



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 Please refer to page 34, lines 7-12 of your rebuttal testimony. Please
- 80R provide:

- (a) any documents, memos or analyses regarding the Capgemini assessment of the Hawaiian Telcom transition referred to on page 34, lines 7-12, by Mr. Kurtze;
- (b) the names of Capgemini and Verizon representatives who discussed that transition and when such discussions took place;
- (c) cites to the public reports filed with the FCC and SEC and examined by Capgemini;
- (d) information from the Hawaiian Public Utilities Commission, if in document form, reviewed by Capgemini;
- (e) any written evaluation of the Hawaiian Telcom transition performed by or on behalf of FairPoint or Verizon;
- (f) confirm that Capgemini does not have any first hand knowledge surrounding the Hawaiian Telecom Transition as indicated at page 34, line 7 of the rebuttal testimony in Vermont Docket No. 7270.

REPLY: **OBJECTION:** FairPoint objects to Data Request 80R on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, FairPoint will provide

information responsive to Data Request 80R. [Objection served September 25, 2007.]

(a) Please refer to FairPoint's response to subparts (c) and (d).

(b) The Capgemini individual was Mr. Kurtze. The Verizon individual was Mr. Smith at the New Hampshire technical conference the first week of June 2007. A second individual was an ex-Verizon employee, Mr. Harry Artz, who was employed by Verizon and worked on the Hawaiian Telcom project. Those discussions were also in June.

(c) Please see the Form S-4 Registration Statement of Hawaiian Telcom Communications, Inc., Hawaiian Telcom, Inc., and Hawaiian Telcom Services Company, Inc. at <http://www.sec.gov/Archives/edgar/data/46216/000119312506008763/ds4.htm>. Please see the Master Services Agreement dated as of August 6, 2004 at <http://www.sec.gov/Archives/edgar/data/46216/000119312506070208/dex105.htm>.

(d) Please refer to FPNH 1252 to FPNH 1256.

(e) FairPoint has no written evaluations of the Hawaiian Telcom transition.

(f) Capgemini has no first hand knowledge of the Hawaiian Telcom transition.