

Number	Status	Request	Inadequate or Objection	Stated Objection	Purpose and Relevance of Request	Summary of Response Inadequacy
1-8	Finance	Please provide the estimates of all capital and expense costs to achieve the merger, as well as any acquisition premium paid for the FairPoint assets, and any portions allocated to the FairPoint entities.	Objection, inadequate response.	Not admissible evidence, not material to RSA evaluation, exceeds Commission authority.	Costs to achieve merger savings are key factors of the financial viability of a merger transaction. Capital and expense costs to achieve the merger are also material in determining merger financial results - a factor affecting future financial sustainability.	CCI has not provided the estimates of capital and expense costs to achieve the merger, as requested.
1-11	Finance	Please provide the projected impact of the merger savings and costs on depreciation and expenses of the FairPoint assets on a going-forward basis.	Objection.	Not admissible evidence, not material to RSA evaluation, exceeds Commission authority.	Merger savings and costs to achieve are key factors of the financial viability of a merger transaction. Merger savings and costs to achieve the merger are also material in determining merger financial results - a factor affecting future financial sustainability.	
1-12	Finance	Please provide the Credit Agreements for each portion of the transaction financing that has been arranged by Consolidated, as noted in Mr. Childer's testimony on page 7.	Objection.	Not admissible evidence, not material to RSA evaluation, exceeds Commission authority.	Transaction financing can have a material impact on financial viability following an acquisition, requiring its evaluation to determine post-acquisition financial viability. Consolidated describes the financing in its Application and touts interest savings anticipated, making the inquiry further relevant in addressing claims made in the application and supporting testimony. Financing covenants are also important regarding their impact on FairPoint in the future. Examining transaction financing comprises a central aspect in commission reviews of financial risk and capability.	
1-15	Finance	Please provide the reports, presentations and analysis prepared by Ernst & Young regarding net operating losses, as noted on page 9 of the Childers testimony.	Inadequate response.			Refer to page 9 of the Childers testimony: "We also performed extensive analysis with Ernst & Young on potential limitations or restrictions regarding \$300 million in Federal net operating losses." Require any and all analyses, as referenced.
1-17	Finance	Please provide all of the Consolidated analysis regarding the pledge of FairPoint assets by Consolidated that assesses the costs and risks involved to FairPoint.	Objection, inadequate response.	Not admissible evidence, not material to RSA evaluation, exceeds Commission authority.	The pledge of FairPoint's assets to secure CCI debt financing is an important consideration in the evaluation of the financial viability of CCI's merger Application. The pledge of FairPoint assets undoubtedly reduces the costs of CCI transaction financing, but at undetermined risks to FairPoint's financial status in the future.	CCI's response did not include any analysis of the risks involved with pledging the assets of FairPoint in its debt credit agreements.
1-18	Finance	Please provide all presentations and analysis prepared for Consolidated regarding credit facilities for FairPoint that could be arranged on a stand-alone basis.	Inadequate response.			On page 12 of the Joint Application, the following statement was made: "While FairPoint would hope that it could improve on the terms of its credit facility in the event FairPoint were to seek access to the credit market outside of the Transaction, it is unlikely that FairPoint could achieve the favorable rates that Consolidated has already secured. Consolidated's financing, in addition to providing certainty and lower risk, provides a better financial platform measured both against FairPoint's current facility and against FairPoint's likelihood of achieving such financing on a stand-alone basis in the future." The data request sought to determine the informational basis for statements that financing for FairPoint on a stand-alone basis is unlikely, a key consideration in the financial advantage of a CCI acquisition.
1-19	Finance	Please provide the financing agreements for all long-term debt funding for Consolidated that are currently in place.	Objection.	Broad, burdensome, not admissible evidence, not material to RSA evaluation, exceeds Commission authority.	CCT's existing credit agreements are only one or two documents, at most. CCI debt refinancing occurred on October 5, 2016, with credit agreements that are also related to the merger debt financing. The credit agreements consist of only one or two "off-the-shelf" documents. The request is neither broad nor burdensome. This request is specific to the Consolidated debt credit agreements, which contain the terms of agreements, as well as the various covenants that can be relevant to FairPoint. To provide just one example, cross-default provisions in Consolidated financings can have a negative impact on FairPoint. Examining the covenants of the Consolidated financing is important in assessing their impact on FairPoint and its financial viability in the future. Examining transaction financing covenants comprises a central aspect in commission reviews of financial risk and capability.	CCI's response does not address why FairPoint stand-alone financing is "unlikely".
1-23	Finance	Please provide all analyses of financial statistics and metrics for Consolidated vs. its "peer companies", as referenced by Mr. Childers in his testimony.	Inadequate response.			CCI's response to 1-23 referenced 1-9, which included peer comparison valuation metrics, but not peer comparison credit rating metrics.
1-25	Management	Please provide background and experience for all existing senior executives and managers (to the second level below officer) for: (a) the Consolidated parent, (b) each affiliated entity that provides services to an affiliated operating communications company that provides wireline services, and (c) each affiliated operating communications company that provides wireline services.	Objection	Relevance	Managerial capability is in material part a function of the background and experience of the executive and management team, making inquiry in to the area relevant for the parent, which will provide overall direction, and affiliates that serve operations with businesses like FairPoints. Examining how Consolidated has staffed its operating companies with operations like FairPoint is also relevant as an indicator of its view of what it takes to provide capable leadership at its operations.	
1-38	Management	Please explain the rationale for each currently proposed change in the boards of directors of (1) Consolidated, (2) all Consolidated subsidiaries expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire, and (3) all FairPoint boards expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire.	Inadequate Response			The answer does not address the requested "rationale"
1-40	Management	With respect to all Consolidated acquisitions of entities providing wireline communications services within the past 10 years, please explain how Consolidated modified within one year of acquisition board of director membership of (1) Consolidated, (2) all Consolidated subsidiaries expected to have a role in overseeing, managing or conducting operations of the acquired company, and (3) all boards of the acquired company having a role in overseeing, managing or conducting the operations of the acquired company.	Objection	Overly broad, burdensome, relevance	Boards of Directors are clearly directly and significantly material to management operation and effectiveness, making inquiry into their structure and operations (and into any differences Consolidated intends for FairPoint) one of the many relevant measures for addressing management capability. An inability to comprehend and provide for appropriate structure and operation would comprise a gap in management capability. Understanding the reason for and nature of the changes proposed by Consolidated is material to understanding its views about FairPoint's needs from a governance perspective, and therefore relevant to determining management capability.	
1-41	Management	Please provide all documents made or received by Consolidated or any of its affiliates or any third party engaged to examine, analyze, assess, or assist in the acquisition of FairPoint to the extent that such documents address either or both of the competitive landscape in New Hampshire or the effect of Consolidated's FairPoint acquisition on that landscape.	Objection	Relevance	Boards of Directors are clearly directly and significantly material to management operation and effectiveness, making inquiry into their structure and operations (and into any differences Consolidated intends for FairPoint) one of the many relevant measures for addressing management capability. An inability to comprehend and provide for appropriate structure and operation would comprise a gap in management capability. Understanding the reason for and nature of the changes proposed by Consolidated is material to understanding its views about FairPoint's needs from a governance perspective, and therefore relevant to determining management capability.	
1-42	Management	Please provide operational and financial details of the previous Consolidated acquisitions in the past 10 years, including, but not limited to, information about the size of company acquired, number of access lines, price, impact on debt, length to achieve integration, and treatment of employees.	Objection	Overly broad, burdensome, relevance	How well or poorly such acquisitions have occurred bear on the managerial capability of Consolidated, which capability should include integrating new operations, such as FairPoint without undue disruption or degradation. Moreover, determining the size of those prior acquisitions relative to the FairPoint acquisition bears upon how probative past experience is in judging Consolidated's ability to integrate FairPoint without undue disruption or degradation.	

1-46	Management	Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a pre-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.	Objection	Relevance	The response is disingenuous. The question did not ask which employees were valuable (i.e., have some utility), but which are "key." The term "key employee" has broad recognition in business - referring to particular employees or executives so core to business operation that their death, disability or absence could have major consequences. A material element in managerial competence (more fundamental than and therefore a part of "capability") is the identification and planning for the loss of such employees through proper succession planning (also a core element in demonstrating management competence). Inquiry into the executives and employees who will fit this definition pre- and post-acquisition is relevant to determining whether Consolidated exhibits the managerial capability necessary for its personnel to play intended roles in oversight and management of FairPoint's operations. The information also bears on technical capabilities, which are in part a function of the personnel who have material technical and operating responsibilities and accountabilities	
1-47	Management	Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a post-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.	Objection	Overly broad, burdensome, relevance	See 1-46	
1-48	Management	For all differences in FairPoint and subsidiary affiliates whose key/non-key status would change with the acquisition by Consolidated, please explain the reasons for the change.	Objection	Overly broad, burdensome, relevance	See 1-46	
1-49	Management	Please: (a) supply a list of key post-acquisition Consolidated and subsidiary and FairPoint and subsidiary employees as planned, (b) summarize their planned responsibilities and titles, (c) identify the entity now employing them if within a Consolidated or FairPoint entity now, and (d) identify those expected to be added from outside.	Objection	Overly broad, burdensome, relevance	See 1-46	
1-52	Management	With respect to existing Consolidated and FairPoint benefit and pension plans, please (a) describe all material differences, (b) describe whether and how specifically Consolidated plans to modify in the future their structure and levels or migrate them to structures seeking to bring plans of the two entities closer in harmony, (c) provide the expected schedule for such modifications, and (d) describe commitments in the Employee Matters Agreement related to maintaining current pension and benefit plans.	Objection	Overly broad, burdensome, relevance	The establishment and sound execution of appropriate benefit and pension plans comprises a central aspect of management competence. Moreover, management competence also requires a plan for ensuring that post-acquisition plans for benefits and pensions do not cause undue disruption to workforce stability.	
1-53	Management	Please provide a copy of the "proven playbook" referenced by Bob Udell in the December 5, 2016 Acquisition Analyst Webcast and Presentation.	Inadequate Response			The answer provides a brief summary of the "tenets" of the requested document, not the document. Consolidated has stated that no physical document/playbook exists, but the reference from the webcast indicates that something structured exists and can therefore be described if "proven" is an apt description
1-54	Management	Please provide a copy of all playbooks used in prior acquisitions announced within the past ten full years.	Inadequate Response			See 1-53
1-56	Management	Please provide a copy of the detailed analysis of the NH market conducted during due diligence, as referenced in the December 15, 2016 Analyst webcast.	Objection	Relevance	First just as such information is provided to analysts in order to respond to their interests in ensuring ability to thrive financially in newly entered markets, so it is relevant here in addressing financial capability. A major management challenge for Consolidated will be to thrive in its new markets, in recognition of the impacts that it will have on that market post-acquisition. Understanding what it has sought to learn and what it has learned about relevant markets bears on its managerial capabilities in at least two ways: (a) performing appropriate due diligence about the markets in which one will operate is a material element of management capability management, and (b) knowledge of the substantive information learned will bear on our assessment of how well management experience, structure, and other elements of "capability" comport with the requirements of operating in those markets. Moreover, a significant mismatch between management experience and the markets Hampshire has the potential for raising concerns about management readiness (an element of capability). Finally, an inability to have investigated or significant gaps in ability to respond to that landscape may prove root causes of future financial capability issues.	
1-58	Management	Describe and provide copies of all reports and other documents reflecting all Consolidated reviews or analyses of the adequacy of FairPoint's current level of staffing for conducting its operations in New Hampshire (including personnel in and supporting New Hampshire).	Inadequate Response			The question asked for documents about certain activities; the response indicated performance of such activities, provided scant discussion of them, and did not request documents
1-62	Management	Please provide organization charts that depict changes in the structure of the holding company and each other utility entity since year start 2007.	Objection	Overly broad, burdensome, relevance	The evolution in the structure of Consolidated as it has grown is material in determining its capacity to grow as the scope of its operations have. The growth contemplated by this acquisition is massive, making it proper to examine how well Consolidated has demonstrated the managerial and technical competence to adjust its overall organization in response to growth.	
1-63	Management	For each executive level committee or other regularly meeting group of executives at the parent or Consolidated, please provide: (a) its purpose and objectives, (b) its regular meeting schedule, and (c) charters, policies, procedures, and other governing documents.	Objection	Overly broad, burdensome, relevance	How and by whom Consolidated executives will carry out their oversight and management of FairPoint comprises a material element of managerial and technical capability. The information requested bears directly on how and by whom Consolidated now performs this function for its existing operations, which makes the information a key point of departure in assessing whether what it proposes for FairPoint post-acquisition demonstrates sound managerial and technical capability.	
1-64	Management	Please: (a) identify all reports regularly provided to CCHI and Consolidated executives, to the extent they specifically address Consolidated plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than six months (or most recent available).	Objection	Overly broad, burdensome, relevance	See 1-63	

1-65	Management	Please provide documentation describing the governance structure, policies, procedures, and other governing documents related to all enterprise and operating risk programs at CCHI and Consolidated.	Objection	Overly broad, burdensome, relevance	Enterprise Risk Management comprises a central element of effective management, making inquiries into how Consolidated performs it and intends to perform it post-acquisition a material aspect of examining its management competence. The absence of effective governance structure, policies, and procedures for risk management would bear materially on the formation of overall judgments about Consolidated's capabilities as relevant here. The prestigious US Committee Of Sponsoring Organizations Of Treadway Commission (COSO) operates as a joint initiative of five leading financial, accounting, and auditing private sector organizations. It has for years taken a lead role in establishing best practice in a wide variety of areas, including enterprise risk management, which it addressed well over ten years ago. COSO defines risk management in a manner that makes clear its direct and compelling connection to financial, managerial, and technical capability, calling it "a process, effected by an entity's board of directors, management and other personnel, applied in strategy setting and across the enterprise, designed to identify potential events that may affect the entity, and manage risks to be within its risk appetite, to provide reasonable assurance regarding the achievement of entity objectives. COS has divided the enterprise risk management processes as incorporating eight components: (1) internal environment, (2) objective setting, (3) event identification, (4) risk assessment, (5) risk response, (6) control activities, (7) information and communication, and (8) monitoring.	
1-66	Management	Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for Consolidated, CCHI, and any higher-level groupings into which they are rolled up for each of the past five full years.	Inadequate Response			Only the <b>Bolded</b> portions following provided, leaving the <u>underlined</u> ones missing provide all <b>vision and mission statements, values statements, strategic and operational plans, and similar documents.</b>
1-67	Management	Please provide: (a) the goals and objectives for Consolidated, CCHI, and any higher-level groupings into which they are rolled up for each of the past five full years, (b) the metrics used to measure success in achievement of those goals and objectives, and (c) samples of each no older six months (or most recent available).	Objection	Overly broad, burdensome, relevance	The establishment of comprehensive and appropriate corporate goals and measurement of progress against them comprise fundamental elements of competent management. Goals at the highest levels of the Consolidated corporate hierarchy (i.e., all those entities whose executives, managers, and resources would have material roles in overseeing and managing FairPoint activities clearly have relevance in determining whether those goals: (a) have a structure and measurement system appropriate for FairPoint oversight and management, and (b) establish targets appropriate for ensuring effective financial, managerial, and technical operation. Effective goals and measurements are targeted and specific, making their expression and therefore their provision neither vast nor burdensome. A review of the information requested is material to determining what Consolidated's experience may augur for its oversight and management of FairPoint.	
1-70	Management	Please describe the nature, staffing, operation, and work products of each group at the holding company, service company, or other level which has as a defined part of its responsibilities the examination of: (a) the effectiveness and efficiency of the performance of functions by the service company, (b) the efficiency and effectiveness of operations at communications subsidiaries providing wireline services, or (c) benchmarking best practices among the affiliates or in comparison to their peers in the industry.	Objection	Overly broad, burdensome, relevance	Effective performance assessment and benchmarking comprise material elements of management effectiveness and therefore its capability. Inquiries into how and how well Consolidated measures effectiveness and efficiency thus bear directly on its managerial and technical capability. Moreover, to the extent that measurement and benchmarking have occurred the results may bear directly on assessing managerial, technical, and perhaps even financial capabilities.	
1-71	Management	Please provide statistics used to monitor and assess turnover at the summary and at the most-detailed level available within Consolidated.	Objection	Overly broad, burdensome, relevance	Effective measurement of turnover and addressing its consequences are important elements of management and technical capability, even if turnover has not produced operational problems. Moreover, a history of excessive turnover would clearly bear on management's capability to maintain levels and types of resources. necessary to provide service	
1-73	Management	Please provide for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing: (a) a description of the executive and management succession programs, (b) an identification of the levels/positions covered, and (c) a current version of plans showing potential successors and their development needs and plans.	Objection	Overly broad, burdensome, relevance	Effective succession planning programs are a central element of management effectiveness. The failure to perform them effectively would demonstrate a lack of basic management competence. Thus, examining Consolidated entities that would engage on such matters as they would affect FairPoint post-closing is material to assessing management and technical competence	
1-74	Management	Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing (and provide the associated documents addressing execution of) responsibilities for planning and administering salary, wage, and benefits programs at the Consolidated.	Objection	Overly broad, burdensome, relevance	Effective planning and administering of salary, wage, and benefits programs are a central element of management effectiveness. The failure to perform them effectively would demonstrate a lack of basic management competence. Thus, examining Consolidated entities that would engage on such matters as they would affect FairPoint post-closing is material to assessing management and technical competence	
1-75	Management	Please list and describe the principal systems, processes, and tools used to assure a reasonable and consistent wage and salary program for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing.	Objection	Overly broad, burdensome, relevance	As with the organizations involved (described under question 1-74), the systems, processes, and tools for administering a wage and salary program bear on managerial and technical competence.	
1-76	Management	Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing: (a) where responsibility will lie for analyzing, setting, and approving executing wage and salary policies and procedures, and (b) how and on what time cycles that responsibility will be exercised.	Objection	Overly broad, burdensome, relevance	The applicants have addressed continuity of management and employment at FairPoint. How and by whom executive compensation is set bears on the likelihood of retention of personnel.	
1-77	Management	Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing the principal recruitment programs and activities for bargaining unit and entry level exempt personnel.	Objection	Overly broad, burdensome, relevance	The maintenance of management and technical capability depend heavily on recruitment and acquisition of personnel, making inquiry into who will have responsibility material.	
1-78	Management	Please describe the organization structure and resources of the groups responsible for labor relations for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing.	Objection	Overly broad, burdensome, relevance	Effective management of labor relations is a crucial element of effective management, making inquiry into the location and resources of the function a central element of demonstrating managerial and technical competence.	

