

Docket No. UT-090842

Verizon and Frontier Responses to Public Counsel Data Request Nos. 504-514

January 13, 2010

**PUBLIC COUNSEL DATA REQUEST NO. 509:**

**Re: Additional broadband deployment**

William Weinman states in his testimony supporting the Proposed Settlement Agreement, that “Staff believes that the FCC may require [the applicants to provide 100 percent broadband capability] for this transaction.” What additional (approximate) costs would Frontier incur to provide 100 percent broadband capability to Washington customers within three years of the closing (as was required of CenturyLink in the CenturyTel/Embarq transaction)?

**Response:**

Applicants assert Objection Nos. 3, 7, 8, 10 and 12. Subject to and without waiver of the objections, Applicants respond as follows:

Frontier has not modeled or determined costs to provide 100 percent broadband in Washington or any other state.

Prepared By: Cassandra Guinness

Date: January 13, 2010

Witness: To be determined