

EXHIBIT LIST

DOCKET TITLE: *Verizon/Frontier Transfer*

DOCKET NUMBER: UT-090842

DATE: December 15 - 18, 2009

NUMBER	SPONSOR	O	DISP.	DESCRIPTION
WITNESS: FRONTIER: DANIEL McCARTHY				
STAFF CROSS-EXAMINATION EXHIBITS				
				Frontier Response to Staff Data Request No. 136
				Frontier Response to Staff Data Request No. 137
				HIGHLY CONFIDENTIAL Selected page (p. 20) from "Project North" Board of Directors discussion materials dated April 16, 2009
				Joint Applicants' Response to Public Counsel Data Request No. 4, 5, 6, and 46
				Joint Applicants' Response to Public Counsel Data Request No. 286
				CONFIDENTIAL Joint Applicants' Response to Staff Data Request No. 122
				Table calculating line density for Verizon Northwest's Washington wire centers
				Frontier's Response to Staff Data Request No. 142
				Frontier's Response to Staff Data Request No. 140
				Frontier's Response to Staff Data Request No. 141

UTC STAFF DATA REQUEST NO. 136:

What average DSL/broadband penetration rate does Frontier expect to achieve: (1) in its current service areas by the end of 2013, and (2) in the Verizon's service areas it is acquiring by the end of 2013?

Response:

Applicants assert Objection Nos. 3, 7, 9, 10 and 12. Subject to and without waiver of the objections, Applicants respond as follows:

Frontier's broadband availability in its existing footprint is approximately 92%. Continued deployments are based on market conditions and factors, not on a set plan to hit availability levels by year. As such, Frontier does not currently have a 2013 goal for its existing properties. Within the transferred Verizon service area, Frontier anticipates being at approximately 85% availability (up from the current 62%) by the end of 2013.

Prepared By: Cassandra Guinness

Date: December 3, 2009

Witness: To be determined

Line Density in Verizon Service Territory in Washington

Data Source	Number of Lines or Residences	Density (total area: 10,421 sq miles)
Total number of residential and business lines as of Dec 2008 (Response to Public Council Data Request #4,5,6,46 Attachment)	546,320	52.4
Number of lines served by Verizon as of Dec 31, 2008 (Joint Petition, p.5)	578,000	55.5
Number of residence locations as of Dec 2008 (Response to Public Council Data Request #286)	732,085	70.3

UTC STAFF DATA REQUEST NO. 142:

At page 73, lines 8 through 14, of his rebuttal testimony, Mr. McCarthy states that Frontier cannot accept the Staff's recommended condition that Frontier must waive early termination charges for bundled and HSI services. Mr. McCarthy states that because Frontier commits to maintain Verizon service rates and to honor customer contracts, there is no reason to waive early termination fees.

- a. Will Frontier re-brand the Verizon bundled and HSI services after the close of the transaction, or will they services still be provided under the Verizon brand?
- b. Will any services within the various bundles of services presently offered by Verizon Northwest be changed to different service providers, such as the long distance component of a service bundle?

Response:

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

- a. Yes, per the terms of the merger agreement, Frontier will rebrand the Verizon services after close of the transaction.
- b. The majorities of services within the various bundles are provided directly by Verizon Northwest and will be transferred to Frontier at close. With the exception of certain enterprise accounts, long distance service offered by Verizon within the Verizon Northwest territory will be transferred to Frontier and be provided at the same rates, terms and conditions by New Communications Online and Long Distance. Other than the name change, the long distance transfer should be transparent to end users.

Prepared By: Cassandra Guinness

Date: December 4, 2009

Witness: To be determined

Docket UT-090842
UTC Staff Data Request Nos. 140-143 to Verizon and Frontier
December 4, 2009

UTC STAFF DATA REQUEST NO. 140:

On page 83 of Daniel McCarthy's rebuttal testimony, Mr. McCarthy states Frontier's agreement to provide a one-time \$75 credit to customers that fail to receive the appropriate discount, credit, or waiver of deposit, within the first bill cycle after application. However, Mr. McCarthy proposes a modification that the application must be received more than 10 days before the bill cycle for the discount, credit, or waiver of deposit to apply to that bill cycle (otherwise the discount, credit, or waiver would apply to the second bill cycle after the application).

- a. Does Mr. McCarthy mean 10 calendar days or 10 business days?
- b. Would the 10 day limitation apply only to existing customers who apply for WTAP rates and discounts, or would it also apply to consumers seeking to initiate new service? If it would apply to new customers as well as existing customers, please explain why.

Response:

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

- a. Mr. McCarthy meant 10 business days.
- b. The 10-day limitation would apply to existing customers. For new customers, the billing cycle can be established during the initial customer contact to ensure that any and all credits are appropriately reflected on the initial bill.

Prepared By: Cassandra Guinness
Date: December 4, 2009
Witness: To be determined

UTC STAFF DATA REQUEST NO. 141:

At the top of page 82 of his rebuttal testimony, Mr. McCarthy talks about the hours that the DSHS WTAP office is open, and states that the company cannot do a three-way call outside those hours. Would Frontier agree to verify the customer's eligibility during the next opportunity (i.e., when the DSHS next opens for business)? For instance, if a customer called for WTAP after DSHS hours, would the company agree to verify eligibility on the next business day? If the customer called Frontier before DSHS hours, would the company agree to verify on that day?

Response:

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

Frontier agrees to verify the customer's eligibility during the next opportunity.

Prepared By: Cassandra Guinness

Date: December 4, 2009

Witness: To be determined