



BAILEY EX. 20

Kearsarge Telephone Company
Wilton Telephone Company
Hollis Telephone Company
Merrimack County Telephone Company
Docket No. DT 07-027
Company Responses
To OCA Set 1 Data Requests
September 4, 2007

OCA 1-36: Re testimony of Michael Reed (p. 4, line 2), stating, concerning TDS' "best estimate of the extent of competition..." (emphasis added). Please provide a list of all data or information that TDS did not have or have access to upon which the actual extent of competition, etc., could be calculated.

Response:

The Petitioners object to OCA Data Request 1-36 on the grounds that the data request is vague, overbroad and unduly burdensome. Moreover, OCA Data Request 1-36 requests the Petitioners to answer a negative question for which the answer cannot be fully known. Subject to and without waiving these objections, the Petitioners will respond to this data request.

The information to which Mr. Reed used to provide his best estimate (emphasis added) is included in the description in his testimony, use of competitor web sites, advertising, local technical knowledge, etc. Information Petitioners do not have is detailed customer data on exactly how many customers, where they are located, bundled products they have purchased, usage data on their lines. Much of the information that Petitioners do not have access to is data that has been requested in the round of discovery by the parties in this case. Please see objections filed August 24, 2007.

Michael C. Reed is responsible for this response.