

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-54 Refer to page 25, line 20 through page 27, line 6, of the Rebuttal Testimony of Michael S. Brown, Michael L. Harrington and John Smee.

- a. This referenced portion of the testimony addresses quality of service standards but is included under the heading "provisioning of wholesale services." Please confirm that the testimony is intended to address retail service quality standards.
- b. Please explain more fully why outside plant technicians cannot be dispatched more readily to areas with high trouble reports during the post-closing, pre-cutover and post-closing, post-cutover time periods.
- c. Does the reference to FairPoint proposing "to be measured against these standards starting on that date which is two (2) years after cutover" refer to being measured:
 - i. On a statewide basis?
 - ii. On a wire center basis?
- d. Are there any existing PUC-established metrics, or other metrics, against which FairPoint would be willing to be measured at the time of the transaction? If so, please discuss?
- e. For how many years post-transaction, if any, is FairPoint willing to commit to not challenge the existing PUC-established quality of service standards?
- f. Please describe fully the quality of service standards, if any, to which FairPoint would agree to be applied at the wire center level (e.g., not exceeding 2.5 trouble reports per 100 lines in any given wire center for more than two consecutive months, not exceeding 2.5 trouble reports per 100 lines in any given

wire center for more than three months within any six-month period, etc.).

REPLY:

- a. Page 25 line 20 through page 27 line 6 is intended to address retail service quality standards.
- b. FairPoint will be hiring additional Splice Service Technicians at close. These additional forces will require both job training and systems training. It is anticipated this will take at least 8 weeks. All continuing Verizon employees will require training on the new systems.
- c. Both.
- d. FairPoint agrees to be measured against the statewide and wire center metrics which exist today in New Hampshire. We only sought forbearance of the imposition of the financial penalties. The SQI metrics target levels remain the same, and we will be working to achieve full on-target performance with progress coming in phases over the 2 years post cutover.
- e. FairPoint will not challenge the existing PUC-established quality of service standards before 6 months following the date by which FairPoint is required to meet the wire center level objectives.
- f. FairPoint agrees to the existing New Hampshire wire center level reporting and target metrics.