1-83	Technical	<p>Please provide Consolidated's assessment of the efficiency and quality of FairPoint's network in New Hampshire as a result of its due diligence analysis. Specifically, please:</p> <p>a. List in detail any areas of network or service quality concern that Consolidated identified, including for each deficiency or problem identified:</p> <ol style="list-style-type: none"> <li>i. Consolidated's plans to resolve the deficiency or problem</li> <li>ii. The estimated investment and timeline of expenditures required to resolve the deficiency or problem</li> </ol> <p>b. Provide all documentation and performance measurement results Consolidated reviewed to arrive its conclusions, including, but not limited to, the following areas:</p> <ol style="list-style-type: none"> <li>i. Service ordering</li> <li>ii. Service provisioning</li> <li>iii. Maintenance and repair</li> <li>iv. Billing</li> <li>v. Network blocking</li> </ol> <p>c. Provide the observed values of all indices or measurements used</p> <p>d. State what Consolidated considers adequate performance values for the indices or measurements reviewed</p>	Objection	Burdenome, relevance, exceeds Commission authority	Consolidated's ability to draw reasonable conclusions about FairPoint's network and service quality from its due diligence analysis requires both knowledge of the appropriate information to seek and the ability use that information correctly, which are important indicators of technical capability. Moreover, any conclusion from such an analysis that identifies significant network or service quality concerns that Consolidated will need to address through significant investment is relevant to assessing Consolidated's financial capability to maintain FairPoint's obligations.	
1-84	Technical	Please provide Consolidated's assessment of the need for investment in new technology in FairPoint's network.	Objection	Overly broad, vague, relevance, exceeds Commission authority	Consolidated's ability to draw reasonable conclusions about the need for new technology in FairPoint's network from its due diligence analysis requires both knowledge of the appropriate information to seek and the ability use that information correctly, which are important indicators of technical capability. Moreover, any conclusion from such an analysis that identifies the need for significant network investment in new technology is relevant to assessing Consolidated's financial capability to maintain FairPoint's obligations.	
1-87	Technical	<p>Please provide:</p> <p>a. A list of all internal and externally reported measures Consolidated uses to monitor the service quality of its network operations, including but not limited to, those related to service ordering, service provisioning, maintenance and repair, and network blocking</p> <p>b. Any benchmarks or standards Consolidated uses to assess the results of each of these measures</p> <p>c. The results of each of these measurements for the most recent five years.</p>	Objection	Overly broad, burdensome, vague, relevance, exceeds Commission authority	Effective monitoring of network and service quality is a key component of competent technical management of a wireline telecommunications company. Choice of the appropriate measurements to use for this purpose is a measure of technical competence. The results of such measurements are indicators of how well a company has recognized and addressed any quality concerns. These measurements need to be assessed over a reasonable period of time in order to understand trends and any changes in the way a company has been addressing these concerns.	
1-92	Technical	<p>Please provide:</p> <p>a. A list of all functions Consolidated's network operations organizations provided for each of the last five years, including but not limited to engineering, maintenance, construction, repair, new service provisioning, and network management</p> <p>b. The number of full time equivalent employees (FTE) providing these functions for each of the last five years</p> <p>c. The number of contractors or consultants providing these functions for each of the last five years</p> <p>d. The total cost of these network operations functions for each of the last five years</p> <p>e. Projected network operations budget for the next five years</p> <p>f. Documentation and/or descriptions of the policies, standards, and practices used for each of these functions</p> <p>g. A comparison of the level of Consolidated's network operations staffing, as measured in access lines per employee with that of FairPoint's in supporting the New Hampshire operations.</p>	Objection	Overly broad, burdensome, relevance, exceeds Commission authority	How a company staffs its technical organizations provides direct evidence of both its managerial and technical capabilities. Assessing such staffing requires understanding the size of the organization relative to its scope; to what extent the staffing is provided internally or through contractors; the budget allocated to such and organization; and the organization's policies, standards and practices. Assessing the adequacy of these features of Consolidated's current network operations organizations in comparison to FairPoint's requires an appropriate means of scaling such as access lines per employee.	
1-93	Technical	<p>Please describe the organization and experience levels of Consolidated's existing network planning, engineering and maintenance organizations. Specifically, please:</p> <p>a. Indicate whether these organizations are centrally deployed, regionally deployed, or a combination of both</p> <p>b. Provide organization charts of key management staff members along with their years of experience in their area of expertise</p> <p>c. Provide an assessment of these organization's ability and capacity to assume the additional responsibilities of the northern New England network planning and engineering after closure of the merger.</p>	Objection to part b	Overly broad, burdensome, vague, relevance, exceeds Commission authority	The background and experience of the team managing Consolidated's current network and how that team is organized is a direct measure of the company's managerial and technical capabilities and how well it understands how to manage a wireline telecommunications company. Reviewing the company's current organization chart and the experience level of the incumbents in the positions in this chart provide the most direct means to assess these aspects of managerial and technical capabilities.	
1-101	Technical	<p>Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 10, lines 16 – 23, and page 11, lines 1-20, which discuss five acquisitions that Consolidated made between 2004 and 2016. Please describe the post-acquisition improvements Consolidated made to the networks of each of these five telephone companies, including, but not limited to:</p> <p>a. Service quality improvements</p> <p>b. Provision of new and advanced services to customers that were unavailable prior to the acquisition</p>	Objection to part a	Burdenome, relevance, exceeds Commission authority	Information as to how Consolidated has handled the technical aspects of past acquisitions provides direct evidence its managerial and technical capability to manage the acquisition of FairPoint. To asses this, we need to understand not only what advanced services Consolidated may have introduced to customers of the acquired companies but also how well the company addressed any existing service quality issues be introducing service quality improvements.	

1-102	Technical	<p>Please describe Consolidated's experience in providing E911 service. Please include in this description:</p> <p>a. Any policies regarding facility route diversity between its central offices and the Public Safety Answering Points (PSAP)</p> <p>b. Any policies regarding facility route diversity between primary PSAPs and secondary PSAPs</p> <p>c. Any policies policy regarding facility route diversity on Automatic Location Identification (ALI) circuits</p> <p>d. How Consolidated provides ALI services, including</p> <p>i. Where Consolidated's ALI databases are located</p> <p>ii. Whether these databases are mated mirror images of each other</p> <p>iii. How the ALI information is provided to the PSAPs</p> <p>e. How Consolidated maintains and updates its ALI database</p> <p>f. How Consolidated provides Automatic Number Identification (ANI)</p> <p>g. Any measurements used to monitor internally and/or to report externally the accuracy of E911 records in its current service area, including</p> <p>i. Benchmarks and standards used for these measurements</p> <p>ii. Reports of the measurements for the most recent five years</p> <p>h. A list of all 911 network outages that prevented customers from being able to make emergency phone calls over the past five years, including</p> <p>i. Where the outage occurred</p> <p>j. The number of customers affected</p> <p>k. The outage duration of the outage</p> <p>l. Steps taken to correct the problem and to ensure such an outage would not occur again.</p> <p>m. A list of any vendors and/or other carriers used to provide E911 service.</p>	Objection	Overly broad, burdensome, relevance	All wireline telecommunications companies are involved to some degree in the processing of 911 calls. Therefore, understanding Consolidated's past experience with E911 is relevant to understanding its technical capabilities to manage this key aspect of customer safety in New Hampshire.	
1-106	Technical	<p>Please list all the operations support systems that Consolidated currently uses in its telecommunications business and provide for each of these systems:</p> <p>a. The system's functionality</p> <p>b. The jurisdiction(s) in which the system is used</p> <p>c. The average daily volume the system supports</p> <p>d. Percentage "uptime" for each month for the last five years</p> <p>e. Number of and average time to resolve system troubles for each month for the last five years</p> <p>f. The number and duration of major outages</p>	Inadequate Response		Consolidated's experience with operations support systems is an important provides evidence for the company's technical capabilities.	The response provided answers to only some subparts of the data request.
1-108	Technical	<p>Please provide:</p> <p>a. All information systems functions Consolidated provided for each of the last five years, including, but not limited to, systems support, systems maintenance, systems trouble handling, systems architecture planning and development, and systems security</p> <p>b. The number of full time equivalent employees (FTE) providing these functions for each of the last five years</p> <p>c. The number of contractors or consultants providing these functions for each of the last five years</p> <p>d. The total cost of IT functions for each of the last five years</p> <p>e. The percentage of this cost spent on consultants for each of the last five years</p> <p>f. Projected IT budget for the next five years</p> <p>g. Documentation and/or descriptions of the policies and practices used for each of these functions</p> <p><i>b. A comparison of the level of Consolidated's IT staffing with that of FairPoint</i></p>	Objection	Overly broad, burdensome, relevance, exceeds Commission authority	How a company staffs its technical organizations provides direct evidence of both its managerial and technical capabilities. Assessing such staffing requires understanding the size of the organization relative to its scope; to what extent the staffing is provided internally or through contractors; the budget allocated to such and organization; and the organization's policies, standards and practices. Assessing Consolidated's managerial and technical capability to maintain FairPoint's obligations requires a comparison between Consolidated's and FairPoint's information systems staffing.	
1-112	Technical	<p>Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 18, line 20, through line 19, line 1, which refers to Consolidated's relationships with CLECs and other carriers. Please list all products and services that Consolidated provides to CLECs and other carriers (including, but not limited to, other LECs and access services for interexchange carriers) in the jurisdictions in which it currently operates, indicating:</p> <p>a. The jurisdiction(s) in which the product or service is offered</p> <p>b. The systems and/or manual processes used to pre-order, order and provision each such product or service</p> <p>c. The monthly volume of orders by jurisdiction for each such product or service for each year for the last five years.</p>	Objection	Overly broad, burdensome	Consolidated's experience in providing service to CLECs and other carriers provides direct evidence of its technical competence to maintain FairPoint's obligations. Providing such services comprises a major component of FairPoint's service obligations.	
1-118	Technical	<p>Please provide a list of all billing disputes Consolidated has had with other carriers (including, but not limited to, other LECs and interexchange carriers) for the past five years along and the length of time taken to resolve these disputes.</p>	Objection	Overly broad, burdensome, relevance	Consolidated's experience in providing service to CLECs and other carriers provides direct evidence of its technical competence to maintain FairPoint's obligations. Providing such services comprises a major component of FairPoint's service obligations. The number, nature, and promptness in resolving billing disputes with these other carriers is a measure of managerial and technical competence.	
1-119	Customer Service	<p>Please provide organization charts that detail all organizational groups delivering customer service to Consolidated customers in all territories. Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers. Include titles and number of compliment reporting to each.</p>	Objection	Broad, Burdensome, Exceeds Commission Authority	A wireline telecommunications company's ability to provide quality customer service is a direct indication of its managerial and technical ability. The size, structure, and span of control of the organizations a company has created to address customer service comprise key evidence of such managerial and technical ability and its commitment to providing quality service to its customers.	
1-120	Customer Service	<p>Please: (a) describe all Consolidated analysis to assess the adequacy of FairPoint staffing for Customer Service responsibilities in New Hampshire (these areas of responsibility should include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers, and (b) if so, explain the nature of this analysis and what conclusions Consolidated arrived at.</p>	Objection	Broad, Burdensome, Exceeds Commission Authority	Consolidated's ability to draw reasonable conclusions about the adequacy of FairPoint's customer service staffing comprises an important indicator of managerial and technical capability. Moreover, any conclusion from such an analysis that identifies significant staffing concerns that Consolidated will need to address through significant investment is relevant to assessing Consolidated's financial capability to maintain FairPoint's obligations.	

1-121	Customer Service	Please provide Consolidated's current staffing level for each operating entity (measured in access lines per employee) for those employees who are responsible for Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).	Objection	Broad, Burdensome, Exceeds Commission Authority	How a wireline telecommunications company staffs its customer service organizations provides direct evidence of both its managerial and technical capabilities. Assessing such staffing requires understanding the size of the organization relative to its scope. Assessing the adequacy of these features of Consolidated's current network operations organizations in comparison to FairPoint's requires an appropriate means of scaling such as access lines per employee.
1-122	Customer Service	Please detail the level of overtime, by employee classification, by operating entity, for the past 5 years for front-line customer service employees handling ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers.	Objection	Broad, Burdensome, Exceeds Commission Authority	Whether a wireline telecommunications company has adequately staffed its customer service organizations provides direct evidence of both its managerial and technical capabilities. The level of overtime of the existing Consolidated customer service organizations is a measure of the adequacy of its customer service staffing.
1-123	Customer Service	Please provide quarterly and annual business unit goals for Consolidated's customer service functions, as defined in the prior question, at each operating entity, for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The ability to set reasonable, complete, and relevant goals comprises a key measure of managerial competence. Understanding these goals is therefore a key measure of Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.
1-124	Customer Service	Please list all grievances or other labor disputes within front-line customer service employees, as defined in prior questions, at each service entity for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The nature and number of employee grievances comprises a measure of managerial competence. Information about these grievances therefore comprises a relevant measure of Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.
1-125	Customer Service	Please: (a) identify the senior management personnel primarily responsible for overseeing FairPoint's continued Customer Service related operations after the closing, (b) describe their experience managing customer service operations and personnel, (c) identify the functions and numbers of employees currently reporting to them now and the number proposed after the closing, and (d) if post-closing numbers have not yet been determined, please identify when they will be.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding how Consolidated intends to oversee FairPoint's customer service operations and the experience of the managers designated to provide this oversight therefore comprise direct measures of Consolidated's managerial and technical competence to maintain FairPoint's obligations.
1-126	Customer Service	Please detail any short (one to two years) and longer-term (> two years) plans that will affect the staffing of Consolidated's workforce supporting Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations.
1-127	Customer Service	Please detail any short (one to two years) and longer-term (> two years) plans that will consolidate or centralize the management or operation of customer service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations.
1-128	Customer Service	Please: (a) explain which, if any, Customer Service functions or groups, as defined in the prior question, will be considered in any plans that Consolidated has to evaluate the potential for realizing efficiencies through elimination of overlapping functions, and (b) identify the timing of such an analysis and expected impact on FairPoint's current operations.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations.
1-129	Customer Service	Please: (a) identify the individuals assigned to the transition team(s) that will be responsible for planning and executing the transition of FairPoint's customer service organizations (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers) into Consolidated at closing, and (b) provide a bio for each team member detailing the current transition team role and prior job duties and experience.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations.
1-130	Customer Service	Please provide Consolidated's analysis and supporting details identifying any expected synergies, efficiencies, or back-office system savings specifically within FairPoint's Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations.
1-131	Customer Service	Please: (a) provide examples from all prior acquisitions in which Consolidated conducted a highly structured analysis to evaluate opportunities to deploy Consolidated's best practices for improving customer service and experience, while minimizing customer disruption (Gabe Waggoner Testimony, page 8, lines 4-7), and (b) detail all opportunities identified, actions taken, duration of effort, and resulting outcome.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Information as to how Consolidated has handled the technical aspects of past acquisitions provides direct evidence to its managerial and technical capability to manage the acquisition of FairPoint. To assess this, we need to understand how Consolidated has managed customer service matters in past acquisitions including how it has handled improvements in customer service and experience and minimization of customer disputes.
1-133	Customer Service	Please provide any proposed customer service policy changes as a result of the FairPoint acquisition, including any changes to credit and collection policy, service policies, or billing policy.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations. Changes to customer-facing policies, especially collections policies, can stimulate customer complaints and dissatisfaction.
1-135	Customer Service	Please: (a) provide the performance measurements that Consolidated uses internally to monitor and manage its customer service operations in all territories (these measurements should include any and all measures that Consolidated uses to monitor its customer service performance, and please include groups handling ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers), (b) provide Consolidated's performance results on these measures for each of the past five years, and (c) provide any benchmark standards that Consolidated uses in conjunction with these measures to ensure it is meeting its customer service objectives.	Objection	Broad, Burdensome, Exceeds Commission Authority	Effective monitoring of customer service quality is a key component of competent technical management of a wireline telecommunications company. Choice of the appropriate measurements to use for this purpose is a measure of technical competence. The results of such measurements are indicators of how well a company has recognized and addressed any quality concerns. These measurements need to be assessed over a reasonable period of time in order to understand trends and any changes in the way a company has been addressing these concerns.

