

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

Respondent: Peter G. Nixon
Title: President

REQUEST: Office of Consumer Advocate - Rebuttal

DATED: September 19, 2007

ITEM: OCA R-132 Re page 18, lines 1 through 3, of the Rebuttal Testimony of Peter G. Nixon.

- a. Please define "in the 'normal course.'"
- b. Please identify the criteria that FairPoint is using for determining whether the New Hampshire, Maine, and Vermont operations are staffed "to run the business in the 'normal course.'"
- c. Please provide an example of staffing changes that would represent a departure from the "'normal course.'"

REPLY:

- a. To operate the business as if the merger agreement had not been signed; pricing, introduction and sales of products and services, performance metrics at historic levels and consistent with other states, and capital expenditures as if the merger had not been announced.
- b. FairPoint is using a comparison of monthly performance against service quality objectives for both plant and call center operations, access line losses, revenues and expenses.
- c. Call center metrics below historic levels.