

ATTACHMENT 11

**Verizon NW's September 3, 2004,
Response to Staff Data Request No. 277
(Confidential documents are excluded)**

Regarding Staff Data Request No. 277:

Verizon NW has asked Staff to refine its request. Staff is willing to do so, as follows:

Without waiving any right to seek further documents under this data request, Staff would ask that the Company provide, from the universe of documents covered by Staff Data Request No. 277 as written, supply:

- 1) any document that mentions directory operations, and
- 2) a list of the documents responsive to Staff Data Request as written that are not being produced under item 1).

A non-exclusive list of examples of the meaning of "mention" for purposes of Item 1) include: described in writing in text, or in a dollar figure, or identified in an omitting phrase, such as "this value does not include directory operations."

RESPONSE: Verizon continues to object to this question because it seeks information that is not relevant to this adjudicatory proceeding. In addition, the modified request is unduly burdensome and onerous as it would require Verizon to review each and every document associated with the Hawaii sale, which are voluminous. Without waiving the foregoing objection, Verizon responds as follows.

Verizon assumes the purpose of the request is to ascertain the valuation of the directories business in the Hawaii sale. Verizon did not structure the sale offering so as to assign a particular value to that portion of the business that was sold by Verizon Corporation. The buyer paid a single amount for all of the Hawaii ventures of Verizon Corporation that included the ILEC operations, Verizon Internet Services, Inc., (a separate Verizon subsidiary), Verizon Long Distance (a separate Verizon subsidiary) and Verizon Information Services (VIS) (a separate subsidiary that included the directories operation). Verizon does not know how the buyer valued each of these business units in Hawaii in calculating the purchase price. There has been no allocation of the purchase price for each business unit involved in the Hawaii sale.

Attached hereto are two documents. Confidential Attachment 277a is the portion of an internal Verizon Management presentation concerning this sale dated December 2003 as it pertains to VIS. Confidential Attachment 277b is the VIS segment reporting information that was provided to all potential buyers so they could formulate their assessment of the offer.

Prepared by: Gregg Diamond

Date: September 3, 2004

Witness: n/a

Confidential Attachment 277a

(Confidential per Protective Order in WUTC Docket No. UT-040788)

[Not provided in this motion]

Confidential Attachment 277b

(Confidential per Protective Order in WUTC Docket No. UT-040788)

[Not provided in this Motion]