

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-9 On page 5, lines 5-7, of his testimony, Michael Harrington indicates that FairPoint conducted field inspections of Verizon's outside plant, central office equipment and buildings "on a sample basis." Please provide a description of the method or methods used to select the areas for review and inspections in its outside and inside plant and other physical assets in its due diligence studies of Verizon New Hampshire. In particular, please provide details on how the facilities that were physically examined were selected for the sample and what percent of the total facilities in Verizon's New Hampshire network were included in this sample (e.g., percent of central offices visited, percent of cable runs inspected, etc.). Also, please indicate how Verizon was involved in the process for selecting the sites to visit. In addition, please provide a list of Verizon facilities that were physically inspected by FairPoint or its vendor and any work papers or reports that were created as a result of these inspections.

REPLY: Central office sites visited were selected largely by Verizon. Sites visited included Dover, Concord, Hanover and New Market, New Hampshire.

OSP sites were selected based on Verizon's listing of remote sites. The main purpose of the OSP inspections was to begin the process of estimating the broadband deployment, thus FairPoint narrowed its sample universe to copper-fed remotes. For the copper fed remotes, FairPoint attempted to find addresses for 5% of such remotes serving 200 or more working access lines. Please see attachments to response Staff 2-8 for results of this sample selection.

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DATED: April 13, 2007

ITEM: Staff 2-27 On page 10, lines 11 and 12, of his testimony Michael Harrington states that "92% of FairPoint's lines in Maine, New Hampshire and Vermont are qualified to provide DSL." Please provide the percentage of FairPoint's lines in New Hampshire that are DSL-capable. Also, please provide the characteristics of the areas where these lines are located (i.e., urban, suburban or rural). Finally, if available, please provide the percentage of DSL-capable lines for these same areas prior to FairPoint taking possession of the telephone company(s) in that area.

REPLY: FairPoint's broadband availability is calculated by dividing DSL qualified loops by lines in service as of 12/31/06. DSL qualified loops are defined as those loops within 15,000 feet of a DSL port. FairPoint wire center information is not readily available. The New Hampshire access lines are contained within the Northland Maine counts, the service area is rural, and the percentage of DSL addressable access lines when taking possession was 0%.

<i>DSL Availability</i>	<i>DSL</i>		<i>% DSL Qualified</i>
	<i>Access Lines</i>	<i>Qualified Lines</i>	
Northland Vermont	6,214	5,653	91%
Northland Maine	21,648	19,720	91%
Utilities, Inc.	21,714	19,771	91%
Sidney Telephone Company	1,516	1,374	91%
Community Service Telephone	11,068	10,562	95%
FairPoint New England Total	62,160	57,081	92%

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DATED: April 13, 2007

ITEM: Staff 2-28 On page 9, lines 14-22, of his testimony, Michael Harrington states that it is FairPoint's plan to augment and expand Verizon's existing broadband network using DSL technology. He goes on to explain that FairPoint chose this technology because DSL is "the most efficient technology for most of the areas in which broadband availability is lowest" and "DSL utilizes the current network, allowing build-out to a wider footprint than would be economically feasible through removing and replacing or overbuilding existing infrastructure." Because only 63% of the lines in Verizon's current network are DSL-capable, please explain how FairPoint plans to use this current network infrastructure to provide DSL service.

REPLY: The current network infrastructure is a combination of IOF optical transport systems, optical and copper transport systems between central offices and remotes, and the local copper distribution plant. The FairPoint plan augments existing DSLAM deployments, deploys DSL network elements closer to the customer, and relies upon the local copper distribution plant to reach the customer. To the extent IOF and central office to remote transport capacities might be inadequate, augmentation would be considered.

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REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-29 What experience does FairPoint have with fiber-to-the-premises facilities, equipment and services in its current network?

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-29 on the grounds that it is vague and confusing. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 2-29. [Objection served April 20, 2007.]

FairPoint has deployed FTTP in "Greenfield" service areas (i.e. developments) supporting voice, high speed data, and IPTV.

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Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-30 On page 11, lines 6-7, of Michael Harrington's testimony, he states that FairPoint "will take over and operate" the current fiber-to-the-premises (FTTP) network Verizon has in place. Please provide details on how FairPoint plans to use and maintain the FTTP facilities and the FTTP services currently offered to customers.

REPLY: It is FairPoint's understanding the current Verizon FTTP network in New Hampshire supports voice and high speed data applications. To-date, Verizon reports no video based services have been deployed in New Hampshire. Upon transition, FairPoint will provide voice and high speed data applications over the FTTP network as Verizon does today. FairPoint deployment of video services will be subject to an appropriate business case. FTTP maintenance performed in New Hampshire will be accomplished via appropriate network surveillance (NOC and systems) and field located technical staff, not different from that of other FairPoint FTTP deployments.

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Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-35 On page 13, lines 8-10, of Michael Harrington's testimony, he states that "part of FairPoint's due diligence was to identify the areas in which broadband can be reasonable and economically deployed on a timely basis." Please provide the results of this analysis specific to the areas of New Hampshire where FairPoint will be making its initial broadband expansions. As part of your response, please supply a map showing the time frame for broadband deployment. If FairPoint has not yet determined the time frame for deployment, please estimate it.

REPLY: A review the IOF transport map indicates that all central office locations in New Hampshire are fiber fed and could be DSL enabled (if not already the case) on a rapid basis. Close to 60% of the DLC sites are fiber fed which might render DSL deployment feasible in the near term given consideration for appropriate business case support (sizing, cabinet space, power, transport system, fiber or lambda availability, cost, projected customer take-rate, etc.). Those DLC sites that are copper fed will require additional analysis and assessment in terms of customer density, sizing, required bandwidth, potential to support broadband with copper based transport, or requirement to place fiber transport as the solution. In these cases, an appropriate business case will determine both feasibility and timing. In addition, each DLC site identified as a viable candidate for broadband deployment in the immediate, near future or longer term will be assessed for the most appropriate broadband platform given site specific attributes. Many of the Verizon DLC sites require significant upgrades and cost to enable integrated broadband service deployment. In those cases, FairPoint would consider alternative scenarios inclusive of overlays or even replacement if the business case justified such outcomes. The results of this assessment will not be available until detailed broadband planning has been conducted. At this time and in advance of detailed

broadband planning being completed, there are no maps specifying deployment, nor is it responsible to estimate a timeline. However, FairPoint intends to significantly increase broadband addressable lines in New Hampshire within twelve (12) months of close.

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Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-39 Does Michael Harrington's testimony, p. 14, lines 15-16, mean that FairPoint has no current plans to engage in further FTTP deployment? Please supply the specific hurdles that must be met in order to deploy FTTP or fiber in general.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-39 on the grounds that it is vague, overbroad and confusing. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 2-39. [Objection served April 20, 2007.]

No. The statement means that no firm plans have been made at this time regarding what FairPoint intends to do regarding FTTP deployment. In general, however, FTTP will require appropriate business case justification for deployment to be considered.

FairPoint Communications, Inc.
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Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-40 On pages 15, lines 1-3 of his testimony, Michael Harrington indicates that he is aware of service quality issues that have been raised regarding Verizon's service quality in New Hampshire. Please specify what issues FairPoint is aware of, how each is related to the network infrastructure, and what FairPoint plans to do to address these issues.

REPLY: Mr. Harrington has reviewed a number of documents from NH PUC Docket 04-109 related to Verizon's service quality in New Hampshire.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-51 On page 12, lines 6-8 of the testimony of Verizon witness Stephen Smith, Mr. Smith indicates that Verizon employees who retire prior to the close of the transaction will remain a Verizon company responsibility with respect to post retirement pension and benefits. Has FairPoint reviewed how many of Verizon's current employees in New Hampshire are retirement eligible and determined the impact this will have on FairPoint's staffing should these employees choose to retire before the close of the acquisition? If so, please provide the result of this analysis.

REPLY: FairPoint has not at this time performed an employee-level analysis of the employees in New Hampshire who are retirement eligible.

