

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-154 Refer to page 23, lines 9-11, of the Rebuttal Testimony of Peter G. Nixon, which states, "in order to replace those functions that are currently being performed by Verizon outside of Northern New England, improve service quality, and increase our focus on the residential and business customers, FairPoint will fill over 675 positions..." Please break down this count of "over 675 positions" between:

- a. Those positions which will "replace those functions that are currently being performed by Verizon outside of Northern New England;"
- b. Those positions that will "improve service quality;" and,
- c. Those positions that will "increase [FairPoint's] focus on the residential and business customers."

REPLY: **OBJECTION:** FairPoint objects to Data Request R-154 on the grounds that it is overbroad 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-154. [Objection served September 25, 2007.]

- a. The majority of the new positions will perform functions that are currently being performed by Verizon outside of the Northern New England states.
- b. FairPoint has committed hiring approximately 36 outside plant technicians in northern New England to help in addressing service quality standards that are not meeting objectives.
- c. FairPoint has created a "customer facing" organization such

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that there will be a focus on the customer throughout the organization. For external customers this will be particularly true in Consumer & Small Business Sales & Service, Business & Wholesale, and Operations & Engineering organizations.

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