

**State of New Hampshire
Public Utilities Commission**

**Docket No. DT 10-025
FairPoint Communications, Inc., et al.**

Respondent: Tom Nolting
Title: Vice President of Billing and
Revenue Assurance
Objection: By Counsel

REQUEST: Otel Telekom
Set 1
DATED: March 17, 2010

ITEM: OTEL-16 Regarding Mr. Nolting's testimony at p. 6, line 21 through p. 7, line 4 and p. 8, lines 7-8:

- a. Have the review and audit programs that Mr. Nolting describes resulted in back-bills to wholesale customers?
- b. How many wholesale customers have been back-billed as the result of the review and audit programs that Mr. Nolting describes?
- c. What is the aggregate dollar amount of such back-bills?
- d. How far back in time were the services performed that such back-bills address?
- e. Does FairPoint expect that the review and audit programs that Mr. Nolting describes will result in back-bills to wholesale customers in the future?
- f. How many wholesale customers will be back-billed in the future as the result of the review and audit programs?
- g. What does FairPoint expect the aggregate dollar amount of such back-bills to be?
- h. How far back in time were the services performed that such future back-bills are expected to address?

REPLY: OBJECTION. FairPoint objects to OTEL-16 on the grounds that it is speculative. Subject to and without waiving this objection, FairPoint will provide information responsive to OTEL-16.

- a. This section of the testimony refers to the Switch-to-Bill audit. This audit is an existence check which identifies active switched lines and verifies if they are present in the billing systems, Kenan or CDG. This audit does not validate that the customer is being

billed correctly for the products and services on their account, only that they are or are not being billed.

- b. None.
- c. \$0
- d. N/A.
- e. This is not known at this time.
- f. This is not known at this time.
- g. This is not known at this time.
- h. It potentially will be different by customer and circumstances of the identified discrepancy. Generally, back billing for confirmed under billing incidents is processed for the impacted period, but no more than 180 days for retail customers, and one year for Wholesale customers.