

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  
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**REQUEST NO. 8: Please reference the Testimony in Support of Settlement Agreement of William H. Weinman, Exhibit No. \_\_\_ (WHW-6T), p. 6, l. 1 to p. 7, l. 9.**

Please explain how each of the finance conditions there listed will be affected if Frontier were to enter bankruptcy.

**RESPONSE:**

**Objection: Assumes facts not in evidence.** There is no evidence that Frontier is at risk of bankruptcy. The finance conditions are not intended to “ring fence” the operating company against possible inclusion in a Chapter 11 reorganization involving the parent company. As Mr. Weinman stated in his testimony, because of the way telecommunications companies are structured with operating companies obtaining many of their administrative and overhead services from the parent company, ring fencing of the sort discussed in the energy industry is simply not realistic in the telecommunications industry.