

THE STATE OF NEW HAMPSHIRE

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May 11, 2007




Ms. Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Re: **DT 07-011 Verizon New England/FairPoint Communications**  
**OCA's Notice of Reservation of Rights**

Dear Ms. Howland:

Enclosed for filing with the Commission please find an original and seven copies of the Office of Consumer Advocate's (OCA's) Notice of Reservation of Rights Concerning FairPoint's Responses to Group IV, Set 1 Data Requests. A copy of this filing has been served electronically on all parties in this docket.

Sincerely,

  
Meredith A. Hatfield  
Consumer Advocate

cc: Service List

Q:\Consumer Advocate\Telecom\DT 07-011 FairPoint Purchase\Correspondence

NHPUC MAY 11 2007 3:05 PM



**BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**DT 07-011**

**VERIZON NEW ENGLAND, INC., BELL ATLANTIC COMMUNICATIONS, INC.,  
NYNEX LONG DISTANCE CO., VERIZON SELECT SERVICES, INC.,  
AND FAIRPOINT COMMUNICATIONS, INC.**

**Transfer of Assets to FairPoint Communications, Inc.**

**OFFICE OF CONSUMER ADVOCATE'S  
NOTICE OF RESERVATION OF RIGHTS CONCERNING  
FAIRPOINT'S RESPONSES TO GROUP IV, SET 1, DATA REQUESTS**

The Office of Consumer Advocate (OCA) hereby notifies the N.H. Public Utilities Commission (Commission), FairPoint Communications, Inc. (FairPoint), the other parties and Commission Staff that the OCA reserves its rights to compel the responses of FairPoint Communications, Inc. (FairPoint) to Group IV data requests and to propound additional data requests concerning the subjects covered by the OCA's Group IV, set 1. In support, the OCA states the following:

1. The procedural schedule in this docket provides for the filing today of motions to compel responses to disputed Group IV data requests.<sup>1</sup>

2. In addition to eight "General Objections," FairPoint specifically objected in whole or in part to the following data requests: OCA IV 1-1, OCA IV 1-2, OCA IV 1-4, OCA IV 1-8, OCA IV 1-10, OCA IV 1-11, OCA IV 1-14, OCA IV 1-15, OCA IV 1-16, OCA IV 1-17, OCA IV 1-18, OCA IV 1-22, OCA IV 1-23, OCA IV 1-24, OCA IV 1-33, OCA IV 1-34, OCA IV 1-35, OCA IV 1-36, OCA IV 1-39, OCA IV 1-40, OCA IV 1-42, OCA IV 1-43, OCA IV 1-44, OCA IV 1-45, OCA IV 1-49, OCA IV 1-52, OCA IV 1-53, OCA IV 1-54.<sup>2</sup>

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<sup>1</sup> See Order 24,733, March 16, 2007, pp. 6-7, and 20.

<sup>2</sup> See Attachment A. FairPoint referred to these data requests as 4-1, et seq. The OCA, however, considers the present set of data requests as set one of Group IV. If the OCA propounds a second set of Group IV

3. Within its written objections, FairPoint agreed to provide some response to all of these data requests.

4. FairPoint's responses, however, are due after the deadline for filing this motion to compel.

5. In agreeing to accept, for the time being, FairPoint's offer to provide some response to its Group IV, set 1 data requests, the OCA does not waive its rights to compel further responses to these data requests or to propound additional data requests concerning the subjects covered by the OCA's Group IV, set 1.

6. As such, the OCA reserves these rights and hereby notifies the Commission, FairPoint, other parties and Staff of this reservation of rights.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was forwarded this day to the parties by electronic mail.

May 11, 2006

  
Meredith A. Hatfield

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data requests, it would use the prefix "4-" to refer to these (e.g., OCA IV 4-1, OCA IV 4-2, etc.). As such, and in hopes of avoiding any confusion about possible future sets of Group IV data requests, the OCA refers to the disputed set-one data requests in this motion using the prefix "OCA IV 1-".

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

DT 07-011

VERIZON NEW ENGLAND, INC., BELL ATLANTIC COMMUNICATIONS, INC.,  
NYNEX LONG DISTANCE CO., VERIZON SELECT SERVICES, INC.,  
AND FAIRPOINT COMMUNICATIONS, INC.

