

**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 SUPPLEMENTAL RESPONSE TO JOINT APPLICANTS  
DATA REQUEST NO. 81**

Request No: 81  
Directed to: Public Counsel  
Date received: November 4, 2009  
Prepared by: Sarah Shifley  
Date prepared: November 12, 2009

**Joint Applicants Data Request No. 81**

On page 50 of Mr. Hill's testimony, he notes that the contribution "should be in addition to the \$40 million Verizon escrow account that Dr. Roycroft recommends." Did Mr. Hill conduct an analysis to determine whether the calculation used to produce Dr. Roycroft's proposed condition and Mr. Hill's proposed condition overlapped in any way? If so, please provide that analysis.

**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.

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

Prepared by: Stephen G. Hill

Mr. Hill has undertaken no such analysis.