

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSES TO DATA REQUEST

DATE PREPARED: January 7, 2010

DOCKET: UT-090842

REQUESTER: Public Counsel

WITNESS: William H. Weinman

RESPONDER: William H. Weinman

TELEPHONE: (360) 664-1109

**REQUEST NO. 4: Please reference the Testimony in Support of Settlement Agreement of William H. Weinman, Exhibit No. \_\_\_\_ (WHW-6T), p. 2, ll. 18-19.**

Here Mr. Weinman states that “Verizon has made a considerable effort to define and scrutinize the replication of its computer systems and the migration of those systems to Frontier.”

- a. Please identify the basis for Mr. Weinman’s statement, and provide all supporting documentation.
- b. Please explain how Mr. Weinman was informed by Verizon of its efforts associated with the definition and scrutinization of the replication of its computer systems, and provide copies of all documents reviewed by Mr. Weinman associated with Verizon’s efforts.
- c. For each item reviewed by Mr. Weinman, please provide the date it was received from Verizon or Joint Applicants, and indicate whether Mr. Weinman’s review of the information occurred before after Mr. Weinman’s November 3, 2009 direct testimony (Exhibit No. \_\_\_\_ (WHW-1T)) was filed.

**RESPONSE:**

- a. For the basis of Mr. Weinman’s statement, please refer to Mr. Williamson’s testimony dated November 3, 2009, as well as Verizon and Frontier responses to Staff Data Requests 104-106, 114-121; Comcast Data Requests 18, 22; Public Council Data Requests 20, 28, 29, 30, 62, 84, 86, 87, 89, 183 and all others that may pertain to OSS; the Realignment Overview dated August 20, 2009, and the Systems Overview and Update dated October 2009, both of which were provided in response to PC-3 above. Also see Stipulation among parties Frontier, Verizon, Staff for the Public Utility Commission of Oregon, the Citizens’ Utility Board of Oregon, XO Communications Services, Integra Telecom of Oregon (on behalf of itself and affiliates Eschelon Telecom of Oregon, Electric Lightwave, Advanced Telecom, Oregon Telecom, and Unicom) TW Telecom of Oregon, Covad Communications Company, McCleodUSA Telecommunications Services (d/b/a PAETEC Business Services) and 360 Networks, in Public Utility Commission of Oregon Docket UM 14331 (12-03-09); and Stipulation and Recommendation – Joint Applicants, Staff, and the Office of the Ohio Consumer’s Counsel” (December 7, 2009), and Settlement Agreement between Comcast Phone and Frontier Communications Corporation and Verizon (December 7, 2009) in Public Utilities Commission of

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Ohio case No. 09-454-TP-ACO.

- b. See response to PC-4a above.
- c. See response to PC-3 and PC-4a above. Mr. Williamson and/or Mr. Weinman reviewed all of the above as they were received or became publicly available.