FairPoint is currently developing its staffing plan which will have the flexibility to accommodate Verizon employees who choose to exercise their retirement option.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-74 Please provide the guidelines and/or other relevant documents used by
FairPoint to conduct the due diligence efforts to determine the
condition of Verizon's physical plant.

REPLY: Please see responses to OCA 2-43 and Staff 2-9.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-92 Please detail all FairPoint call center locations across the entire company and service territory. Include current staffing levels, call handling statistics, customer satisfaction survey results for each location for the past 5 years. Include centers that have been closed or consolidated into other centers, stipulating the timing and reasons for the closing or consolidation. Include centers to handle sales, billing, collection, general customer service, technical support, repair, directory assistance, toll assistance, or to add/change/remove service. Include centers that support business and residential customers.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-92 on the grounds that it is overbroad in scope and time, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. [Objection served April 20, 2007.]

Subject to and without waiving this objection, following is information regarding FairPoint's current call centers:

1. FPNE Operations Group: responds to specific technical support and repair issues, and is located in Winthrop, Maine.
 - 3 Repair Representatives answering the telephones.
 - 4 dispatchers working with technicians on truck rolls.
 - 2 switch programmers working on programming the switch for customer's features, Long Distance Pic's etc. These 2 will assist dispatchers and/or repair reps when necessary.
 - 3 Broadband Tier II Support technicians to work with escalated customer broadband issues.
2. Fairpoint South East:
 - 6 Repair/Dispatch Technicians answering customer calls and providing support to technicians on truck roles.

- 2 Tier II Broadband Techs assisting customers with escalated issues from outsourced helpdesk.
- Handles all Florida customers.

3. Fairpoint Mid Atlantic:

- Located in Chatham N.Y.
- 8 Repair representatives handling customer repair calls for all Mid Atlantic Companies.
- 4 Tier II Technicians handling broadband issues escalated by Help Desk (2 located at Chatham, 1 at Westfield, N.Y, and 1 at Kinderhook).

4. Fairpoint Mid West and Fairpoint North West

- 6 Repair representatives handling customer calls for all FPMW & FPNW customers.
- 2 Tier II Techs handling broadband customer issues escalated by help desk.

5. Customer Sales and Service Centers

a. East Call Center – Maine – CSR's = 60 FTE

- Avg Calls Offered per day = 1,200
- Avg Handle Time = 8:00 minutes
- Occupancy = 80/20
- Calls per our = 6 to 8 calls
- Servicing FPT companies:
 1. Bentleyville/MSH - PA
 2. Westfield - NY
 3. Gretna - VA
 4. FairPoint New England, ME/VT/NH
 5. Columbus Grove/Orwell - Ohio

b. West Call Center – Washington State – CSR's = 26 FTE's

- Avg Calls Offered per day = 800
- Avg Handle Time = 7:00 minutes
- Occupancy = 80/20
- Call per hour = 6 to 8 calls
- Servicing FPT companies:
 1. Mosca/Simla - CO
 2. Ellensburg - WA
 3. Yelm - WA
 4. Fremont - ID
 5. Odin/Cornel/EIPaso - IL
 6. Americus/Tribune - KS
 7. Peculiar - MA
 8. Chouteau - OK

FairPoint Communications, Inc.
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Docket No. DT 07-011

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-94 Please describe the recent FairPoint call center consolidations, organizationally and functionally. Explain the expected efficiency gains and cost savings as a result of the recent call center consolidations. Detail any gains realized to-date and timing of future gains.

REPLY: The two expanded locations are expected to be fully operational by the end of the third quarter of 2007, offering support to FairPoint customers throughout the Company's footprint. The consolidation resulted in the closure of 10 local support offices and the partial closure of 10 additional local offices.

FairPoint anticipates that the operational efficiencies resulting from the reorganization will result in net cost savings of approximately \$1.8 million per year after the centers are fully operational. The Company incurred additional net expenses principally in the fourth quarter of 2006 and the first quarter of 2007 of approximately \$0.3 million and \$0.5 million, respectively, in connection with the reorganization.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-95 Please describe the disposition of the employees as a result of the call center consolidation. What process was followed? How was staff transitioned? How many employees were displaced? Please include the timing of the transition, ramp up of staffing, training, cut-over, and downsizing or closing of centers.

REPLY: A company-wide communication was facilitated on October 26, 2007, the same day that communication to the public occurred. Company managers were dispatched to deliver the news personally to each affected employee.

Approximately 100 employees across the company were offered severance packages. The consolidation resulted in the closure of 10 local support offices and the partial closure of 10 additional local offices. These offices began consolidating on December 15, 2006 and will continue through August 17, 2007.

Approximately 60 employees were hired at the two centers. New hire training classes were held in December, January, February, March, and April coinciding with the timeline of office closures. Classes covered 4 weeks of training on systems, process, policy and product.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-97 Please describe the recent expansion of the South China, ME call center, specifying costs, timing, details of expanded facilities, staff additions, management and organization changes, equipment and technology changes, and resulting capacity changes. When will the expanded facilities be fully operational?

REPLY: The existing call center in South China will be expanded to handle up to 96 employees, up from the existing design which housed 35. The cost of the project is estimated to be under \$500,000. It will include an expanded septic system, expanded parking lot, and 2800 square feet of additional call center space for on-line employees, support employees, and management. In the new design a full time training room is provisioned; for on-going training and an expanded employee lounge/break room is also being provisioned. Phase One set about dealing with the expanded facilities and is nearly complete (target date June 1). Phase Two provisions on-line reps to the full capacity (65 on-line reps) and re-designs the call center cubicle layout with a target date of July 15. Phase Three completes the building expansion to house the ACD team, the Business Reps teams and management.

As a result of hiring more CSSRs, FairPoint has had to increase its supervisor and Team Leader count. At full staffing (eighty-six employees) FairPoint will have one Director of Customer Sales and Service, one Manager of ACD services, one Trainer, eight off-line support personnel, five Customer Service Supervisors, five Customer Service Team Leaders and this team will be responsible for sixty-five online reps. This leaves room for an additional ten employees should FairPoint need them. The target date for completion of all three phases is October 15th.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-104 Please detail how customer satisfaction and customer research will be measured during and after the transition.

REPLY: It is FairPoint's intention to survey its customers before and after transition

FairPoint Comm
State of New
Docket No. I

Retail Service

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Product Development

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-111 Please explain how Verizon customers will be transitioned into FairPoint customers, including such matters as public announcements, bill format, customer communication, and advertising. Will customers be aware of the transition? At what point? How? What communication vehicles will be established to support this process?

REPLY: FairPoint is currently developing an overall communications plan that will address such items as customer communication, changes to bill formats, rebranding Verizon signage, market awareness and advertising strategy.

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

Respondent: Michael Hegal
Title: Director, Billing & Operations
Supports Systems

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-112 Please provide details about the FairPoint billing system implementation in 2005 (the system that was ultimately replaced), including vendor, system, scope, platform, and timing. Describe problems with the system and implementation, reasons for high call volume, and scope of problems. Also include any actions taken to mitigate problems. Please detail the replacement billing system, including vendor, system, scope, platform, timing, and the reasons why the replacement system was chosen. Provide any customer communications (letters, stuffers, ads, flyers, etc.) issued prior to and during the billing system implementations, as well as any dealing with the problems encountered during the implementation. Describe any efficiencies or improvement gained as a result of the new billing system, both to the company and to customers.

REPLY: 2005 Conversion

Vendor:	CSG Systems
System:	ICMS
Scope:	Service Bureau providing systems and support for Customer Care, Order Management, POTs Provisioning, POTs Activation, Usage Polling, Usage Rating, Usage Mediation, Billing, Printing, Inserting and Mail.
Platform:	AS400
Timing:	June 2003 through September 2006
Challenges:	CSG had never operated ICMS in a Service Bureau nor had they supported a conversion of this size. Planning for the conversion did not fully take into account the impacts to business

processes.

CSG nor FairPoint fully understood the capabilities of the application resulting in poorly converted data.

Mitigation:

FairPoint hired Bearing Point Project Management consultants to implement project management methods and procedures during the course of the project.

