information that is not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-6 To the extent not previously provided, please provide copies of any materials that comprise the Hart/Scott/Rodino filing associated with this proposed transaction.

REPLY: Objection. Please see Verizon's reply to Labor GI 1-13(h).

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-9 The S-4 states: "During the summer of 2005, FairPoint asked Lehman Brothers, Inc., referred to herein as Lehman Brothers, to convey to Verizon FairPoint's interest in acquiring rural access lines. That led to an initial meeting on September 30, 2005 between management of FairPoint and Verizon. Based on Verizon's initial reaction, FairPoint's management, at FairPoint's December 14, 2005 board of directors meeting, requested approval to pursue further discussions with Verizon, which approval was granted. In December 2005, FairPoint signed a non-disclosure agreement with Verizon." Provide any and all documents prepared for and/or using during the meeting of September 30, 2005.

REPLY: Objection. The request for information regarding the September 30, 2005 meeting seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-10 The S-4 states: "On March 20, 2006, FairPoint engaged Lehman Brothers as a financial advisor in connection with a proposed transaction with Verizon." Provide any and all documents provided by FairPoint and/or Verizon to Lehman Brothers in connection with its role as a financial advisor and describe fully the scope of Lehman Brother's engagement.

REPLY: Objection. The request for information regarding Lehman Brothers' role and documents provided in connection therewith seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-11 The S-4 states: "On April 20, 2006, FairPoint submitted a revised proposal based on its review of additional information provided by Verizon to FairPoint." Provide all information that Verizon provided to FairPoint

- a. Originally, and
- b. As part of the additional information that this excerpt references.

REPLY: Objection. The request for information submitted by Verizon to FairPoint as part of any negotiation leading up to the Merger Agreement seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-12 The S-4 states: "On May 19, 2006, FairPoint engaged Morgan Stanley & Co. Incorporated, referred to herein as Morgan Stanley, as a financial advisor in connection with a proposed transaction with Verizon." Provide any and all documents provided by FairPoint or Verizon to Lehman Brothers in connection with its role as a financial advisor and describe fully the scope of Lehman Brother's engagement.

REPLY: Objection. The request for information regarding Morgan Stanley's role and information provided in connection therewith seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-13 The S-4 states: "Thereafter, on June 26, 2006, Verizon made a management presentation to FairPoint in Boston, Massachusetts covering financial and operating aspects of the Northern New England business." Provide a copy of the management presentation and identify the Verizon and FairPoint employees and outside advisors present at the meeting on June 26, 2006.

REPLY: Objection. The request for the management presentation and the identity of those present at that presentation seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-14 The S-4 states: "On December 11, 2006, FairPoint's and Verizon's senior management and advisors met again in New York City to discuss the key deal points. At its meeting on December 13, 2006, FairPoint's board of directors received a report on the progress of negotiations and discussed the proposed transaction, including a projected transaction schedule." Provide the referenced report and any and all other documents prepared for and used during the two meetings referenced.

REPLY: Objection. The request for any report provided at the December 2006 meetings and any documents prepared for and used during such meetings seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-15 The S-4 states: "On January 2, 2007, FairPoint's board of directors met telephonically with FairPoint's management team, legal counsel and financial advisors to discuss the status of the proposed transaction. . . . Representatives of Deutsche Bank Securities Inc., referred to herein as Deutsche Bank, whose engagement as financial advisor to FairPoint was confirmed on January 4, 2007, participated in the meeting and addressed the scope of the work completed by them in connection with the evaluation of the proposed transaction and indicated that further due diligence in certain areas was required." Provide any and all documents provided by FairPoint or Verizon to Deutsche Bank in connection with its role as a financial advisor and describe fully the scope of Deutsche Bank's engagement.

REPLY: Objection. The request for any documents provided to Deutsche Bank seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-16 Identify any and all advisors and consultants engaged by Verizon regarding the proposed transaction, the date of such engagement, the scope of the engagement, and the compensation for such engagement...

REPLY: Objection. The request seeks information on advisors and consultants not engaged to testify in this proceeding and thus seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-17 Identify any and all Verizon employees who have or are participating in the transaction. Indicate also, the dates and scope of their involvement.

