



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

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

**REQUEST:** BayRing, segTEL & OTEL ("CLECs") - Rebuttal

**DATED:** September 19, 2007

**ITEM:** CLEC's R-13 Please refer to page 7, lines 20 and 21, of Mr. Lippold's prefiled rebuttal testimony where it states that FairPoint "will certify that each customer is ready and trained to interface with our systems."

- a. On the subject of certification, who, if anyone, is going to certify that FairPoint's systems are at least as good as Verizon's prior to cutover?
- b. Who, if anyone, is going to certify that FairPoint's wholesale department is fully staffed and trained prior to cutover?
- c. Who, if anyone, is going to certify that FairPoint's wholesale department is at least as good as Verizon's prior to cutover?

**REPLY:** **OBJECTION:** FairPoint objects to Data Request 13 on the grounds that it is vague. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request 13. [Objection served September 25, 2007.]

- a. FairPoint.
- b. FairPoint will make this determination.
- c. FairPoint will make this determination.