

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

**PROPRIETARY**

**Respondent:** Lee David Newitt  
**Title:** Manager, Corporate  
Development

**REQUEST:** Public Utilities Commission Staff  
Topic Group I

**DATED:** June 11, 2007

**ITEM:** Staff FDR I-10 Please provide the complete model run, including all supporting spreadsheet tabs, that was used to perform the sensitivity analysis provided in CFPNH 0044. Please also provide a completely un-redacted version of CFPNH 0044.

**REPLY:** **OBJECTION:** FairPoint objects to Data Request I-10 to the extent it seeks confidential or proprietary information of a third party which FairPoint is not authorized to disclose. FairPoint further objects to Data Request I-10 on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. [Objection served June 18, 2007.]

THE ATTACHMENT IS HIGHLY CONFIDENTIAL AND SHOULD ONLY GO TO OCA AND STAFF. FairPoint has modified the latest working model provided to Staff to include the MAC impact, namely a \$67 million decrease in EBITDA each and every year of the projection period (Attachment Staff FDR I-10). This format will allow for comparability between FairPoint's "base case" view and a potential "MAC case." The result of the model run shows an outcome worse than that shown in CFPNH 0044 due to model changes between the time CFPNH 0044 was produced (pre-signing) and FairPoint's latest view and projections already provided to Staff. The redactions to CFPNH 0044 remove comparisons of this project to other potential strategic alternatives and are therefore not relevant and thus have not been provided.

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Please refer to CFPNH 2640 - CFPNH 2677 produced under seal and pursuant to RS 378:43 and the Protective Order in this Docket.