FairPoint hired Mike Haga as the Director of Billing and OSS to take over the responsibility of the conversion effort and the CSG relationship near the end of the conversion project.

FairPoint placed CSG under notice and required CSG staff to be on site to provide additional training.

FairPoint created a Bill Review team to audit all bill cycles prior to releasing them.

FairPoint established bill cycle accuracy measures with the Maine PSC.

Communications:

Stuffers, letters and bill messages were used to communicate the pending system conversion up to 60 days in advance of the event.

2006 Conversion

Vendor:

Mid-America Computing Corporation (MACC)

System:

Customer Master and Bill Master

Scope:

Service Bureau providing systems and support for Customer Care, Order Management, POTs Provisioning, POTs Activation, Usage Polling, Usage Rating, Usage Mediation, Billing, Printing, Inserting and Mail.

Platform:

Microsoft Servers, Mainframe

Why Chosen:

MACC had the functionality needed to operate FairPoint's companies.

FairPoint had a long standing relationship with MACC.

MACC had improved their Systems and their Service Bureau Operations

MACC focuses on supporting the Rural Local Exchange market.

Timing:

November 2005 through May 2007 (Note, former ICMS companies were converted by

September 2006)

Challenges:

Due to lessons learned from the prior conversion, FairPoint created a solid plan to address system interfaces, special development needs, data conversion steps, business process changes and training materials. The primary issues encountered were with customers understanding their new bill.

Communications:

Stuffers, letters and bill messages were used to communicate the pending system conversion up to 60 days in advance of the event.

Efficiencies:

The new application was created with the Customer Service Representative in mind allowing for quicker learning of the application and fewer order entry errors. MACC's experience in the market and Sarbanes/Oxley compliant processes allowed us to quickly convert and deliver accurate bills.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-113 Please provide any proposed customer service policy changes as a result of the Verizon acquisition, include any changes to credit and collection policy, service policies, or billing policy.

REPLY: Until more specific information is available, FairPoint is not able to determine this at this time.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-124 Please detail any self-service technology used by FairPoint to respond to customer inquiries or requests for service, sales, repair, or troubleshooting assistance or to process customer-service related transactions.

REPLY: There is no self service technology used at FairPoint.

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

Respondent: Peter G. Nixon
Title: Chief Operation Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-128 Please provide an analysis, by state and by complaint category, of FairPoint customer complaints received for the past 5 years.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-128 on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. FairPoint also objects to Data Request 2-128 to the extent that the request would require FairPoint to create evidence that does not currently exist. [Objection served April 20, 2007.]

Subject to and without waiving this Objection, for NH there were none. For Maine 2001-2005, see ME CAD Annual Reports.xls (FPNH0467 - FPNH0471). For Vermont 2002-2006, see VT Violations 2002-2006.xls (FPNH0476- FPNH0477). For all other states, data was collected in 2006 only, see Complaint Summary by Type.xls (CFPNH0514) produced under seal and pursuant to RSA 378:43 and the Protective Agreement in this Docket.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NH Public Utilities Commission Staff
Group II

DATED: April 13, 2007

ITEM: Staff 2-134 Please provide any benchmarking or comparative performance results relating to Customer Service, Call Center Performance, Sales, Service, Billing, Collections, Directory Assistance, Repair, Credit, Remittance Operations, and Field Service for FairPoint within the last 5 years.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-134 on the grounds that it is overbroad in scope and time. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 2-134 from 2003 to the present. [Objection served April 20, 2007.]

There is no Formal Benchmarking available for repair operations.

Customer Sales and Service comparative performance results:

4th Qtr 2005 -

Metric	Service Level		Abandon Rate					
4Q 2005 Goals	greater than 85%	A	less than 15%	A				
Oct. 2005 Results	80%	A	13%	A				
Nov. 2005 Results	64%	A	11%	A				
December	72%	A	9%	A				
4Q 2005 Totals	65.3%	A	11%	A				

1st Qtr 2006 -

	Service Level	Abandon Rate		
Q1 2006 Goals	70% within 30 seconds	10% or less		
Q1 2006 Actuals	69% within 30 seconds	8%		

2nd Qtr 2006

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	Service Level	Abandon Rate
Q2 2006 Goals	75% within 30 seconds	8% or less
Q2 2006 Actuals	75% within 30 seconds	6%

3rd Qtr 2006

	Service Level	Abandon Rate
Q3 2006 Goals	75% within 30 seconds	8% or less
Q3 2006 Actuals	75% within 30 seconds	7%

4th Qtr 2006

	Service Level	Abandon Rate
Q4 2006 Goals	75% within 30 seconds	8% or less
Q4 2006 Actuals	77.8%	5.3%

1st Qtr 2007

	Service Level	Abandon Rate
Q1 2007 Goals	75% within 30 seconds	8% or less
Q1 2007 Actuals	76.3% within 30 seconds	5.7%

Product Performance Report

	1st Qtr	Growth	2nd Qtr	Growth	3rd Qtr	Growth	4th Qtr	Growth
NE HSD Actual 2007	14,441	587						
NE HSD Actual 2006	11,885	876	13,046	1,161	14,043	997	13,854	(189)
NE HSD Actual 2005	9,598	n/a	10,739	1,141	10,589	(150)	11,009	420
NE ACC Actual 2007	60,790	2,449						
NE ACC Actual 2006	59,598	(710)	59,949	351	60,023	74	58,341	(1,682)
NE ACC Actual 2005	61,724	n/a	62,659	934	62,579	(80)	60,307	(2,271)
NE DU Actual 2007	1,461	(300)						
NE DU Actual 2006	2,328	(514)	2,145	(183)	1,908	(237)	1,761	(147)
NE DU Actual 2005	3,622	n/a	3,567	(55)	3,504	(63)	2,842	(662)
NE LD Intra 2007	28,442	(1,404)						
NE LD Intra 2006	26,225	56	26,896	671	28,606	1,710	29,846	1,240
NE LD Intra 2005	22,229	n/a	23,219	990	24,911	1,692	26,169	1,258
NE LD Inter 2007	31,633	(1,468)						
NE LD Inter 2006	30,236	(408)	31,431	1,195	32,681	1,250	33,101	420
NE LD Inter 2005	26,376	n/a	27,790	1,414	29,414	1,624	30,644	1,230

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-2 On page 4, lines 10-12, of his testimony, Michael Haga states, "FairPoint has carried out many operating company acquisitions in the past and, therefore, is familiar with issues involved with integrating different operations." Please describe the previous systems integration activities that FairPoint has performed, detailing the functions of each of the systems involved, the number of access lines associated with the integration, the length of time it took to complete the integration and problems that were encountered.

REPLY: Please refer to FairPoint's response to Data Request Staff 2-112 for details on previous system integration projects.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-5 Please list all the OSS FairPoint currently uses in the operation of its telecommunications business in northern New England and provide the functionality of each. Also, where appropriate, please provide the average daily volumes these systems currently support. Additionally, please provide a list of all the manual processes that FairPoint uses today in its northern New England operation (e.g., paper trouble tickets). For any manual process that FairPoint currently uses, does FairPoint have any plans to mechanize these processes in the near future?

REPLY: **Engineering – Network**

Switch/Special Circuit Access – Access Service Request (ASR) is submitted by the IXC by fax, occasionally by e-mail. Special Services Engineer enters into Network Service Group (NSG) database for processing of ASR.