REPLY: Objection. The phrase "who have or are participating in the transaction" is vague and ambiguous because it does not define what it means to participate in the transaction. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce given the potentially large number of Verizon employees who may have worked or may work in some capacity on the transaction. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

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**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-18 Provide any and all materials reviewed by any and all advisors and consultants engaged by Verizon.

REPLY: Objection. The request seeks information on advisors and consultants not engaged to testify in this proceeding and thus seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce because it does not limit the subject matter of the material provided or the subject matter of the engagement.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-19 Please provide copies of any documents that will be used for purposes of transition to support the proposed transaction, to the extent not already provided in the filing of or in response to other interrogatories (or in addition to filed documents).

REPLY: Objection. The phrase "to support the proposed transaction" is vague and ambiguous. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce given the potentially broad meaning of "support". Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-20 To the extent not already provided, please provide a copy of any and all documents regarding any and all financial analyses concerning the transaction.

REPLY: Objection. The request for “any and all financial analyses concerning the transaction” is overbroad and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiver of the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-21 Please provide copies of Verizon's capital budgets at the lowest level which includes New Hampshire for the period 2002 to current, including supporting schedules and workpapers.

REPLY: Objection. The request for capital budgets at the lowest level which includes New Hampshire is overbroad and calls for information that would be unduly burdensome to produce given the number of years for which information is requested. Subject to and without waiving the objection, Verizon will produce responsive information from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-22 Provide documents which show Verizon's current/most recently used "hurdle rate" or "hurdle rates" for investments in local exchange company projects and programs.

- a. Provide documents which show how each "hurdle rate" is derived (e.g., development of cost of capital components plus risk/uncertainty adder if any); and
- b. Provide documents which show capital projects by state that were considered but rejected due to a failure to meet hurdle rate thresholds, from 2000 to date.

REPLY: Objection. The request for information on Verizon's most recently used "hurdle rate," including information on such rates in states other than New Hampshire, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. The request for information since the year 2000 is overbroad and calls for information that would be unduly burdensome to produce given the number of years for which information is requested.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-26 Provide copies of documents relating to the work performed by investment advisors for Verizon regarding disposal of ILEC operations, since the point in time Verizon began consideration of potential transactions to sell or otherwise dispose of ILEC operations in New England to date.

REPLY: Objection. The request for information regarding the disposal of ILEC operations seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-27 To the extent not already previously provided, please provide copies of all presentations to Verizon's Board of Directors or any of its committees, working groups, etc., concerning the sale of the Verizon land lines in Maine, New Hampshire and Vermont.

REPLY: Objection. The request for information on the sale of Verizon land lines in Maine and Vermont, as well as the sale of any land lines to companies other than FairPoint, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. The request also seeks information that may be subject to the attorney-client privilege and work-product doctrine. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-28 To the extent not already previously provided, please provide copies of all presentations to Verizon's shareholders, any of its committees, working groups, etc., concerning the sale of the Verizon land lines in Maine, New Hampshire and Vermont.

REPLY: Objection. The request for information on the sale of Verizon land lines in Maine and Vermont is overbroad, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-31 Please provide copies of all unredacted annual reports submitted by Verizon and FairPoint to the Commission for the years ending 2001 to date.

REPLY: Objection. The request for annual reports submitted by Verizon to the Commission is overbroad and calls for information that would be unduly burdensome to produce given the number of years for which information is requested. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-33 Please provide documents that show volumes for the following, for both Verizon and FairPoint operations in New Hampshire, for the most recent time period for which data are available (specify the time period), separately by each CLEC that purchases wholesale facilities from Verizon and FairPoint. If the CLEC names are masked, please provide a guide to the masking, *i.e.*, a complete name of the CLEC.

- a. Residential UNE-P
- b. Business UNE-P
- c. Residential resale
- d. Business resale
- e. UNE-Loop
- f. Collocation
- g. Include statewide totals for all categories specified in this question.
- h. Provide the information and data described above in electronic spreadsheet readable file format.

