

**BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

Petition of Comcast Phone of New Hampshire, LLC)	
d/b/a Comcast Digital Phone for Arbitration of)	
Rates, Terms and Conditions of Interconnection with)	DOCKET NO. DT 08-162
Kearsarge Telephone Company d/b/a TDS Telecom,)	
Merrimack County Telephone Company d/b/a TDS)	COMCAST RESPONSES TO FIRST
Telecom and Wilton Telephone Company, Inc. d/b/a)	TDS DATA REQUESTS
TDS Telecom Pursuant to the Communications Act)	
of 1934, as Amended.)	
)	

Comcast Phone of New Hampshire, LLC (“Comcast”) provides the following objections and responses to the First Set of Data Requests from Merrimack County Telephone Company, Wilton Telephone Company, Inc., and Kearsarge Telephone Company (collectively “TDS”).

As the Commission may be aware, Comcast affiliates are involved in similar arbitration disputes with TDS affiliates in Washington state, Indiana, Florida, Georgia, and Michigan. In each of these states (except Michigan), TDS has propounded similar burdensome and over-reaching discovery requests that seek information far beyond the narrow issues presented by one carrier’s request for interconnection with another. Comcast has objected to many of these as outside the scope of this proceeding. In Washington, the case that is furthest along at this point, the Hearing Officer affirmed the vast majority of Comcast’s objections. The responses provided below are consistent with Comcast’s responses in Washington.

I.

GENERAL OBJECTION

Comcast objects to TDS’s definitions and instructions to the extent that they seek to impose obligations exceeding those imposed by the Commission’s Rules and the New Hampshire Civil Rules. Specifically, Comcast objects to the definition of “Comcast” to include

affiliates who are not telecommunications carriers and who do not provide telecommunications services in New Hampshire. Comcast hereby incorporates these general objections into each of the specific objections and responses provided below.

II.

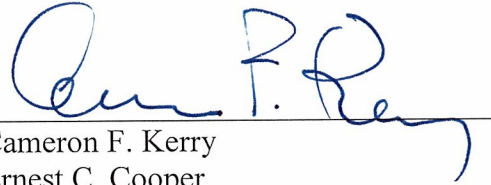
SPECIFIC OBJECTIONS AND RESPONSES

Dated this 27th day of January, 2009

As to objections,

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