



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 - 46R Please refer to page 23, lines 1-2 of Mr. Lippold's rebuttal testimony. Please: (a) provide documentation to support the statement that the costs of modifications to interconnecting systems will be minimal; (b) provide Mr. Lippold's definition of "minimal" in this context; (c) state whether Mr. Lippold's statement takes into account (i) internal training of wholesale customer staff; (ii) e-bonding-related work efforts and costs acknowledged by Messrs. Haga and Kurtze; (iii) point code related work and costs acknowledged by Messrs. Haga and Kurtze (iv) costs and losses incurred in the event that cutover problems are experienced; and (v) costs and losses that would be experienced during the so-called "dark" or "transition" period preceding the flash cutover.

REPLY: **OBJECTION:** FairPoint objects to Data Request 46R on the grounds that it is vague and argumentative. FairPoint further objects on the grounds that Data Request 46R assumes that (iv) costs and losses will occur in the event that cutover problems are experienced and that (v) costs and losses would be experienced during the transition period, each of which are expressly denied by FairPoint. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 46R. [Objection served September 25, 2007.]

(a) No such documentation exists.

(b) The majority of wholesale customers use the WebGUI for which we have already established there will be no costs as the customer systems are not interconnected through this form of access. For the few customers who use e-bonding, where

FairPoint will implement the same industry standards as currently employed by Verizon, the only costs will be one of labor and FairPoint believes the time required will be less than 40 hours of labor. In our view, this is minimal.

- (c) (i) Yes. (ii) Yes. (iii) No. (iv) Yes. (v) Yes but FairPoint does not admit or agree that any costs and losses would be experienced during the transition period unless the CLEC acts in a commercially unreasonable manner.