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September 23, 2009

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Public Utilities Commission of Oregon
Attention: Filing Center
550 Capitol Street N.E., Suite 215
Salem, OR 97301-2551

***Re: Docket No. UM 1431; Further Support for Verizon's Motion to Enforce
Commission Orders***

Dear Filing Center:

In further support of Verizon's pending Motion to Enforce Commission Orders filed on September 17, 2009, attached please find more instances of IBEW's violation of the Highly Confidential Protective Order entered in this docket. In the attached public version of the data requests propounded by IBEW in Ohio, the IBEW asks specific questions about documents produced and designated as "Highly Confidential" in this Oregon docket (included with the two relevant data requests, numbered 157-58, are the first and last pages of the full data request set). Copies of the relevant documents have not been provided to nor reviewed by IBEW in Ohio, and the genesis for the documents is clear by the label referenced in the requests themselves (e.g., "OR IBEW Set 1 VZ10 Attach 1 Project North Board Presentation 051109 HIGHLY CONFIDENTIAL" and "OR IBEW Set 1 VZ10 Attach 2 Barclays and JPMorgan VZ BoD Presentation 051109 HIGHLY CONFIDENTIAL"). The requests show more examples of IBEW using "Highly Confidential Information" for a "purpose other than the purposes of preparation for and conduct of this proceeding," in direct violation of the Highly Confidential Protective Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory M. Romano".

Gregory M. Romano

GMR:pl

Enclosures

cc: See Certificate of Service

UM 1431
CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all of the following parties, as follows:

Public Utilities Commission of Oregon

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VIA EMAIL

DATED: September 23, 2009.



Patti Lane

ATTACHMENT

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Frontier Communications Corporation,)
New Communications Holdings, Inc. and) Case No. 09-454-TP-ACO
Verizon Communications Inc. for Consent)
and Approval of a Change in Control.)
)

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 986 AND
COMMUNICATION WORKERS OF AMERICA'S
FOURTH SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO JOINT APPLICANTS VERIZON COMMUNICATIONS INC. AND
FRONTIER COMMUNICATIONS CORP.**

Pursuant to Commission Rules 4901-1-16, 4901-1-18, 4901-1-19 and 4901-1-20, the International Brotherhood of Electrical Workers, Local 986 (IBEW) and the Communication Workers of America ("CWA"), by and through their undersigned counsel, hereby serve the following fourth set of interrogatories and requests for production of documents upon Joint Applicants Verizon Communications Inc. ("Verizon") and Frontier Communications Corp. ("Frontier") (collectively "Applicants"):

IBEW/CWA INTERROGATORIES:

- Labor INT-109. Within the past five years, has anyone at Verizon or on behalf of Verizon conducted an audit of its plant, property, and equipment, and its continuing property records for its Ohio operations?
- Labor INT-110. Has anyone at Frontier or on behalf of Frontier conducted an audit of Verizon's plant, property, and equipment, and Verizon's continuing property records for

Interrogatories With Respect to Highly Confidential Verizon Document labeled "OR IBEW Set1_VZ10 Attach1_VZ Project North Board Presentation 051109 HIGHLY CONFIDENTIAL" and further labeled "Verizon Communications, Project North, Board of Directors, May 8, 2009"

Labor INT-157. Was this the first document shared with the Verizon Board of Directors on this transaction?

Interrogatories With Respect to Highly Confidential Verizon Document labeled "OR IBEW Set1_VZ10 Attach2 Barclays and JPMorgan VZ BoD Presentation 051109 HIGHLY CONFIDENTIAL" and further labeled "Project North: Presentation to the Board of Directors, May 11, 2009, Barclay's Capital J.P.Morgan"

Labor INT-158. Referring to the table on page 11, labeled "SpinCo and East Standalone Projections:"

- a) How were the projections for SpinCo Capital Expenditures derived?
- b) The Capital Expenditures projections on this page are not the same as the capital expenditure projections for Spinco on page 9 of the May 8 Highly Confidential Presentation to the Verizon Board of Directors. How do you explain these differences and why are they different?

Re testimony of Mr. McCarthy, p. 15, which states: "More significantly, in 2008, Frontier also converted more than 500,000 Rochester Telephone access lines to Frontier's standard customer service and billing system."

Labor INT-159. On what date in 2008 did Frontier convert the Rochester Telephone access lines to Frontier's standard customer service and billing system?

Labor INT-160. Separately for the time periods September 1 through December 31 for each of the years 2006, 2007, and 2008, what were each of the following for the Rochester Telephone territory:

- a. Percentage of installation commitments met?
- b. Average installation interval?
- c. Initial reports per hundred lines?
- d. Repeat reports per hundred lines?
- e. Initial out of service interval (hours)?
- f. Repeat out of service interval (hours)?
- g. Percent of troubles cleared within 24 hours?
- h. Total customer calls to call center (also provide separately by category of call, e.g., billing, service order, missed appointment, repair, etc.)?

- b. Please provide all due diligence reports prepared by or on behalf of Frontier concerning the transaction.
- c. Please identify each specific Verizon central office, service center, garage, or other location in Ohio that was visited by anyone by or on behalf of Frontier as part of the due diligence process. For each such visit, please provide the date the facility was visited and the name of the Frontier representative(s) who conducted the visit.

Labor RPD-112. Concerning the preliminary registration statement (S-4) filed by Frontier and Verizon with the Securities and Exchange Commission on July 24, 2009, p. 51, regarding the Frontier Board's consultation "with Frontier's management and legal and financial advisors": To the extent not already provided, please provide a list of all reports, opinions, or memoranda provided by Frontier's management and financial advisors to Frontier's Board relating to the proposed transaction. Please provide each such document.

Labor RPD-113. Concerning the preliminary registration statement (S-4) filed by Frontier and Verizon with the Securities and Exchange Commission on July 24, 2009, p. 53, discussing the opinions of Evercore and Citi: Please provide all reports and opinions prepared by Evercore and Citi concerning the transaction and that were provided to Frontier.

Respectfully submitted,



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