1-136	Customer Service	Please: (a) explain how Consolidated measures performance, customer satisfaction and gathers customer feedback for any self-service options, such as web portals, virtual agents, IVR automated services, payment kiosks or other self-service payment options, or any other customer-facing self-service option, and (b) provide monthly and annual performance statistics for each of these self-service options for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Effective monitoring of customer service quality is a key component of competent technical management of a wireline telecommunications company. Choice of the appropriate measurements to use for this purpose is a measure of technical competence. The results of such measurements are indicators of how well a company has recognized and addressed any quality concerns. These measurements need to be assessed over a reasonable period of time in order to understand trends and any changes in the way a company has been addressing these concerns.	
1-140	Customer Service	Please describe how FairPoint call center service level goals compare for the past five full years to existing Consolidated service center goals, including, but not limited to, answering goals, wait time, abandons, blocked calls, first call resolution, hold time, and transfers.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Setting appropriate service level goals is a measure of this aspect of technical competence. Comparing Consolidated's and FairPoint's service level goals therefore provide an understanding of Consolidated's technical and managerial competence to maintain FairPoint's obligations.	
1-144	Customer Service	Please: (a) describe all Consolidated plans to negotiate any contractual service agreements that FairPoint has entered into in New Hampshire, and (b) if so, please explain which contractual service agreements, nature of changes, and provide copies of current agreements.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's plans for managing this function in FairPoint's territory therefore provides a key input to understanding the company's managerial and technical competence to maintain FairPoint's obligations. Providing a description (part a) and explanation (part b) of plans for negotiating contractual service agreements comprise important input to assess this.	Consolidated did not respond to subpart b
1-145	Customer Service	Please: (a) describe Consolidated's any experience in providing service to large business customers, and (b) provide the number of large business customers served and the number of voice grade equivalent lines (VGEs) provided to each. For the purpose of responding to this question assume a large business customer is defined as any customer to which Consolidated provides 24 or more VGEs.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Large business customers are an important part of FairPoint's customer base. Understanding Consolidated's experience with providing service to such customers therefore constitutes an important part of assessing Consolidated's technical competence to maintain FairPoint's obligations.	
1-149	Customer Service	Please detail all Consolidated call center locations across the entire company and service territory. Include current staffing levels, call handling statistics, customer satisfaction survey results for each location for the past 5 years. Include centers that have been closed or consolidated into other centers, stipulating the timing and reasons for the closing or consolidation. Include centers to handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers. Include centers that support business and residential customers.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The location, staffing, call handling success, and customer satisfaction with Consolidated's existing call centers therefore provide important evidence of its technical competence in this area and technical capability to maintain FairPoint's obligations.	
1-153	Customer Service	Please: (a) describe Consolidated's process and methods to measure and track customer satisfaction, for all functions evaluated. Include types of surveys issued, frequency, vendors used, scope, and objectives, and (b) provide the results from all customer satisfaction studies conducted during the past five full years, including the survey instruments administered for each study.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding whether customers are satisfied with the service provided is an important part of providing quality customer service. Assessing Consolidated's technical competence to maintain FairPoint's obligations therefore requires an understanding of the company's experience with measuring customer satisfaction and the results of such measurements.	
1-154	Customer Service	Please provide the results of any customer research conducted concerning the proposed acquisition, including a description of the process, methodology, scope, timing, and objectives.	Objection	Broad, Burdensome, Exceeds Commission Authority	Understanding how New Hampshire customers view the service that FairPoint provides them is an important element of due diligence to assess the challenges Consolidated would face after acquiring FairPoint. An explanation of the type of and results from any customer research performed as part of that due diligence therefore helps in the assessment of: (1) the extent to which Consolidated has properly assessed the financial commitments associated with the acquisition and (2) the technical and managerial capabilities to properly conduct such research.	
1-155	Customer Service	Please detail how customer satisfaction and customer research will be measured during and after the transition.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding whether customers are satisfied with the service provided is an important part of providing quality customer service. Assessing Consolidated's technical competence to maintain FairPoint's obligations therefore requires an understanding of the company's plans for the conduct of such research as part of the transition activities.	
1-156	Customer Service	Please: (a) define Consolidated's current customer service strategy, (b) describe how Consolidated's customer service strategy compare with FairPoint's customer service strategy, and (c) describe all expected changes to will Consolidated's customer service strategy change as a result of the FairPoint acquisition.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's current service strategy and planned changes in FairPoint's customer service strategy therefore provide important input to the assessment of the company's technical competence to maintain FairPoint's obligations.	
1-157	Customer Service	Please: (a) explain how Consolidated measures front-line customer service employee satisfaction and engagement, including scope, frequency, and methodology, (b) describe how Consolidated will measure employee satisfaction and engagement after the transition, and (c) provide the results all Consolidated's employee satisfaction and employee engagement studies for employees for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Measuring customer service employee satisfaction and engagement is an important aspect of competent management of the customer service employee base. Understanding Consolidated's experience with measuring employee satisfaction, the results of such measurements, and plans for such measurements after the acquisition therefore comprise relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-158	Customer Service	Please: (a) explain how Consolidated measures customer service performance for all areas of customer service, including: including, but not limited to ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers, and (b) provide performance statistics for all of these customer service functions described above for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Measuring customer service performance is an important aspect of competent management of the customer service employee base. Understanding Consolidated's experience with measuring customer service performance and the results of such measurements therefore comprise relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-159	Customer Service	Please: (a) explain how Consolidated measures billing accuracy, and (b) provide billing accuracy statistics since 2004.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The quality and accuracy of customer bills are among the most important factors in maintaining customer satisfaction. Understanding how well Consolidated measures billing accuracy and the results of such measurements therefore comprise relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-160	Customer Service	Please detail any self-service technology used by Consolidated to respond to customer inquiries or requests for service, sales, repair, or troubleshooting assistance or to process customer-service related transactions.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's experience with customer service, include the use of self-service technology therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	

1-161	Customer Service	Please explain the process Consolidated uses to receive, track, resolve, and report customer complaints, including handling of executive-level and complaints through regulators for each operating entity.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding Consolidated's experience with handling customer complaints therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.
1-162	Customer Service	Please provide an analysis, by federal, state and complaint category, of Consolidated's customers received since 2004.	Objection	Broad, Burdensome, Exceeds Commission Authority	The manner in which a company analyzes customer complaints can indicate how well a company is managing its business. As such, this analysis can provide evidence for determining technical and managerial capability. Examining complaints received since Consolidated has been acquiring other entities provides key insight into Consolidated's managerial capabilities to maintain FairPoint's obligations.
1-163	Customer Service	Please describe Consolidated's current process for monitoring call quality within Consolidated's call center operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria. Include the evaluation forms used to measure each call type.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Monitoring call center quality is an important aspect of competent management of the customer service employee base. Understanding Consolidated's experience with measuring call quality therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.
1-164	Customer Service	Please describe Consolidated's current process for monitoring written customer correspondence, chat, and email quality within Consolidated's customer service operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria, including the evaluation forms used to measure each type of written correspondence.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Monitoring the quality of handling communications with customers is an important aspect of competent management of the customer service employee base. Understanding Consolidated's experience with measuring such quality therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.
1-165	Customer Service	Please provide all benchmarking or comparative performance results relating to Customer Service, Call Center Performance, Sales, Service, Billing, Collections, Directory Assistance, Repair, Credit, Remittance Operations, and Field Service for Consolidated operating entities for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. An important aspect of providing quality of customer service is benchmarking performance. Understanding Consolidated's experience with benchmarking therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.

Number	Topic	Request	Inadequate or Objection	Stated Objection	Purpose and Relevance of Request	Summary of Response Inadequacy
1-2	Finance	Please provide all of the complete credit reports for FairPoint and its subsidiaries from Moody's and Standard and Poor's for a full five years prior to the merger announcement	Objection and Inadequate Response	Overbroad, info not in FP possession, info equally available, not relevant to proceeding issues, not admissible evidence, exceeds the scope of relevance, FP does not subscribe to credit reports.	Credit rating reports are crucial information regarding the financial health and viability of both parties involved in this proceeding.	Three years of rating agency reports provided, but not the five years requested.
1-3	Finance	Please provide all presentations, supporting materials and financial modeling provided by FairPoint to Moody's and Standard and Poor's related to the merger and credit ratings.	Objection and Inadequate Response	Overbroad, info not in FP possession, not relevant to proceeding issues, beyond scope of Commission, not admissible evidence, not relevant to RSA requirements.	FairPoint and CCI presentations and submittal of forward-looking financial modeling to credit rating agencies are crucial information regarding the financial health and viability of both parties involved in this proceeding.	"FairPoint did not provide the specified credit rating agencies with any materials related to the proposed transaction." However, CCI provided FairPoint financial forecasts to the rating agencies, which it represented were refinements of FairPoint forecasts.
1-5	Finance	Please provide the latest, official forecasts of all financial statements, including capital structures and key cash flow and credit ratios of FairPoint stand-alone for a full five years prior to the merger announcement.	Objection and Inadequate Response	Overbroad, burdensome, not relevant to proceeding issues, beyond scope of Commission jurisdiction, not admissible evidence, exceeds scope of relevance..	FairPoint forward-looking forecasts are crucial information regarding the financial health and viability of both parties involved in this proceeding.	FairPoint says that it "does not prepare forecasts to the levels of detail requested." "FairPoint did not provide the specified credit rating agencies with any materials related to the proposed transaction." However, CCI provided FairPoint financial forecasts to the rating agencies, which it represented were refinements of FairPoint forecasts.
1-7	Finance	Please provide all of the FairPoint analysis regarding the pledge of FairPoint assets by Consolidated that assesses the costs and risks involved to FairPoint.	Objection and Inadequate Response	Not relevant to proceeding issues, not admissible evidence, beyonds RSA evaluation requirements.	CCI pledgings of FairPoint assets in its debt financing could pose significant risks to the FairPoint entity.	"The pledge of FairPoint assets by Consolidated under Consolidated's current credit facility poses no risk or cost to FairPoint as no pledge or encumbrance of FairPoint's assets is effective until such time as the transaction is consummated." This response is unresponsive to a request for analysis regarding this issue.
1-9	Finance	Please provide all presentations and analysis prepared for FairPoint regarding credit facilities for FairPoint that could be arranged on a stand-alone basis.	Objection and Inadequate Response	Overbroad, info not in FP possession, not relevant to proceeding issues, beyond scope of Commission, not admissible evidence, not relevant to RSA requirements.	On page 12 of the Joint Application, the following statement was made: "While FairPoint would hope that it could improve on the terms of its credit facility in the event FairPoint were to seek access to the credit market outside of the Transaction, it is unlikely that FairPoint could achieve the favorable rates that Consolidated has already secured. Consolidated's financing, in addition to providing certainty and lower risk, provides a better financial platform measured both against FairPoint's current facility and against FairPoint's likelihood of achieving such financing on a stand-alone basis in the future." The data request sought to determine the informational basis for statements that financing for FairPoint on a stand-alone basis is unlikely, a key consideration in the financial advantage of a CCI acquisition.	FairPoint responded that it "has not received an analysis prepared on its behalf." This is non-responsive to the data request.
1-24	Management	Please provide all internal and external analyses, evaluations, assessments, or reports addressing the structure, operation, performance, of the FairPoint board of directors and the boards of all FairPoint entities expected to play a role in conducting or supporting FairPoint operations in New Hampshire post-acquisition.	Inadequate Response			The question does not address post-acquisition information, but information already existing insofar as it concerns any entity expected to survive closing. NOTE: FAIRPOINT HAS INDICATED A RESPONSE WILL BE FORTHCOMING; NO DATE OFFERED.
1-25	Management	Please: (a) identify all committees, councils, or other, similar bodies used by FairPoint or any affiliate to provide stakeholder input on matters affecting the operation of these entities at any time during the past five full years, (b) describe their purposes and scope, (c) identify the dates of their initiation and termination, (d) provide copies of all their charters, policies, procedures, and other governance documents, provide their regular meeting schedules.	Objection	Overbroad, burdensome, relevance		NOTE: FAIRPOINT HAS INDICATED A RESPONSE WILL BE FORTHCOMING; NO DATE OFFERED.
1-28	Management	Please: (a) identify all reports regularly provided to executives of FairPoint or any entity conducting, managing, or supporting New Hampshire operations, to the extent they specifically address plans, resources, results, and operations for or affecting New Hampshire, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).	Objection and Inadequate Response	Overbroad, burdensome, relevance	Foundational question to identify the types and nature of information needed to manage NH operations, in order to determine what and how Consolidated will continue to address, given that addressing such information is an element of managerial and technical capability	Requested samples of reports were not provided.
1-30	Management	Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations past two full years.	Objection and Inadequate Response	Overbroad, burdensome, relevance	Documents are foundational to identifying business and operations needs and challenges, which Consolidated will have to have the managerial, technical, and financial capability to meet	Requested strategic and operating plans for the past two years not provided.
1-32	Management	Please describe the timing and coordination of personnel planning with overall planning and budgeting processes.	Objection	Overbroad, burdensome, relevance	Existence or lack of an effective personnel planning approach and processes has bearing on the nature of the managerial and technical challenges that Consolidated will need to have the capability to address NOTE: FAIRPOINT HAS ASKED FOR CLARIFICATION - PERSONNEL PLANNING REFERS TO THE PROCESS OF DETERMINING APPROVED STAFFING LEVELS AT THE DEPARTMENT AND LOWER WORK GROUP LEVELS. REQUEST SEEKS TO UNDERSTAND HOW THAT PROCESS RELATES TO BUDGETING	
1-35	Management	For all FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing, please provide all available (a) projections of losses in key employees and in other positions where that is monitored, (b) documented analyses of gaps in work performance capability, and (c) what efforts (e.g., apprentice programs and partnering with local training and educational institutions) have been designed and implemented to address those gaps.	Objection	Overbroad, burdensome, relevance	Securing information about FairPoint's knowledge (including documentation) about capabilities and gaps in areas where FairPoint has reason to believe will continue to be relied on by Consolidated is relevant to identifying the management and technical challenges that Consolidated will need to be capable to meet	
1-40	Management	Please provide: (a) the goals and objectives for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations, and any higher-level groupings into which they are rolled up for each of the past five full years, (b) the metrics used to measure success in achievement of those goals and objectives, and (c) samples of each no older six months (or most recent available).	Objection	Overbroad, burdensome, relevance	Knowledge about goals and objectives and progress in meeting them bears directly on identifying the business and operations challenges that Consolidated will need to have the managerial, technical, and financial capability to meet	NOTE: FAIRPOINT HAS INDICATED A RESPONSE WILL BE FORTHCOMING; NO DATE OFFERED.
1-42	Management	Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations any higher-level groupings into which they are rolled up for each of the past five full years.	Objection	Overbroad, burdensome, relevance	See 1-30	
1-44	Management	Please provide all available agendas, minutes, reports to and reports by all committees or other bodies charged with enterprise and operating risk responsibilities, for the last five years.	Objection	Overbroad, burdensome, relevance	FairPoint business and operations risks are fundamental determinants of the managerial, technical, and financial challenges that Consolidated will need to have the capability to address	NOTE: FAIRPOINT HAS INDICATED A RESPONSE WILL BE FORTHCOMING; NO DATE OFFERED.

