

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent: John F. Nestor, III
Title: Vice President - State
Government Relations N.H.

REQUEST: Office of Consumer Advocate, Rebuttal Data Request

DATED: September 17, 2007

ITEM: OCA R-7 Re page 11, lines 11 through page 12, line 2. Mr. Nestor states that "it is critical when assessing Verizon NH's overall service quality today that the Commission recognize that Verizon NH or any carrier must meet the needs of its customers or else those customers will vote with their feet and take their business elsewhere."

- a. Separately for each of the wire centers listed in Exhibit SMB-29a-C to Ms. Baldwin's testimony, please provide the following annual totals for the twelve-month-period spanning January through December 2006:
 - i. Installations of residential primary lines.
 - ii. Disconnections of residential primary lines.
 - iii. Installations of residential additional lines.
 - iv. Disconnections of residential additional lines.

If providing answers to these questions would require a special study, please describe the person hours required for such a study.

- b. Please identify the options for customers wishing to "vote with their feet" seeking basic residential local telephone service offered at rates within 150% of the rate that Verizon NH charges for basic local exchange service. Identify the supplier, name the product, provide the monthly rate, and indicate the geographic region covered.
- c. Is it Mr. Nestor's position that residential customers, voting with their feet, can subscribe to basic local telephone service at rates that

are comparable to Verizon NH's rate ranging between \$11.11 and \$15.69 from other suppliers? If yes, please identify the supplier, the product, and the rate, and define "comparable."

- d. Has Verizon NH or any company on behalf of Verizon NH conducted any analyses of customers' reasons for disconnection in the wire centers listed in Exhibit SMB-29a-C to Ms. Baldwin's testimony? If yes, please provide.
- e. Has Mr. Nestor developed or reviewed analyses, reports, or studies which analyze the availability of products that compete with Verizon NH's basic local telephone service offering? If yes, please provide all such materials.

**SUPPLEMENTAL
REPLY:**

Verizon NH considers information responsive to this request to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

- a. Please see Proprietary Attachment NH OCA R-7a for residential primary and additional installed lines as well as the total disconnects for residential lines. Residential disconnects are not disaggregated into primary and additional lines in the ordinary course of business, and thus are not available.
- b. Objection. The request calls for information that would be unduly burdensome to produce because it seeks information that is equally available to the Office of Consumer Advocate. Subject to and without waiving the objection, Verizon responds as follows:

Mr. Nestor's statement refers to more than just local exchange service at a particular rate level, as customers have chosen alternative providers for their telecommunications needs, including local exchange service, for a multitude of reasons (rates, service, technology, etc.). This is evidenced by Verizon NH's loss of access lines, demonstrated in the attached Proprietary Testimony of Robert Kenney, Attachments and Settlement filed in the most recent AFOR proceeding in Docket No. 06-072 (see Proprietary and Non-Proprietary Attachments OCA R-7b (1 through 6)).

Information on the pricing of local phone service can be found on carriers' websites. For a list of carriers see OCA's website at <http://www.oca.nh.gov/ChoosingATelephoneProvider.htm>. In addition, wireless and broadband services compete with wireline services and specific service and rate information can be found at individual wireless and broadband carrier websites.

- c. Objection. The request seeks a statement of Verizon's position and thus is argumentative and it calls for information that would be unduly burdensome to produce because it seeks information that is equally available to the Office of Consumer Advocate. Subject to and without waiving the objection, Verizon responds as follows:

See subpart (b). In addition, Verizon NH's retail services are available for resale at approximately a 20% discount and, to the extent required by the FCC, Verizon NH makes unbundled network elements (UNE's) available so a carrier can compete for all retail customers' local exchange service in New Hampshire. Moreover, Verizon NH's basic residential rates are but one component of the overall cost of service. Customers generally do not buy just basic service, so when choosing carriers, customers look to the overall value and price of all the services being provided, including bundles.

- d. Information responsive to the request is not maintained in the ordinary course of business and thus is not available. In addition, customers are not required to provide Verizon NH with a reason for changing service.
- e. Yes. See sub part (b).

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APPENDIX A

The following PUC 400 rules will continue to apply to Verizon NH upon implementation of the stipulation:

PART Puc 410	ILEC RULES
Puc 410.01	Purpose.
Puc 410.02	Application of Rules.
PART Puc 411	ILEC REGULATORY REQUIREMENTS
Puc 411.01	Tariffs (Unless Verizon NH opts for Model Tariff)
Puc 411.02	ILECs Operating as CLECs.
Puc 411.03	Assessment.
Puc 411.04	Contact Information.
Puc 411.05	Information Required When Service Cannot be Provided
Puc 411.06 a, b, c	Quality of Service Information
Puc 411.06 d	Quality of Service Information
Puc 411.07 a	Service Outages.
Puc 411.08	Accident Notifications.
PART Puc 412	ILEC CUSTOMER RELATIONS
Puc 412.01	Provision of Basic Service
Puc 412.02	Telecommunications Relay Service
Puc 412.03	E911 Surcharge.
Puc 412.04	ILEC Notices to Customers
Puc 412.05	Bill Forms.
Puc 412.06	Application of Payments.
Puc 412.07	Notice to Customers of Changes in Rates
Puc 412.08	Slamming Prohibited.
Puc 412.09	Cramming Prohibited.
Puc 412.10	Customer Refunds for Interruptions of Service
Puc 412.11	Directories.
Puc 412.12	Publication of Telephone Numbers
Puc 412.13	Confidentiality Requirements
Puc 412.14	Exit Fees.
Puc 412.15	Disconnection of Service
Puc 412.16	Disconnection of Service to Lifeline Telephone Assistance Customers
Puc 412.17	Notice of Disconnection.
Puc 412.18	Disconnection Conferences
Puc 412.19	Disconnection of Service to Non-Residential Customers
Puc 412.20	Disconnection of Associated Services
Puc 412.21	Application of Payments for Customers Participating in the Lifeline Telephone Assistance Program
PART Puc 413	ILEC EQUIPMENT AND FACILITIES
Puc 413.01 a, b	Construction, Installation and Maintenance of Physical Plant
Puc 413.01 c, d, e	Construction, Installation and Maintenance of Physical Plant
Puc 413.02	Restoration of Service.
Puc 413.03	Emergency Operations.
Puc 413.04	Safety Instructions.
Puc 413.05	Commission Inspections.

Puc 413.06 a, b, c	Quality of Service Standards
Puc 413.06 d	Quality of Service Standards
PART Puc 414	ILEC ACCOUNTING REQUIREMENTS
Puc 414.01	Uniform System of Accounts
Puc 414.03	Short Term Debt, as modified by Commission Order No. 24,483 dated 7/1/05, approving the Short Term Debt Stipulation in Docket DT 05-020.
PART Puc 415	ILEC REPORTS AND FILINGS
Puc 415.01 a, b 1-5	Annual Reports.
Puc 415.03 a	Monthly Reports.
Puc 415.04 a 1-2	Other Reports.
Puc 415.05	Submitting Reports and Forms
Puc 415.06	Confidential Treatment.
PART Puc 416	ILEC RECORDS
Puc 416.01	General Preservation and Location of Records
PART Puc 417	ILEC OPERATOR SERVICES
Puc 417.01	Provision of Service.
PART Puc 418	ILEC INTERCARRIER OBLIGATIONS
Puc 418.01	Intercompany Cooperation.
Puc 418.02 a, b, d-f	Switching and Signaling Obligations
Puc 418.02 c	Switching and Signaling Obligations
Puc 418.03	Trouble Reporting and Resolution
Puc 418.04	Rights of Way.
Puc 418.05	Exchange of Billing Name and Address Information
Puc 418.06	Carrier to Carrier Migrations
Puc 418.07	Intercompany Contact Information
Puc 418.08 a	Accessing, Maintaining and Updating of Databases
Puc 418.08 b	Accessing, Maintaining and Updating of Databases
Puc 418.09	Directory Obligations.
PART Puc 419	ILEC RESALE
Puc 419.01	Resale Requirements.
PART Puc 420	ILEC UNBUNDLING RULES
Puc 420.01	Unbundled Network Elements
PART Puc 421	ILEC INTERCONNECTION
Puc 421.01	Provision of Interconnection
Puc 421.02	Terms and Conditions.
Puc 421.03	Network Changes.
PART Puc 429	ILEC FORMS
Puc 429.01	Availability of Forms.
Puc 429.02	Form ILEC-1 Contact Information
Puc 429.03	Form ILEC-2 Assessment Report
Puc 429.04	Form ILEC-3 Annual Report
Puc 429.05	Form ILEC-4 Quality of Service Report. In addition, Verizon shall quarterly file Quality of Service Reports as otherwise required by Commission Order No. 22,484 dated 1/20/97 in Docket DR 96-220.
Puc 429.06	Form ILEC-5 Quality of Service Report Card
Puc 429.08	Form ILEC-21 Report of Customer Troubles
Puc 429.11	Form ILEC-30 Utility Accident Report
PART Puc 449	CLEC FORMS
Puc 449.08	Form CLEC-11 Intent to Use Uniform Tariff
Puc 449.10	Form CLEC-25 Rate Schedule Cover Sheet (Not required if Verizon files tariff)

Puc 449.14	Form CLEC-36 Transfer of Customer Base
Puc 449.15	Form CLEC-37 Change in Ownership
	<p>Verizon shall file Special Contract data per Commission Order No. 24,481 dated 7/1/05, approving the Stipulation in Docket DT 04-203, with the following modification:</p> <ul style="list-style-type: none"> • The annual filing required to provide data on the status of Special Contracts will not be required beginning in the sixth year of the AFOR Plan unless the Commission extends the requirement prior to its expiration.