

EXHIBIT No.
ONE - 30 (P)

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

Respondent: Brian Lippold
Title: Vice President, Business and
Wholesale Services

REQUEST: One Communications - Rebuttal

DATED: September 1, 2007

ITEM: 17 Please refer to the Lippold rebuttal testimony at p. 28, lines 4-7, in which Mr. Lippold says that transit service “is becoming increasingly competitive in the United States, so it clearly is not a service in which the ILECs possess any unique bottleneck. In point of fact, the various interconnected companies have the ability to connect directly to one-another and therefore do not necessarily need a transit provider.”

- (a) Please explain in detail how, and provide any evidence in FairPoint’s possession to the effect that, transit service is becoming increasingly competitive in the United States.
- (b) Is FairPoint aware, approximately, of how much greater the expenses would be for interconnecting carriers (e.g., CLECs and IXC’s), generally or in any particular markets or wire centers, to interconnect directly with each other instead of interconnecting through an ILEC tandem with which they are already interconnected?
- (c) If the expenses for interconnecting carriers to interconnect directly are significantly higher than those to interconnect indirectly through an ILEC tandem, then please explain why the ILECs cannot be described as possessing a “unique bottleneck” for transit services.

REPLY: (a) In Mr. Lippold’s past experience leading a wholesale services team, he has personally received numerous requests from other providers to interconnect the network he was representing at that time, with the customer’s network for the purpose of exchanging traffic destined for each others end-users. Further, he has assisted many of his customers in the past with their efforts to interconnect their network with the networks of other

providers for the purpose of exchanging traffic and bypassing the ILEC provided tandem transit service offering, by providing interconnecting facilities between the networks. Finally, Mr. Lippold was solicited by at least one other transit provider to utilize their service in place of the ILEC transit services.

- (b) FairPoint does not agree that it would be more expensive in all cases. In many cases, it could be less expensive for interconnecting carriers depending upon the motivation of the interconnecting parties, the volume of facilities purchased and their negotiating skills.
- (c) Please refer to (a) and (b) above.