1-45	Management	Please: (a) identify all reports regularly provided to FairPoint executives, to the extent they specifically address FairPoint plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).	Inadequate Response	Overbroad, burdensome, relevance	See 1-28	See 1-28
1-47	Management	Please: (a) identify all reports regularly provided to board of directors, to the extent they specifically address FairPoint generally and plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).	Objection	Overbroad, burdensome, relevance	See 1-28	See 1-28 - - NOTE: FAIRPOINT HAS INDICATED A RESPONSE WILL BE FORTHCOMING; NO DATE OFFERED.
1-58	Customer Service	Please: (a) provide the performance measurements that FairPoint uses internally to monitor and manage its customer service operations in New Hampshire these measurements should include any and all measures that FairPoint uses to monitor its customer service performance in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service), (b) provide FairPoint's performance results on these measures for each of the past five years, and (c) provide all benchmark standards that FairPoint uses in conjunction with these measures to ensure it is meeting its customer service objectives.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Measuring customer service performance is an important aspect of competent management of the customer service employee base. Understanding FairPoint's experience with measuring customer service performance and the results of such measurements therefore comprise relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-59	Customer Service	Please provide: (a) all FairPoint analyses within the past five full years that examine the adequacy of its current level of staffing for its Customer Service responsibilities in New Hampshire (these areas of responsibility should include all FairPoint personnel associated with, but not be limited to, the following functions: ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and (b) explain the nature of this analysis and what conclusions FairPoint arrived at.	Objection and Inadequate Response	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding the adequacy of current staffing levels is an important aspect of the competent management of the customer service function and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	Response did not provide any analysis of the adequacy of its staffing levels for Customer Service responsibilities in New Hampshire. With respect to the response to Staff Data Request Set 1, Number 59, please: (a) confirm or deny that FairPoint has not conducted any analysis within the past 5 years that examines the adequacy of its staffing levels for Customer Service responsibilities in New Hampshire, as described in the data request, (b) if denied, please provide all such analyses.
1-60	Customer Service	Please provide FairPoint's current staffing levels (measured in access lines per employee) for those employees who are responsible for Customer Service functions (in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service)	Objection and Inadequate Response	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding the adequacy of current staffing levels is an important aspect of the competent management of the customer service function and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	Response did not specify staffing levels by functional group. With respect to the response to Staff Data Request Set 1, Number 60, please provide a breakdown of staffing levels by functional employee group (measured in access lines per employee).
1-62	Customer Service	Please identify the nature and timing of all new or enhanced products or services that FairPoint plans to offer its customers in New Hampshire.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding and preparing for the rollout of planned product and service enhancements is an important aspect of competent management of the customer service and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-63	Customer Service	For all employees are responsible for customer service operations, as defined in prior questions, in of New Hampshire please provide, by employee level, the number and percentage of employees who are retirement eligible at each level (for both the management and the non-management employees in New Hampshire).	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding the implications of an aging workforce is an important aspect of competent management of the customer service organization and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-64	Customer Service	Please: (a) describe how customer inquiries and customer calls are handled by FairPoint today, whether by calls, email, chat, fax, web inquiries, social media, and written correspondence, and for all types of contact (ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service), and (b) describe any specialization of workforce, functionally or by location. Include a historical perspective for the past five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. Understanding how customer service is delivered by Fairpoint and the current customer experience is an important aspect of competent management of the customer service function and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	
1-65	Customer Service	Please detail FairPoint call center locations in New Hampshire. Include current staffing levels and call handling statistics for each location for the past five years, including centers that have been closed or consolidated into other centers, and the timing and reasons for the closing or consolidation. Include centers that handle in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service. Include centers that support large and small business and residential customers.	Objection and Inadequate Response	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The location, staffing, and call handling performance with Fairpoint's existing call centers is an important aspect of the competent management of the customer service function and therefore comprises relevant information needed to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	With respect to the response to Staff Data Request Set 1, Number 65, please: (a) confirm or deny that FairPoint has not maintained call handling statistics for its New Hampshire call center operations within the past 5 years, (b) if denied, please provide all such statistics.
1-68	Customer Service	Please provide the results from all FairPoint customer satisfaction studies relating to its New Hampshire operations conducted during the past five full years, including the survey instruments administered for each study.	Objection	Broad, Burdensome, Exceeds Commission Authority	Effective monitoring of customer service quality is a key component of competent technical management of a wireline telecommunications company. Choice of the appropriate measurements to use for this purpose is a measure of technical competence. The results of such measurements are indicators of how well a company has recognized and addressed any quality concerns. These measurements need to be assessed over a reasonable period of time in order to understand trends and any changes in the way a company has been addressing these concerns.	With respect to the response to Staff Data Request Set 1, Number 68, please: (a) confirm or deny that FairPoint did not measure customer satisfaction for its New Hampshire customers prior to the results provided in the response dated September 2015, (b) if denied, please provide all such customer satisfaction results prior to that date and for the full five years requested.
1-70	Customer Service	Please define and describe FairPoint's current customer service strategy, indicating how this strategy links to objectives, budgets, and reporting.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential managerial competence for a wireline telecommunications company. Understanding FairPoint's current service strategy and how this strategy links to objectives, budgets, and reporting is an important aspect of competent management of the customer service operation and therefore provides important input to the assessment of Consolidated's managerial competence to maintain FairPoint's obligations.	
1-73	Customer Service	Please provide any assessments of customer service staffing requirements for the past five years in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service.	Objection	Broad, Burdensome, Exceeds Commission Authority	FairPoint's ability to draw reasonable conclusions about the adequacy of its customer service staffing comprises an important indicator of managerial and technical capability. Moreover, any conclusion from such an analysis that identifies significant staffing concerns that Consolidated will need to address through significant investment is relevant to assessing Consolidated's financial capability to maintain FairPoint's obligations.	
1-81	Customer Service	Please provide any benchmarking or comparative performance results in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service for FairPoint within the last five years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. An important aspect of providing quality of customer service is benchmarking performance. Understanding FairPoint's experience with benchmarking, and the results of its benchmarking, therefore comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	

1-82	<b>Customer Service</b>	Please detail the level of overtime, by employee classification, for the past five full years for front-line customer service employees in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service.	Objection	Broad, Burdensome, Exceeds Commission Authority	Whether a wireline telecommunications company has adequately staffed its customer service organizations provides direct evidence of both its managerial and technical capabilities. The level of overtime of the existing FairPoint customer service organizations is a measure of the adequacy of its customer service staffing. Moreover, any significant staffing concerns that Consolidated will need to address through significant investment is relevant to assessing Consolidated's financial capability to maintain FairPoint's obligations.	
1-83	<b>Customer Service</b>	Please provide quarterly and annual business unit goals for the Customer Service organizations (in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service) for the last five full years.	Objection	Broad, Burdensome, Exceeds Commission Authority	Providing quality customer service is an essential technical competence for a wireline telecommunications company. The ability to set reasonable, complete, and relevant goals comprises a key measure of managerial competence. Understanding FairPoint's goals comprises relevant information to assess Consolidated's managerial and technical capabilities to maintain FairPoint's obligations.	

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.**

**DT 16-872**

**Joint Petition/or Findings in Furtherance of the Acquisition of  
FairPoint Communications, Inc. and its New Hampshire Operating Subsidiaries  
by Consolidated Communications Holdings, Inc.**

**CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.'S  
OBJECTIONS TO COMMISSION STAFF'S FIRST SET OF DATA REQUESTS**

Consolidated Communications Holdings, Inc. ("Consolidated") respectfully submits these general and specific objections, pursuant to N.H. Admin. R. Puc 203.09(g), to the Data Requests from Commission Staff to Consolidated- Set 1 ("the Data Requests") dated February 17, 2017.

**General Objections**

1. Consolidated objects to the Data Requests insofar as they would require Consolidated to reveal the following to its competitors, members of the public or others with whom it must engage in future contractual negotiations: trade secrets; any confidential, commercial, proprietary or competitively sensitive information; information regarding internal personnel practices; personnel other documents whose disclosure would constitute invasion of privacy; and/or any other information that, if disclosed, would compromise the security of Consolidated's network.
2. Consolidated objects to the Data Requests as overly broad or unduly burdensome to the extent that they: (a) are cumulative or duplicative; (b) call for the production of documents or information not in Consolidated's possession, custody or control; (c) call for the review,

compilation or production of publicly available documents or information that could be obtained by Staff in a less burdensome manner including from a publicly available website; (d) call for the review, compilation and/or production of documents already in Staff's possession, custody or control; (e) unnecessarily call for the review, compilation and/or production of a voluminous number of documents that are either irrelevant or of questionable relevance and that would require a significant amount of resources at a significant expense to compile and produce; and (f) would require Consolidate to perform custom analysis of data for the benefit of Staff.

3. Consolidated objects to the Data Requests to the extent that they seek information that is not relevant to the issues within the proper scope of this proceeding and/or not within the scope of the Commission's regulatory authority, and/or are not reasonably calculated to lead to the discovery of relevant and admissible evidence in this proceeding.

4. Consolidated objects to the Data Requests to the extent that they seek discovery that is unrelated to Consolidated's prefiled testimony in this proceeding.

5. Consolidated objects to the Data Requests insofar as they would require Consolidated to reveal the confidential information of third parties in violation of Consolidated's obligations toward such third parties.

6. Consolidated objects to the Data Requests to the extent they purport to impose obligations that exceed those permitted by applicable law and Commission rules.

7. Consolidated objects to the Data Requests to the extent that they call for the disclosure or production of information protected by attorney-client privilege, the attorney work product doctrine, or any applicable privilege, immunity, or limitation on discovery. Consolidated will not respond to any Data Request seeking such privileged information.

Consolidated does not intend to waive any of the privileges asserted in this objection by any inadvertent responses that may occur.

8. Each of these General Objections is incorporated by reference into the specific objections and responses set forth below as if expressly restated therein. Consolidated does not waive any objections and expressly reserves the right to later raise any additional objections.

### **Specific Objections**

In addition to the General Objections stated above, Consolidated specifically objects to the Data Requests as indicated below. Notwithstanding its objections, Consolidated will attempt to answer the Data Requests to the extent reasonable and consistent with the objections.

1-1. Please provide the complete merger-specific credit reports for Consolidated and its subsidiaries from Moody's and Standard and Poor's.

***Response will be provided.***

1-2. Please provide all of the complete credit reports for Consolidated and its subsidiaries from Moody's and Standard and Poor's for a full five years prior to the merger announcement.

***Response will be provided.***

1-3. Please provide all presentations, supporting materials and financial modeling provided by Consolidated to Moody's and Standard and Poor's related to the merger and credit ratings.

***Response will be provided.***

1-4. Please provide all reports or letters from Moody's and Standard and Poor's for any ratings assessment services related to the Consolidated/FairPoint merger.

***Response will be provided.***

1-5. Please provide the annual, audited financial statements and supporting information for Consolidated and its subsidiaries for a full five years prior to the merger announcement.

**Objection: Consolidated objects on the ground that the request is unduly burdensome. Without waiving the objection, Consolidated responds as follows: please see**

**<http://ir.consolidated.com/sec.cfm> and <http://ir.consolidated.com/financials.cfm>.**

1-6. Please provide the latest, official forecasts of all financial statements, including capital structures and key cash flow and credit ratios of Consolidated stand-alone and the merged company for a full five years prior to the merger announcement.

**Objection: The request is unduly burdensome. The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-7. Please provide the official five-year capital expenditure forecasts for each Consolidated and the merged entities.

*Confidential response will be provided.*

1-8. Please provide the estimates of all capital and expense costs to achieve the merger, as well as any acquisition premium paid for the FairPoint assets, and any portions allocated to the FairPoint entities.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because Commission approval is not required for any acquisition of an ELEC's stock, see RSA 374:33, the request exceeds the Commission's regulatory authority.**

1-9. Please provide the analysis of all components of the synergies expected to be generated by the merger annually as noted on page 13 of Mr. Childer's testimony.

*Confidential response will be provided.*

1-10. Please provide the financial analysis of Consolidated regarding the net economics of the merger savings versus costs to achieve on an annual, going-forward basis for five full years.

*Confidential response will be provided.*

1-11. Please provide the projected impact of the merger savings and costs on depreciation and expenses of the FairPoint assets on a going-forward basis.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because an ELEC is not required to report depreciation or other expenses to the Commission, the request exceeds the Commission's regulatory authority.**

1-12. Please provide the Credit Agreements for each portion of the transaction financing that has been arranged by Consolidated, as noted in Mr. Childer's testimony on page 7.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an**

**evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because an ELEC is not required to obtain Commission approval of its financings, see RSA 369:1-a, the request exceeds the Commission's regulatory authority.**

1-13. Please provide the estimates of payments for the "loan commitments of \$4 million per month" noted in Mr. Childer's testimony on page 8.

*Response will be provided.*

1-14. Please provide the "stress tests" and the financial modeling prepared in conjunction with FairPoint on their business plan and financial models, as noted on pages 9, 10, 11 and 12 of the Childers testimony.

*Confidential response will be provided.*

1-15. Please provide the reports, presentations and analysis prepared by Ernst & Young regarding net operating losses, as noted on page 9 of the Childers testimony.

*Confidential response will be provided.*

1-16. Please provide the presentations and related financial modeling that demonstrate the financial benefits of the FairPoint transaction, as noted on pages 9 and 10 of Mr. Childer's testimony.

*Confidential response will be provided.*

1-17. Please provide all of the Consolidated analysis regarding the pledge of FairPoint assets by Consolidated that assesses the costs and risks involved to FairPoint.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because an ELEC is not required to obtain Commission approval of its pledge of assets, see RSA 369:1-a, the request exceeds the Commission's regulatory authority.**

*Without waiving this objection, a response will be provided.*

1-18. Please provide all presentations and analysis prepared for Consolidated regarding credit facilities for FairPoint that could be arranged on a stand-alone basis.

*Response will be provided.*

1-19. Please provide the financing agreements for all long-term debt funding for Consolidated that are currently in place.

**Objection: The requested information is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because an ELEC is not required to obtain Commission approval of its financings, see RSA 369:1-a, the request exceeds the Commission's regulatory authority.**

1-20. Please provide all of the analyses prepared for Consolidated that assess the ability of Consolidated to satisfy any existing debt covenants and/or any debt covenants that arise out of the FairPoint merger.

*Confidential response will be provided.*

1-21. Please provide an explanation of Consolidated's processes for injecting equity capital as needed to the legacy FairPoint entities to fund capital expenditure projects and programs.

*Response will be provided.*

1-22. Please provide an explanation of Consolidated and legacy FairPoint's going-forward capability to access capital markets at all times to fund capital expenditures.

*Response will be provided.*

1-23. Please provide all analyses of financial statistics and metrics for Consolidated vs. its "peer companies", as referenced by Mr. Childers in his testimony.

*Confidential response will be provided.*

1-24. Please provide detailed organization charts of the current Consolidated corporate structure, showing the relationships among all entities and ventures, the detailed organization structure of each entity (identifying all work groups and their current staffing levels at the most detailed level possible), and all boards of directors.

*Response will be provided.*

1-25. Please provide background and experience for all existing senior executives and managers (to the second level below officer) for: (a) the Consolidated parent, (b) each affiliated entity that provides services to an affiliated operating communications company that provides wireline services, and (c) each affiliated operating communications company that provides wireline services.

**Objection: The requested information is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

***Without waiving this objection, Consolidated responds as follows: Please refer to Prefiled Direct Testimony of Michael J. Shultz, Attachment MJS-1.***

1-26. With respect to all examinations, due diligence, studies, or other inquiries into (1) the capabilities of Consolidated board(s), executives, or management to manage or oversee the operations of FairPoint or (2) the capabilities of existing FairPoint board(s), executives, or management to manage and conduct the operations of FairPoint in New Hampshire, please: (a) describe their purpose, scope, dates, performers, (b) summarize their major findings and conclusions, (c) summarize all findings of gaps or needs, and (d) provide copies of reports and other documents describing their findings, conclusions, and recommendations.

***Response will be provided.***

1-27. Please list and describe all changes that will result to the entities, structures, and boards addressed in the previous request and provide a description of the purpose of such change, how it will affect New Hampshire operations, and a schedule showing the expected dates of each change.

***Response will be provided.***

1-28. Please list, describe, and provide the status and resolution of known legal actions or investigations by financial regulators, public utility commissions, or attorneys general in the last full five-year period, to the extent they involve the parent, any subsidiary providing services to an affiliate that provides wireline services or any subsidiary that provides wireline communication services.

***Response will be provided.***

1-29. Please list, describe, and provide the status and resolution of known legal actions by state or federal agencies for labor practices in the last full five-year period, to the extent they involve the parent, any subsidiary providing services to an affiliate that provides wireline services or any subsidiary that provides wireline communication services.

***Response will be provided.***

1-30. Please list and describe all plans that exist for employee job changes, relocation layoffs, hiring, and training for current Consolidated or subsidiary employees expected to have roles in the oversight, management, or conduct of the FairPoint northern New England business operations in or supporting New Hampshire.

***Response will be provided.***

1-31. Please list and describe all plans that exist for employee job changes, relocation layoffs, hiring, and training for current FairPoint or subsidiary employees expected to have roles in the oversight, management, or conduct of the FairPoint northern New England business operations in or supporting New Hampshire.

***Response will be provided.***

1-32. Please list and describe all plans (including scope, persons/organizations conducting, activities, completion schedule) for examining employee job changes, relocation layoffs, hiring, and training for current Consolidated or subsidiary employees expected to have roles in the oversight, management, or conduct of the FairPoint northern New England business operations in or supporting New Hampshire.

*Response will be provided.*

1-33. Please list and describe all plans (including scope, persons/organizations conducting, activities, completion schedule) for examining employee job changes, relocation layoffs, hiring, and training for current FairPoint or subsidiary employees expected to have roles in the oversight, management, or conduct of the FairPoint northern New England business operations in or supporting New Hampshire.