Field Sheet -- Engineering

- Engineer manually completes field sheet for various reasons; i.e., unsatisfactory plant report (UPR's), terminal work, pole attachment or transfer, cable count changes, verification of customer's locating cable count, road name change/correction, buried service work (BSW), pole stencing, or pole construction.
- Engineer manually enters field sheet information into Field Sheet ledger on the Engineering drive, assigns accordingly and updates as stages are completed.
- If Field Sheet "Other" category was completed, the sheet could be sent to our CAD department for map updates or to MACC for plant record updates
- Only Engineer staff and Operations area managers have access

to the Field Sheet Ledger

Field Sheet – Operations Technician Staff

- Technician manually completes field sheet for various reasons; but primarily to request Buried Service Work (BSW) for a residential and/or business customer to have new BSW (home construction, new office line) or a repair to an existing BSW.
- The technician faxes the field sheet to Repair/Dispatch for logging on to the BSW Worksheet and assigning an internal BSW #.
- FairPoint Northeast employs a BSW contractor. Once the field sheet has been assigned a number and logged, it is faxed to the BSW contractor.
- The BSW number is used by the contractor in contacting repair/dispatch when job has been completed and is used in the contractor's invoicing to FairPoint Northeast.
- The technician will also utilize the Field Sheet form when he notices a plant related item that requires attention either by engineering or facilities (MACC facility plant records, CAD). The technician will manually complete the form and submit accordingly.

FairPoint Northeast logged in from early April through end November 2006 and completed 412 BSW jobs not including 8 carryovers from 2006 due to ground conditions. As of May 3rd we have logged in 59 new BSW jobs.

Facilities/Assignment

MACC Service Order system automatically prompts Assignor regarding Service Order requiring assignment assistance. Assignor manually views plant record system and CAD system for specifics related to the Service Order. Assignor manually completes Field Sheet when a new terminal needs to be cut into the cable (i.e., new house construction) and faxes the field sheet to the appropriate Operations Area Manager for disposition to a technician for action. The Area Manager logs the field sheet into the Field Sheet Ledger and accordingly assigns to a technician. The Area Manager updates the stages within the ledger accordingly.

Technician contacts Assignment by phone or e-mail when corrections need to be made to records from previously received Service Orders or Troubles; i.e., cable pair or line equipment needs to be changed or E911 street address is incorrect or incomplete.

FairPoint Northeast has a loop qualification process in place. The

Customer Service Representative takes a phone call from a customer desiring DSL or asking if they are eligible for DSL service. The CSR manually enters the customer information into the DSL Loop Qualification request into the Paradox database. The Assignor checks the Paradox database daily. The Assignor reviews the plant record data to determine if the customer is within eligible DSL qualifying distance. Assignor enters "True or False" designation in the log. If "True", the CSR contacts the customer and if the customer desires DSL service, proceeds with the DSL service order. If "False", the data is automatically transferred to the Crystal Report for Engineers to view how many customers desire DSL in that particular distance area for potential placing of DSLAM.

E-911 Administrator manual duties re: MACC new Service Orders. Customer Service Representative does not see new Service Order address in MACC. CSR e-mails E911 administrator concerning the lack of address within MACC. E911 administrator verifies address against PSAP and builds E911 address within MACC system. When completed, the E911 Administrator notifies CSR accordingly.

FairPoint Northeast does not track its daily volume; other than the Field Sheet Ledger and BSW log internally by date entered and is therefore unable to provide average daily volumes. We have days/seasons when workload is voluminous due to season re-connects or disconnects and new construction or highway work.

Repair/Dispatch Service Delivery Center

Attached is a detailed SOP on the process (CFPNH0600- CFPNH0604 produced under seal pursuant to RSA 378:43 and the Protective Agreement in this Docket). It is manual in that a person answers the repair line and takes information from the customer and works with them on trouble shooting an issue.

In addition, attached is the Network Service Outage Flow chart used by technician staff pursuant to which contacts are made with the Area Manager and/or the Operations Project Coordinator to report a network outage, such as loss of dial tone service which could be caused by a cable cut to the remote, a loss of power and battery backup failed or a vehicle accident. Internally, Operations Project Coordinator issues a company-wide e-mail notifying the Customer Service and others of the outage to assist in responding to customers. In addition, a phone call is made to SRC E911 as well as an e-mail or phone call to the appropriate State PUC and in Maine, County Emergency Management Agency.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-7 In his testimony on page 4, lines 14-16, Michael Haga indicates that the “addition of a wholesale business serving CLECs and other wholesale customers” is one of the main differences from other transactions FairPoint has engaged in. Does FairPoint provide service to any wholesale customers in its current service territory? If so, please describe the nature of these business relationships specifically detailing the wholesale products sold and the tariffs and/or contractual agreements under which these products are sold.

REPLY: FairPoint does provide service to wholesale customers in its current service territory. FairPoint provides services pursuant to Section 251(a) and (b) interconnection agreements as well as exchange access services.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-8 Please describe how FairPoint provides access service to the inter-exchange carriers (IXCs) in its current service territory. Specifically, do IXCs order access service directly from FairPoint, and, if so, what ordering interface does FairPoint make available for receipt of Access Service Requests (ASR) from the IXCs? In those cases where the IXCs do not order access directly from FairPoint, please explain how access to FairPoint's end-user customers is provided to the IXCs.

REPLY: Yes. FairPoint provides direct access trunks with a receipt of ASR(s) from IXC(s). FairPoint does not provide a direct order interface and does not provide automated ASR(s). Orders are processed through fax or e-mail submissions to the RBOC for tandem services. In addition, FairPoint also has cases where an IXC does not order from FairPoint directly.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-9 What is FairPoint's service quality record in providing access service to IXC? Please provide any internal metrics that FairPoint records to measure the quality of service it provides to its IXC customers.

REPLY: FairPoint does not keep in the normal course of business specific service metrics concerning access service to IXC(s).

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-10 Please describe how IXCs report trouble conditions on their access service to FairPoint today.

REPLY: A company specific designated FairPoint representative would be contacted by a member of an IXC directly via telephone, facsimile or United States mail/carrier service to address any service issues. For the Northeast region, currently IXCs report their special and/or switched access trouble conditions to a FairPoint business office at 1-800-400-5568 or to repair at 1-888-889-9950. IXC provides circuit ID, trouble ticket number, trouble being reported and call back number. Dispatch center sends trouble report to local technicians. After hours trouble reporting is the same procedure except trouble report is sent to On-Call technician.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-15 Does FairPoint have any interconnection agreements in place and/or offer service to CLECs via a Schedule of Generally Available Terms (SGAT) in any of its current service territories? If so, please explain where these services are offered and how they are ordered by a CLEC from FairPoint. Also, please explain what mechanized interfaces FairPoint makes available to these CLECs, the current volumes of ordering activity these interfaces serve and how FairPoint bills these CLECs for the services and products it purchases.

REPLY: Please refer to FairPoint's response to Data Request Staff 3-7. In addition, FairPoint does not have any mechanized interfaces as referenced above. For the Northeast region, currently the only interconnection agreement that FairPoint Northeast has in place is with Revolution Networks d/b/a Oxford Networks. This agreement is in place due to a prior independent consortium that included FairPoint Companies, Northland Telephone Company, Utilities Inc and Community Service Telephone. Oxford Networks has co-location in Standish Maine, East Vassalaboro, Maine and Monmouth, Maine due to this prior consortium. This allows Oxford Networks to offer special access out of the above mentioned locations. Orders are placed via electronic mail to Network Special Services Engineer. Electronic and/or verbal confirmation of service order due date is sent to Oxford Networks.

The current volume of activity is approximately seven (7) special service orders per year.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-18 On page 5, lines 6 and 7, of his testimony, Michael Haga states, "Some of the existing FairPoint systems could be expanded or enhanced to serve the combined operations." Please list each of the existing FairPoint systems that will be used to replace a Verizon system and the current functionality of the FairPoint system and of the Verizon system that it will replace. Please explain how FairPoint plans to modify each of these existing systems so that they are capable of accepting the historic data records from Verizon's existing systems and of assuming the additional load resulting from the transfer of the northern New England properties.

