

Docket No. UT-090842  
Verizon and Frontier Responses to Public Counsel Data Request Nos. 390-452  
December 1, 2009

**RE: Rebuttal Testimony of Timothy McCallion**

**PUBLIC COUNSEL DATA REQUEST NO. 394**

Please refer to Exhibit No. \_\_ (TM-2HCT), p. 6, lines 10-12. Please list all of the “areas” in Washington “where Verizon has not targeted investment for broadband deployment.” Please provide supporting documentation as well as Frontier’s capital expenditure plans over the next five years for each area.

**Response:**

Without limitation of the other General Objections, Applicants assert Objection Nos. 7 and 8. Subject to and without waiver of the objections, Verizon responds as follows:

Verizon has not targeted investment in Washington for broadband deployment except where it has existing, unfulfilled obligation to deploy FiOS.

Prepared By: James Miggans

Date: December 1, 2009

Witness: To be determined