

FairPoint Communications, Inc.
State of New Hampshire
Docket No. DT 07-011

Respondent: William E. King
Title: President, JSI Capital Advisors,
LLC and JSI Transaction
Advisors, LLC

REQUEST: Office of Consumer Advocate - Rebuttal

DATED: September 19, 2007

ITEM: OCA R-15 Provide all workpapers and notes generated by Mr. King or by others working for him during the review of the "NNE projections" and ultimate preparation of the testimony.

REPLY: **OBJECTION:** FairPoint objects to Data Request R-15 to the extent it seeks information protected from production by the attorney-client privilege and/or attorney work product doctrine. Subject to and without waiving these objections, FairPoint will produce non-privileged responsive information in its custody, possession or control. [Objection served September 25, 2007.]

Please refer to FairPoint Response OCA R-1 and documents produced therewith. Please also refer to CFPNH 3096 - CFPNH 3106, produced hereto under seal and pursuant to RSA 378:43 and the Protective Agreement and orders from the PUC in this Docket.

In addition, I relied upon the FairPoint financial projections that have been presented as Confidential Exhibit WL-3 to the Rebuttal Testimony of Walter Leach, the electronic version of the same provided previously in response to Data Requests Staff 1-118, Staff 1-119, Staff 1-95 (First Supplemental Response), OCA 1-114, OCA 1-115, OCA 1-35, and the attachments to his Rebuttal Testimony, as well as publicly available data.