REPLY: FairPoint plans to implement version #9 of the Lawson suite with respect to the Verizon assets acquired at closing. FairPoint currently utilizes version #8. FairPoint does not plan to modify the current FairPoint systems for the acquired Verizon assets. Instead, FairPoint plans to utilize separate systems for the current FairPoint operations and the operations to be acquired by Verizon at closing.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-22 In his response to the question regarding Capgemini's experience on page 6, lines 4-22 and page 7, lines 1-19, of his testimony, Michael Haga states, "Capgemini delivered multiple projects for a regional Bell operating company (RBOC) as key elements in the client's program to transform itself into a broadband leader." He then provides a bullet list, some of which are not clearly related to the work performed for this RBOC. Please explain which of these bullets relate to the work performed for this RBOC and which do not. Also, please specify the RBOC for which this work was performed. Additionally, please provide details as to what Mr. Haga means by the phrase "delivered multiple projects," specifying exactly what Capgemini was responsible for and what it delivered.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-22 to the extent that it seeks information confidential or proprietary information of a third party which FairPoint is not authorized to disclose. [Objection served April 27, 2007.]

FairPoint understands from Capgemini that the requested information is proprietary and confidential to Capgemini's clients. As such, FairPoint is not in possession of the requested information.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-30 Please provide the names of those Capgemini personnel who actually worked on the various projects that Michael Haga cites on pages 6 and 7 of his testimony and who will also be assigned and dedicated to FairPoint on the project to transition from Verizon to FairPoint OSS.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-30 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 3-30. [Objection served April 30, 2007.]

Please refer to FairPoint's response to Data Request Staff 3-22. In addition, please refer to the testimony of Mr. Haga, page 8 of 28.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-38 Michael Haga's testimony on page 9, lines 21 and 22 and page 10, lines 1-4, seems to indicate that FairPoint does not plan to develop any new systems and will seek to replace Verizon's OSS with off-the-shelf vendor applications. Please confirm whether it is FairPoint's intent not to develop any replacement systems from scratch and only to use existing vendor applications. If so, please provide each of the vendors and vendor product or products that will be used and the Verizon OSS functionality that these products will replace.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-38 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 3-38. [Objection served April 27, 2007.]

FairPoint does not intend to develop replacement systems from "scratch." FairPoint's OSS remains under development. In addition, FairPoint has not produced a functionality comparison of Verizon's OSS to FairPoint's OSS under development.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-39 On page 10, lines 13-21, page 11, lines 1-3 and page 12, lines 1-4, of his testimony, Michael Haga discusses at a high level the system functionality that will not be covered by the TSA and must be operational at closing. Mr. Haga indicates that Capgemini is working with FairPoint "to build the systems" that will be needed to support the functions that are not included in the TSA. Please describe in detail what these systems and processes are and when the replacement systems and processes are planned to be complete. Additionally, please explain exactly what Mr. Haga means by "build" in this response. Specifically, is it FairPoint's intent to build these systems from scratch or will FairPoint and Capgemini seek to obtain this system functionality from an alternate vendor's off-the-shelf product?

REPLY: Please refer to FairPoint's response to Data Request Staff 3-18. The following systems are not included within the transition services agreement: supply chain management, procurement and non-regulated accounting processes. Mr. Haga's reference to the word "build" was a reference to systems and processes to be designed and configured from off-the-shelf software, the systems needed by FairPoint on a post-closing basis.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-47 On page 16, lines 16-18 of his testimony, Michael Harrington states, "Our intention is to collaborate with carriers and make the transition to FairPoint as smooth and seamless as reasonably possible." Please explain how FairPoint intends to conduct this collaboration. Specifically, will periodic meetings be held with the carriers to keep them informed of progress and potential problems? If not, what is FairPoint's intention?

REPLY: Mr. Harrington did not testify as cited above. Assuming the data request referenced the prefiled direct testimony of Mr. Haga, FairPoint responds as follows: FairPoint intends to initiate formal communication with carriers with respect to the transition from Verizon to FairPoint operations. If necessary, FairPoint will agree to meet with a representative of the carriers as necessary. At present, however, FairPoint has not finalized the transition process.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-48 Will FairPoint's wholesale customers have an opportunity to conduct user acceptance testing on the new interfaces that FairPoint is developing for them? If so, will this test plan be developed jointly with the wholesale carriers or solely by FairPoint?

REPLY: It is not FairPoint's intention to provide wholesale customers with an opportunity to conduct "user acceptance testing." Instead, it is FairPoint's intention to develop a certification process by which wholesale customers may validate the interface through a joint FairPoint/wholesale customer process. FairPoint plans to initially develop this certification process and jointly execute the process with wholesale customers.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-49 Will FairPoint provide to the CLECs and IXCs all the same pre-order query capabilities that Verizon currently makes available?

REPLY: This portion of the operations support systems remain under design. Final decisions have not yet been made.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-62 On page 21, lines 13-21, and page 22, lines 1-5, of his testimony, Michael Haga discusses training of FairPoint's employees on the new OSS. Please describe FairPoint's training plans providing specific details when this training will be held in relation to the termination of the TSA and the training experience of those Capgemini personal that Mr. Haga indicates will be responsible for the delivery of the initial training.

REPLY: Specific training plans will be developed in conjunction with the development of a new OSS. Currently, FairPoint plans and intends to conduct most of the training referenced above during the period of time covered by the transition services agreement. Specific training personnel from Capgemini have not formally been identified.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-63 Will FairPoint provide training to its wholesale customers on the use of its new wholesale interfaces? If so, please provide details about what training FairPoint will make available to the carriers, how this training will be conducted, who will facilitate this training, and whether there will be any cost to the carriers to attend this training.

REPLY: FairPoint intends to provide training materials through wholesale customers with respect to the new wholesale interface system. FairPoint's goal is to provide the training materials through wholesale customers at least six months prior to the cutover date at no cost. Facilitation of the actual training process has not yet been determined.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-65 What is FairPoint's fallback plan if should it find that some (or all) of the new systems are not functioning sufficiently to support operations in New Hampshire?

REPLY: FairPoint does not intend to effectuate a cutover absent a determination that the new systems are functioning sufficiently to support the new operations. As such, FairPoint intends to continuously monitor the functionality of the new systems in order to ensure the systems support the Verizon operations in New Hampshire, as well as for Vermont and Maine.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-69 On page 27, lines 10 and 11, of his testimony, Peter Nixon states, "FairPoint will provide substantially the same wholesale services as those undertaken by Verizon." Please explain what Mr. Nixon means by "substantially the same wholesale services" and detail those services that will not be exactly the same as what Verizon currently offers in New Hampshire.

REPLY: Final decisions have not yet been determined. In general, however, it is FairPoint's intent to provide the same services at closing as presently provided by Verizon and to otherwise honor Verizon's present contractual obligations.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-75 What is FairPoint's experience with offering network interconnection to competitive carriers?

REPLY: FairPoint has negotiated and implemented interconnection agreements with CLECs. However, FairPoint has limited experience with offering network interconnection to competitive carriers due to our legal stature of Independent Local Exchange Carrier (ILEC) which requires competitive carriers to initiate a bona fide request to offer service in FairPoint Northeast exchanges. Please refer to FairPoint's response to Data Request Staff 3-15. FairPoint Northeast currently has an interconnection agreement in place with Oxford Networks. Recently an interconnection agreement with Time Warner Cable of Maine was signed, but there has been no request for service at this time.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-82 Will FairPoint receive any training from Verizon? If so, please describe what areas this training will be in.

REPLY: Generally, as FairPoint plans to replace the out of state Verizon systems which support the northern New England operations, no need exists at present for Verizon to provide FairPoint employees with "training." During the period of time covered by the Transition Services Agreement, and in the event Verizon makes a change to its systems, then Verizon is obligated to notify FairPoint of the changes and to assist FairPoint employees as needed with respect to those changes.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-83 How will FairPoint treat wholesale carrier contracts that contained volume commitments with Verizon when these volume commitments cross multiple states?

REPLY: The Merger Agreement specifies that to the extent an agreement between Verizon and a CLEC contains minimum volume commitments for services Verizon currently provides to that CLEC across multiple states, FairPoint will reduce such volume commitments pro-rata, without a change in rates and charges or other terms and conditions under such agreements. The pro-rata reduction shall be equal to or exceed the amount of the volume commitment provided by Verizon New England after closing. By way of example, and not by limitation, if after closing, such affiliate purchased 75% of a volume commitment from FairPoint and 25% of a volume commitment from Verizon New England, then FairPoint would reduce the volume commitment by 25% in affected agreements implementing such tariffs.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-84 Will FairPoint honor all contracts and interconnection agreements that Verizon currently has with other carriers (e.g., wireless carriers, independent telephone companies, cable companies, etc.) that do business in New Hampshire?