Transfer of Assets to FairPoint Communications, Inc.

**Objections of FairPoint Communications, Inc. to  
Group IV, Set 1 Data Requests of the Office of Consumer Advocate**

NOW COMES FairPoint Communications, Inc. ("FairPoint") and pursuant to New Hampshire Public Utilities Commission (the "Commission) Procedural Order No. 24,733, objects to the following Group IV data requests as follows:

**General Objections**

1. FairPoint objects to these data requests (including their instructions and definitions) to the extent that they purport to impose obligations beyond the applicable law and Commission rules and decisional law.
2. FairPoint objects to any data request that seeks information or data protected by the attorney-client privilege and attorney work product doctrine. In this regard, FairPoint waives no privilege or objection by (i) inadvertent, unintentional or unauthorized disclosure of such information or documents; and (ii) any information or documents provided by the requesting party to establish a basis for any privilege asserted.
3. FairPoint objects to any request to produce data other than in the form in which FairPoint stores or maintains data in the ordinary course of business.

4. FairPoint objects to any definition or instruction which provides for definitions of terms at variance with their common meaning. In responding to these data requests, FairPoint shall apply the common meanings of such terms.

5. FairPoint objects to any data request that seeks all documents concerning a particular subject as overbroad and unduly burdensome in that FairPoint can and will only produce such documents reasonably relating to a particular subject within FairPoint's custody, possession and control.

6. FairPoint objects to any data request that characterizes any statement, document or transcript of testimony and states that such documents or transcripts speak for themselves.

7. FairPoint objects to any data request the response to which requires disclosure, response or production of confidential or proprietary information of FairPoint, and FairPoint will only produce such information to a party to these proceedings who has entered into the Protective Order in this action and the Commission Staff pursuant to RSA 378:43. FairPoint objects to any data request the response to which requires the disclosure of information or documents from a third party of a confidential or proprietary nature which FairPoint is not authorized to disclose.

8. FairPoint objects to any data request which requests information or documents with respect to matters not addressed within FairPoint's testimony.

#### **Objections to Specific Data Requests**

**OCA 4-1:** Please confirm that FairPoint would be considered a "non-rural" company in New Hampshire under § 251, assuming the transaction occurs as proposed.

FairPoint objects to Data Request 4-1 on the grounds that it seeks a legal conclusion. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-1.

**OCA 4-2:** What is the average cost to FairPoint per working loop based on the most recent year for which data are available (specify the year, and include assumptions, methodology used to compute the cost):

- a. in New Hampshire?
- b. in Maine?
- c. in Vermont?

FairPoint objects to Data Request 4-2 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 4-2.

**OCA 4-4:** In FairPoint's view, are the transferred exchanges eligible for safety valve funds in New Hampshire? Explain fully, including the bases and assumptions relied upon for the response.

FairPoint objects to Data Request 4-4 on the grounds that it seeks a legal conclusion. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-4.

**OCA 4-8:** How many Lifeline customers does FairPoint currently serve in jurisdictions other than New Hampshire?

FairPoint objects to Data Request 4-8 on the grounds that it is overbroad and unduly burdensome. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 4-8.

**OCA 4-10:** How will the proposed transaction affect the number of customers enrolled in LifeLine in New Hampshire?

FairPoint objects to Data Request 4-10 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-10.

**OCA 4-11:** Please provide the number of residential customers enrolled in the Lifeline telephone assistance program in New Hampshire by year since 2003 through the present.

FairPoint objects to Data Request 4-11 on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. FairPoint further objects to Data Request 4-11 to the extent that it seeks information confidential or proprietary information of a third party which FairPoint is not authorized to disclose. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 4-11.

**OCA 4-14:** Please provide a detailed description of the process presently in place in New Hampshire to enroll customers in the Lifeline telephone assistance program. If major changes have occurred in this process since 2003, describe each such major change, the year in which it occurred, and the reason for the change.

FairPoint objects to Data Request 4-14 on the grounds that it is vague, overbroad, unduly burdensome and is 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 4-14.

**OCA 4-15:** How will the proposed transaction affect FairPoint's process for Lifeline enrollment?

FairPoint objects to Data Request 4-15 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-15.

