

STATE OF NEW HAMPSHIRE

Before the

PUBLIC UTILITIES COMMISSION

Docket No. DT 23-103

Consolidated Communications Holdings, Inc.

And

Condor Holdings, LLC

**Joint Petition for Findings in Furtherance of an Indirect Transfer of Control of CCHI's
Operating Subsidiaries as part of Parent Transaction**

**CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.'S
OBJECTIONS TO SET 1 DISCOVERY REQUESTS OF THE
OFFICE OF THE CONSUMER ADVOCATE**

NOW COMES Consolidated Communications Holdings, Inc. (“Consolidated”), and pursuant to N.H. Code Admin. R. Puc 203.09(g), hereby objects to the data requests (collectively, the “Requests” and individually, each being a “Request”) propounded by the Office of the Consumer Advocate, on the grounds specified below and as of April 8, 2024.

GENERAL OBJECTIONS

1. Consolidated generally objects to the Requests to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, work product doctrine, common defense doctrine, and/or any other applicable privilege, rule, or duty of confidentiality to third parties that precludes or limits the production or disclosure of information or documents. Accordingly, Consolidated interprets the Requests as not requiring disclosure of such protected information or documents. Nothing contained in Consolidated’s responses is intended to, or in any way shall be deemed, a waiver of such applicable privilege, doctrine, rule, or duty. In

responding to each Request, Consolidated will not provide privileged or otherwise protected information or documents.

2. Consolidated generally objects to the Requests as overly broad, unduly burdensome, oppressive, and harassing to the extent that they seek production of information or documents that have no bearing on the issues in the docket, the standard of review applicable to the relief sought in the Joint Petition filed in this docket, and/or are neither relevant to the subject matter of the pending docket nor reasonably calculated to lead to the discovery of admissible evidence. Consolidated also generally objects to each Request to the extent that it seeks information that is proprietary, competitively and/or commercially sensitive, and/or subject to confidential treatment.

3. Consolidated has not fully completed its investigation into the facts pertaining to this docket, has not completed its discovery, and has not completed its preparation for any evidentiary hearing. Responses will be based only on such information and documents as are presently available and known to Consolidated. This anticipated further discovery, investigation, legal research, and analysis may supply additional facts and may establish information that may vary from that set forth in any Consolidated responses. Consolidated's responses will be without prejudice to Consolidated's right to introduce evidence of any subsequently discovered fact(s) or circumstance(s).

4. All General Objections set forth above are incorporated by reference into each specific objection listed under each of the Office of the Consumer Advocate's Requests set forth below.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-01

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Request from: Office of the Consumer Advocate

Witness:

Please provide a topographic map of the New Hampshire service territory indicating signal strength contours throughout the service territory.

Objection: Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding as Consolidated does not provide wireless services, and it is not reasonably calculated to lead to the discovery of admissible evidence.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-02

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Request from: Office of the Consumer Advocate

Witness:

Please indicate whether and to what extent there are specific service dead zones in the New Hampshire service territory.

Objection: Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding as Consolidated does not provide wireless services, and it is not reasonably calculated to lead to the discovery of admissible evidence. This Request also is unduly vague as the phrase “specific service dead zones” is not defined.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-05

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Request from: Office of the Consumer Advocate

Witness:

Please provide system performance statistics for the past five years, including frequency and duration of service interruptions and their root causes in the NH service territory.

Objection: The proposed Transaction involves an indirect transfer of control via stock purchase without any change to the identity or direct ownership of the Licensees. Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, Consolidated objects on the grounds that the Request seeks information that is not kept in the ordinary course of business, and it would be unduly burdensome to compile responsive information.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-06

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Request from: Office of the Consumer Advocate

Witness:

Please provide system performance statistics for the past five years, including frequency and duration of service interruptions and their root causes in other service territories in the northeast.

Objection: The proposed Transaction involves an indirect transfer of control via stock purchase without any change to the identity or direct ownership of the Licensees. Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, Consolidated objects on the grounds that the Request seeks information that is not kept in the ordinary course of business, and it would be unduly burdensome to compile responsive information.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-07

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Request from: Office of the Consumer Advocate

Witness:

Please provide a summary of consumer concerns and complaints over the past three years in the New Hampshire service territory.

Objection: The proposed Transaction involves an indirect transfer of control via stock purchase without any change to the identity or direct ownership of the Licensees. Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

Consolidated Communications Holdings, Inc.

Docket No. DT 23-103

Date Request Received: 03/27/2024

Date of Response:

Date of Objection: 04/08/2024

Request No.: 1-08

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Request from: Office of the Consumer Advocate

Witness:

Please provide a summary of consumer concerns and complaints over the past three years in other service territories in the northeast.

Objection: The proposed Transaction involves an indirect transfer of control via stock purchase without any change to the identity or direct ownership of the Licensees. Consolidated objects to this Request on the grounds that it seeks information that is irrelevant to the instant proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, Consolidated objects on the grounds that the Request seeks information that is not kept in the ordinary course of business, and it would be unduly burdensome to compile responsive information.