REPLY: Objection. The request for information on the volume of individual CLEC purchases, whether in New Hampshire or other states, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-34 Provide the most current revised versions of the FCC Form 477 semi-annual reports filed for Verizon-New Hampshire for the periods 1999 to current. Provide the electronic version as filed with the FCC.

REPLY: Objection. The request for Verizon-New Hampshire's FCC Form 477 semi-annual reports from 1999 to the present is overbroad and calls for information that would be unduly burdensome to produce given that the request calls for nine years of reports. Subject to and without waiving the objection, Verizon will produce responsive information from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-53 Provide copies of any interrogatories submitted to Verizon or FairPoint by any party in proceedings on this proposed transaction before the Maine Commission, or before the Vermont Board.

REPLY: Objection. The request for interrogatories submitted to Verizon by parties in the Maine and Vermont proceedings seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. In addition, the request is overbroad and calls for information that would be unduly burdensome to produce. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

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**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-54 Identify and describe fully any and all executive compensation for Verizon that is related specifically or contingent upon to the pending transaction.

REPLY: Objection. The request for information regarding “any and all executive compensation for Verizon that is related specifically or contingent upon to the pending transaction” seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-59 Please provide Verizon's "business as usual" plans for New Hampshire, assuming the transaction does not occur.

REPLY: Objection. The request for forecasts of Verizon "business as usual" plans assuming the transaction does not occur seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-60 Separately for each Verizon wire center, please provide in an Excel spreadsheet the following data, and, for each category, also include statewide totals:

- a. Number of Analog Links (Basic Local Loop Link) in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- b. Number of Digital Links (Premium Link) in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- c. Number of Basic Four Wire Links in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- d. Number of 56 kbps Digital Links in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- e. Number of DS1 Loops in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- f. Number of DS3 Loops provisioned to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- g. Number of total xDSL qualified Digital Two-Wire Links in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.

- h. Number of xDSL qualified Digital Four-Wire Links in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue.
- i. Number of Digital Designed Links in service to CLECs in New Hampshire for each month from January 1997 to April 2007 and the per-month amount of resulting revenue. .
- j. Number of UNE-Platform (UNE-P) in service to CLECs in New Hampshire for each month from January 1997 to April 2007 including the per-month amount of resulting revenue. Also include data for the commercially-available UNE-P replacement (*e.g.*, "Wholesale Advantage"). Please provide the data separately for residential and business lines.
- k. Number of UNE-loops (UNE-L) in service to CLECs in New Hampshire for each month from January 1997 to April 2007 including the per-month amount of resulting revenue. Please provide the data separately for residential and business lines.
- l. Resold lines for each month from January 1997 to April 2007 and the per-month resulting revenue. Please provide the data separately for residential and business lines.
- m. Retail access lines for each month from January 1997 to April 2007 and the per-month resulting revenue. .
- n. Total switched access lines (retail and wholesale) for each month from January 1997 to June 2006 and the per-month resulting revenue.
- o. Number of primary residential lines, additional residential lines, small business lines, enterprise lines, centrex lines and total access lines for each month from January 1997 to June 2007 and the per-month resulting revenue.

REPLY:

Objection. The request for data on each Verizon wire center, for each month from January 1997 to April 2007, is overbroad and calls for information that would be unduly burdensome to produce given the significant number of wire centers and the 120 month time span for which information is sought, and to the extent it requests information on wire centers outside of New Hampshire, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no

REPLY:
(Cont'd)

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net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire wire centers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-61 Please provide for each month starting from January 1998 to April 2007, the number of first-time Verizon residential customers that migrated from CLECs (also referred to in the industry as a “win over”).

REPLY: Objection. The request for numbers of first-time Verizon residential customers migrating to CLEC’s for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought, and to the extent it requests information on customers outside of New Hampshire, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-62 Please provide for each month starting from January 1998 to April 2007 the number of previous Verizon residential customers that moved to a CLEC and then returned to Verizon service (also referred to in the industry as a "win back").

REPLY: Objection. The request for numbers of previous Verizon residential customers migrating to CLEC's and returning to Verizon service for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought, and to the extent it requests information on customers outside of New Hampshire, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-63 Please provide by month starting from January 1998 to April 2007 the number of new Verizon business customers that migrated from a CLEC (also referred to in the industry as a “win over”).