*Response will be provided.*

1-34. Please list and describe all studies, analyses, and other efforts to: (a) assess likely and potential levels of departures (relative to the promised retention of a significant majority of employees), and (b) develop contingency plans if that promised retention level is not realized.

*Response will be provided.*

1-35. With specific reference to meeting service needs including provision of basic service effectively, timely, reliably, and economically in New Hampshire, please list and describe all measures Consolidated intends with respect to: (a) structuring, (b) setting objectives and performance targets for, (c) managing performance, (d) measuring performance, and (e) staffing the operations of Consolidated and its current entities.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority to set metrics for ELECs' retail service quality, the request exceeds the Commission's regulatory authority.**

1-36. With specific reference to meeting service needs including provision of basic service effectively, timely, reliably, and economically in New Hampshire, please list and describe all measures Consolidated intends with respect to: (a) structuring, (b) setting objectives and performance targets, (c) managing performance, (d) measuring performance, and (e), and staffing the operations of FairPoint and its current entities.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority to set**

**metrics for ELECs' retail service quality, the request exceeds the Commission's regulatory authority.**

1-37. Please describe the most current plans with respect to the boards of directors of (1) Consolidated, (2) all Consolidated subsidiaries expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire, and (3) all FairPoint boards expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire, addressing specifically: (a) board structure, (b) board role, and (c) board membership.

*Response will be provided.*

1-38. Please explain the rationale for each currently proposed change in the boards of directors of (1) Consolidated, (2) all Consolidated subsidiaries expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire, and (3) all FairPoint boards expected to have a role in overseeing, managing or conducting FairPoint northern New England business in or supporting New Hampshire.

*Response will be provided.*

1-39. Please explain why Consolidated determined to add one board member position following the closing of the FairPoint acquisition.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over the composition of the board of directors of an ELEC's holding company, the request exceeds the Commission's regulatory authority.**

1-40. With respect to all Consolidated acquisitions of entities providing wireline communications services within the past 10 years, please explain how Consolidated modified within one year of acquisition board of director membership of (1) Consolidated, (2) all Consolidated subsidiaries expected to have a role in overseeing, managing or conducting operations of the acquired company, and (3) all boards of the acquired company having a role in overseeing, managing or conducting the operations of the acquired company.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over the composition of the board of directors of an ELEC holding company or its subsidiaries' boards, the request exceeds the Commission's regulatory authority.**

1-41. Please provide all documents made or received by Consolidated or any of its affiliates or any third party engaged to examine, analyze, assess, or assist in the acquisition of FairPoint to the extent that such documents address either or both of the competitive landscape in New Hampshire or the effect of Consolidated's FairPoint acquisition on that landscape.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-42. Please provide operational and financial details of the previous Consolidated acquisitions in the past 10 years, including, but not limited to, information about the size of company acquired, number of access lines, price, impact on debt, length to achieve integration, and treatment of employees.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, Consolidated responds as follows: Please refer to the Prefiled Direct Testimony of Michael J. Shultz at pages 10-11 for a list of Consolidated's acquisitions.*

1-43. Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of Consolidated and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a pre-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, Consolidated responds as follows: Consolidated considers all of its employees to be valuable.*

1-44. Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of Consolidated and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a post-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, Consolidated responds as follows: Consolidated considers all of its employees to be valuable.*

1-45. For all differences in Consolidated and Consolidated affiliates whose key/non-key status would change with the FairPoint acquisition, please explain the reasons for the change.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, Consolidated responds as follows: Consolidated considers all of its employees to be valuable.*

1-46. Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a pre-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-47. Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and all current affiliates (above the individual operating company level) that Consolidated considers (with respect to providing or supporting current wireline operations) on a post-FairPoint acquisition basis to be key employees, their titles, and their responsibilities.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-48. For all differences in FairPoint and subsidiary affiliates whose key/non-key status would change with the acquisition by Consolidated, please explain the reasons for the change.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-49. Please: (a) supply a list of key post-acquisition Consolidated and subsidiary and FairPoint and subsidiary employees as planned, (b) summarize their planned responsibilities and titles, (c) identify the entity now employing them if within a Consolidated or FairPoint entity now, and (d) identify those expected to be added from outside.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-50. Please describe what plans Consolidated has made to assure that all appropriate employees are designated for transfer from FairPoint at closing.

*Response will be provided.*

1-51. Please describe all plans for backfilling positions that might be vacant at the time of the merger closing because of employee's retiring, resigning, or otherwise choosing not to remain post-closing.

*Response will be provided.*

1-52. With respect to existing Consolidated and FairPoint benefit and pension plans, please (a) describe all material differences, (b) describe whether and how specifically Consolidated plans to modify in the future their structure and levels or migrate them to structures seeking to bring plans of the two entities closer in harmony, (c) provide the expected schedule for such modifications, and (d) describe commitments in the Employee Matters Agreement related to maintaining current pension and benefit plans.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over ELEC benefit and pension plans, the request exceeds the Commission's regulatory authority.**

1-53. Please provide a copy of the "proven playbook" referenced by Bob Udell in the December 5, 2016 Acquisition Analyst Webcast and Presentation.

*Response will be provided.*

1-54. Please provide a copy of all playbooks used in prior acquisitions announced within the past ten full years.

*Response will be provided.*

1-55. Please: (a) provide a detailed description of the systems and technology comprising Consolidated's "common platforms" used to serve multiple communications subsidiaries offering wireline services, and (b) describe and if documented provided copies of all transition plans to move FairPoint to common platforms.

*Response will be provided.*

1-56. Please provide a copy of the detailed analysis of the NH market conducted during due diligence, as referenced in the December 15, 2016 Analyst webcast.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-57. Please provide a copy of the model that forecasts \$55 million in savings over the first two years for this acquisition.

*Confidential Response will be provided.*

1-58. Describe and provide copies of all reports and other documents reflecting all Consolidated reviews or analyses of the adequacy of FairPoint's current level of staffing for conducting its operations in New Hampshire (including personnel in and supporting New Hampshire).

*Confidential Response will be provided.*

1-59. Please provide names and resumes for all current members of the Consolidated board of directors and the boards of all Consolidated entities expected to play a role in conducting or supporting FairPoint operations in New Hampshire.

*Response will be provided.*

1-60. Please provide all internal and external analyses, evaluations, assessments, or reports addressing the structure, operation, performance, of the Consolidated board of directors and the boards of all Consolidated entities expected to play a role in conducting or supporting FairPoint operations in New Hampshire.

*Response will be provided.*

1-61. Please: (a) identify all committees, councils, or other, similar bodies used by Consolidated or CCHI to provide stakeholder input on matters affecting the operation of these entities at any time during the past five full years, (b) describe their purposes and scope, (c) identify the dates of their initiation and termination, and (d) provide copies of all their charters, policies, procedures, and other governance documents, provide their regular meeting schedules.

*Response will be provided.*

1-62. Please provide organization charts that depict changes in the structure of the holding company and each other utility entity since year start 2007.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over the structure of ELEC holding companies, the request exceeds the Commission's regulatory authority.**

1-63. For each executive level committee or other regularly meeting group of executives at the parent or Consolidated, please provide: (a) its purpose and objectives, (b) its regular meeting schedule, and (c) charters, policies, procedures, and other governing documents.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over the structure of ELEC executive level committees or other ELEC executive groups, or their charters, policies, procedures and other governing documents, the request exceeds the Commission's regulatory authority.**

1-64. Please: (a) identify all reports regularly provided to CCHI and Consolidated executives, to the extent they specifically address Consolidated plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than six months (or most recent available).

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's plans, resources, results and operations, the request exceeds the Commission's regulatory authority.**

1-65. Please provide documentation describing the governance structure, policies, procedures, and other governing documents related to all enterprise and operating risk programs at CCHI and Consolidated.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's enterprise and operating risk programs, the request exceeds the Commission's regulatory authority.**

1-66. Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for Consolidated, CCHI, and any higher-level groupings into which they are rolled up for each of the past five full years.

*Response will be provided.*

1-67. Please provide: (a) the goals and objectives for Consolidated, CCHI, and any higher-level groupings into which they are rolled up for each of the past five full years, (b) the metrics used to measure success in achievement of those goals and objectives, and (c) samples of each no older six months (or most recent available).

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's goals and objectives, the request exceeds the Commission's regulatory authority.**

1-68. Please identify the location and describe the mission, responsibilities, organization, staffing, and principal activities of any organization within CCHI that performs planning, budgeting, or performance assessment for any part or all of CCHI or Consolidated and that is expected to have a similar role involving FairPoint post-acquisition.

*Response will be provided.*

1-69. To the extent they are expected to play a similar role involving FairPoint post-execution, please explain the basis on which each service company department or other work grouping structure you deem useful chosen: (a) determines its required personnel complement, and (b) determines for resource planning purposes the workloads expected to be imposed by each entity served.

*Response will be provided.*

1-70. Please describe the nature, staffing, operation, and work products of each group at the holding company, service company, or other level which has as a defined part of its responsibilities the examination of: (a) the effectiveness and efficiency of the performance of functions by the service company, (b) the efficiency and effectiveness of operations at

communications subsidiaries providing wireline services, or (c) benchmarking best practices among the affiliates or in comparison to their peers in the industry.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's effectiveness, efficiency and benchmarking best practices, the request exceeds the Commission's regulatory authority.**

1-71. Please provide statistics used to monitor and assess turnover at the summary and at the most-detailed level available within Consolidated.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's staff turnover, the request exceeds the Commission's regulatory authority.**

1-72. For all Consolidated and for all FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing, please provide all available (a) projections of losses in key employees and in other positions where that is monitored, (b) documented analyses of gaps in work performance capability, and (c) what efforts (e.g., apprentice programs and partnering with local training and educational institutions) have been designed and implemented to address those gaps.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, a response will be provided.*

1-73. Please provide for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing: (a) a description of the executive and management succession programs, (b) an identification of the levels/positions covered, and (c) a current version of plans showing potential successors and their development needs and plans.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether**

**Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, a response will be provided.*

1-74. Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing (and provide the associated documents addressing execution of) responsibilities for planning and administering salary, wage, and benefits programs at the Consolidated.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's salary, wage and benefits programs, the request exceeds the Commission's regulatory authority.**

1-75. Please list and describe the principal systems, processes, and tools used to assure a reasonable and consistent wage and salary program for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's wage and salary programs, the request exceeds the Commission's regulatory authority.**

1-76. Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing: (a) where responsibility will lie for analyzing, setting, and approving executing wage and salary policies and procedures, and (b) how and on what time cycles that responsibility will be exercised.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's wage and salary policies and procedures, the request exceeds the Commission's regulatory authority.**

1-77. Please describe for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing the principal recruitment programs and activities for bargaining unit and entry level exempt personnel.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's personnel recruitment programs or activities, the request exceeds the Commission's regulatory authority.**

1-78. Please describe the organization structure and resources of the groups responsible for labor relations for all Consolidated and FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's groups responsible for labor relations, the request exceeds the Commission's regulatory authority.**

1-79. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 5, lines 12 and 20-22, of his testimony, discussing the Consolidated a physical inspection of a portion of FairPoint's outside plant, cable facilities and central office network in New Hampshire. Please provide a description of the method or methods used to select the areas for review and inspections in its outside and inside plant and other physical assets in its due diligence studies of FairPoint New Hampshire. In particular, please:

- a. Provide details on how the facilities that were physically examined were selected
- b. The fraction of the total facilities in FairPoint's New Hampshire network the examined facilities represent (e.g., percent of central offices visited, percent of cable runs inspected, etc.)
- c. Describe who from and how FairPoint was involved in the process for selecting the sites to visit
- d. Provide a list of FairPoint's facilities that Consolidated physically inspected
- e. Provide any work papers, reports, or other documentation created as a result of these inspections.

***Response will be provided.***

1-80. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 5, lines 9-12, discussing the Consolidated review of documentation relating to FairPoint's network in New Hampshire as part of its inspection of the FairPoint assets. Please:

- a. Provide the review plan and guidelines Consolidated used for this inspection to ensure it conducted a comprehensive study of these assets
- b. Provide the process Consolidated used to validate the accuracy of the documentation it reviewed.
- c. Provide all work papers and reports that resulted from this documentation review.

***Response will be provided.***

1-81. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 5, lines 9 and 10, discussing the time Consolidated spent reviewing the New Hampshire network with FairPoint's engineering and operations leadership. Please provide an estimate (in person hours) of the amount of time Consolidated spent with the FairPoint staff as part of its network due diligence efforts.

***Response will be provided.***

1-82. Please provide details of what Consolidated was able to determine from review of FairPoint's network related to current operations, facility replacement/retirement requirements, and future growth. Specifically, please provide Consolidated's assumptions concerning:

- a. Resources needed to maintain existing infrastructure and services
- b. Resources needed to improve service quality where necessary
- c. Resources needed to deploy new facilities and introduce new service offers or to expand existing service offers
- d. Condition of and replacement needs for existing copper loop and inter-office facilities
- e. Condition of and replacement needs for existing switching network including switch rebalancing if needed
- f. Condition of and replacement needs for signaling network and associated databases
- g. Condition of and replacement needs for the test equipment and tools needed for network maintenance.

***Response will be provided.***

1-83. Please provide Consolidated's assessment of the efficiency and quality of FairPoint's network in New Hampshire as a result of its due diligence analysis. Specifically, please:

- a. List in detail any areas of network or service quality concern that Consolidated identified, including for each deficiency or problem identified:
  - i. Consolidated's plans to resolve the deficiency or problem

- ii. The estimated investment and timeline of expenditures required to resolve the deficiency or problem
- b. Provide all documentation and performance measurement results Consolidated reviewed to arrive its conclusions, including, but not limited to, the following areas:
  - i. Service ordering
  - ii. Service provisioning
  - iii. Maintenance and repair
  - iv. Billing
  - v. Network blocking
- c. Provide the observed values of all indices or measurements used
- d. State what Consolidated considers adequate performance values for the indices or measurements reviewed
- e. Explain what Consolidated used as the basis for its service quality assessment, if it did not review such documentation or measurements.

**Objection: The requested information is unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over the efficiency and quality of an ELEC's network, the request exceeds the Commission's regulatory authority.**

1-84. Please provide Consolidated's assessment of the need for investment in new technology in FairPoint's network.

**Objection: The requested information is overly broad, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's investment in its network, the request exceeds the Commission's regulatory authority.**

1-85. Please:

- a. Describe any analysis Consolidated made of the adequacy of FairPoint's current level of staffing for network operations functions in New Hampshire, including, but not limited to, the following functions:
  - i. Engineering
  - ii. Maintenance

- iii. Construction
- iv. Repair
- v. New service provisioning
- vi. Management personnel.

b. Indicate by how much Consolidated considers any of these functions to be either under- or overstaffed.

***Response will be provided.***

1-86. Please:

- a. Describe any review Consolidated conducted of the routine preventative network maintenance activities FairPoint currently performs in New Hampshire
- b. Provide any assessment made regarding the adequacy of FairPoint's preventative maintenance processes and expenditures.

***Response will be provided.***

1-87. Please provide:

- a. A list of all internal and externally reported measures Consolidated uses to monitor the service quality of its network operations, including but not limited to, those related to service ordering, service provisioning, maintenance and repair, and network blocking
- b. Any benchmarks or standards Consolidated uses to assess the results of each of these measures
- c. The results of each of these measurements for the most recent five years.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's monitoring of its network operations service quality, the request exceeds the Commission's regulatory authority.**

1-88. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 2, lines 9-19, which lists some of the technology Consolidated has deployed in its current network but does not include some the technologies FairPoint currently uses in its network. Please describe Consolidated's experience with the following network technologies:

- a. Class 5 digital switches such as 5ESS and DMS-10
- b. Class 5 host and remote switching systems
- c. Tandem switches

- d. Signal Transfer Points (STPs) and Service Control Points (SCPs)
- e. Pair-gain systems
- f. Remote terminals
- g. Operator service switches and databases.

***Response will be provided.***

1-89. Please list all state and the federal customer complaints registered against Consolidated in its current service area over the past five years, including for each complaint:

- a. The nature of the complaint
- b. Status of or resolution of the complaint
- c. Time required to resolve the complaint.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over complaints from ELEC's retail customers, the request exceeds the Commission's regulatory authority.**

1-90. Please describe the processes Consolidated uses to manage its network, including but not limited to:

- a. Routine maintenance
- b. Network engineering
- c. Service provisioning
- d. Repair
- e. Disaster recovery
- f. Network management tools
- g. Mutual assistance agreements with other utilities.

***Response will be provided.***

1-91. Please provide a list of all major network element outages and their duration in Consolidated's network for the past five years. These outages should include, but not be limited to:

- a. Planned and unplanned switch outages
- b. Dual failure of STPs

- c. Major cable outages (both fiber and copper)
- d. Extraordinary events such as central office fires and major weather-related outages.

