



**CONFIDENTIAL  
MATERIAL  
IN COMM FILE**

April 16, 2012

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*Via Electronic & Hand Delivery*

Debra A. Howland  
Executive Director & Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429



**Re: DT 12-069 Stebbins Commercial Properties Billing Complaint Against FairPoint Communications – FairPoint Witness Identification and Summary of Positions - REDACTED**

Dear Ms. Howland:

The following is sent on behalf of Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE (“FairPoint”) in response to the New Hampshire Public Utilities Commission’s (the “Commission”) Secretarial Letter dated April 4, 2012, referenced in Docket Number DT 12-069. Pursuant to the Secretarial Letter, FairPoint hereby submits its witness identification and summary of positions.

FairPoint will present Paul Little at the evidentiary hearing on April 18, 2012. Paul is currently employed by FairPoint as a Sales Support Supervisor and works at 875 Holt Avenue, Manchester, New Hampshire. He has been in this capacity for four (4) years. Paul has seventeen (17) years in telecommunications experience, including service with FairPoint, Verizon, Bell Atlantic and NYNEX in similar roles.

With respect to a written summary of Mr. Little’s testimony, FairPoint offers the following:

- Stebbins Commercial Properties (“Stebbins”) is disputing billing for telephone number (“TN”) 603.622.0463
- Stebbins is currently located at 730 Pine Street, Manchester, New Hampshire and has been at this location since at least June, 2002
- Stebbins was invoiced for said TN from June, 2002 through August, 2011 by both Verizon New England Inc. (“Verizon”) and FairPoint
- Stebbins has paid the invoices for said TN each month from June, 2002 through August, 2011

- The average monthly invoice is approximately **[BEGIN CONFIDENTIAL] [END CONFIDENTIAL]**
- Stebbins disconnected this TN on August 15, 2011
- The transfer of assets from Verizon to FairPoint occurred on April 1, 2008
  - Prior to this date through the year 2000, Verizon was the operating company providing said TN at 730 Pine Street, Manchester, New Hampshire
  - After this date, FairPoint was the operating company providing said TN at 730 Pine Street, Manchester, New Hampshire
- FairPoint does not have provisioning records from June, 2002
- Verizon does not have provisioning records from June, 2002
- Both Verizon and FairPoint have record retention policies
- Stebbins initially disputed the billing for said TN with FairPoint on August 15, 2011
- On August 29, 2011, FairPoint offered a **[BEGIN CONFIDENTIAL] [END CONFIDENTIAL]**
  - Stebbins declined FairPoint's offer
- On September 27, 2011, Stebbins requested a hearing before the Commission
- On April 4, 2012, the Commission issued a Secretarial Letter to Stebbins, and, amongst other items in this Letter, scheduled an evidentiary hearing on April 18, 2012 at the New Hampshire Public Utilities Commission
- On April 13, 2012, FairPoint again offered a **[BEGIN CONFIDENTIAL] [END CONFIDENTIAL]**
  - Stebbins declined FairPoint's offer.

Because FairPoint and Verizon are operating within their respective record retention policies, no such provisioning record from 2002 can be presented to the Commission. As such, the focus of Mr. Little's testimony will review FairPoint's provisioning process, specific to customer order intake through installation. This process is similar to that of Verizon, which was the telecommunications provider in 2002 when the TN in dispute was installed. Mr. Little was working for Verizon in 2002 in a similar capacity, and is familiar with Verizon's order intake process. Mr. Little will explain that an external request initiated the installation of 603.622.0463 at Stebbins Commercial Properties, 730 Pine Street, Manchester, New Hampshire in June, 2002.

Additionally, Mr. Little will review FairPoint's process to disconnect service, which, is similar to Verizon's process. As mentioned above, Mr. Little was employed by Verizon between the years of 2000 and 2008 in similar capacities and can validate Verizon's disconnect process. The value in detailing this process for the Commission is to highlight that no such disconnection order was placed by Stebbins on said TN until August 15, 2011.

Mr. Little's testimony will demonstrate for the Commission that the billing for 603.622.0463 at Stebbins Commercial Properties, 730 Pine Street, Manchester, New Hampshire from June, 2002 through August 15, 2011 is justified. FairPoint attempted to work in good faith with Stebbins in this matter, and went as far as offering a **[BEGIN CONFIDENTIAL] [END**

**CONFIDENTIAL**] on August 29, 2011. FairPoint also offered this same adjustment to Stebbins on April 13, 2012. In both instances, Stebbins declined. In light of the fact that FairPoint's efforts to work with Stebbins to adjust its charges and avoid a hearing have been declined, FairPoint hereby withdraws its offer of August 29, 2011 and its recent offer of April 13, 2012.

Pursuant to the Commission's Secretarial Letter dated April 4, 2012, FairPoint files the attached confidential and proprietary exhibits as evidence and plans to detail these more in testimony on April 18, 2012. FairPoint Communications represents that the materials marked "Proprietary Information" pertain to the provision of competitive services: set forth trade secrets or other confidential information falling within the scope of RSA 91-A:5 and PUC Rule 201:4 (5) ; and are not general public knowledge or published elsewhere; FairPoint Communications having taken measures to prevent dissemination of the information in the ordinary course of business. Pursuant to PUC 203.08, FairPoint represents that a motion for confidentiality will be filed in advance of the April 18, 2012 hearing.

An original and 7 copies of this filing, along with a compact disc, are enclosed herewith. Please do not hesitate to contact me in the event you need further information concerning the above.

Very truly yours,

A handwritten signature in black ink, appearing to read "R.P. Taylor", with a stylized flourish extending to the right.

Ryan P. Taylor

Electronic cc: Service List DT 12-069