

Docket No. UT-090842

Verizon and Frontier Responses to Public Counsel Data Request Nos. 453-503

December 1, 2009

PUBLIC COUNSEL DATA REQUEST NO. 455

Please refer to Exhibit No. ___ (DRW-15T), p. 10, lines 11-13.

Please identify, with as much detail as possible, all of the information Frontier had access to with regard to the physical condition of Verizon's utility plant?

Response:

Applicants assert Objection Nos. 2, 3, 7, 8, 9 and 12. Subject to and without waiver of the objections, Applicants respond as follows:

With reference to Public Counsel Data Request No. 62, Frontier is acquiring operating business units in 14 states and is specifically acquiring all of Verizon Northwest's operations in Washington, Oregon and Idaho as part of the proposed transaction. Verizon provided an overview on the condition of OSP plant in Washington State as part of the review of the transaction as well as service quality results, including trouble reports per 100 access lines.

Prepared By: Cassandra Guinness

Date: December 30, 2009

Witness: To be determined