

EXHIBIT  
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DT 16-872

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RESPONSES TO STAFF'S DATA REQUESTS – FIRST SET

Date Request Received: February 17, 2017

Date of Response: March 6, 2017

Request No. Staff 1-80

Witness: Gabe Waggoner

- 1-80. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 5, lines 9-12, discussing the Consolidated review of documentation relating to FairPoint's network in New Hampshire as part of its inspection of the FairPoint assets. Please:
- a. Provide the review plan and guidelines Consolidated used for this inspection to ensure it conducted a comprehensive study of these assets
  - b. Provide the process Consolidated used to validate the accuracy of the documentation it reviewed.
  - c. Provide all work papers and reports that resulted from this documentation review.

RESPONSE: Please see Confidential Attachment 1-80 to address all three questions. The process Consolidated used is outlined in the attachment. Consolidated has developed a list of questions for network review and submits the questions to the selling party. Once the answers are received, Consolidated reviews and asks follow-up clarification questions. The information is reviewed and as the in-person discussions take place, validation of the interpretation of the answers and additional information is gained. We spent time with the FairPoint CTO and Senior Vice President of Operations discussing the information and subsequently, time with the CTO and SVP of Operations and their direct report teams. The Consolidated team reviewed the information for consistency and accuracy and provided us with confidence in its validity.

**Synopsis and Notes around Consolidated's review of the FairPoint network in Northern New England.**

In September of 2015, Consolidated's Chief Marketing Officer, Chief Sales Officer, and Vice-President of Operations spent multiple days in the Northern New England (NNE) market driving throughout communities in Maine, Vermont, and New Hampshire. The intent of the market level view was to review the market conditions and perform an independent network verification and inspection.

**Notes from the NNE review:**

The majority of the cable facilities are aerial on what appear to be both owned and joint pole lines. The deployment of the cables include a consistent design with prior Verizon/GTE practices. This practice includes placing additional cable(s) for capacity and maintaining the existing cable paths resulting in one or more cables serving the same customer bases. It appears that FairPoint has changed this design philosophy to match the CCI policy of placing new cables that are sized to accommodate the existing cable capacity and provide growth capacity. Customer services are moved from the old cable to the new cable and the old cable is removed. In driving through the NNE markets, there were visible areas where this practice appears to be in place.

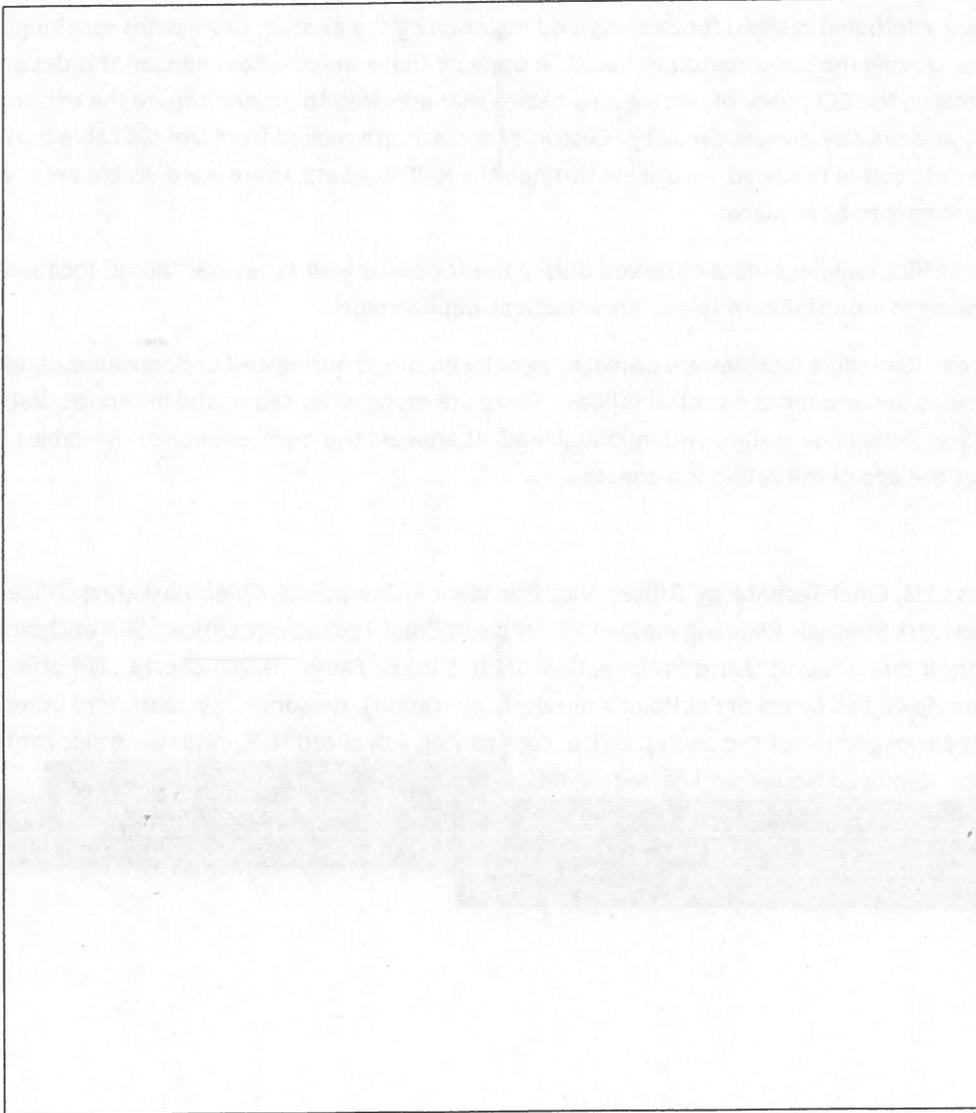
Several central office buildings were observed during the review as well as several "node" locations. All appeared consistent with standard telecommunications deployments.

Summary notes: The cable facilities are primarily aerial with direct buried and underground noted in some subdivisions and around the central offices. There are many older cables still in service that appear to be Stal-Peth/paper cables with minimal lead. It appears the maintenance of the cables is fairly good, yet the age of the cables is a concern.

Consolidated's CEO, Chief Technology Officer, Vice President – Operations, Chief Marketing Officer, and Director of Network Strategic Planning met with FairPoint's Chief Technology Officer, SVP of Operations, and many of their direct report teams in November of 2015 in the FairPoint Manchester, NH offices. This meeting reviewed all facets of FairPoint's network, operations, personnel, systems, and other areas including physical inspection of the central office, data center, Advanced NOC, and two other central offices and field deployed Nodes, and cable facilities. [REDACTED]

[REDACTED]

## NNE Network - Infrastructure



Notes from discussions:

[REDACTED]

Updated Network Notes between November of 2015 and November of 2016 as well as from face to face in Charlotte:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]