

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DT 14-102

**Northern New England Telephone Operations LLC d/b/a FairPoint Communications -
NNE
Complaint Against FairPoint Communications, Inc.
Rate Increase Dispute**

**MOTION TO AMEND GENERAL AND SPECIFIC OBJECTIONS AND RECORD
REQUEST RESPONSES**

Pursuant to the New Hampshire Code of Administrative Rules § 203.10, Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE (“FairPoint” herein) hereby moves to amend its General and Specific Objections and Record Request Responses in the above-captioned docket. In support of this Motion, FairPoint states the following:

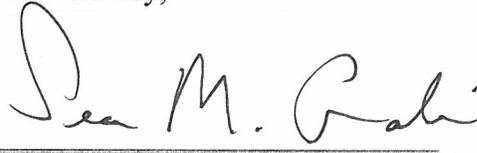
FairPoint makes no changes to the substance or the relief requested in its previous filing. FairPoint is filing this Motion with the intent to replace its original filing with the attached corrective filing in order to comport with the requested identification and numbering methods of submitted documents and record requests and related responses. FairPoint has also changed “attached” to “enclosed” in its record request responses to more accurately reflect the filing and has included page numbers to this Motion.

WHEREFORE, FairPoint respectfully requests that the Commission grant its Motion to account for such changes to the record and refer to the attached corrective filing going forward as the General and Specific Objections and Record Request Responses and apply these changes nunc pro tunc.

Respectfully submitted,

NORTHERN NEW ENGLAND TELEPHONE
OPERATIONS LLC, D/B/A
FAIRPOINT COMMUNICATIONS-NNE

By Its Attorney,



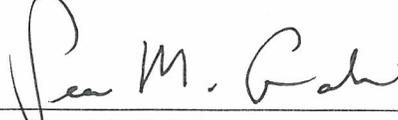
Dated: June 10, 2014

Sean M. Galvin
Sean M. Galvin
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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2014 an original and the requisite number of copies of the foregoing Motion were hand delivered to the Commission and e-mailed to all service list parties.

FairPoint Communications – NNE

By: 
Sean M. Galvin
Sean M. Galvin

(Corrective Filing)

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
DT 14-102

William Whalen G. Whalen Complaint Against FairPoint Communications, Inc. – Rate Increase Dispute

Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE's Responses to Oral Record Requests Propounded by the New Hampshire Public Utilities Commission (the "Commission"), the Commission Staff and New Hampshire Legal Assistance.

General and Specific Objections

1. Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE ("FairPoint" herein) hereby objects to these oral data/record requests to the extent that they purport to impose obligations beyond the applicable law and Commission rules and decisional law.

2. FairPoint objects to any record or data request that seek information or data protected by the attorney-client privilege and attorney work product doctrine. In this regard, FairPoint waives no privilege or objection by inadvertent, unintentional or unauthorized disclosure of such information or documents.

3. FairPoint objects to any definition or instruction which provides for definitions of terms at variance with their common meaning. In responding to these record requests, FairPoint shall apply the common meanings of such terms.

4. FairPoint objects to any record or data request that seeks all documents or information concerning a particular subject as overbroad in that FairPoint can and will only

produce such documents reasonably relating to a particular subject within FairPoint's custody, possession and control that may be relevant to the present proceedings in this docket.

5. FairPoint objects to any record request to which the response requires disclosure, response or production of confidential, commercial or proprietary information of FairPoint. FairPoint is only producing such information to the Commission and Staff in accordance with its Motion for Confidential Treatment and Request for Protective Order and applicable rules and laws. If the Commission denies this motion in part by allowing disclosure to any other party in this proceeding other than Staff, FairPoint preserves its objection to such disclosure; however, in such event, FairPoint further objects to any disclosure without such party (or parties) being required to enter into a Protective Agreement prior to such disclosure.

6. Not in limitation of any other objections, FairPoint specifically objects to the Record Request marked as Exhibit 7 as i) it is not relevant to this docket and outside the scope of the issues raised in Mr. Whalen's complaint, ii) to the extent relevant, FairPoint takes exception in that any probative value of this request is substantially outweighed by the likelihood that this will cause undue delay, unfair prejudice and/or confusion of the issues and iii) this request is not reasonably calculated to lead to the discovery of admissible evidence.

7. Not in limitation of any other objections, FairPoint specifically objects to the Record Request marked as Exhibit 9 as it is overly broad and not relevant in part as it applies to all basic service eligibility (not just multiline) and any document referenced when determining basic service eligibility. To the extent relevant, FairPoint takes exception to the extent this response is not specific to the multiline issue of basic service and specific policies or methods and procedures related thereto, and that, therefore, this request will result in undue delay and/or

confusion of the issues presented in this docket to FairPoint's prejudice to the extent information or documentation is used for purposes outside of the multiline issue.