

ATTACHMENT C

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

VERIZON NORTHWEST INC.,

Respondent.

) Docket No. UT-040788

)
) DECLARATION OF DALE
) CHAMBERLAIN

Dale Chamberlain states and declares as follows:

1. I am Assistant General Counsel for Verizon Communications Inc. My business address is Verizon, 600 Hidden Ridge, PO Box 152092, Irving, TX 75015-2092.

2. I am the Verizon transactional attorney responsible for the sale of the Verizon Hawaii properties that were sold as a combined package.

3. I have reviewed Verizon's response to Staff Data Request No. 277 and it is true and accurate. Specifically, I know that Verizon had no separate evaluation of, and determined no independent value for, the directory operations included in a Hawaii sale; such operations were part of the aggregate operations sold for a specific price to the purchaser. The offer accepted by Verizon for the total Verizon properties was a single amount without any indication, direct or indirect, as to the buyer's assessment of the value of any individual piece part of the properties being sold, such as the Verizon Hawaii directory operations.

4. Verizon is not privy to, nor can it determine, how the buyer arrived at its sales price, or how the directory operations was included in that determination.

5. I know of no document that individually evaluates the value of the directory operations of Verizon Hawaii.

6. Potential buyers were provided with financial and operational information pertaining to the Hawaii business operations.


7. Potential buyers were provided no information with respect to Verizon's Washington operations in any respect. There is no relationship between these operations and the Hawaii directory operations.

8. I am familiar with the documents associated with the Hawaii sale, maintained in a comprehensive data room. This data room contains over 5,800 documents associated with the sale. Many of the documents are not segregated by business unit or segment, so I cannot state the extent to which documents may contain information that directly or indirectly relates to the Hawaii directory operations.

9. It would be onerous and burdensome to identify every document related to the Hawaii sale.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.

DATED this 22nd day of September, 2004 at Irving, Texas.



Dale Chamberlain