**OCA 4-16:** Please provide a detailed description of the eligibility guidelines in New Hampshire for the Lifeline telephone assistance program. If major changes have occurred in the eligibility guidelines within the past ten years, describe each such major change, the year in which it occurred, and the reason for the change.

FairPoint objects to Data Request 4-16 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 4-16.

**OCA 4-17:** How will the proposed transaction affect the benefits, eligibility and service to FairPoint's LinkUp customers in New Hampshire, including those who are in the process of applying the program and those customers who have completed the application process but who have not yet received any benefit?

FairPoint objects to Data Request 4-17 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-17.

**OCA 4-18:** How will the proposed transaction affect the number of customers enrolled in LinkUp in New Hampshire?

FairPoint objects to Data Request 4-18 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-18.



**OCA 4-22:** Please provide a detailed description of the process presently in place in New Hampshire to enroll customers in the LinkUp program. If major changes have occurred in this process since 2003, describe each such major change, the year in which it occurred, and the reason for the change.

FairPoint objects to Data Request 4-22 on the grounds that it is vague, overbroad 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 4-22.

**OCA 4-23:** How, if at all, will the proposed transaction affect FairPoint's process for LinkUp enrollment?

FairPoint objects to Data Request 4-23 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-23.

**OCA 4-24:** Please provide a detailed description of the eligibility guidelines in New Hampshire for the LinkUp telephone assistance program. If major changes have occurred in the eligibility guidelines within the past five years, describe each such major change, the year in which it occurred, and the reason for the change.

FairPoint objects to Data Request 4-24 on the grounds that it is vague, overbroad and unduly burdensome. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 4-24.

**OCA 4-33:** Has FairPoint or anyone on behalf of FairPoint conducted any study, research, analysis or survey regarding the New Hampshire Lifeline or LinkUp programs since January 1, 2003? If the response is in the affirmative, please provide such documents.

FairPoint objects to Data Request 4-33 on the grounds that it is overbroad and unduly burdensome. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 4-33.

**OCA 4-34:** Has FairPoint Corporate, or anyone on behalf of FairPoint Corporate, since January 1, 2003, conducted any study, research, memoranda, survey or other documents regarding ways to increase Lifeline participation? If the response is in the affirmative, please provide such documents.

FairPoint objects to Data Request 4-34 on the grounds that it is overbroad and unduly burdensome. Subject to and without waiving these objections, FairPoint will provide information responsive to Data Request 4-34.

**OCA 4-35:** Does FairPoint have any internal procedures, benchmarks, guidelines or other criteria by which it measures the effectiveness of its Lifeline or LinkUp programs? If the response is in the affirmative, please describe completely.

FairPoint objects to Data Request 4-35 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-35.

**OCA 4-36:** Does FairPoint Corporate have any internal procedures, benchmarks, guidelines or other criteria by which it measures the effectiveness of its Lifeline or LinkUp programs? If the response is in the affirmative, please describe completely.

FairPoint objects to Data Request 4-36 on the grounds that it is vague, 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 4-36.

**OCA 4-39:** Is there automatic Lifeline Program enrollment in any state in which FairPoint operates? If so, please identify the state(s) and provide an estimate of the percentage of eligible Lifeline customers that participate in the program in each state.

FairPoint objects to Data Request 4-39 on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-39.

**OCA 4-40:** Is there automatic LinkUp Program enrollment in any state in which FairPoint operates? If so, please identify the state(s) and provide an estimate of the percentage of eligible LinkUp customers that participate in the program in each state.

FairPoint objects to Data Request 4-40 on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-40.

**OCA 4-42:** Based on FairPoint's experience offering a Lifeline Program in New Hampshire, please identify the major challenges FairPoint perceives to increasing enrollment.

FairPoint objects to Data Request 4-42 on the grounds that it is vague 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 4-42.

**OCA 4-43:** Based on FairPoint's experience offering a Lifeline Program throughout its service territory, please identify the major challenges FairPoint perceives to increasing enrollment.

FairPoint objects to Data Request 4-43 on the grounds that it is vague 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 4-43.

**OCA 4-44:** Based on FairPoint's experience offering a Lifeline Program in New Hampshire, please identify the major measures that FairPoint has implemented that it considers to have enhanced enrollment.

FairPoint objects to Data Request 4-44 on the grounds that it is vague 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 4-44.