***Response will be provided.***

1-92. Please provide:

- a. A list of all functions Consolidated's network operations organizations provided for each of the last five years, including but not limited to engineering, maintenance, construction, repair, new service provisioning, and network management
- b. The number of full time equivalent employees (FTE) providing these functions for each of the last five years
- c. The number of contractors or consultants providing these functions for each of the last five years
- d. The total cost of these network operations functions for each of the last five years
- e. Projected network operations budget for the next five years
- f. Documentation and/or descriptions of the policies, standards, and practices used for each of these functions
- g. A comparison of the level of Consolidated's network operations staffing, as measured in access lines per employee with that of FairPoint's in supporting the New Hampshire operations.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's network operations staffing, costs, budgets and policies, the request exceeds the Commission's regulatory authority.**

1-93. Please describe the organization and experience levels of Consolidated's existing network planning, engineering and maintenance organizations. Specifically, please:

- a. Indicate whether these organizations are centrally deployed, regionally deployed, or a combination of both
- b. Provide organization charts of key management staff members along with their years of experience in their area of expertise
- c. Provide an assessment of these organization's ability and capacity to assume the additional responsibilities of the northern New England network planning and engineering after closure of the merger.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's network planning, engineering and maintenance organizations, the request exceeds the Commission's regulatory authority.**

*Without waiving this objection, Consolidated will provide a response to subparts a & c.*

1-94. Please:

- a. List the primary vendors Consolidated uses to build out and support its current network. This list should include vendors:
  - i. Of switches
  - ii. Of signaling and transport equipment
  - iii. Of network or customer service operations such as billing, operations support system support, database support, operator services, E911 service, construction, etc.
- b. Compare this vendor list with the vendors that FairPoint currently uses to support its New Hampshire operations.

**Objection: The requested information is unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's vendors, the request exceeds the Commission's regulatory authority.**

*Without waiving this objection, Consolidated will provide a list of vendors that are common to both Consolidated and FairPoint.*

1-95. Please describe Consolidated's assessment of and plans for the FairPoint network management workforce after the closing of the acquisition, including:

- a. The results of any review of the number of FairPoint employees who are retirement eligible and the impact of the retirement of such employees before or shortly after the close of the acquisition
- b. Plans for backfilling positions that might be vacant at the time of the closing or shortly thereafter as a result of employee retirements, resignations, or otherwise choosing not to join Consolidated

c. Any plans to outsource, consolidate or centralize network operations functions, including, but not limited to engineering, maintenance, construction, repair, new service provisioning, and network management.

***Response will be provided.***

1-96. Please describe Consolidated's experience in managing a unionized workforce.

***Response will be provided.***

1-97. Refer to the Joint Petition, page 6, which states that "a significant majority of FairPoint's existing employees" will be retained. Please indicate what percentage of existing FairPoint employees supporting the New Hampshire operations will not be retained, identifying, where possible, the position and responsibility of FairPoint's current staff the Consolidated is targeting not to retain.

***Response will be provided.***

1-98. Refer to the Joint Petition, page 13, which indicates that Consolidated expects to achieve at least \$8 million annually in network access synergies. Please provide the assumptions that were used to arrive at these cost savings, including any specific network engineering and operations plans.

***Response will be provided.***

1-99. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 3, lines 1-21, which discusses various improvements Consolidated has made to its existing network. Please list any areas in FairPoint's New Hampshire network Consolidated has identified, based on its due diligence analysis, for network investment to:

- a. Improve current service quality levels
- b. Expand FairPoint's current fiber network
- c. Offer or expand advanced services such as broadband.

***Response will be provided.***

1-100. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 3, lines 10-13, which indicates that Consolidated invested \$134 million during 2015 in capital projects to extend its fiber network and add broadband capacity for its existing residential and commercial customers. Please indicate:

- a. Whether Consolidated has made any initial projections of the capital expenditures needed to make similar improvements to the current network in New Hampshire.
- b. If so, provide the projected level of capital spending by year and improvement project.

***Response will be provided.***

1-101. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 10, lines 16 – 23, and page 11, lines 1-20, which discuss five acquisitions that Consolidated made between 2004 and 2016. Please describe the post-acquisition improvements Consolidated made to the networks of each of these five telephone companies, including, but not limited to:

- a. Service quality improvements
- b. Provision of new and advanced services to customers that were unavailable prior to the acquisition.

**Objection: The requested information is unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's service quality improvements and new/advanced services, the request exceeds the Commission's regulatory authority.**

*Without waiving this objection, Consolidated will provide a response to subpart b.*

1-102. Please describe Consolidated's experience in providing E911 service. Please include in this description:

- a. Any policies regarding facility route diversity between its central offices and the Public Safety Answering Points (PSAP)
- b. Any policies regarding facility route diversity between primary PSAPs and secondary PSAPs
- c. Any policies policy regarding facility route diversity on Automatic Location Identification (ALI) circuits
- d. How Consolidated provides ALI services, including
  - i. Where Consolidated's ALI databases are located
  - ii. Whether these databases are mated mirror images of each other
  - iii. How the ALI information is provided to the PSAPs
- e. How Consolidated maintains and updates its ALI database
- f. How Consolidated provides Automatic Number Identification (ANI)
- g. Any measurements used to monitor internally and/or to report externally the accuracy of E911 records in its current service area, including
  - i. Benchmarks and standards used for these measurements
  - ii. Reports of the measurements for the most recent five years

- h. A list of all 911 network outages that prevented customers from being able to make emergency phone calls over the past five years, including
  - i. Where the outage occurred
  - j. The number of customers affected
  - k. The outage duration of the outage
  - l. Steps taken to correct the problem and to ensure such an outage would not occur again.
  - m. A list of any vendors and/or other carriers used to provide E911 service.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, FairPoint is not currently the E911 provider in New Hampshire, therefore Consolidated will not be assuming E911 responsibilities post close.**

1-103. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 7, lines 2 – 15, which refers to integration projects Consolidated has conducted after prior acquisitions. Please describe all previous systems integration activities that Consolidated has performed subsequent to an acquisition, detailing for each:

- a. The functions of the system(s) involved
- b. The number of access lines associated with the integration
- c. The process used to manage the project
- d. How soon after acquisition the projects began
- e. The length of time it took to complete the integration
- f. New operational support systems Consolidated developed and deployed
- g. New “off-the-shelf” operational support systems deployed
- h. Problems that were encountered and how these problems were resolved.

***Response will be provided.***

1-104. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 21, lines 16 – 23, which describes the \$55M in synergies anticipated from the FairPoint acquisition, including, among items, savings associated with “back-office systems,” “network optimization,” and “IT.” Please:

- a. Provide the exact amount of savings Consolidated has assumed to realize from savings associated with:

- i. Back-office systems
  - ii. Network optimization
  - iii. IT
- b. Describe the specific anticipated actions required to achieve these savings, including, for each of the three items listed in part a. of this question:
- i. Systems integration
  - ii. Job position elimination or consolidation at FairPoint
  - iii. Job position elimination or consolidation at Consolidated
  - iv. All other actions.

***Response will be provided.***

1-105. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 16, lines 4 - 7, which refers to Consolidated's plans for evaluating systems for company-wide integration, a process it says will take from 12 to 24 months. Please:

- a. List all current FairPoint systems and processes Consolidated has already identified as potential candidates for replacement by existing Consolidated systems and processes as part of its due diligence analysis of FairPoint
- b. List all current FairPoint systems and processes Consolidated has already identified as potential candidates to replace existing Consolidated systems and processes as part of its due diligence analysis of FairPoint
- c. State how much of the anticipated \$55M in synergies are anticipated to be realized through such integration projects
- d. State in what years these synergies are expected to be realized.

***Response will be provided.***

1-106. Please list all the operations support systems that Consolidated currently uses in its telecommunications business and provide for each of these systems:

- a. The system's functionality
- b. The jurisdiction(s) in which the system is used
- c. The average daily volume the system supports
- d. Percentage "uptime" for each month for the last five years
- e. Number of and average time to resolve system troubles for each month for the last five years
- f. The number and duration of major outages.

*Response will be provided.*

1-107. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 14, lines 19 – 21, which states that Consolidated plans to rely on FairPoint resources in addition to its own resources to meet the ILEC obligations set forth in RSA 362:8 and RSA 374:22-p. Please provide:

- a. A list of all functions that Consolidated plans to provide through its own resources to meet these ILEC obligations in New Hampshire
- b. An estimate of the number of full time equivalent Consolidated employees (FTE) used to provide these functions
- c. An estimate of the number of FairPoint FTE currently providing these functions that will no longer be needed.

*Response will be provided.*

1-108. Please provide:

- a. All information systems functions Consolidated provided for each of the last five years, including, but not limited to, systems support, systems maintenance, systems trouble handling, systems architecture planning and development, and systems security
- b. The number of full time equivalent employees (FTE) providing these functions for each of the last five years
- c. The number of contractors or consultants providing these functions for each of the last five years
- d. The total cost of IT functions for each of the last five years
- e. The percentage of this cost spent on consultants for each of the last five years
- f. Projected IT budget for the next five years
- g. Documentation and/or descriptions of the policies and practices used for each of these functions
- h. A comparison of the level of Consolidated's IT staffing with that of FairPoint.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's information systems, the request exceeds the Commission's regulatory authority.**

1-109. Please provide Consolidated's plans for:

- a. Replacing with centralized Consolidated employees the current FairPoint information systems functions, including, but not limited to, systems support, systems maintenance, systems trouble handling, systems architecture planning and development, and systems security
- b. Identifying and retaining critical FairPoint information systems employees
- c. Backfilling critical FairPoint information systems employees who may choose to leave FairPoint after the acquisition.

***Response will be provided.***

1-110. Please:

- a. Describe any analysis Consolidated made of the adequacy of FairPoint's current level of staffing for IT functions, including, but not limited to, the following functions:
  - i. Systems support
  - ii. Systems maintenance
  - iii. Systems trouble handling
  - iv. Systems architecture planning and development
  - v. Systems security.
- b. Indicate by how much Consolidated considers any of these functions to be either under- or overstaffed.

***Response will be provided.***

1-111. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 18, lines 18 – 20, which states that Consolidated is familiar with FairPoint's obligations as a successor to a Regional Bell Operating Company (RBOC). Please list what Consolidated understands to be FairPoint's obligations as an RBOC specifically in New Hampshire.

***Response will be provided.***

1-112. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 18, line 20, through line 19, line 1, which refers to Consolidated's relationships with CLECs and other carriers. Please list all products and services that Consolidated provides to CLECs and other carriers (including, but not limited to, other LECs and access services for interexchange carriers) in the jurisdictions in which it currently operates, indicating:

- a. The jurisdiction(s) in which the product or service is offered
- b. The systems and/or manual processes used to pre-order, order and provision each such product or service

- c. The monthly volume of orders by jurisdiction for each such product or service for each year for the last five years.

**Objection: The request is overly broad and unduly burdensome.**

1-113. Refer to the Prefiled Direct Testimony of Michael J. Shultz, page 19, lines 1 - 4, which indicates that Consolidated plans to rely on FairPoint's wholesale carrier group to provide support for the New Hampshire wholesale performance assurance plan post-close. Please indicate:

- a. How long Consolidated plans to rely on the FairPoint wholesale carrier group for this purpose
- b. What plans Consolidated has for backfilling any employees in the wholesale carrier group who may choose to leave FairPoint after the Consolidated acquisition
- c. Whether Consolidated plans to rely on the FairPoint wholesale carrier group for any other functions besides the performance assurance plan and, if so:
  - i. For what functions
  - ii. How long.

***Response will be provided.***

1-114. Please:

- a. Describe any analysis Consolidated made of the adequacy of FairPoint's current level of staffing in its wholesale carrier group
- b. Indicate by how much Consolidated considers this group to be either over- or understaffed.

***Response will be provided.***

1-115. Please provide data on Consolidated's service quality record in provide service to CLECs and other carriers (including, but not limited to, other LECs and interexchange carriers). The response should include any internal and externally provided metrics that Consolidated records to measure the quality of service it provides to these carriers.

***Response will be provided.***

1-116. Please describe how Consolidated currently bills other carriers (including, but not limited to, other LECs and interexchange carriers) for access, unbundled elements and other wholesale services, including:

- a. The bill medium (paper, electronic, etc.)

- b. The systems and processes used.

*Response will be provided.*

1-117. Please describe the systems and processes CLECs and other carriers (including, but not limited to, other LECs and interexchange carriers) use to report trouble conditions for the services Consolidated provides to them, including:

- a. The systems and processes used
- b. The monthly volume of trouble reports by jurisdiction for each year for the last five years.

*Response will be provided.*

1-118. Please provide a list of all billing disputes Consolidated has had with other carriers (including, but not limited to, other LECs and interexchange carriers) for the past five years along and the length of time taken to resolve these disputes.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

1-119. Please provide organization charts that detail all organizational groups delivering customer service to Consolidated customers in all territories. Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers. Include titles and number of compliment reporting to each.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-120. Please: (a) describe all Consolidated analysis to assess the adequacy of FairPoint staffing for Customer Service responsibilities in New Hampshire (these areas of responsibility should include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers, and (b) if so, explain the nature of this analysis and what conclusions Consolidated arrived at.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-121. Please provide Consolidated's current staffing level for each operating entity (measured in access lines per employee) for those employees who are responsible for Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-122. Please detail the level of overtime, by employee classification, by operating entity, for the past 5 years for front-line customer service employees handling ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations or overtime associated with those operations, the request exceeds the Commission's regulatory authority.**

1-123. Please provide quarterly and annual business unit goals for Consolidated's customer service functions, as defined in the prior question, at each operating entity, for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition,**

because the Commission lacks authority over an ELEC's goals regarding customer service functions, the request exceeds the Commission's regulatory authority.

1-124. Please list all grievances or other labor disputes within front-line customer service employees, as defined in prior questions, at each service entity for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's grievances or other labor disputes, the request exceeds the Commission's regulatory authority.**

1-125. Please: (a) identify the senior management personnel primarily responsible for overseeing FairPoint's continued Customer Service related operations after the closing, (b) describe their experience managing customer service operations and personnel, (c) identify the functions and numbers of employees currently reporting to them now and the number proposed after the closing, and (d) if post-closing numbers have not yet been determined, please identify when they will be.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-126. Please detail any short (one to two years) and longer-term (> two years) plans that will affect the staffing of Consolidated's workforce supporting Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-127. Please detail any short (one to two years) and longer-term (> two years) plans that will consolidate or centralize the management or operation of customer service functions (Please

include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-128. Please: (a) explain which, if any, Customer Service functions or groups, as defined in the prior question, will be considered in any plans that Consolidated has to evaluate the potential for realizing efficiencies through elimination of overlapping functions, and (b) identify the timing of such an analysis and expected impact on FairPoint's current operations.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-129. Please: (a) identify the individuals assigned to the transition team(s) that will be responsible for planning and executing the transition of FairPoint's customer service organizations (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers) into Consolidated at closing, and (b) provide a bio for each team member detailing the current transition team role and prior job duties and experience.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations or personnel assigned to those functions, the request exceeds the Commission's regulatory authority.**

1-130. Please provide Consolidated's analysis and supporting details identifying any expected synergies, efficiencies, or back-office system savings specifically within FairPoint's Customer Service functions (Please include employees that handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to

add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers).

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-131. Please: (a) provide examples from all prior acquisitions in which Consolidated conducted a highly structured analysis to evaluate opportunities to deploy Consolidated's best practices for improving customer service and experience, while minimizing customer disruption (Gabe Waggoner Testimony, page 8, lines 4-7), and (b) detail all opportunities identified, actions taken, duration of effort, and resulting outcome.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations, the request exceeds the Commission's regulatory authority.**

1-132. Please: (a) explain how FairPoint customers will be transitioned into Consolidated customers, including such matters as public announcements, bill format, customer communication, and advertising, (b) describe if, when, and how customers will be made aware of the transition, and (c) describe the communication vehicles to be established to support this process.

*Response will be provided.*

1-133. Please provide any proposed customer service policy changes as a result of the FairPoint acquisition, including any changes to credit and collection policy, service policies, or billing policy.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service, credit and collection or billings policies, the request exceeds the Commission's regulatory authority.**

1-134. Please describe training that FairPoint employees will receive as they transition into Consolidated's organization.

*Response will be provided.*

1-135. Please: (a) provide the performance measurements that Consolidated uses internally to monitor and manage its customer service operations in all territories (these measurements should include any and all measures that Consolidated uses to monitor its customer service performance, and please include groups handling ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers), (b) provide Consolidated's performance results on these measures for each of the past five years, and (c) provide any benchmark standards that Consolidated uses in conjunction with these measures to ensure it is meeting its customer service objectives.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service operations or metrics used to monitor, manage or assess same, the request exceeds the Commission's regulatory authority.**

1-136. Please: (a) explain how Consolidated measures performance, customer satisfaction and gathers customer feedback for any self-service options, such as web portals, virtual agents, IVR automated services, payment kiosks or other self-service payment options, or any other customer-facing self-service option, and (b) provide monthly and annual performance statistics for each of these self-service options for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's assessment of its customer satisfaction or self-service options, the request exceeds the Commission's regulatory authority.**

1-137. Referring to page 13, lines 6-7, of Michael Shultz's testimony, please: (a) explain specifically how Consolidated "works hard to address early warnings of potential customer issues before they become actual complaints" and (b) provide specific examples.