REPLY: Objection. The request for numbers of new Verizon business customers migrating from a CLEC for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought, and to the extent it requests information on customers outside of New Hampshire, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #
:

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-64 Please provide by month starting from January 1998 to April 2007 the number of previous Verizon business customers that switched to a CLEC and then reconnected back to Verizon (also referred to in the industry as a “win back”).

REPLY: Objection. The request for numbers of previous Verizon business customers that switched to a CLEC and then reconnected back to Verizon service for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought, and to the extent it requests information on customers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-65 Please provide by month from January 1998 to April 2007 the number of residential disconnects due to the customer switching to another Verizon New Hampshire service.

REPLY: Objection: The request for numbers of residential disconnects due to the customer switching to another Verizon New Hampshire service for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-66 Please provide the number of Verizon residential disconnects categorized by reason for each month from January 1998 to April 2007.

REPLY: Objection. The request for the number of Verizon residential disconnects for each month from January 1998 to April 2007 is overbroad and calls for information that would be unduly burdensome to produce given the 112 month time span for which information is sought, and to the extent it requests information on disconnects outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-67 Please provide the number of Verizon residential disconnects from January 1998 to April 2007 disaggregated by voluntary and involuntary disconnects.

REPLY: Objection. The request for the number of Verizon residential disconnects for each month from January 1998 to April 2007 disaggregated by voluntary and involuntary disconnects is overbroad and calls for information that would be unduly burdensome to produce given the 12 month time span for which information is sought, and to the extent it requests information on disconnects outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-69 Regarding Verizon's intrastate regulated revenue per residence *line*, for each of the years 2001 through 2006 provide:

- a. The lowest, highest, and range (difference between lowest and highest);
- b. The mean (average);
- c. The median; and
- d. The mode (the most frequent).

REPLY: Objection. The request for Verizon's intrastate regulated revenue per residence line for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenues generated outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire revenue from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-70 Regarding Verizon intrastate regulated revenue per residence
customer, for each of the years 2001 through 2006 provide:

- a. The lowest, highest, and range (difference between lowest and highest);
- b. The mean (average);
- c. The median; and
- d. **The mode (the most frequent).**

REPLY: Objection. The request for Verizon's intrastate regulated revenue per residence customer for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenues generated outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire revenue from 2003 to the present to the extent available.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-71 Regarding Verizon intrastate regulated revenue per business *line*, for each of the years 2001 through 2006 provide:

- a. The lowest, highest, and range (difference between lowest and highest);
- b. The mean (average);
- c. The median; and
- d. The mode (the most frequent).

REPLY: Objection. The request for Verizon's intrastate regulated revenue per business line for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenues generated outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire revenue from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-72 Regarding Verizon intrastate regulated revenue per business *customer*, for each of the years 2001 through 2006 provide:

- a. The lowest, highest, and range (difference between lowest and highest);
- b. The mean (average);
- c. The median; and
- d. The mode (the most frequent).

REPLY: Objection. The request for Verizon's intrastate regulated revenue per business customer for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenues generated outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire revenue from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-73 Separately for each of the years 2001 through 2006 (actual) and 2007 through 2011 (projected), provide for Verizon:

- a. Total intrastate regulated revenues;
- b. Total intrastate residential regulated revenues;
- c. Total intrastate business regulated revenues;
- d. Total intrastate switched access revenues;
- e. Total intrastate toll revenues;
- f. Total interstate switched access revenues;
- g. Total interstate regulated revenues;
- h. Total interstate special access revenues;
- i. Total DSL revenues; and
- j. Total revenues associated with operations and services to be transferred to FairPoint.

REPLY: Objection. The request for Verizon's revenue by class for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenues generated outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire revenue from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-75 Separately, for each of the years 2001 through 2006, and separately for each "Freedom" package, provide the quantities of residential lines that subscribe to a Verizon's "Freedom" package.

REPLY: Objection. The request for quantities of residential lines subscribing to Verizon's Freedom package for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-76 Separately, for each of the years 2001 through 2006, provide the quantities of residential lines that do not subscribe to any Verizon "Freedom" package.

