

State of New Hampshire
Public Utilities Commission

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

Respondent: Richard Murtha
Title: Vice President of Wholesale
Operations
Objection: By Counsel

REQUEST: Joint CLECS
Set 1

DATED: March 17, 2010

ITEM: CLECS-35 Please provide FairPoint's or any third party analysis of the operational and/or economic impact of the proposed reorganization and FairPoint's post-reorganization operations on CLECs. If FairPoint has not prepared such an analysis, or obtained such an analysis from a third party, please so state.

REPLY: OBJECTION. FairPoint objects to this request on the grounds that it is irrelevant, speculative, overbroad, unduly burdensome, requires information not in FairPoint's possession, and not reasonably calculated to lead to the discovery of admissible evidence. FairPoint further objects that any such information, if FairPoint had it, would be competitively sensitive and confidential and inappropriate to provide to a competitor. Subject to and without waiving this objection, FairPoint will provide information in response to CLECS-35.

FairPoint has not prepared such an analysis because the reorganization will not change any processes within FairPoint's operational systems for the processing of CLEC orders. Therefore, reorganization should have no impact on CLECs. In fact, and as explained in FairPoint's prefiled testimony filed on February 24, 2010, the reorganization should have positive benefits for all of FairPoint's customers.