REPLY: FairPoint intends to assume all interconnection agreements that Verizon currently has with other carriers that do business in New Hampshire that can be assigned by Verizon to FairPoint.

FairPoint plans to honor those contracts and interconnection agreements currently in place between Verizon and the other carriers to the extent the contracts are assigned to FairPoint at the closing. Absent such assignment, FairPoint is willing to negotiate on a good faith basis any necessary contracts and interconnection agreements.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-86 Please confirm that FairPoint will assume all of the same Section 251 and Section 271 obligations of the Telecommunications Act of 1996 that Verizon is currently responsible for.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-86 on the grounds that it seeks a legal conclusion. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 3-86. [Objection served April 27, 2007.]

FairPoint believes that the obligations that apply under Section 251 of the Act and the FCC's rules thereunder (for example, interconnection, unbundling, resale, collocation, etc.) will apply to FairPoint in the to-be-acquired service territories post-closing (to the extent that those obligations remain in effect under the law and the FCC's rulings). However, FairPoint does not concede that it will become a BOC as a result of this transaction and, thus, become generally subject to Section 271 of the Act.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-87 Please indicate whether the competitive impairment designation of any New Hampshire central offices for the purpose of satisfying federal network unbundling requirements will change at closing because of this transaction. If so, please specify which ones.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-87 on the grounds that it seeks a legal conclusion. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 3-87. [Objection served April 27, 2007.]

FairPoint does not currently have any plans to reclassify the impairment status of any wire center in New Hampshire; however, FairPoint may seek to reclassify the impairment status of a wire center in New Hampshire on the grounds that it contains a collocation arrangement of the former MCI. Under the conditions to the Verizon/MCI merger, the Commission required that Verizon/MCI exclude fiber-based collocation arrangements established by MCI in identifying wire centers in which Verizon claims there is no impairment because of the affiliation between MCI and Verizon. See Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control, Memorandum Opinion and Order, FCC 05-184 (rel. Nov. 17, 2007). FairPoint will not be affiliated with MCI, so this condition will not apply to FairPoint.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-88 Please confirm that FairPoint will assume all of the wholesale and access tariff terms, conditions and prices that Verizon currently has in place for carriers doing business in New Hampshire.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-88 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 3-88. [Objection served April 27, 2007.]

FairPoint will adopt Verizon's tariffs filed in New Hampshire.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-89 On page 14, lines 18-22, of his testimony, Michael Haga indicates that FairPoint will have a dedicated business unit to “serve the various carriers that interconnect with or utilize FairPoint’s facilities as part of their offerings.” Please provide the management structure of this business unit, the projected size of this business unit’s staff, the expertise this group of people will have, where FairPoint will obtain this expertise, and the training that will be given. Please also indicate whether any of the employees to be transferred from Verizon have this expertise, and, if so, whether they will be part of this business unit. In addition, please indicate where this business unit will be located and the tools that the unit will be given to quickly resolve other carriers’ issues.

REPLY: FairPoint currently is in the process of developing the above-referenced business unit. Final decisions have not yet been made.

FairPoint has added Brian Lippold to its organization, who will serve as FairPoint’s Vice President of Wholesale Services. Mr. Lippold was previously employed by Level 3.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-93 In his testimony on p. 15, lines 15-20, Michael Haga states, "We will also meet applicable Performance Assurance Plan and Carrier to Carrier Requirements." Please confirm whether FairPoint plans to be bound by the current New Hampshire Verizon Performance Assurance Plan (PAP) and Carrier to Carrier Guidelines. Please explain whether any aspects of these are not applicable.

REPLY: **OBJECTION:** FairPoint objects to Data Request 3-93 on the grounds that it seeks a legal conclusion. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 3-93. [Objection served April 27, 2007.]

FairPoint intends to assume, and to mirror and accept, all of Verizon's obligations under the PAP and the carrier to carrier guidelines.

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

Respondent: Robin Tuttle
Title: Director of Federal Affairs

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-94 In his testimony on p. 28, lines 7-11, Peter Nixon states, "To the extent that FairPoint assumes those [interconnection] agreements ... FairPoint would expect to assume the terms of the PAP incorporated by reference in the agreements." Does this mean that FairPoint will only assume the PAP for CLECs who refer to it in their interconnection agreements or certain limited provisions of the PAPs for CLECs who refer to specific terms in their interconnection agreements?

REPLY: FairPoint will abide by the standards enforced by the PAP where the PAP is incorporated by reference in any interconnection agreement. FairPoint is designing systems processes and organizations to meet the requirements of the PAP for those agreements in which the PAP is referenced. For those CLECs whose agreements with Verizon do not reference the PAP, it is FairPoint's intent to provide service levels consistent with the PAP. FairPoint's goal is to meet PAP requirements for all CLEC(s) as the PAP exists at this time.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: NHPUC Staff
Group III

DATED: April 20, 2007

ITEM: Staff 3-107 Please describe FairPoint's current process for receiving and processing customer payments. Please describe how all payment types are processed, including mailed payment, internet payments, in-person payments, bank-direct payments, phone payments, interactive voice response (IVR) payments. Also, please indicate any differences in processing by type of payment – cash, credit card, check, or automated clearing house (ACH). Please include the functions and locations responsible for receiving and processing the payments, including company organization, third party, or lockbox operation. How will this process change as a result of the Verizon transition?

REPLY: FairPoint's current process for receiving and processing customer payments is noted below. FairPoint does not intend to revise the below processes as applicable to FairPoint classic operations.

Mailed payments: FairPoint receives and processes payments at a lock box vendor in Charlotte, North Carolina. FairPoint then receives from the vendor a file of all successfully processed payments, which is posted to customer accounts. Payments that cannot be processed by the vendor are provided to FairPoint for manual processing.

Internet payments: Not offered at present.

In-person payments: As payments are received in person, the payments are posted to the customer's account and a receipt is provided.

Bank direct payments: Payments made via ACH transactions are applied to the customer's account once the transaction is complete. The ACH file is securely transferred to FairPoint's clearing house and

processed.

Phone payments: Not offered at present.

IVR payments: Not offered at present.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-10 Please identify, provide resumes for, and describe the New Hampshire duties of all FairPoint's officers and persons holding the first level below officer who are expected to have responsibility for New Hampshire operations and who will report directly or through intermediate levels to the COO.

REPLY:

- Steve Rush - Vice President, Customer Sales and Service – Mass Market: responsible for inbound, outbound, retail, operator services, directory assistance, collections and other channels to support the consumer and small business market segments;
- Brian Lippold - Vice President, Business Services/Wholesale Services: responsible for the inbound, outbound, direct sales, indirect sales channels to support the medium and large business market segments; responsible for the carrier and CLEC market segments;
- Gracie Coleman - Vice President, Human Resources: responsible for the recruiting, hiring, reviews, compensation and benefit plans to support the employees;
- Ralph Wasner - Vice President, Information Technology: responsible for the selection, design, operations and development on the systems to support the company and the services it provides;
- Position Open - Vice President, Operations and Engineering: responsible for the design, planning, installation and maintenance of the network infrastructure;
- Position Open - Director of IT Operations: responsible for the system operations in the data center;
- Position Open - Director of IT Development: responsible for the software development on the systems that support the

company;

- John Smee - Director of Operations: responsible for the field operations in the three states, including installation and repair technicians, central office technicians, construction and field engineering;
- Position Open - Director of Business Services – Direct Sales: responsible for the direct sales force for medium and large business accounts;
- Gil Lamarre - NOC Manager: responsible for the Tier II and Tier III network support technicians, network monitoring and service provisioning;
- Donald Romano - Network Provisioning Manager: responsible for circuit provisioning;
- Position Open - Facilities Manager responsible for the upkeep and maintenance of the facilities and space planning for new and existing work groups and employees.

