

Verizon New England Inc.  
d/b/a Verizon New Hampshire

State of New Hampshire

Docket No. DT 07-011

**Respondent:** Stephen E. Smith  
**Title:** Vice President-- Business  
Development

**REQUEST:** Office of the Consumer Advocate, Group I, Set #1  
Transactional and Financial Issues  
**DATED:** April 6, 2007  
**ITEM:** OCA GI 1-59 Please provide Verizon's "business as usual" plans for New  
Hampshire, assuming the transaction does not occur.

**SUPPLEMENTAL  
REPLY #2:** Objection. The request for forecasts of Verizon "business as usual"  
plans assuming the transaction does not occur seeks information not  
reasonably calculated to lead to the discovery of admissible evidence  
regarding whether the transaction with FairPoint in New Hampshire  
that is currently before the Public Utilities Commission meets the no  
net harm standard and will be for the public good. Subject to and  
without waiving the objection, Verizon responds as follows:

Verizon does not prepare business plans on an individual state level.

Supplemental Reply #2:

Business plans responsive to the request that pertain to New  
Hampshire operations do not exist and thus are not available.

VZ # 190