

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. 87

Request No: 87
Directed to: Public Counsel
Date received: November 4, 2009
Prepared by: Trevor R. Roycroft
Date prepared: November 12, 2009

Joint Applicants Data Request No. 87

Does Dr. Roycroft believe that the performance levels observed with Verizon's existing systems are or are not a good indicator of the performance that can be expected from the replicated system? Please explain.

RESPONSE:

Dr. Roycroft does not believe that the performance of the existing systems is a good indicator of the performance of the replicated systems. Please see the Direct Testimony of Trevor R. Roycroft, PhD., Exhibit No. __ (TRR-1HCT), at page 31.