REPLY: Objection. The request for quantities of residential lines not subscribing to Verizon's Freedom package for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-77 Considering *only* those lines that do not subscribe to a Verizon "Freedom" package, based on the most recent time period (please specify time period), indicate the quantity that subscribe to:

- a. Zero discretionary features;
- b. One discretionary feature;
- c. Two discretionary features;
- d. Three discretionary features; and
- e. Four or more discretionary features.

REPLY: Objection. The request is overbroad to the extent it seeks information on subscribers outside of New Hampshire and is not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-78 Separately, for each of the years 2001 through 2006, including customers of "Freedom" packages and those customers that do not subscribe to Verizon's "Freedom" packages, provide the quantities of customers that subscribe to Verizon's long distance (interLATA) for:

- a. Residence lines; and
- b. Business lines;

REPLY: Objection. The request for quantities of Verizon customers that subscribe to Verizon's long distance service for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-86 Separately, for each year 2001 through the present, *and only for those customers who did not or do not subscribe to any Verizon "Freedom" package*, provide the residential penetration rate (*i.e.*, percentage of lines) for:

- a. Call waiting;
- b. Caller ID;
- c. Home voice mail;
- d. Three-way calling; and
- e. Speed dialing.

REPLY: Objection. The request for the Verizon residential penetration rate for customers not subscribing to Verizon's Freedom package for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-87 Separately, for each year 2001 through the present, *and only for those customers who did or do subscribe to a Verizon "Freedom" package*, provide the residential penetration rate (*i.e.*, percentage of lines) for:

- a. Call waiting;
- b. Caller identification;
- c. Home voice mail;
- d. Three-way calling; and
- e. Speed dialing.

REPLY: Objection. The request for the Verizon residential penetration rate for customers subscribing to Verizon's Freedom package for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-88 Separately, for each year since 2001 through the present, *and for all Verizon customers (regardless of whether they subscribe to a Freedom package)*, provide the residential penetration rate (*i.e.*, percentage of lines) for:

- a. Call waiting;
- b. Caller identification;
- c. Home voice mail;
- d. Three-way calling; and
- e. Speed dialing.

REPLY: Objection. The request for the Verizon residential penetration rate for all customers for each year from 2001 through 2006 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on such subscribers outside of New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues
DATED: April 6, 2007

ITEM: OCA GI 1-92 Has Verizon, or any entity on behalf of Verizon, conducted any surveys of customers' demand for telecommunications services in New Hampshire since 2001 (*see, e.g.*, TNS Telecoms ReQuest Consumer Survey – referenced by Verizon in its redacted response in New Jersey BPU Docket No. TX06120841, to Rate Counsel Request RC-VNJ2-9)? If yes, provide any and all such surveys, and include full descriptions of any sample selected. If not, has Verizon, or any entity on behalf of Verizon, conducted any surveys of customers' demand for telecommunications services in Maine, or Vermont since 2001? If yes, provide any and all such surveys, and include full descriptions of any sample selected.

REPLY: Objection. The request for Verizon customer survey data since 2001 is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on survey data in Maine and Vermont, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-93 Does Verizon maintain any records about customers' disconnection of lines? If so, please provide any and all data, information, studies and analyses regarding customers' reasons for disconnections.

REPLY: Objection. The request for customer disconnection records is overbroad and calls for information that would be unduly burdensome to produce given the indefinite time span for which information is sought, and to the extent it requests information on survey data other than for New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon New Hampshire will produce responsive information on its New Hampshire customers from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-94 Please identify the entity that provides yellow pages on behalf of Verizon.

REPLY: Objection. The request to identify the entity that provides yellow pages on behalf of Verizon, both in New Hampshire and in other states, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-95 When did the specified entity first publish yellow pages on behalf of Verizon?

REPLY: Objection. The request for the date of first publication by the entity providing yellow pages to Verizon, both in New Hampshire and in other states, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-96 Please provide a complete copy of the publishing agreement between Verizon and the entity that publishes yellow pages on behalf of Verizon, including any and all attachments.

