**Exhibit No. \_\_\_ (SLS-2)**

**Docket UT-090842**

**Witness: Suzanne L. Stillwell**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|  |  |
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| **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**

**SUZANNE L. STILLWELL**

**STAFF OF**

**WASHINGTON UTILITIES AND**

**TRANSPORTATION COMMISSION**

***Verizon and Frontier Responses to Public Counsel***

***Data Request Nos. 220 and 221***

**November 3, 2009**

**PUBLIC COUNSEL DATA REQUEST NO. 220:**

Please reference Verizon’s response to Public Counsel Data Request No. 26. Please explain whether each of the consumer ordering centers and business mass markets ordering centers identified in the response will be transferred to Frontier following the close of the merger.

**Response:**

Applicants assert Objection Nos. 1,3,7,9,10,12. Subject to and without waiver of the objections, Verizon responds as follows:

With reference to Public Counsel Data Request No. 26, the realignment plan has not been finalized. It is contemplated that Verizon consumer ordering centers that will be transferred to Frontier following the close of the merger are expected to include: Everett, Washington; Marion, Ohio; and Fort Wayne, Indiana.

Verizon business mass market ordering centers that will be transferred to Frontier following the close of the merger are expected to include: Marion, Ohio and Fort Wayne, Indiana.

Prepared By: James Miggans

Date: August 24, 2009

Witness: To be determined

**PUBLIC COUNSEL DATA REQUEST NO. 221:**

Please identify the location of all call centers to which a Washington consumer contacting Frontier’s business office could be routed following the close of the merger.

**Response:**

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

The realignment plan has not been finalized. Following the close of the merger, calls may be routed, among other locations, to the consumer ordering centers and business mass market ordering centers identified in response to Data Request No. 220.

Prepared By: James Miggans and Cassandra Guinness

Date: August 24, 2009

Witness: To be determined