

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. 84

Request No: 84  
Directed to: Public Counsel  
Date received: November 4, 2009  
Prepared by: Trevor R. Roycroft  
Date prepared: November 12, 2009

**Joint Applicants Data Request No. 84**

Identify all telecommunications asset transfer transactions that Mr. Roycroft is aware of that he believes introduced a "substantial degree of risk" and thus required the imposition of conditions to address risk.

**RESPONSE:**

Public Counsel objects to this request as unclear and burdensomely broad; the term, "asset transfer transaction," is not defined and is overly broad. Without waiving this objection, public counsel provides the following response:

Each of the telecommunications merger transactions that Dr. Roycroft has addressed in docketed proceedings has introduced a substantial degree of risk. However, each transaction had unique risks that required varied responses to mitigate the risks.