REPLY: Objection. The request for a copy of the publishing agreement between Verizon and the entity that publishes yellow pages on its behalf, both in New Hampshire and in other states, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-97 Please describe any and all changes, if any, to the yellow pages publishing agreement if the proposed FairPoint/Verizon transaction occurs.

REPLY: Objection. Please see Verizon's reply to OCA GI 1-96. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-98 Provide detailed information about Verizon's spin off of its directory publishing operations, including but not limited to the date when this occurred and the sale amount. *See Verizon Communications, Inc., "Verizon CFO Provides Updates on Initiatives to Enhance Shareholder Value,"* December 6, 2006.

REPLY: Objection. The request for information regarding the spin-off of securities of an unregulated Verizon affiliate to Verizon shareholders seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-99 Has Verizon compensated any New Hampshire consumers for the sale of its yellow pages? If so, please explain how. If not, please explain why not.

REPLY: Objection. Please see Verizon's reply to OCA GI 1-98. Subject to and without waiving its objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-100 To the extent not addressed in the publishing agreement, describe fully any further information governing the affiliate transactions between Verizon and the entity that publishes its yellow pages (*e.g.*, fees for service, directory publishing rights, use of logo, etc.).

REPLY: Objection. The request for information regarding any affiliate transactions between Verizon and the entity that publishes its yellow pages, both in New Hampshire and in other states, seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-101 Separately, by year, please provide the revenues and expenses for the most recent five years for Verizon's yellow pages, including any and all inter-affiliate payments.

REPLY: Objection. The request for revenues and expenses for the past five years for Verizon's yellow pages, including any inter-affiliate payments both in New Hampshire and in other states, is overbroad, calls for information (to the extent available) that would be unduly burdensome to produce given the time span for which information is sought and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-103 Separately, by year, for each of the past five years show the revenues and expenses associated with Verizon's directory assistance.

REPLY: Objection. The request for revenues and expenses associated with Verizon's directory assistance for each of the past five years is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenue and expenses in states other than New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information on revenue and expenses in New Hampshire from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-104 Separately, by year, for each of the past five years show the revenues and expenses associated with Verizon's directory listings' services.

REPLY: Objection. The request for revenues and expenses associated with Verizon's directory listings' service for each of the past five years is overbroad and calls for information that would be unduly burdensome to produce given the five year time span for which information is sought, and to the extent it requests information on revenue and expenses in states other than New Hampshire, it seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon will produce responsive information from 2003 to the present to the extent available.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-106 Provide any and all documents prepared by or on behalf of Verizon regarding services offered in New Hampshire, Northern New England, corporate-wide.

REPLY: Objection. The phrase “regarding services offered in New Hampshire, Northern New England, corporate-wide” is vague and ambiguous because it does not specify whether it seeks information on services offered in each of the three identified sectors or only in all three jointly. The request for all documents regarding such services is overbroad and calls for information that would be unduly burdensome to produce because it would involve, at a minimum, every document regarding Verizon’s services in each of the three listed sectors. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent:

Title:

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-107 Provide any and all documents prepared by or on behalf of Verizon regarding the impact of the following on its business, operations, revenues, or profitability;

- a. FCC CC Docket 01-92 (intercarrier compensation); and
- b. FCC CC Docket 05-25 (special access).

REPLY: Objection. The request for copies of documents regarding the “impact” on Verizon “business, operations, revenues, or profitability” of FCC intercarrier compensation and special access dockets is ambiguous, overbroad and calls for information that would be unduly burdensome to produce because it seeks information on Verizon companies that are not parties to the proceeding and operations other than in New Hampshire. The request also seeks information that is not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire meets the no net harm standard and will be for the public good. Finally, to the extent seeking information filed with the FCC, the request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Verizon.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-108 Identify each aspect of the proposed “new” directory publishing agreement that is less favorable to the local telephone operating company than the existing Verizon publishing agreement with Verizon New Hampshire, if any.

REPLY: Objection. The term “less favorable” is vague and ambiguous because it does not specify any criteria by which to evaluate the current and proposed directory publishing agreements. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-109 Provide revenues by subaccount associated with the Verizon publishing agreement for Verizon New Hampshire for 2005 and 2006.

