

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-134 Re page 25, line 8 through page 26, line 11, of the Rebuttal Testimony of Peter G. Nixon:

- a. Please define KPI.
- b. Identify the individual and title of those people developing the KPIs.
- c. At what level of geographic disaggregation will the KPIs apply (e.g., county, wire center, north vs.south, etc.)?
- d. When will the KPI design be completed?
- e. Please provide the KPIS when they have been developed.

REPLY:

OBJECTION: FairPoint objects to Data Request R-134 on the grounds that it seeks highly confidential and proprietary commercial and strategic information that would provide competitors a business advantage if disclosed. The information sought pertains to the provision of competitive services and includes trade secret information that required significant effort and cost to produce and/or confidential, research or commercial information, including customer, geographic, market and product-specific data. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request R-134. [Objection served September 25, 2007.]

- a. KPI (Key Performance Indices) are operational objectives used as management tools to understand the performance of the company.
- b. Each Vice President and the Controller are developing the KPIs.
- c. The level of geographic disaggregation for a KPI will depend

upon what it is measuring and the ability to measure at a particular level. KPI's will include all service quality objectives required by the Commission.

- d. KPIs will be completed by close.
- e. KPIs for regulated services and quality of service requirements will be provided when complete.