

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DT 07-011

Respondent: John F. Nestor, III
Title: Vice President - State
Government Relations N.H.

REQUEST: Office of Consumer Advocate, Rebuttal Data Request

DATED: September 17, 2007

ITEM: OCA R-13 Refer to the Rebuttal Testimony of Michael S. Brown, Michael L. Harrington and John Smee at page 12, lines 4 through 7.

- a. Do you concur that “the report rates for some wire centers indicate a need for proactive maintenance and outside plant refurbishment or replacement?”
- b. If the response to part (a) is no, please explain.
- c. If the response to part (b) is yes, please describe Verizon NH’s plans, if any, for calendar year 2007, and until the close of the proposed transaction, for maintaining, refurbishing, or replacing outside plant in any of the wire centers shown in Exhibit SMB-29a-C to Ms. Baldwin’s testimony.

- REPLY:**
- a. Mr. Nestor has not undertaken an analysis of the outside plant and therefore cannot comment on the specific testimony referenced. However, to the extent there is an ongoing need to proactively maintain an outside plant network that is exposed to weather and mechanical effects on a daily basis, Verizon NH performs this type of maintenance work as part of its day-to-day operations, described in Verizon NH’s reply to OCA R-4
 - b. Not applicable.
 - c. Not applicable. Please see Verizon NH’s reply to OCA R-4.

VZ# 927