

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

Respondent: Michael Haga
Arthur Kurtze
Title: Director of Billing and
Operations Support Systems
Advisor, Capgemini

REQUEST: New Hampshire Public Utilities Commission Staff - Rebuttal

DATED: September 17, 2007

ITEM: RDR-22 On page 31, lines 14-18, of the joint rebuttal testimony of Michael Haga and Arthur Kurtze, Mr. Haga states that FairPoint is in the process of developing contingency plans. He goes on to state that FairPoint plans to use the first two data extracts it will get from Verizon "to obtain an understanding of the type of manual efforts that will have to be in place for correcting information (if the need arises) and for adding information which requires manual input." Please clarify this statement. Specifically, is it one of FairPoint's objectives to use the test data extracts to determine what manual processes FairPoint will need to have in place at cutover to compensate for system functionality that is not performing as expected? If not, then what was the intent of this statement? Additionally, please provide the date when FairPoint's contingency plan will be available for review.

REPLY: **OBJECTION:** FairPoint objects to Data Request RDR-22 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 if disclosed. 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 RDR-22. [Objection served September 25, 2007.]

The data extracts and test transactions will be used to determine if we

have system functionality that is not performing as expected. We will use the first set of extracts to determine what we can do programmatically to correct these issues. Between extracts we will test this functionality and begin to have a better understanding of what data will require manual support. We will use the second set of extracts to confirm our test results and finalize the contingency plans. The contingency plans will be completed by February 29, 2008.