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May 30, 2008

Lynn Fabrizio, Esq.  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

**Re: DT 07-011 Verizon New England/FairPoint Communications  
OCA Comments on Liberty Consulting Group's Draft Assessment of FairPoint's  
Cutover Readiness Verification Plan**

Dear Ms. Fabrizio:

We write in response to your email of May 22, 2008 inviting parties to Docket No. DT 07-011 to comment on Liberty Consulting Group's Draft Assessment of FairPoint's Cutover Readiness Verification Plan. Thank you for the opportunity to provide these comments.

The OCA has reviewed the Draft Assessment and has the following thoughts and questions:

1. On p. 4, Liberty "notes that some of the dates shown in this appendix are no longer applicable." It is not clear to the OCA which dates are no longer applicable, why, and what impact changes may have on FairPoint's ability to give its notice of readiness for cutover in July.
2. On p. 6, Liberty notes that the set of test cases "remain incomplete in a few areas," including ordering, provisioning, billing, engineering work orders, Lifeline and Link-Up, among other things. Liberty goes on to state on p. 7 that there is a project completion date of these items of May 30, 2008. We wonder if that deadline has been met, and if not, what the ramifications may be.
3. On p. 9 Liberty lists the open needs that remain with respect to operations support systems testing. One is "Liberty's review of the complete and final definition of all the systems test cases that have not yet been finalized." We wonder when this will be finalized, and if it will be completed in time for the planned July notice of readiness for cutover.

The other issue related to conditions on severity level and manual workarounds on p. 9 raises similar questions.

4. On p. 11 Liberty states that “it understands that there is not yet full agreement between FairPoint and Verizon on a set of cross comparisons that will be conducted between the source Verizon systems and the FairPoint landing database.” Liberty goes on to state its desire to review these pieces before making a final assessment. This, combined with other issues raised in this draft report as well as in Liberty’s May 9, 2008 monthly Cutover Monitoring Status Report, raises question about FairPoint’s ability to give its notice of readiness in July. It is of particular concern to the OCA that FairPoint and Verizon have not reached agreement on this issue.
5. On p. 13 Liberty notes the challenges that FairPoint faces in filling both pre-existing Verizon positions, as well as its new 675 positions. Liberty states that it will “evaluate whether FairPoint has correctly identified the key positions that must be staffed at the time cutover readiness is given.” The OCA wonders when Liberty will be provided with the information needed to conduct this important evaluation, as having appropriate staff seems to be a critical component of readiness for cutover.
6. On p. 14 Liberty states that it has “proposed to FairPoint that it amend the training plan so that a few employees in all the key organizations will have completed training by the time of cutover readiness, with provision to retrain these employees as necessary.” The OCA concurs with this suggestion and would like to know whether FairPoint has agreed to make this important change.
7. In its overall assessment on p. 14 Liberty states that “in a few limited areas FairPoint has yet to provide Liberty the details necessary to demonstrate that these acceptance criteria will be sufficiently complete.” This is of concern to the OCA, as Liberty must have the necessary information in order to complete its review in light of the many tasks remaining to be complete between now and July.
8. On p. 15 Liberty states that it is “optimistic these remaining gaps will be filled,” and states that once it receives additional information it will issue a supplement to this report. The OCA wonders how close to the July cutover readiness deadline that this work can be completed, and whether there is sufficient time to complete a supplement assessment and complete other steps required prior to the notice of readiness. Does Liberty have an estimate as to when a supplemental report will be filed?

9. Lastly, on p. 15 Liberty lists additional items that it will investigate. The OCA is not clear as to whether these are additional items that will be included in the supplemental report.

In addition, the OCA has reviewed the monthly Cutover Monitoring Reports filed by Liberty. The latest report on the NH PUC's website, dated May 9, 2008, makes clear that much more work is necessary before FairPoint could issue its notice of readiness in July. In particular, on p. 3 Liberty states that a "number of related activities will be required that will span several weeks" prior to notice of readiness for cutover. Among them are a final Liberty report on cutover readiness, a status conference with the Vermont Board, and possibly hearings in all three states should FairPoint proceed without a favorable assessment by Liberty. The OCA is concerned that with the current status of FairPoint's readiness, it seems unlikely that FairPoint will be able to give its notice of readiness in July. A failure to do so means higher TSA costs for FairPoint and longer delays for customers receiving promised upgrades and improved service quality, among other things.

On a procedural note, we request that the Commission post all comments received on this topic, along with the Draft, Final and Supplemental reports from Liberty, on its website for Docket No. DT 07-011, or a new docket as the Commission sees fit.

Again, the OCA appreciates the opportunity to provide these comments, and we greatly appreciate the work that Liberty is performing on behalf of all three states.

Respectfully,



Meredith A. Hatfield  
Consumer Advocate

cc: DT 07-011 service list via electronic mail