*Response will be provided.*

1-138. Please explain and provide recent examples from prior acquisitions of how Consolidated diligently works to improve the customer experience while evolving to support the next generation of services (Gabe Waggoner Testimony, page 8, lines 3-4).

*Response will be provided.*

1-139. Please: (a) list and describe the multiple tools and automation resources that Consolidated uses to assist in the deployment and support of services allowing for quality installation and first call resolution of issues (Gabe Waggoner Testimony, page 8, lines 20-21), and (b) detail examples from prior acquisitions that demonstrate the use of these tools and resources.

*Response will be provided.*

1-140. Please describe how FairPoint call center service level goals compare for the past five full years to existing Consolidated service center goals, including, but not limited to, answering goals, wait time, abandons, blocked calls, first call resolution, hold time, and transfers.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's call center service level goals, the request exceeds the Commission's regulatory authority.**

1-141. Please provide a list of the products and services that Consolidated currently offers and provides its customers in each state/operating territory.

*Response will be provided.*

1-142. Please describe all new or enhanced products or services that Consolidated plans to offer its customers in New Hampshire, and (b) provide the timing of their introduction in New Hampshire.

*Response will be provided.*

1-143. Please identify all Consolidated plans for eliminating or grandfathering any of the services that FairPoint currently offers in New Hampshire.

*Response will be provided.*

1-144. Please: (a) describe all Consolidated plans to negotiate any contractual service agreements that FairPoint has entered into in New Hampshire, and (b) if so, please explain which contractual service agreements, nature of changes, and provide copies of current agreements.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.**

*Without waiving this objection, Consolidated will provide a response to subpart a.*

1-145. Please: (a) describe Consolidated's any experience in providing service to large business customers, and (b) provide the number of large business customers served and the number of voice grade equivalent lines (VGEs) provided to each. For the purpose of responding to this question assume a large business customer is defined as any customer to which Consolidated provides 24 or more VGEs.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's service to large business customers, the request exceeds the Commission's regulatory authority.**

1-146. Please: (a) describe and provide examples of Consolidated's marketing and sales capabilities, referred to in the December 5, 2016, Analyst Webcast by Steve Childers as "advanced marketing" (b) explain why these marketing activities are considered advanced, and (c) discuss how Consolidated is currently applying these marketing capabilities across its current territories and detail Consolidated's plans for applying these capabilities to promote FairPoint products and services in New Hampshire.

*Response will be provided.*

1-147. Please: (a) describe and provide examples of Consolidated's record of providing a high quality customer experience, as it relates to the installation and service appointment processes, consumer-friendly pricing and packaging choices, and the delivery of further advanced broadband services, as detailed in the Joint Petition, and (b) discuss how this experience will be leveraged in New Hampshire.

*Response will be provided.*

1-148. Please: (a) state whether Consolidated outsource any customer service, collections, repair/service, sales, technical support, or directory or toll assistance workload, either prior to, during, or after the transition, and (b) explain any plans or contingencies to outsource call handling for any length of time, including the scope and timing.

*Response will be provided.*

1-149. Please detail all Consolidated call center locations across the entire company and service territory. Include current staffing levels, call handling statistics, customer satisfaction survey results for each location for the past 5 years. Include centers that have been closed or consolidated into other centers, stipulating the timing and reasons for the closing or consolidation. Include centers to handle ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service,

and any other responsibility for supporting or interfacing with all types of customers. Include centers that support business and residential customers.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's call centers or their staffing, call handling statistics or customer satisfaction survey results, the request exceeds the Commission's regulatory authority.**

1-150. Please" (a) describe any recent Consolidated call center consolidations, organizationally and functionally, (b) explain the expected efficiency gains and cost savings as a result of the call center consolidations, and (c) detail any gains realized to-date and timing of future gains.

*Response will be provided.*

1-151. Please: (a) detail any expansion plans or recent expansion of call center locations handling customer calls throughout Consolidated's existing territory, specifying costs, timing, details of expanded facilities, staff additions, management and organization changes, equipment and technology changes, and resulting capacity changes, and (b) identify when the expanded facilities are expected to be fully operational.

*Response will be provided.*

1-152. Please: (a) describe how customer inquiries and customer calls are handled by Consolidated today, whether by calls, email, fax, web inquiries, social media, and written correspondence, and for all types of contact (sales, service, repair, troubleshooting, payment, directory assistance), and (b) describe any specialization of workforce, functionally or by location (including a historical perspective for the past 5 years).

*Response will be provided.*

1-153. Please: (a) describe Consolidated's process and methods to measure and track customer satisfaction, for all functions evaluated. Include types of surveys issued, frequency, vendors used, scope, and objectives, and (b) provide the results from all customer satisfaction studies conducted during the past five full years, including the survey instruments administered for each study.

**Objection: The requested information is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's process and methods to measure**

**and track customer satisfaction, the request exceeds the Commission's regulatory authority.**

1-154. Please provide the results of any customer research conducted concerning the proposed acquisition, including a description of the process, methodology, scope, timing, and objectives.

**Objection: The requested information is overly broad, unduly burdensome, vague and is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer research, the request exceeds the Commission's regulatory authority.**

1-155. Please detail how customer satisfaction and customer research will be measured during and after the transition.

**Objection: The requested information is not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer satisfaction or research, the request exceeds the Commission's regulatory authority.**

1-156. Please: (a) define Consolidated's current customer service strategy, (b) describe how Consolidated's customer service strategy compare with FairPoint's customer service strategy, and (c) describe all expected changes to will Consolidated's customer service strategy change as a result of the FairPoint acquisition.

**Objection: The requested information is unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service strategy, the request exceeds the Commission's regulatory authority.**

1-157. Please: (a) explain how Consolidated measures front-line customer service employee satisfaction and engagement, including scope, frequency, and methodology, (b) describe how Consolidated will measure employee satisfaction and engagement after the transition, and (c) provide the results all Consolidated's employee satisfaction and employee engagement studies for employees for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service employee satisfaction and engagement, the request exceeds the Commission's regulatory authority.**

1-158. Please: (a) explain how Consolidated measures customer service performance for all areas of customer service, including: including, but not limited to ordering, sales, billing, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and any other responsibility for supporting or interfacing with all types of customers, and (b) provide performance statistics for all of these customer service functions described above for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer service performance, the request exceeds the Commission's regulatory authority.**

1-159. Please: (a) explain how Consolidated measures billing accuracy, and (b) provide billing accuracy statistics since 2004.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's billing accuracy, the request exceeds the Commission's regulatory authority.**

1-160. Please detail any self-service technology used by Consolidated to respond to customer inquiries or requests for service, sales, repair, or troubleshooting assistance or to process customer-service related transactions.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's self-service technology, the request exceeds the Commission's regulatory authority.**

1-161. Please explain the process Consolidated uses to receive, track, resolve, and report customer complaints, including handling of executive-level and complaints through regulators for each operating entity.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer complaints, the request exceeds the Commission's regulatory authority.**

1-162. Please provide an analysis, by federal, state and complaint category, of Consolidated's customers received since 2004.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's customer complaints, the request exceeds the Commission's regulatory authority.**

1-163. Please describe Consolidated's current process for monitoring call quality within Consolidated's call center operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria. Include the evaluation forms used to measure each call type.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's call quality, the request exceeds the Commission's regulatory authority.**

1-164. Please describe Consolidated's current process for monitoring written customer correspondence, chat, and email quality within Consolidated's customer service operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria, including the evaluation forms used to measure each type of written correspondence.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the**

**obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's process for monitoring written customer correspondence, chat and email quality, the request exceeds the Commission's regulatory authority.**

1-165. Please provide all benchmarking or comparative performance results relating to Customer Service, Call Center Performance, Sales, Service, Billing, Collections, Directory Assistance, Repair, Credit, Remittance Operations, and Field Service for Consolidated operating entities for the past five full years.

**Objection: The requested information is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. The requested information is not relevant or material to an evaluation under RSA 374:30, II of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p. In addition, because the Commission lacks authority over an ELEC's comparative performance results relative to the issues contained in this question, the request exceeds the Commission's regulatory authority.**

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**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DT 16-872**

**Joint Petition for Findings in Furtherance of the Acquisition of  
FairPoint Communications, Inc. and its New Hampshire Operating  
Subsidiaries by Consolidated Communications Holdings, Inc.**

**FAIRPOINT'S OBJECTIONS TO SET 1 DISCOVERY  
REQUESTS OF COMMISSION STAFF**

**February 27, 2017**

**I. FairPoint's General Objections**

1. FairPoint has attempted to identify every data request that seeks information and/or documents protected against discovery by the attorney-client privilege or the attorney work-product doctrine or any other applicable privilege. To the extent that any specific data request is intended to elicit such privileged information and/or documents, FairPoint objects and asserts the applicable privilege to the fullest extent permitted by law.

2. To the extent that FairPoint responds to these data requests, FairPoint does not concede the relevancy of the responses or documents to this action, nor does FairPoint concede that such responses or documents may be used for any purpose in this or any other actions, lawsuit or proceeding. FairPoint expressly reserves the right to object to further discovery into the subject matter of any of the responses or any portion thereof.

3. FairPoint objects to each data request to the extent that it seeks information and/or documents equally available to the requester as to FairPoint or that are not within FairPoint's possession, custody or control.

4. FairPoint objects to data requests that solicit information and/or documents that FairPoint has already made available to the requester in this docket.

5. FairPoint reserves the right to object that any data requests, in the aggregate, are overly burdensome and exceed reasonable limits of discovery.

6. FairPoint has attempted to respond to each data request based on the instructions and definitions provided. However, FairPoint reserves the right to object to such definitions and instructions to the extent that there are differences in them among the requesters.

7. FairPoint objects to the extent that the instructions and/or definitions seek to impose burdens on FairPoint that are greater than those imposed by applicable portions of N.H. Admin. Rules Part Puc 200, that impose undue burdens on FairPoint, and/or that have the effect of making the data requests overbroad. FairPoint will make a good faith effort to provide information responsive to the data requests subject to this objection, but FairPoint specifically objects to providing, among other things, drafts of documents, identical copies of documents, non-identical copies of documents that contain handwritten notes, and descriptions of responsive documents that once existed but cannot be produced due to loss or destruction.

8. FairPoint objects to all data requests to the extent they seek information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment. Subject to specific instances where FairPoint considers information responsive to a particular data request to be highly proprietary and extraordinarily competitively and/or commercially sensitive, FairPoint will produce the requested information pursuant to a duly executed protective agreement.

## II. FairPoint's Specific Objections

<b>Respondent: Michael C. Reed</b> <b>Title: State President - Maine</b>
<b>Data Request: Staff 1-1</b>
<b>Objection Date:</b> February 27, 2017
<b>Item:</b> <b>Please provide the complete merger-specific credit reports for FairPoint and its subsidiaries from Moody's and Standard and Poor's.</b>
<b>Objection:</b> FairPoint objects to this request on the ground that the request seeks information and/or documents equally available to the requester as to FairPoint. In particular, FairPoint does not subscribe to or routinely receive credit reports from Moody's or Standard and Poor's. Subject to and without waiving the foregoing Objection, FairPoint responds as follows: In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-2**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all of the complete credit reports for FairPoint and its subsidiaries from Moody's and Standard and Poor's for a full five years prior to the merger announcement.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request seeks information that is not within FairPoint's possession, custody, or control; (3) the request seeks information and/or documents equally available to the requester as to FairPoint; (4) the request seeks information that is not relevant to the issues in this proceeding; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. In addition, FairPoint does not subscribe to or routinely receive credit reports from Moody's or Standard and Poor's.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-3**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all presentations, supporting materials and financial modeling provided by FairPoint to Moody's and Standard and Poor's related to the merger and credit ratings.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-4**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the annual, audited financial statements and supporting information for FairPoint and its subsidiaries for a full five years prior to the merger announcement.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-5**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the latest, official forecasts of all financial statements, including capital structures and key cash flow and credit ratios of FairPoint stand-alone for a full five years prior to the merger announcement.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-6**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the official five-year capital expenditure forecasts for the FairPoint entities.**

**Objection:**

FairPoint objects to this request on the ground that the request seeks information that is beyond the scope of the Commission's statutory jurisdiction. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objection, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-7**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all of the FairPoint analysis regarding the pledge of FairPoint assets by Consolidated that assesses the costs and risks involved to FairPoint.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is not relevant to the issues in this proceeding; and (2) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-8**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the financing agreement for the current credit facility of FairPoint.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-9**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all presentations and analysis prepared for FairPoint regarding credit facilities for FairPoint that could be arranged on a stand-alone basis.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-10**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the financing agreements for all long-term debt funding for the FairPoint entities that are currently in place.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-11**

**Objection Date:** February 27, 2017

**Item:**

**Please provide detailed organization charts of the current FairPoint corporate structure, showing the relationships among all entities and ventures, the detailed organization structure of each entity (identifying all work groups and their current staffing levels), and all boards of directors.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-12**

**Objection Date:** February 27, 2017

**Item:**

**Please provide background and experience for all existing senior executives and managers (to the second level below officer) for: (a) the FairPoint parent, (b) each affiliated entity that provides services to an affiliated operating communications company that provides wireline services, and (c) each affiliated operating communications company that provides wireline services in New Hampshire.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-13**

**Objection Date:** February 27, 2017

**Item:**

**Please list and describe: (a) all plans that exist for employee job changes, relocation layoffs, hiring, and training for current FairPoint or subsidiary employees expected to have roles in the oversight, management, or conduct of the FairPoint northern New England business operations in or supporting New Hampshire, and (b) contingency plans if that expected retention level is not realized.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; and (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-14**

**Objection Date:** February 27, 2017

**Item:**

**With specific reference to meeting service needs including provision of basic service effectively, timely, reliably, and economically in New Hampshire, please list and describe all measures FairPoint currently uses to: (a) structure, (b) set objectives and performance targets for, (c) manage performance, (d) measure performance, and (e) staff the operations of the parent and its current entities who manage, conduct, or support New Hampshire operations.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-15**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all documents made or received by FairPoint or any of its affiliates or any third party engaged to examine, analyze, assess, or assist in the acquisition of FairPoint to the extent that such documents address either or both of the competitive landscape in New Hampshire or the effect of Consolidated's FairPoint acquisition on that landscape.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that issues relating to "the competitive landscape" fall well outside the scope of the Commission's statutory review in this proceeding and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-16**

**Objection Date:** February 27, 2017

**Item:**

**Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and of all current affiliates who manage, conduct, or support New Hampshire operations whom FairPoint considers, on a pre-acquisition basis to be key employees, their titles, and their responsibilities.**

**Objections:**

FairPoint objects to this request on the following bases: (1) the request is vague and ambiguous; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-17**

**Objection Date:** February 27, 2017

**Item:**

**Please provide a list of those current employees (job titles are sufficient if clear indicators of responsibilities) of FairPoint and of all current affiliates who manage, conduct, or support New Hampshire operations whom FairPoint considers, on a post-acquisition basis to be key employees, their titles, and their responsibilities.**

**Objections:**

FairPoint objects to this request on the following bases: (1) the request is vague and ambiguous; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-18**

**Objection Date:** February 27, 2017

**Item:**

**For all differences in FairPoint and FairPoint affiliate employees whose key/non-key status would change with the FairPoint acquisition, please explain the reasons for the change.**

**Objections:**

FairPoint objects to this request on the following bases: (1) the request is vague and ambiguous; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is not within FairPoint's possession, custody, or control; (4) the request seeks information beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-19**

**Objection Date:** February 27, 2017

**Item:**

**Please provide: (a) a list and description of the resources included in all bargaining units involving company personnel, (b) the job titles included in each unit, and (c) the number of persons by unit and job title.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the request seeks information governed by one or more collective bargaining agreements that are subject to the exclusive jurisdiction of the National Labor Relations Board, and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-20**

**Objection Date:** February 27, 2017

**Item:**

**Please provide copies of all current bargaining agreements involving company personnel.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is not relevant to the issues in this proceeding; (2) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (3) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the request seeks information that is subject to the exclusive jurisdiction of the National Labor Relations Board and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-21**

**Objection Date:** February 27, 2017

**Item:**

**Please; (a) list the principal metrics used to track labor management performance (e.g., number of grievances), and (b) provide measurements against them from year start 2004 through year to date.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the request seeks information governed by one or more collective bargaining agreements that are subject to the exclusive jurisdiction of the National Labor Relations Board; that 13 years of information exceeds the scope of reasonableness and relevance to this proceeding; and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-22**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) describe the major areas where duties and responsibilities are provided by external resources, and (b) explain the processes used to assess internal versus external design and delivery of these services.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-23**

