

Communications  
Workers of America  
AFL-CIO, CLC

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September 5, 2007

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

**RE: Ex Parte Notice. WC Docket No. 07-22. In the Matter of Application Filed for the Transfer of Certain Spectrum Licenses and Section 214 Authorizations in the States of Maine, New Hampshire and Vermont from Verizon Communications Inc. and its Subsidiaries to FairPoint Communications, Inc.**

Attached please find the testimony of Randy Barber and Dr. Kenneth Peres delivered to the Maine Public Utility Commission. The testimony contains analyses and data that support our contention that the public interest risks posed by the transaction overwhelm any purported benefits.

For example, Mr. Barber shows that FairPoint does not have the financial and operational capability and is too inexperienced at running such a huge operation to reliably undertake this transaction without posing extraordinary risks to Maine's consumers, work force and economy.

Dr. Peres shows that FairPoint's limited resources will be stretched even further because it will not only have to address its own service quality issues but rectify Verizon's significant service quality problems. Verizon's service quality performance deteriorated in nine of the fifteen areas measured by the Maine Public Utility Commission and five areas measured by the FCC using ARMIS data over the past five years. In

addition, FairPoint subsidiaries had among the highest rates of customer complaints in the state.

Sincerely,

A handwritten signature in black ink that reads "Kenneth R. Peres". The signature is written in a cursive style with a clear, legible font.

Kenneth R. Peres, PhD.  
Research Economist  
Research and Development Department  
Communications Workers of America

encl:

cc: Thomas Navin  
William Dever  
Adam Kirschenbaum