Please refer to FPNH 0915 - FPNH 0935 for the resumes of the above referenced individuals.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-27 On page 20, lines 11-13, of the testimony of Verizon witness Stephen Smith, Mr. Smith indicates that FairPoint will assume Verizon's contract in New Hampshire to provide Enhanced-911-related (E911) services. Please confirm that FairPoint will assume all Verizon's current responsibilities for providing E911 emergency services in New Hampshire aside from the database that will be assumed by the New Hampshire Bureau of Emergency Communications (NHBECE). If there are any 911 related functions performed by Verizon today that FairPoint will not assume please describe what these functions are and explain why FairPoint will not assume responsibility for each of them.

REPLY: FairPoint will assume the responsibilities of the current Network Contract between Verizon and the State of New Hampshire.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-28 Does FairPoint provide E911 services for its current customer base in northern New England? If so, please provide details on the following aspects of this service:

- a) FairPoint's policy regarding facility route diversity between its central offices and the Public Safety Answering Points (PSAP)
- b) FairPoint's policy regarding facility route diversity between primary PSAPs and secondary PSAPs
- c) FairPoint's policy regarding facility route diversity on Automatic Location Identification (ALI) circuits
- d) How FairPoint provides ALI services, including where FairPoint's ALI databases are located, whether these databases are mated mirror images of each other and how the ALI information is provided to the PSAPs
- e) How FairPoint maintains and updates its ALI database
- f) How FairPoint provides Automatic Number Identification (ANI).

REPLY: a) FairPoint provisions its E-911 trunks in a diversely routed manner from its end offices to the designated E-911. If appropriate, Tandem switch facilities are available.

b-e) FairPoint does not currently serve any PSAPs, nor does FairPoint currently provide any ALI circuits or databases in New England. In New England, FairPoint's current properties subtend the Verizon E-911 network.

f) FairPoint forwards E-911 caller ANI from its end offices to the designated Verizon E-911 Tandem switch. Verizon then assumes

responsibility for forwarding associated ANI to the appropriate PSAP.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-29 Does FairPoint provide Basic 911 (B911) service to any of its current customers in northern New England? If so, what plans, if any, does FairPoint have to upgrade this service to E911 service? Also, please describe FairPoint's policy regarding facility route diversity for the delivery of its B911 service from its central offices to the PSAPs.

REPLY: FairPoint does not provide Basic 911 service in northern New England. All of FairPoint's central offices are provisioned for E-911 service.

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

SUPPLEMENTAL RESPONSE

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-30 Page 21, lines 11-17, of the testimony of Verizon witness Stephen Smith, addresses Verizon's current practice of monitoring its E911 system performance in New Hampshire from a mated database system located in Massachusetts and New York. Mr. Smith states, "Because of the important redundancy function that the mated database systems perform, the systems cannot be separated. Instead, at Cutover, FRP will assume the going forward E911 activities." Please describe in detail FairPoint's plan for assuming the E911 system performance monitoring that is currently performed by Verizon using the mated databases in Massachusetts and New York described by Mr. Smith. Also, please list all of the E911 system performance monitoring activities that are currently performed by Verizon and confirm whether it is FairPoint's intention to continue to perform the same E911 system performance monitoring that Verizon does.

**FIRST
SUPPLEMENTAL
REPLY:** FairPoint is waiting to receive a proposal from Verizon, which it expects to receive shortly. Once FairPoint has received the proposal, this response will be further supplemented.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-33 Does FairPoint use other vendors and/or carriers to provide 911 service to its customers in northern New England? If so, please list all vendors and/or carriers with whom FairPoint has contracted for the delivery of this service and what geographies each vendor/contractor serves.

REPLY: In northern New England, FairPoint relies upon Verizon for E-911 voice network connectivity, E-911 database and ALI services.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-34 Will FairPoint have any responsibility for or participation in the transfer of the 911 database functions from Verizon to NHBEC?

REPLY: Assuming such responsibilities have not previously been transferred from Verizon to the State of New Hampshire at the time of close, then FairPoint will have responsibility for or participate in the transfer of the 911 database functions from Verizon to NHBEC.

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

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-35 How does FairPoint plan to maintain and update the ALI data for its customers in New Hampshire?

REPLY: FairPoint is in the process of determining how its new service order and provisioning systems will integrate with the ALI database system to be selected and/or available for New Hampshire. Since the status of the E-911 database and ALI system is uncertain at this time, FairPoint is unable to fully respond to this data request.

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

SUPPLEMENTAL RESPONSE

Respondent: Michael Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Group V

DATED: May 4, 2007

ITEM: Staff 5-50 Will FairPoint assume responsibility for rehomeing the four remote switches currently homed on the host switch located in the Raymond central office that was recently damaged by flood waters, if this rehomeing work is not completed by Verizon prior to the transition of its New Hampshire network assets to FairPoint?

**FIRST
SUPPLEMENTAL
REPLY:** FairPoint will work with Verizon to ensure all work related to the remote switches located in Raymond, New Hampshire is completed. All remote switches for Raymond are expected to be homed off of another central office. This work is expected to be completed before the end of the year.

Flood prevention work will begin before the closing. Waterproofing of the Raymond facility is expected to cost between \$1 million and \$2 million. The cost can be accommodated in FairPoint's projected capex budget.

FairPoint has built in sufficient capex increases per line for items of this nature that may arise in the future.

Please also refer to FairPoint's response to Labor FDR I-41.

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

Respondent: Lee David Newitt
Title: Manager, Corporate
Development

REQUEST: Public Utilities Commission Staff
Topic Group I

DATED: June 11, 2007

ITEM: Staff FDR I-2 During the Technical Conference on June 6, FairPoint indicated that it did not conduct any sensitivity analysis on its CAPEX model using various best-case/worst-case assumptions about the quality of the network it will be obtaining from Verizon. Please confirm that this is correct. If not, please provide the assumptions that went into this analysis.

REPLY: This is correct.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: Public Utilities Commission Staff
Topic Group II

DATED: June 11, 2007

ITEM: Staff FDR II-1 In its response to Staff 2-7, which asked for FairPoint's pricing plans for its expanded broadband service offering, FairPoint stated, "FairPoint intends to offer broadband in the new areas at the same rates, terms and conditions as offered elsewhere in the former Verizon areas in New Hampshire. At this point, FairPoint cannot predict what broadband service prices will be when the network buildout is complete in the newly served areas." This response appears to be contradictory. Please clarify whether or not it is FairPoint's intent to offer broadband services in the areas that it plans to build-out at the same rates that Verizon currently offers for comparable services. Additionally, please clarify what FairPoint means by the statement that "it cannot predict what broadband service prices will be when the network buildout is complete in the newly served areas."

REPLY: FairPoint will offer broadband (DSL) in the areas it intends to build out at the same rates that Verizon currently offers and has assumed that Verizon will not change such prices. FairPoint is not aware of any additional or expanded broadband services that Verizon contemplates between now and closing. Thus, it would be difficult to commit to something that is unknown or speculative.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Topic Group II

DATED: June 11, 2007

ITEM: Staff FDR II- Staff 2-47, 2-48, 2-49, and 2-55 inquired about FairPoint's plans for
3 replacing various network functionalities performed by Verizon today. These functionalities included SCP (2-47), LIDB and CNAM (2-48), AIN (2-49) and OS/DA (2-55). In each of its responses to these data requests FairPoint stated that it is either assessing solutions or is in negotiations with potential vendors. Please provide an update to each of these data request responses indicating the vendors being considered, where FairPoint is in its negotiations and when FairPoint anticipates finalizing the contracts for these functionalities.

REPLY: FairPoint has not concluded its assessments of alternative vendor proposals and solutions for AIN and OS/DA services. To date, proposals have been received from Nortel, Alcatel-Lucent, Tekelec, VoltDelta, Telcordia, and selected data base providers. Vendor proposals are being refined prior to FairPoint selecting vendors and negotiating contracts accordingly. These assessments and/or negotiations are in progress and it is anticipated that final identification of vendors and contract negotiations will be completed by mid-August.

