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. 74

Request No:	74
Directed to:	Public Counsel
Date received:	November 4, 2009
Prepared by:	Sarah Shifley
Date prepared:	November 12, 2009

Joint Applicants Data Request No. 74

On page 32 of Mr. Hill's testimony, he states "there appears to have been very little vetting of the basic accounting assumptions or financial projections on which it is based." Please identify every basis for Mr. Hill's conclusion that is not outlined in his testimony.

RESPONSE:

It is Public Counsel's understanding that sufficient bases for Mr. Hill's statement are provided in his testimony and/or accompanying exhibits, or may be found in materials provided by the Joint Applicants through discovery in this docket. To the extent that an additional response to this data request is appropriate and/or available, Public Counsel will provide such as soon as possible per its response to Joint Applicants Data Request No. 54.

SUPPLEMENTAL RESPONSE (11/24/09):
Prepared by: Stephen G. Hill

Frontier has provided no indication, data or testimony indicating that it has undertaken any review of the Spinco "carve-out" process and, as Mr. Hill points out in his testimony, the accounting firm that indicates the Spinco financial statements meet FASB standards also states that those financial statements, which are based on allocations undertaken by Verizon management, are the "responsibility" of Verizon management.