



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

Respondent: Michael Haga
Title: Director of Billing and
Operations Support Systems

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

DATED: September 19, 2007

ITEM: CLEC's R-37 Please review page 41, lines 11-19, of the rebuttal testimony of Mr. Haga and Mr. Kurtz where they describe the test review process.

- a. When does FairPoint intend to provide the Commission's Consultant with the latest version of the Test Strategy?
- b. Which state commission's Consultant will be given the Test Strategy?
- c. Does the state commission consultant have the authority to reject the test strategy if he or she finds it to be insufficient?
- d. Is FairPoint proposing to provide the state commission consultant with the Test Strategy before the Commission has an opportunity to approve FairPoint's test review proposal? What if the Commission should decide that it wants an independent auditor to design and implement a testing plan to ensure that FairPoint's systems are equal to or better than Verizon's systems?
- e. What analysis did FairPoint undertake to determine if providing the Consultant with 2-3 weeks to review the materials and submit questions was sufficient?
- f. What analysis did FairPoint undertake to determine if two weeks after hosting the meeting described on page 41, lines 15 - 16, was sufficient for the parties to concur with respect to a testing plan and acceptance criteria?
- g. Does FairPoint intend to provide CLECs with all of the testing strategy, testing plans, testing criteria and related information that it provides to the state commission consultant? If the answer is no please specifically identify the materials that CLECs will be provided and will not be provided and explain the basis for not providing the materials that you do not intend

to provide to CLECs.

- h. When does FairPoint intend to share the information in paragraph g) above with CLECs?
- i. When did FairPoint begin to prepare its testing plans?
- j. Is FairPoint developing its testing plans from scratch?
- k. Has Fairpoint reviewed any of the Master Test Plans and testing procedures implemented by KPMG, Price Waterhouse, and various state commissions in connection with their review of Verizon's OSS in state proceedings involving Verizon's 271 applications? If yes, what aspects of those plans is it accepting? What aspects of those plans is it modifying or rejecting? If no, why not?
- l. Was Cap Gemini retained by the Connecticut Department of Public Utility Control as a third party auditor in connection with the evaluation of SNET's operating support systems? If so please provide a copy of any final testing plans designed or implemented by Cap Gemini for the Connecticut DPUC and any written reports provided by Cap Gemini to the Connecticut DPUC evaluating SNET's systems.

REPLY:

OBJECTION: FairPoint objects to Data Request 37 on the grounds that that it seeks a legal conclusion. FairPoint further objects to Data Request 37 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. BayRing, segTEL and Otel Telekom 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. FairPoint further objects on the grounds that the request may seek 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 37. [Objection served September 25, 2007.]

- a. As soon as all of the required parties agree on the testing proposal, FairPoint will provide the designated parties with the latest version of the Test Strategy and Test Plans.
- b. FairPoint's proposal contemplates that the three states will agree on a single, common consultant.

- c. FairPoint expects to reach an agreement with the consultant on test strategy, test plans, acceptance criteria, and severity level definition.
- d. FairPoint desires that the states accept the testing proposal before FairPoint provides any consultant with the testing details. Assuming the chosen consultant has the necessary experience, FairPoint does not expect any major difficulties in reaching agreement with the consultant. The objective of the proposal is to permit an independent view as to whether FairPoint is ready for cutover.
- e. No analysis was done. That period represents FairPoint's estimate of a reasonable time frame.
- f. No analysis was done. That period represents FairPoint's estimate of a reasonable time frame especially when added to the first 2-3 weeks and then matched with the overall project timetable.
- g. FairPoint intends to provide CLECs with testing materials that are relevant to the various CLEC transactions. This will permit CLECs to test the various interactions with FairPoint.
- h. FairPoint's current plans indicate that FairPoint will begin communicating and working with CLECs during the month of October 2007.
- i. The development of a test strategy began almost immediately (that is, February/March 2007) and has continued to evolve since then.
- j. The test plan for this project is unique, but it is based on well-established testing methodologies and processes.
- k. FairPoint did not review the plans and procedures referenced above. The scope and objectives of 271 testing are not appropriate for the vast majority of this project and are contained within existing test plans and test cases.
- l. Capgemini had a limited engagement with Connecticut. Any documentation that was produced for the client would be the property of the client and is not available to FairPoint.