FairPoint recently reached agreement with VeriSign for outsourcing LIDB/CNAM data base services.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Topic Group II

DATED: June 11, 2007

ITEM: Staff FDR II- In Verizon's response to Staff 2-14, Verizon provided a list of the
5 preventative maintenance test it runs on a routine basis. Will FairPoint continue to conduct this routine testing in New Hampshire? Does FairPoint plan to conduct additional routine testing? If so, please identify the tests FairPoint will add.

REPLY: The reference to Staff 2-14 does not appear to be correct. However, and related to Verizon's response to Staff 2-27, the following preventative maintenance testing is performed.

"Verizon currently performs the following preventative maintenance testing on its network facilities in New Hampshire:

- Automatic Line Insulation Testing - constantly running
- Mechanized Line Testing – automatic test for each service order closed
- Network Monitoring and Analysis - air pressure/low pressure alarms - constantly running."

FairPoint intends to continue to conduct this routine preventative testing. Detailed plans regarding additional preventative testing have not been finalized.

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

Respondent: Peter G. Nixon
Title: Chief Operating Officer

REQUEST: Public Utilities Commission Staff
Topic Group II
DATED: June 11, 2007

ITEM: Staff FDR II-8 In Verizon's response to Staff 2-18, which asked Verizon to explain how the estimated time of 15 months for the termination of TSA by FairPoint was determined, Verizon referred to its response to OCA GI: 1-119. In this response to OCA, Verizon stated that "FairPoint advised Verizon that the cutover could be completed expeditiously and within 15 months of closing." Please explain how FairPoint arrived at the 15 month estimate that it provided to Verizon.

REPLY: FairPoint estimated that the transition would take at least 15 months from active commencement of it and Verizon's efforts. Notwithstanding that FairPoint is starting its cutover preparations far in advance of closing, it sought to receive transition services from Verizon for an ample period of time to permit adequate time for planning and to cover all contingencies.

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

Respondent: John F. Smee
Title: Director of Operations

REQUEST: Public Utilities Commission Staff
Topic Group II

DATED: June 11, 2007

ITEM: Staff FDR II-9 During the Technical Conference on June 5, FairPoint indicated that it will be able to provide a date next week for when it will have its plan developed to address the service quality issues in New Hampshire. Please provide the date that this plan will be available. When the plan is available, please provide the plan and an estimate of its associated expenses and investments.

REPLY: FairPoint expects to have its service quality plan for New Hampshire completed on or before August 20, 2007.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Topic Group II

DATED: June 11, 2007

ITEM: Staff FDR II-10 During the Technical Conference on June 5, FairPoint indicated that it will complete the fiber ring in northern New Hampshire if Verizon does not complete this work prior to close. Please confirm that FairPoint will do the work necessary to complete this ring. Also, please indicate where FairPoint will obtain the funding necessary to complete this work and whether and how this funding is reflected in its financial models.

REPLY: As stated during the Technical Conference, FairPoint does intend to complete the referenced fiber ring in northern New Hampshire in the event not completed by Verizon. Funds necessary to complete this work will be taken from the Capex budget or through funds generated by operations.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: Public Utilities Commission Staff
Topic Group III

DATED: June 11, 2007

ITEM: Staff FDR III- In its response to Staff 3-2, which inquired about FairPoint's previous
1 system integration experience, FairPoint referred to its response to
Staff 2-112, which described FairPoint's 2005 billing system
implementation. Please confirm that this is the only previous system
integration experience that FairPoint has. If FairPoint has other system
integration experiences not provided in response to Staff 2-112, please
provide details on each.

REPLY: The response to Staff 2-112 also references FairPoint's billing system
implementation when FairPoint converted off of ICMS to MACC's
Customer Master and Billing Master applications. Michael Haga's
experience prior to joining FairPoint included several system
integration and system replacement efforts with RLECs and CLECs
throughout the country. Client confidentiality precludes Mr. Haga
from releasing specific client engagement information.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: Public Utilities Commission Staff
Topic Group III

DATED: June 11, 2007

ITEM: Staff FDR III-8 During the Technical Conference on June 4, FairPoint indicated that the systems test results criteria that will be used by FairPoint to make its cutover-ready decision has yet to be determined. Please provide an estimate of when FairPoint will have established its criteria for determining that its systems are ready and the TSA can be terminated. Additionally, once these criteria are established, please provide the details of what these criteria are.

REPLY: The following are included in the FairPoint/Capgemini Work Order #1:

- June 15: Program Test Strategy
- August 15: Systems Test cases due
- November 15: Performance Test cases due

Additional test criteria are contained in Work Order #2 and will be provided upon execution of that Work Order. FairPoint will use the information provided within the Test Cases to begin formulating its cutover readiness criteria. This effort will begin in September and will be a working document as FairPoint progresses through out testing.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: Public Utilities Commission Staff
Topic Group III

DATED: June 11, 2007

ITEM: Staff FDR III- 10 During the Technical Conference on June 4, Capgemini did not provide any indication that it has experience developing or integrating systems for traditional wire-line companies. Please confirm whether Capgemini has any experience in wire-line systems development or integration. If so, please provide explicit details of the experience Capgemini has in this area.

REPLY: Client confidentiality precludes Capgemini from releasing specific client engagement information. Capgemini has informed FairPoint that over the last several years, units of Capgemini have been engaged by 7 of the 10 largest ILECs (based on Table 7.3 of Trends in Telephone Service, February 2007, published by the FCC). Those engagements have included experience with network and OSS systems, billing and wholesale systems, accounting and finance systems. Additionally there has been major work in data migration and conversion involving millions of customers. Finally, Capgemini has done strategic network planning as well.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: Public Utilities Commission Staff
Topic Group III

DATED: June 11, 2007

ITEM: Staff FDR III- 11 During the Technical Conference on June 5, FairPoint stated that it manages Capgemini's progress by tracking milestones and deliverables documented on "the project plan." Please provide a copy of this project plan showing all of the milestones and deliverable dates that FairPoint has established for Capgemini.

REPLY: Capgemini's engagement is governed by work orders. The work orders describe project deliverables with due dates (usually the 15th of each month). Work Order #1 has been provided as CFPNH 0020-CFPNH 0040 under seal and pursuant to RSA 378:43 and the Protective Agreement in this Docket.

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

Respondent: Michael Haga
Title: Director of Billing & Operations
Support Systems

REQUEST: Public Utilities Commission Staff
Topic Group III

DATED: June 11, 2007

ITEM: Staff FDR III- Has FairPoint completed the design of the retail end-user bill it
12 proposes to use? Please provide a copy of the proposed bill. If the bill
design is not complete, please provide the timeline for this project.

REPLY: FairPoint intends to maintain the current retail end-user bill format.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Topic Group V
DATED: June 11, 2007

ITEM: Staff FDR V-1 In its response to Staff 5-7, Verizon described its responsibilities for providing E911 services for other carriers (i.e. wireless carriers, CLECs, independent company carriers, etc.) in New Hampshire. Please confirm that FairPoint will assume all of these same obligations from Verizon. If not, please explain which obligations FairPoint will not assume and why.

REPLY: FairPoint will assume all of these same obligations from Verizon for as long as the contractual obligations exist. To the extent E911 service arrangements change between Verizon and the State in advance of closing, FairPoint's obligations may also change.

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

Respondent: Michael L. Harrington
Title: Vice President, Network
Engineering Services

REQUEST: Public Utilities Commission Staff
Topic Group V

DATED: June 11, 2007

ITEM: Staff FDR V-3 During the Technical Conference on June 5, FairPoint indicated that it will complete the work on the Raymond central office to prevent future occurrences of flooding that this office has experienced in the past should this work not be completed by Verizon at close. Please confirm that FairPoint will see this project through to its successful completion. Also, please indicate where FairPoint will get the funding necessary to complete this work.

REPLY: If not completed upon closing, FairPoint will complete the work associated with the Raymond central office initiated by Verizon. Funds necessary to complete this work will be taken from the Capex budget or through funds generated by operations.