

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: Office of Consumer Advocate
Group II

DATED: April 13, 2007

ITEM: OCA 2-25 Re page 22, lines 5-7. Mr. Nixon testifies that the TSA "provides adequate opportunity for FairPoint to expand current systems or start-up new systems necessary to continue the prior levels of service." Is it FairPoint's position that the current quality of service provided by Verizon is acceptable? Explain fully and identify all documents, conversations, memoranda, or other information sources upon which your response relies.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-25 on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 2-25. [Objection served April 20, 2007.]

FairPoint is committed to meeting the service level obligations required by regulatory agencies and the contractual obligations required under contracts that will be assigned to them or negotiated by them. If the current quality of service by Verizon does not meet such service level obligations, it would not be deemed acceptable.