

Exhibit No. ____ (JYR-3)
Docket UT-090842
Witness: Jing Y. Roth

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

DOCKET UT-090842

**FRONTIER COMMUNICATION
CORPORATION AND VERIZON
COMMUNICATIONS, INC.**

**for Approval of Indirect Transfer of
Control of Verizon Northwest, Inc.**

EXHIBIT TO

TESTIMONY OF

JING Y. ROTH

STAFF OF

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Verizon and Frontier Response to UTC Staff Data Request No. 72

November 3, 2009

Docket No. UT-090842

Verizon and Frontier Responses to UTC Staff Data Requests Nos. 31-73

August 19, 2009

DATA REQUEST NO. 72:

During the meeting on June 10, Staff learned that the cost model currently used by Verizon in support of its various filings before the Commission will be replaced with the cost model(s) used by Frontier. Please identify the cost model(s). Please provide any information and documentation.

Response:

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

The forward-looking cost proxy model Frontier Communications uses when computing UNE costs by study area on a TELRIC basis is the CostPro Loop Model licensed from CostQuest Associates, Inc. The CostPro Loop Model calculates the incremental investment required for various components of local loop facilities. These investments serve as inputs to the calculation of Total Service long Run Incremental Cost (TSLRIC) and Total Element Long Run Incremental Cost (TELRIC). At its core, CostPro Loop is a “spatial” model in that it determines where customers are located and “lays” cable along the roads of that wire center. Serving areas are determined for a wire center based on a Minimum Spanning Road Tree (MSRT) algorithm. Simply, the MSRT is the shortest road path that connects customer locations. The model requires user inputs for all of the serving addresses of all its customers and geocodes these addresses along with the existing ILEC central office locations in order to form the basis for the forward-looking network plant design. Once a network design is complete by the model, the model proceeds into the network configuration process, followed by the investment process followed by the summary and reports process. Specific details on the CostPro Loop Model are contained in the CostPro Wireline Loop Model User Guide and the Cost Pro Wireline Loop Model Methodology Manual.

Prepared By: Cassandra Guinness

Date: August 19, 2009

Witness: To be determined