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

Respondent: John Smee
Title: Director of Operations

REQUEST: Office of Consumer Advocate - Rebuttal

DATED: September 19, 2007

ITEM: OCA R-51 Refer to page 10, line 13 through page 11, line 8, of the Rebuttal Testimony of Michael S. Brown, Michael L. Harrington and John Smee.

    a. With reference to the additional ten outside plant installation and maintenance technicians for New Hampshire:

        i. How many outside plant technicians were in SpinCo's New Hampshire operations as of June 30, 2007 (that is, what is the "base" level of technicians to which ten more are being added)?

        ii. In FairPoint's view, is the need for ten additional technicians temporary (e.g., to correct a backlog of problems) or ongoing?

        iii. What is the approximate fully loaded annual cost of adding ten technicians?

        iv. At the time that FairPoint negotiated the terms of the proposed transaction with Verizon NH, did FairPoint anticipate the need to hire an additional ten outside plant technicians?

REPLY: **OBJECTION:** FairPoint objects to Data Request R-52 on the grounds that it is overbroad and unduly burdensome in that the request would require FairPoint to create evidence that does not currently exist. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request R-52. [Objection served September 25, 2007.]

    a.
        i. 410 Splice Service Technicians.

ii. FairPoint views the need for the additional 10 technicians as an ongoing need, subject to re-evaluation as workload conditions change.

iii. Approximately $1,000,000 annually.

iv. As a result of our due diligence work, FairPoint was confident the network infrastructure in New Hampshire was fundamentally sound. FairPoint did expect that there would be service areas and metrics which would require expenditure of both labor dollars and capital dollars. The estimated costs associated with the addition of 10 technicians is included in financial projections.