REPLY: Objection. The request for revenues by subaccount associated with Verizon's publishing agreement for Verizon New Hampshire for the years 2005 and 2006 seeks information (to the extent available) not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-110 Provide expenses by subaccount associated with the Verizon publishing agreement for Verizon New Hampshire for 2005 and 2006.

REPLY: Objection. The request for expenses by subaccount associated with Verizon's publishing agreement for Verizon New Hampshire for the years 2005 and 2006 seeks information (to the extent available) not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-113 Please state or provide the following information regarding Verizon's proposed transfer of its ILEC and other operations in New Hampshire, Vermont and Maine (hereafter "the New England properties"). Dates can be approximated to month and year if necessary:

- a. State the date at which Verizon decided to investigate prospects for transfer of the New England properties;
- b. Provide the document used by Verizon to notify potentially interested parties of the potential for transfer of the New England properties;
- c. State the names of each party that was so notified;
- d. State the date at which Verizon began providing information to parties potentially interested in acquiring the New England properties;
- e. State the names of each party to which Verizon provided information on the New England properties;
- f. For each party which submitted a serious bid for the New England properties, state:
 - i. The name of the party;
 - ii. The date of the bid and any subsequent bids;
 - iii. The amount and structure of the bid and any subsequent bids; and,
 - iv. Any conditions attached to the bid or subsequent bids.
- g. State the date at which each bidder withdrew or decided not to pursue its bid;
- h. State the date or dates at which FairPoint withdrew from negotiations for acquisition of the New England properties, and the reason(s) for such withdrawal.

REPLY: Objection. The request for information regarding Verizon's proposed transfer of its ILEC and other operations in New Hampshire, Vermont

REPLY:
(Cont'd)

- 2 -

and Maine seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-114 Refer to Smith testimony, p. 2, lines 16-18. Please identify credible expressions in the last five years. Please describe in detail the steps Verizon took to “investigate[] and evaluate[]” each of these proposals.

REPLY: Objection. The request for information regarding “steps” Verizon took to investigate and evaluate alternative proposals seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-123 Refer to Smith testimony, p. 27. Provide agendas, presentations and other documents as utilized or considered by the Cutover Planning Committee.

REPLY: Objection. The request for information regarding agendas, presentations and other documents utilized or considered by the Cutover Planning Committee seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-124 Refer to Smith testimony, p. 27. Provide the Preliminary Cutover Plan, and any subsequent major draft revisions

REPLY: Objection. The request for the Preliminary Cutover Plan and any subsequent major draft revisions seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon respond as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-127 Please provide a complete copy of the "data book" assembled by Verizon to provide detailed information on the property and assets in Maine, New Hampshire and Vermont to potential buyers, including any documents referenced in the data book.

REPLY: Objection. The request for a complete copy of the "data book" containing information on Verizon's property in Maine, New Hampshire and Vermont is ambiguous and not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiving the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-128 Please provide a copy of any and all due diligence reports conducted pertaining to this proposed transaction.

REPLY: Objection. The request for any and all due diligence reports leading up to the proposed transaction seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiver of its objection, Verizon responds as follows:

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-129 Please provide a copy of any solvency analyses or opinions pertaining to the proposed transaction, whether draft or final.

REPLY: Objection. The request for any and all “solvency analyses or opinions pertaining to the proposed transaction, whether draft or final” seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good. Subject to and without waiver of the objection, Verizon responds as follows:

VZ #

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI 1-131 Will the proposed transaction have any ramifications upon the jurisdiction or authority of the New Hampshire Public Utilities Commission over the Joint Applicants? If so, please explain in detail.

REPLY: Objection. The request seeks a legal opinion.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

**Respondent:
Title:**

REQUEST: Office of the Consumer Advocate, Group I, Set #1
Transactional and Financial Issues

DATED: April 6, 2007

ITEM: OCA GI
1-135 Please provide the room number, street address and city where any “data room” was made available to potential buyers for review of information pertaining to the Maine, New Hampshire and Vermont properties of Verizon. Provide a copy of the index of information contained in that “data room”.

REPLY: Objection. The request seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding whether the transaction with FairPoint in New Hampshire that is currently before the Public Utilities Commission meets the no net harm standard and will be for the public good.

VZ #