



**FairPoint Communications, Inc.**  
**State of New Hampshire**  
**Docket No. DT 07-011**

**Respondent:** Brian Lippold  
**Title:** Vice President, Business and  
Wholesale Services

**REQUEST:** New England Cable and Telecommunications Association, Inc. and  
Comcast Phone of New Hampshire, LLC - Rebuttal

**DATED:** September 20, 2007

**ITEM:** NECTA/CPNH Please provide:  
- 43R

- (a) documentation of the training programs "for our business and wholesale organization" identified on pages 10 – 12 of Mr. Lippold's testimony,
- (b) whether business and wholesale organization employees are one and the same or whether they are separate groups that will be separately trained,
- (c) the dates when such training is scheduled to occur, the duration of the training, who will provide the training,
- (d) whether such training will precede FairPoint training to be provided to wholesale customers,
- (e) what quality controls will be put in place to assure that such training is adequate and that those receiving training are capable of performing the functions covered by the training provided

**REPLY:** **OBJECTION:** FairPoint objects to Data Request 43R on the grounds that it is overbroad, unduly burdensome, and seeks highly confidential and proprietary commercial and strategic information that would provide competitors a business advantage. NECTA and CPNH are FairPoint's competitors. The information sought pertains to the provision of competitive services and includes trade secret information that required significant effort and cost to produce and/or confidential, research or commercial information, including

customer, geographic, market and product-specific data. Subject to and without waiving these objections, FairPoint will provide a response to sub-parts (b), (d) and (e). [Objection served September 25, 2007.]

Subject to and without waiving this objection, FairPoint responds as follows:

- (a) This documentation is not yet completed.
- (b) Some business and wholesale employees are one and the same and others are separate. Those that are one and the same are at the Director level and above.
- (c) FairPoint has not finalized the training program at this time.
- (d) Some of the training will precede training provided to wholesale customers and some will be during and some will be afterwards.
- (e) The FairPoint employees who are responsible for managing each of the wholesale functional areas each has extensive experience in their area of discipline and we are confident in their ability to adequately train those employees on their staffs.