

Communications
Workers of America
AFL-CIO, CLC

501 Third Street, N.W.
Washington, D.C. 20001-2797
202/434-1100



November 13, 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.

On November 9, 2007, Kenneth Peres, economist with the Communications Workers of America, had a phone conversation with Scott Deutchman, Legal Advisor for Commissioner Copps.

Dr. Peres expressed the union's concerns that the public interest harms of the proposed sale of Verizon's Maine, New Hampshire and Vermont operations to FairPoint would overwhelm any supposed benefits. He described how the ratepayers and residents of Verizon's Northern New England (NNE) region would be worse off than they are today if the transaction were to be approved.

He also urged the Commission to wait to make its decision until after the state regulatory commissions issue their orders. As active parties in the state proceedings it has become obvious to us that the Commission could benefit greatly from the documents, responses to interrogatories, cross examination and briefs filed in the state proceedings. The completed record in those proceedings would provide the information needed to assess the public interest benefits and harms of the transaction based on an informed analysis of FairPoint's ability to adequately fund its operations, maintain and improve service quality, successfully complete the replacement of Verizon's 600 back systems, improve service quality and expand broadband build-out.

There is nothing unusual in the Commission reaching a decision after state proceedings have concluded. The Commission reached decisions on the ATT-

BellSouth, Bell Atlantic-GTE, SBC-Ameritech and Bell Atlantic-NYNEX mergers
AFTER the various state commissions issued their orders.

Please direct any questions concerning these matters to me.

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

cc: Scott Deutchman
Adam Kirschenbaum