



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

**Respondent:** Michael Haga  
**Title:** Director of Billing and  
 Operations Support Services

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

**DATED:** September 20, 2007

**ITEM:** NECTA/CPNH - 76R When does FairPoint expect to have available the contingency plans that it is in the process of developing, according to Mr. Haga's statement on page 31, line 14, and Mr. Kurtze's statement at page 33, lines 1-2. Please provide the same when available. Does FairPoint commit to providing proposed contingency plans to wholesale customers and the independent third party consultant for review and approval by such consultant as a cutover readiness criteria?

**REPLY:** **OBJECTION:** FairPoint objects to Data Request 76R 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. [Objection served September 25, 2007.]

Subject to and without waiving these objections, FairPoint responds as follows:

As stated in the testimony, FairPoint plans to use the first two data extracts (on August 31, 2007 and scheduled for January 30, 2008) to gain an understanding of what contingency plans might be necessary. Those plans will primarily focus on the type and amount of incremental human intervention necessary to complete transactions. FairPoint will notify wholesale customers promptly after it determines if any relevant contingency plans are necessary to support wholesale operations.