

**Exhibit No. \_\_\_\_ (RTA-2)**  
**Docket UT-090842**  
**Witness: Rick T. Applegate**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Joint Application** )  
**of** )  
 )  
**FRONTIER COMMUNICATION** ) **DOCKET UT-090842**  
**CORPORATION AND VERIZON** )  
**COMMUNICATIONS, INC.** )  
 )  
**for Approval of Indirect Transfer of** )  
**Control of Verizon Northwest, Inc.** )

**EXHIBIT TO**  
**TESTIMONY OF**  
**RICK T. APPLGATE**  
**STAFF OF**  
**WASHINGTON UTILITIES AND**  
**TRANSPORTATION COMMISSION**

*Verizon Response to Comcast Data Request No. 19*

**November 3, 2009**

Docket No. UT-090842

Verizon Responses to Comcast Data Requests Nos. 1-57

August 13, 2009

**DATA REQUEST NO. 19:**

Please describe all efforts Verizon will take to test, measure, and ensure that the Verizon Northwest Inc. operations support systems (“OSS”) functionality, performance, and electronic bonding will be seamlessly migrated to Frontier and will remain at least at the same level of quality as Verizon Northwest Inc. currently provides them. Please include in your response (a) the extent to which any independent third parties will be used to oversee testing and certification to ensure that replicated OSS systems are working properly prior to close; and (b) whether current billing account numbers, login IDs or passwords used in Verizon territories will change in any way.

**Response:**

Applicants assert Objection Nos. 3, 6, 7, 8, 10. Subject to and without waiver of its objections, Verizon responds as follows:

Verizon will take numerous steps to confirm that the Verizon Northwest Inc. operations support systems (“OSS”) functionality, performance, and electronic bonding will be migrated to Frontier and will remain at least at the same level of quality as Verizon Northwest Inc. currently provides them. Frontier will also have the opportunity to confirm that such systems are in operation prior to closing.

Verizon will develop system readiness acceptance criteria to ensure that the separate instance created for Spinco will perform in a like manner as it did before close. Systems will not be transferred unless Frontier is reasonably satisfied that the condition to the closing of the Merger Agreement has been met.

No independent third parties will be used to oversee testing and certification to ensure that replicated OSS systems are working properly prior to close. This is not necessary because the separate instance developed for Frontier is not the creation of a new system or processes. Rather, it is the equivalent of basically cloning the existing proven systems which eliminates new system debugging issues.

Current end-user billing account numbers will remain the same. However, for security reasons, certain login IDs and passwords to access the systems may be changed, and any such change will be conducted in consultation with Frontier.

Prepared By: James Miggans

Date: August 13, 2009

Witness: To be determined