**OCA 4-45:** Based on FairPoint's experience offering a Lifeline Program throughout its service territory, please identify the major measures that FairPoint has implemented that it considers to have enhanced enrollment.

FairPoint objects to Data Request 4-45 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-45.

**OCA 4-49:** Does FairPoint offer a discounted DSL rate to Lifeline customers in any state? If the response is in the affirmative, please indicate the states.

FairPoint objects to Data Request 4-49 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 4-49.

**OCA 4-52:** Identify each jurisdiction in which your company offers SDT.

FairPoint objects to Data Request 4-52 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 4-52.

**OCA 4-53:** If your company offers SDT in any of the New England states, please provide the following information; the reason for offering SDT; the date first offered by your company; an estimate of the cost to your company, if any, of offering SDT; and whether, the call reverts to the incumbent carrier's business office with SDT or connects to the carrier that most recently served the location at the time of service termination.

FairPoint objects to Data Request 4-53 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 4-53.

**OCA 4-54:** Does SDT have any impact on numbering resources (e.g., tie up telephone numbers and prevent their re-assignment)?

FairPoint objects to Data Request 4-54 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 4-54.

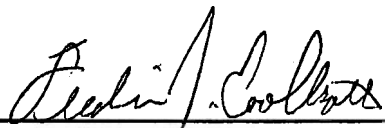
Respectfully submitted,

FAIRPOINT COMMUNICATIONS, INC.

By its Attorneys,

DEVINE, MILLIMET & BRANCH,  
PROFESSIONAL ASSOCIATION

Dated: May 4, 2007

By:   
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FairPoint Group I Incomplete/Unresponsive Responses

OCA1-1: Documents filed at FCC, or provided to FCC commissioners or staff.

- This request included documents that were provided by FRP to FCC commissioners or staff, not just “filings.” Please provide complete response.
- Are CFPNH 0041-0043 the correct pages to go with this DR response?

OCA 1-14: Sought documents associated with 9/30/2005 meeting between Verizon and Fairpoint. No documents provided. Instead, 1/14/07 Board documents are provided, in redacted form. Please provide requested materials.

[CONFIDENTIAL] Redacted documents are from Deutsche Bank, dated 1/14/07. Please provide unredacted documents.

Please also provide unredacted copies of pages:

CFPNH 0145; 0146; 0157; 0158; 0168; 0169; 0174; 0177; 0189.

OCA 1-15: Documents provided by FRP to Lehman Brothers.

No Documents were provided. The response indicates that Lehman Brothers “was engaged to provide financial advisory services related to the proposed transaction, including, but not limited to, assistance with due diligence, financial projections, and financing strategies. (Emphasis added.) Please provide these be substantive and important documents associated with each of these three areas.

[would accept output documents in each of these areas, since the time Lehman began working for FairPoint, in the summer of 2005.]

OCA 1-31: Synergies documents

No documents were provided. CFPNH 0164 indicates that FRP does have documents that are responsive, which should be provided.

(from page CFPNH 0164: “With respect to the financial forecasts and projections, including the analyses and forecasts of certain cost savings, operating efficiencies, revenue effects and financial synergies expected by FairPoint to be achieved as a result of the Merger (collectively, the “Synergies”), made available to Deutsche Bank and used in its analyses...”.)

OCA 1-35: Financial Analyses.

We understand that you will provide the full model to certain parties in Maine, and request that you do the same in response to these questions.

OCA 1-36: Capital Budgets and supporting schedules and workpapers.

The request sought “supporting schedules and workpapers” which were not provided. Aggregate numbers are provided. Please provide supporting schedules and workpapers, at least for the most recent year and current year.

OCA 1-37: Hurdle rates

No response was provided. However, in OCA Group 2 1-65(e) (labeled 2-65 by FairPoint), the response indicates that capital budgeting decisions "include all assumptions (e.g, regarding consumer demand, cost of money, time period of capital budgeting analysis, etc.). (my emphasis) The response indicates that the capital budgeting decision "often comes down to the financial metrics (IRR, NPV, etc.)..." IRR is Internal Rate of Return of a project. NPV is net present value of a project. Hurdle rates are used with both types of analyses. For a project to be a "go" from a capital budgeting standpoint, a) the IRR as calculated must exceed the hurdle rate; or b) the NPV must be positive (not negative) when using the hurdle rate as the discount rate in the NPV analysis.

