

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of Verizon Communications Inc. and Frontier Communications Corporation For An Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.

Docket No. UT-090842

PUBLIC COUNSEL'S RESPONSE TO JOINT APPLICANTS
DATA REQUEST NO. 124

Request No: 124
Directed to: Public Counsel
Date received: November 4, 2009
Prepared by: Barbara R. Alexander
Date prepared: November 12, 2009

Joint Applicants Data Request No. 124

On page 10 of Ms. Alexander's testimony, she states "nor can it be said that [Spinco's post-closing operating] systems will be the same as those currently in place." Please identify each way in which the operating system will not be the same as those currently in place, and the bases for that identification.

RESPONSE:

Ms. Alexander's statement reflects her understanding that Verizon's systems are not the same as the systems currently used by Frontier in other states because Frontier's systems are proprietary to its own operating systems and Verizon's systems in Washington are those that were transferred from its former GTE companies, as updated by Verizon since that transfer. Ms. Alexander has not evaluated the details of either system.