

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUEST

DATE PREPARED: January 11, 2010  
DOCKET: UT-090842  
REQUESTER: Public Counsel

WITNESS: William H. Weinman  
RESPONDER: William H. Weinman  
TELEPHONE: (360) 664-1109

**REQUEST NO. 23: Re: Testimony of William H. Weinman in Support of the Settlement Agreement.**

Regarding physical due diligence, please:

- a. Provide the information that Staff receiving showing that the transaction should not be denied because Frontier “has not done enough to investigate the condition of the plant it is acquiring or to determine whether its own projections are realistic given the many risks the Company identifies” (Exhibit No. \_\_\_ (WHW-1T), p. 5, lines 25-28).
- b. Indicate where and/or how Frontier has shown that it has done the “operational due diligence of Verizon NW plant” necessary for it to “ascertain its ability to deploy broadband services in the more rural exchanges” (Exhibit No. \_\_\_ (WHW-1T), p. 14, line 22 through p. 15, line 8).

**RESPONSE:**

Frontier witness, Mr McCarthy, speaks to due diligence efforts taken by Frontier beginning on p. 29, line 9 through p. 30, line 10. He describes the due diligence taken by Frontier for this transaction and the use of computer files to analyze Verizon NW plant. Staff accepts the company assertions but has also reviewed other data to come to the conclusion Frontier has appropriately analyzed the plant. The following is an example of plant data relied on by Staff needed to determine that settlement is in the public interest:

1. Response to UTC Staff’s data request No. 101 indicates that all of Verizon’s GTD 5 switches are utilizing the most current generic upgrades
2. Verizon’s (Highly Confidential) response to Public Counsel’s data request No. 287 responds to competitive cable television services in Verizon’s service areas.
3. Verizon’s (Highly Confidential) response to Public Counsel’s data request No. 324 gives a detailed response to the DSL information request.
4. Staff has also reviewed Verizon’s trouble index and finds the company is meeting Commission standards.

The data responses are examples of information obtained by the various parties that has led Staff to conclude Frontier has done an adequate job reviewing Verizon’s Washington plant.