

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

**Respondent:** Walter E. Leach, Jr.  
**Title:** Executive Vice President,  
Corporate Development

**REQUEST:** Office of Consumer Advocate - Rebuttal

**DATED:** September 19, 2007

**ITEM:** OCA R-29 OCA R-29:Re page 20, lines 7 through 13, of the Rebuttal Testimony of Walter E. Leach, Jr. Among other things, the testimony states that “[i]n this way, we serve the dual purpose of ensuring that our own understanding of the operations at any given point in time is reflected in the model as accurately as possible and of providing the Commission and parties with the latest information as our understanding evolves.”

- a. Does FairPoint have any plans to seek updated information from Verizon regarding actual demand and revenues for the first half of 2007? If yes, when? If not, why not?
- b. What is the most recent data sought by FairPoint from Verizon NNE or Verizon NH regarding demand and revenues for Spinco services?
- c. What is the most recent data received by FairPoint from Verizon NNE or Verizon NH regarding demand and revenues for Spinco services?
- d. Does FairPoint have any plans to update its model further? If yes, when and why? If no, why not?

**REPLY:** **OBJECTION:** FairPoint objects to Data Request R-29 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. FairPoint further objects on the grounds that the request may seek confidential or proprietary information of a third party which FairPoint is not authorized to

disclose. Subject to and without waiving these objections, FairPoint will provide a response. [Objection served September 25, 2007.]

- a. Yes, we have received summary information which details units and revenues through June 30, 2007.
- b. Verizon NNE information was sought for the period ended June 30, 2007.
- c. Verizon NNE information was received for the period ended June 30, 2007.
- d. FairPoint does not have any plans to update its model. The outlook for the business has not changed since the projections, which were submitted in May, were prepared. If there was a material change in the outlook for the cashflows from the business FairPoint would determine if such change warranted an update to its model.