



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

Respondent: Brian Lippold
Title: Vice President, Business and
Wholesale Services

REQUEST: New England Cable and Telecommunications Association, Inc. and
Comcast Phone of New Hampshire, LLC - Rebuttal

DATED: September 20, 2007

ITEM: NECTA/CPNH - 39R Please refer to page 7, lines 16 – 20 of Mr. Lippold’s rebuttal testimony. Please provide the referenced training plan. Also, please discuss whether the training plan is only designed to ensure system compatibility with customers’ systems and processes or whether the training plan incorporates end to end system testing at actually anticipated wholesale customer levels. Please indicate if the referenced training certification is the same as the certification process referenced at page 22, lines 19-20.

REPLY: **OBJECTION:** FairPoint objects to Data Request 39R on the grounds that it is overbroad, unduly burdensome, and seeks highly confidential and proprietary commercial and strategic information that would provide competitors a business advantage. NECTA and CPNH are FairPoint’s competitors. The information sought pertains to the provision of competitive services and includes trade secret information that required significant effort and cost to produce and/or confidential, research or commercial information, including customer, geographic, market and product-specific data. Subject to and without waiving these objections, FairPoint will provide a response. [Objection served September 25, 2007.]

As noted in Mr. Lippold’s rebuttal testimony, p. 7, line 20 through p. 8, line 2, the training plan does not yet exist but will be developed and will be shared with the customers at least six months prior to cutover. The training plan will be designed to ensure system compatibility with the customers’ systems and processes, provided the customers adhere to the industry standards.

The certification referenced on page 7, lines 18-22, and on page 22, lines 119-20, is the same certification.