**Objection Date:** February 27, 2017

**Item:**

**Please provide names and resumes for all current members of the FairPoint board of directors and for all current members of the boards of all FairPoint entities expected to play a role in conducting or supporting FairPoint operations in New Hampshire.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) (2) the request seeks information that is not within FairPoint's possession, custody, or control; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-24**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all internal and external analyses, evaluations, assessments, or reports addressing the structure, operation, performance, of the FairPoint board of directors and the boards of all FairPoint entities expected to play a role in conducting or supporting FairPoint operations in New Hampshire post-acquisition.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not within FairPoint's possession, custody, or control; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-25**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) identify all committees, councils, or other, similar bodies used by FairPoint or any affiliate to provide stakeholder input on matters affecting the operation of these entities at any time during the past five full years, (b) describe their purposes and scope, (c) identify the dates of their initiation and termination, (d) provide copies of all their charters, policies, procedures, and other governance documents, provide their regular meeting schedules.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-26**

**Objection Date:** February 27, 2017

**Item:**

**Please provide: (a) current organization charts for the holding company and each subsidiary, and (b) personnel numbers for each department or other work group at the most detailed level available.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-27**

**Objection Date:** February 27, 2017

**Item:**

**For each executive level committee or other regularly meeting group of executives at the parent or any affiliate conducting, managing, or supporting New Hampshire, please provide: (a) its purpose and objectives, (b) its regular meeting schedule, and (c) charters, policies, procedures, and other governing documents.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-28**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) identify all reports regularly provided to executives of FairPoint or any entity conducting, managing, or supporting New Hampshire operations, to the extent they specifically address plans, resources, results, and operations for or affecting New Hampshire, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-29**

**Objection Date:** February 27, 2017

**Item:**

**Please provide documentation describing the governance structure, policies, procedures, and other governing documents related to all enterprise and operating risk programs at FairPoint and affiliates conducting, managing, or supporting New Hampshire operations.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-30**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations past two full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-31**

**Objection Date:** February 27, 2017

**Item:**

**Please identify the location and describe the mission, responsibilities, organization, staffing, and principal activities of any organization within FairPoint or affiliates that performs planning, budgeting, or performance assessment for any part or all of FairPoint and affiliates managing, conducting *[sic]*, or supporting New Hampshire operations post-acquisition.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not within FairPoint's possession, custody, or control; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-32**

**Objection Date:** February 27, 2017

**Item:**

**Please describe the timing and coordination of personnel planning with overall planning and budgeting processes.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is vague and ambiguous; (2) the request is overbroad; (3) the request is unduly burdensome; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the request is not bounded by time or place and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-33**

**Objection Date:** February 27, 2017

**Item:**

**Please provide turnover data at the summary and most detailed levels existing (e.g., numbers, experience levels of departing personnel) for each department or other work grouping structure you deem useful.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the request is not bounded by time or place and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-34**

**Objection Date:** February 27, 2017

**Item:**

**Please provide: (a) a description of the executive and management succession programs, (b) an identification of the levels/positions covered, and (c) a current version of plans showing potential successors and their development needs and plans.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is not relevant to the issues in this proceeding; (2) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (3) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-35**

**Objection Date:** February 27, 2017

**Item:**

**For all FairPoint entities expected to have a role in managing, conducting, or supporting FairPoint operations post-closing, please provide all available (a) projections of losses in key employees and in other positions where that is monitored, (b) documented analyses of gaps in work performance capability, and (c) what efforts (e.g., apprentice programs and partnering with local training and educational institutions) have been designed and implemented to address those gaps.**

**Objections:**

FairPoint objects to this request on the following bases: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not within FairPoint's possession, custody, or control; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-36**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) list the dates, nature, and purpose of all internal or external benchmarking undertaken of staffing by FairPoint or any of their departments or other work grouping structure you deem useful in the last five years and current year to date, and (b) provide copies of their final (or last if not finalized) documented reports.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-37**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) list the dates, nature, and purpose of all internal or external staffing studies undertaken in the last five years and current year to date, and (b) provide copies of their final (or last if not finalized) documented reports.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-38**

**Objection Date:** February 27, 2017

**Item:**

**Please provide year-end and current staffing information for FairPoint for each of the past five years broken down by department or other work grouping structure you deem useful.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-39**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the policies, procedures, guidance, and time cycles and schedules for the performance of strategic and operational planning activities.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is vague; (3) the request is unduly burdensome; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-40**

**Objection Date:** February 27, 2017

**Item:**

**Please provide: (a) the goals and objectives for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations, and any higher-level groupings into which they are rolled up for each of the past five full years, (b) the metrics used to measure success in achievement of those goals and objectives, and (c) samples of each no older six months (or most recent available).**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-41**

**Objection Date:** February 27, 2017

**Item:**

**Please identify the location and describe the mission, responsibilities, organization, staffing, and principal activities of any organization within FairPoint that performs planning, budgeting, or performance assessment.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-42**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all vision and mission statements, values statements, strategic and operational plans, and similar documents at the corporate (and major department level) for FairPoint and affiliates conducting, managing, or supporting New Hampshire operations any higher-level groupings into which they are rolled up for each of the past five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-43**

**Objection Date:** February 27, 2017

**Item:**

**Please provide copies of all lists of enterprise and operating risks (and supporting documentation describing and explaining them and all actions associated with addressing them) for the last five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-44**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all available agendas, minutes, reports to and reports by all committees or other bodies charged with enterprise and operating risk responsibilities, for the last five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-45**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) identify all reports regularly provided to FairPoint executives, to the extent they specifically address FairPoint plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-46**

**Objection Date:** February 27, 2017

**Item:**

**Please provide documentation describing the governance structure, policies, procedures, and other governing documents related to all enterprise and operating risk programs at FairPoint.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-47**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) identify all reports regularly provided to board of directors, to the extent they specifically address FairPoint generally and plans, resources, results, and operations, (b) provide the reporting cycle for each, and (c) provide a representative sample of each no older than 6 months (or most recent available).**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-48**

**Objection Date:** February 27, 2017

**Item:**

**Please provide a list of all the major network element outages and their duration in FairPoint's New Hampshire network over the past five years. These outages should include, but not be limited to:**

- a. Planned and unplanned switch outages**
- b. Dual failure of STPs**
- c. Major cable outages (both fiber and copper)**
- d. Extraordinary events such as central office fires and major weather-related outages.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information and/or documents equally available to the requester as to FairPoint; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-49**

**Objection Date:** February 27, 2017

**Item:**

**Please provide all state and federal customer service complaints recorded against FairPoint in New Hampshire over the past five years. This list should include:**

- a. The nature of the complaint**
- b. Status of or resolution of the complaint**
- c. Time required to resolve the complaint.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-50**

**Objection Date:** February 27, 2017

**Item:**

**Please provide:**

- a. A list of all internal measures FairPoint uses to monitor the service quality of its network operations, including but not limited to, those related to service ordering, service provisioning, maintenance and repair, and network blocking**
- b. Any benchmarks or standards FairPoint uses to assess the results of each of these measures**
- c. The results of each of these measurements for the most recent five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-51**

**Objection Date:** February 27, 2017

**Item:**

**Please provide information about FairPoint employees responsible for supporting network operations and other network functions in New Hampshire, including, for both management and non-management employees:**

- a. The number of full time equivalent employees (FTE) by level**
- b. The number and percentage of employees who are retirement eligible by level.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-52**

**Objection Date:** February 27, 2017

**Item:**

**Please list all the operations support systems that FairPoint currently uses in its telecommunications operations in New Hampshire and provide for each of these systems:**

- a. The system's functionality**
- b. The average daily volume the system supports**
- c. Percentage "uptime" for each month for the last five years**
- d. Number of and average time to resolve system troubles for each month for the last five years**
- e. Number and duration of major outages.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-53**

**Objection Date:** February 27, 2017

**Item:**

**Please list:**

- a. All product and services that FairPoint currently provides to CLECs and other carriers pursuant to federal or state mandates (including, but not limited to, other LECs and interexchange carriers) in New Hampshire**
- b. The systems and/or manual processes used to handle each such product or service**
- c. The volume of orders for each such product and service for each year for the last five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not within FairPoint's possession, custody, or control; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-54**

**Objection Date:** February 27, 2017

**Item:**

**Please list:**

- a. All non-mandated product and services that FairPoint currently provides to CLECs and other carriers (including, but not limited to, other LECs and interexchange carriers) in New Hampshire**
- b. The systems and/or manual processes used to handle each such product or service**
- c. The volume of orders for each such product and service for each year for the last five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-55**

**Objection Date: February 27, 2017**

**Item:**

**Please provide:**

- a. All information systems functions FairPoint provided for each of the last five years, including, but not limited to, systems support, systems maintenance, systems trouble handling, systems architecture planning and development, and systems security**
- b. The number of full time equivalent employees (FTE) providing these functions for each of the last five years**
- c. The number of contractors or consultants providing these functions for each of the last five years**
- d. The total cost of these functions for each of the last five years**
- e. The percentage of this the cost of the functions spent on consultants for each of the last five years**
- f. Documentation and/or descriptions of the policies and practices used for each of these functions.**
- g. A list of the operations support systems that FairPoint contracts to an outside vendor for support.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-56**

**Objection Date:** February 27, 2017

**Item:**

**Please provide:**

- a. The current number of full time equivalent employees (FTE) in FairPoint's wholesale carrier group**
- b. The number of FTE that FairPoint current *[sic]* uses to support and execute its New Hampshire wholesale performance assurance plan.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-57**

**Objection Date: February 27, 2017**

**Item:**

**Please list the primary vendors FairPoint uses to build out and support its New Hampshire network. This list should include vendors of:**

- a. Switches**
- b. Signaling and transport equipment**
- c. Network or customer service operations such as billing, operations support system support, database support, operator services, E911 service, construction, etc.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-58**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) provide the performance measurements that FairPoint uses internally to monitor and manage its customer service operations in New Hampshire these measurements should include any and all measures that FairPoint uses to monitor its customer service performance in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service), (b) provide FairPoint's performance results on these measures for each of the past five years, and (c) provide all benchmark standards that FairPoint uses in conjunction with these measures to ensure it is meeting its customer service objectives.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-59**

**Objection Date:** February 27, 2017

**Item:**

**Please provide: (a) all FairPoint analyses within the past five full years that examine the adequacy of its current level of staffing for its Customer Service responsibilities in New Hampshire (these areas of responsibility should include all FairPoint personnel associated with, but not be limited to, the following functions: ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service, and (b) explain the nature of this analysis and what conclusions FairPoint arrived at.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-60**

**Objection Date:** February 27, 2017

**Item:**

**Please provide FairPoint's current staffing levels (measured in access lines per employee) for those employees who are responsible for Customer Service functions (in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service)**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-61**

**Objection Date:** February 27, 2017

**Item:**

**Please provide a list of the products and services that FairPoint currently provides its customers in New Hampshire.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-62**

**Objection Date:** February 27, 2017

**Item:**

**Please identify the nature and timing of all new or enhanced products or services that FairPoint plans to offer its customers in New Hampshire.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-63**

**Objection Date:** February 27, 2017

**Item:**

**For all employees are [sic] responsible for customer service operations, as defined in prior questions, in of [sic] New Hampshire please provide, by employee level, the number and percentage of employees who are retirement eligible at each level (for both the management and the non-management employees in New Hampshire).**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; ; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-64**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) describe how customer inquiries and customer calls are handled by FairPoint today, whether by calls, email, chat, fax, web inquiries, social media, and written correspondence, and for all types of contact (ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service), and (b) describe any specialization of workforce, functionally or by location. Include a historical perspective for the past five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-65**

**Objection Date:** February 27, 2017

**Item:**

**Please detail FairPoint call center locations in New Hampshire. Include current staffing levels and call handling statistics for each location for the past five years, including centers that have been closed or consolidated into other centers, and the timing and reasons for the closing or consolidation. Include centers to handle in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service. Include centers that support large and small business and residential customers.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-66**

**Objection Date:** February 27, 2017

**Item:**

**Please detail the nature and schedule (for full operation) for any expansion plans or recent expansion of call center locations handling customer inquiries, specifying costs, timing, details of expanded facilities, staff additions, management and organization changes, equipment and technology changes, and resulting capacity changes.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is not bounded by time or place. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-67**

**Objection Date:** February 27, 2017

**Item:**

**Please describe FairPoint's process and methodology used to measure and track customer satisfaction for its New Hampshire customers, for all functions evaluated and all types of customers. Include types of surveys issued, frequency, vendors used, scope, and objectives.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-68**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the results from all FairPoint customer satisfaction studies relating to its New Hampshire operations conducted during the past five full years, including the survey instruments administered for each study.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-69**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the results of any customer research conducted concerning the proposed acquisition. Include a description of the process, methodology, scope, timing, and objectives and provide a copy of the results from the research.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-70**

**Objection Date:** February 27, 2017

**Item:**

**Please define and describe FairPoint's current customer service strategy, indicating how this strategy links to objectives, budgets, and reporting.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-71**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) explain how FairPoint customers will be transitioned into Consolidated customers, including such matters as public announcements, bill format, customer communication, and advertising, and (b) state if, how, when, and through what communications vehicles customers be made aware of the transition.**

**Objections:**

FairPoint objects to this request on the following bases: (1) the request seeks information that is not within FairPoint's possession, custody, or control; (2) the request seeks information beyond the scope of the Commission's statutory jurisdiction; and (3) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-72**

**Objection Date:** February 27, 2017

**Item:**

**Please: (a) explain how FairPoint measures front-line customer service employee satisfaction or engagement, including scope, frequency, and methods, and (b) provide the results of FairPoint employee satisfaction and employee engagement studies for the past five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint will provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-73**

**Objection Date:** February 27, 2017

**Item:**

**Please provide any assessments of customer service staffing requirements for the past five years in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-74**

**Objection Date:** February 27, 2017

**Item:**

**Please provide the current “years of service” distribution by function and level for the FairPoint New Hampshire customer service work force (in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service). This distribution should be in five-year increments.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission’s statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-75**

**Objection Date:** February 27, 2017

**Item:**

**Please explain how FairPoint measures billing accuracy for all types of customer billing. Provide billing accuracy performance for the past five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-76**

**Objection Date:** February 27, 2017

**Item:**

**Please detail any self-service technology used by FairPoint to respond to customer inquiries or requests for billing, service, sales, repair, or troubleshooting assistance or to process customer-service related transactions.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-77**

**Objection Date:** February 27, 2017

**Item:**

**Please explain the process FairPoint uses to receive, track, resolve, and report customer complaints, including handling of executive-level and complaints through regulators.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

Subject to and without waiving the foregoing Objections, FairPoint responds as follows:

In its Responses, FairPoint expects to provide information responsive to this request within the limits of the regulatory jurisdiction of the Staff and Commission and the statutory scope of the proceeding.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-78**

**Objection Date:** February 27, 2017

**Item:**

**Please provide an analysis, by complaint category, of FairPoint's New Hampshire customer complaints received for the past five years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-79**

**Objection Date:** February 27, 2017

**Item:**

**Please describe FairPoint's current process for monitoring call quality within call center operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria. Include the evaluation forms used to measure each call type.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment; (2) the request seeks information that is not relevant to the issues in this proceeding; (3) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (4) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-80**

**Objection Date:** February 27, 2017

**Item:**

**Please describe FairPoint’s current process for monitoring written customer correspondence and email quality within customer service operations, including the process, frequency, scope, methodology, technology, roles and responsibilities, and measurement criteria. Include the evaluation forms used to measure each type of written correspondence.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission’s statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-81**

**Objection Date:** February 27, 2017

**Item:**

**Please provide any benchmarking or comparative performance results in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service for FairPoint within the last five years.**

**Objections:**

FairPoint objects to the form of the question and further objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is not relevant to the issues in this proceeding; (4) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (5) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-82**

**Objection Date:** February 27, 2017

**Item:**

**Please detail the level of overtime, by employee classification, for the past five full years for front-line customer service employees in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment ; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-83**

**Objection Date:** February 27, 2017

**Item:**

**Please provide quarterly and annual business unit goals for the Customer Service organizations (in the areas of ordering, provisioning, repair, billing, sales, collection, general customer service, technical support, directory assistance, toll assistance, or to add/change/remove service) for the last five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment ; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.

**Respondent: Michael C. Reed**  
**Title: State President - Maine**

**Data Request: Staff 1-84**

**Objection Date:** February 27, 2017

**Item:**

**Please list any grievances or other labor disputes within front-line customer service employees within the past five full years.**

**Objections:**

FairPoint objects to this request on the following grounds: (1) the request is overbroad; (2) the request is unduly burdensome; (3) the request seeks information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment ; (4) the request seeks information that is not relevant to the issues in this proceeding; (5) the request seeks information that is beyond the scope of the Commission's statutory jurisdiction; and (6) the request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, FairPoint asserts that a request for five years of information exceeds the scope of reasonableness and relevance to this proceeding. FairPoint further notes that the request seeks information governed by one or more collective bargaining agreements that are subject to the exclusive jurisdiction of the National Labor Relations Board, and that the present proceeding is limited to an evaluation, under RSA 374:30, II, of whether Consolidated is technically, managerially and financially capable of maintaining the obligations of an ILEC-ELEC as set forth in RSA 362:8 and RSA 374:22-p.