As a result, these responses are completely inconsistent. If the response to 2-65 is accurate, then the company needs to answer 1-37.

OCA 1-38: Cash flow analyses (free cash flow)

The only information provided was 19 pages of Leach back up. This is not responsive.

OCA 1-40: Credit Rating Reports

- a. The page citation is apparently in error. CFPNH 0054 – 0063 is cited in the response. 0054 does not appear to be pertinent. Please provide correct page citations.
- b. The attachments appear to be in error compared to the Reply. Reply indicates Moody’s and S&P attached, only Moody’s provided.
- c. Why is this labeled confidential? Due to the fact it comes from a subscription service?

OCA 1-41: Securities Analyst Reports, concerning FRP since 1/1/2005.

Not Responsive. FRP indicates they are property of “third parties”. (See below, and also Staff 1-16).

OCA 1-42: Securities Analyst Reports discussing proposed transaction.

FRP states that these must be requested directly from Securities Analyst, not responsive. However, FairPoint should have an investor relations department where these reports are maintained. The OCA does not know which analysts follow the company at any one time. Further, it sets up potential for conflict for us to be in contact with securities analysts. In other cases companies provide the requested reports, no doubt for these reasons.

OCA 1-43: Investment Advisor documents (reports and presentations).

FRP provided 1/14/07 Board materials. This is not responsive.

OCA 1-44: All presentations to Board/working groups regarding acquisition.

FRP provided 1/14/07 Board materials. This is not responsive.

OCA 1-48: Provide indicative bond ratings.

“See OCA 1-40” (Moody’s) is not responsive. Did or did not FRP seek indicative bond ratings associated with the potential acquisition of the Verizon New England properties? If yes, provide those indicative ratings documents.

OCA 1-51: FairPoint data book.

Response: “See VZ response to OCA 1-135”, which is Verizon “data room” index.

Non-responsive, we asked for the data FRP provided to Verizon, not the other way around. HSR documents indicate that FRP provided substantive documents to Verizon (CFPNH HSR 0004-0005). Please provide the information FairPoint provided to Verizon in support of the proposed transaction, to include information indicated at CFPNH HSR 0004-0005, and any subsequent documents provided. This and any subsequent submissions should be provided in response to this question.

OCA 1-59 and 1-60: Considering FRP’s response, does FRP then agree that its capital structure is the result of whatever it takes to accomplish its acquisitions under acquisition terms FRP considers to be appropriate? If so, please state to be responsive.

OCA 1-76: Amended credit agreement



Non-responsive. Provide documents and correspondence pertaining to the amendment of FRP's Credit Agreement with its lenders, from the point at which FRP initially sought the amendment.

OCA I-93: Limits on management from Reverse Morris Trust structure.

Non-responsive. Please provide.

OCA 1-96: Maximum total debt, while still being investment grade.

Non-responsive reply refers to Leach testimony, does not answer question.  
a) Please answer the question. b) Please provide to OCA information that was provided by FRP to Verizon per point 7 on CFPNH HSR 0004.

OCA 1-101: Transaction expense tracking reports.

CONFIDENTIAL Response to f): explain why there are no "tracking reports that can be provided" even though expenses associated with the transaction are being incurred and tracked separately by FRP.

OCA 1-112: FRP states it can "detect no mistakes in the confidential designation of Mr. Leach's testimony."

Claim of 15 entire pages in sequence as confidential is sweeping and overbroad. FRP should take a more careful approach interest to use redactions to limit properly scoped and claimed proprietary information in testimony.

Other responses which may contain information improperly claimed as proprietary (or redacted) by FRP: 1-40 (Moody's Ratings, see above); 1-14 (CFPNH 0177; "LIBOR plus xxx interest rate redacted, when it is disclosed in public in OCA 1-97).

OCA 1-130: Access line growth assumption documents.

Non-responsive reply is "see response to OCA 1-8," which is HSR documents. Please provide responsive documents, or direct to cite within HSR materials...

OCA 1-113: Explain specifically what is addressed by the qualifier "essentially".

OCA 1-114 and 1-115: We understand that you will provide the full model to certain parties in Maine, and request that you do the same in response to these questions.