

Exhibit No. ____ (JYR-4)
Docket UT-090842
Witness: Jing Y. Roth

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

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

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

DOCKET UT-090842

EXHIBIT TO

TESTIMONY OF

JING Y. ROTH

STAFF OF

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Verizon and Frontier Response to Public Counsel Data Request No. 248

November 3, 2009

Docket No. UT-090842

Verizon and Frontier Responses to Public Counsel Data Request Nos. 246-249

September 10, 2009

PUBLIC COUNSEL DATA REQUEST NO. 248:

Identify any Verizon residential service plans or promotional offerings that obligate customers subscribed to such plan, or receiving such offering to subscribe to Verizon's service for a particular period of time and, for each such plan or offering:

- (a) Indicate whether such customers are obligated to pay Verizon an early termination fee or other charge if they terminate service with Verizon prior to the expiration of the applicable time period;
- (b) For any early termination fees or other charges identified in response to this request, provide the amount of the fee or charge applicable and any policy or program that reduces the amount of the fee or charge over time (*i.e.*, proration); and,
- (c) Indicate whether such early termination fees or other charges will be waived for customers subscribed to such residential service plans or promotional offerings who elect not to transition or migrate to Frontier's service at, or after, the closing of the proposed transaction or otherwise terminate service with Verizon prior to the closing.

Response:

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

Beginning June 21, 2009, a minimum 12-month term is required for all discounted Verizon bundles that include Regional Value or Regional Essentials along with a qualifying unlimited long distance calling plan and Verizon Online Broadband. No minimum term is required for bundles that do not include Verizon Online Broadband.

- (a) Customers are only obligated to pay an early termination fee if they decide to choose a discounted offer with a 12-month term and then cancel either the voice or broadband service portion of the bundle after the first month but before the completion of the term contained in the offer.
- (b) The early termination fee is \$120.
- (c) Verizon and/or Frontier will honor the terms of their contracts with customers.

Prepared By: James Miggans and Cassandra Guinness

Date: September 10, 2009

Witness: To be determined