

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

*In the Matter of the Joint Application of Verizon Communications Inc. and Frontier Communications Corporation For An Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.*

**Docket No. UT-090842**

**PUBLIC COUNSEL'S HIGHLY CONFIDENTIAL  
SUPPLEMENTAL RESPONSE TO JOINT APPLICANTS  
DATA REQUEST NO. 79**

Request No: 79  
Directed to: Public Counsel  
Date received: November 4, 2009  
Prepared by: Sarah Shifley  
Date prepared: November 12, 2009

**Joint Applicants Data Request No. 79**

On page 50 of Mr. Hill's testimony, he recommends that Verizon "contribute at least \$600 million to Frontier to assist with necessary capital spending in Washington." Please provide the methodology used by Mr. Hill to reach the \$600 million figure and provide all documents Mr. Hill used to devise the amount.

**RESPONSE:**

As confirmed during the November 5, 2009 telephone conversation between Verizon attorney, Gregory Romano, and Public Counsel attorney, Sarah Shifley, Mr. Hill is currently unavailable due to a medical emergency. Public Counsel cannot respond to this data request without consulting with Mr. Hill. Thus, Public Counsel is not providing a response and/or stating an objection to this data request at this time and cannot anticipate when it will be able to do so.

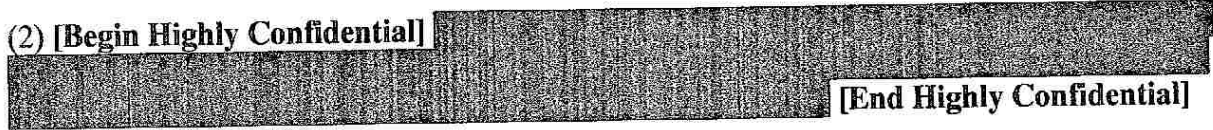
**HIGHLY CONFIDENTIAL SUPPLEMENTAL RESPONSE (11/24/09):**

Prepared by: Stephen G. Hill

On page 43 of his testimony, Mr. Hill cites **[Begin Highly Confidential]** [REDACTED]  
[REDACTED] **[End Highly Confidential]** which is approximately the same amount as the \$600 million recommended by Mr. Hill. This should be viewed as a relatively low recommendation with regard to a discount to the asking price for the Spingo assets, given that (1) the Verizon CEO has expressed his view that land-line telecom assets have very little value and

**[Public Counsel's Highly Confidential Supplemental Response to Joint Applicants Data  
Request No. 79]**

(2) **[Begin Highly Confidential]**



**[End Highly Confidential]**

(see HSR 4(c)(41)).