

**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  
Group I, Set 1

**DATED:** April 5, 2007

**ITEM:** OCA 1-59 Please provide documents that show the plans and objectives for FairPoint's capital structure prior to the proposed transaction, including debt/equity target percentages, and the basis for those plans and objectives.

**REPLY:** **OBJECTION:** FairPoint objects to Data Request 1-59 on the grounds that it is vague, overbroad and confusing, and that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, FairPoint will produce responsive information concerning FairPoint's pre-closing capital structure within FairPoint's custody and control. [Objection served April 13, 2007.]

FairPoint does not generate and maintain documents responsive to this request. Please also see the prefiled direct testimony of Walter E. Leach Jr.