



Federal Communications Commission
Washington, D.C. 20554

February 12, 2010

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

09-95

Via Electronic Mail

Kenneth F. Mason
Vice President – Government and Regulatory Affairs
Frontier Communications Corporation
180 South Clinton Avenue
5th Floor
Rochester, NY 14646

Karen Zacharia
Vice President
Verizon
1320 North Court House Road
9th Floor
Arlington, VA 22201

Re: Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control (WC Docket No. 09-95)

Dear Mr. Mason and Ms. Zacharia:

On July 30, 2009, Frontier Communications Corporation (Frontier) and Verizon Communications Inc. (Verizon) filed a series of applications pursuant to sections 214 and 310(d) of the Communications Act of 1934, as amended,¹ seeking Commission approval for various assignments and transfers of control of licenses and authorizations.² In order for the Commission to complete its review of the applications and make the necessary public interest findings under sections 214 and 310(d), we require additional information and clarification of certain matters discussed in the applications

Accordingly, pursuant to sections 214 and 308(b) of the Act, we request that you provide written responses and supporting documentation for each request set forth in the attached Information and Document Request and, where appropriate, amend the lead application to reflect such responses. In order to expedite consideration of your application, please respond to the following requests pertaining to this proposed transaction by Monday, March 1, 2010.

¹ 47 U.S.C. §§ 214, 310(d).

² See Verizon Communications Inc. and Frontier Communications Corporation Application for Consent to Assign and Transfer Control of Authority to Provide Global Facilities-Based and Global Resale International Telecommunications Services and to Assign and Transfer Control of Domestic Common Carrier Transmission Lines, Pursuant to Section 214 of the Communications Act of 1934, as Amended, WC Docket No. 09-95 (filed July 30, 2009); see also *Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control*, WC Docket No. 09-95, Public Notice, 24 FCC Rcd 10652 (2009).

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List A B C D E

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, under reference number WC Docket No. 09-95. The Wireline Competition Bureau also should receive, at a minimum, two copies of all filings.³

If you have any questions regarding this matter, please contact Alex Johns or Carol Simpson, Wireline Competition Bureau, at (202) 418-1167 or (202) 418-2391, respectively.

Sincerely,


Sharon Gillett
Chief, Wireline Competition Bureau

Attachment

Cc: John Nakahata, Wiltshire & Grannis LLP, Counsel for Frontier
Nancy J. Victory, Wiley Rein LLP, Counsel for Verizon

³ If you submit information pursuant to the Protective Orders issued in this proceeding, you should follow the filing procedures specified therein. *Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control*, WC Docket No. 09-95, Protective Order, DA 10-221 (rel. Feb. 2, 2010); *Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control*, WC Docket No. 09-95, Protective Order, DA 09-2573 (rel. Dec. 18, 2009).

ATTACHMENT
INFORMATION AND DOCUMENT REQUEST
February 12, 2010

I. Definitions

1. The terms “and” and “or” have both conjunctive and disjunctive meanings.
2. The term “Verizon” means Verizon Inc. and its subsidiaries.
3. The term “Frontier” means Frontier Communications Corp. and its subsidiaries.
4. The term “Verizon Wireless” means Verizon Wireless Corporation and its subsidiaries.
5. The term “person” includes Verizon, Frontier, and Verizon Wireless, and means any actual person, corporate entity, partnership, association, joint venture, government entity, or trust.
6. The term “specification” means a particular numbered request for documents or other information specified in section III below.
7. The term “responses” means documents or other information submitted in response to a particular specification.
8. The term “documents” means written or graphic materials in the possession, custody, or control of the company or companies identified in the particular specification. “Documents” includes hardcopy and electronic copies of correspondence, spreadsheet and database analyses, analyses, reports, memos, and presentations created, revised, prepared for, or distributed within the company or companies identified in the particular specification.
9. The term “Frontier franchise area” means each and every geographic area within a state in which Frontier provides telephone exchange service or exchange access pursuant to franchise or other authority granted by a relevant government or government agency, and in which Frontier is the incumbent local exchange carrier as that term is used in the Telecommunications Act of 1996.
10. The term “transaction market area” means each and every Verizon geographic area included in the proposed transaction, *i.e.*, all of Verizon’s local wireline operating territories in Arizona, Idaho, Illinois, Indiana, Michigan, Nevada, North Carolina, Ohio, Oregon, South Carolina, Washington, West Virginia and Wisconsin; as well as the Verizon exchanges in California that border Arizona, Nevada and Oregon, within which Verizon provides telephone exchange service or exchange access pursuant to franchise or other authority granted by a relevant government or government agency, and in which Verizon operates as a local exchange carrier as that term is used in the Telecommunications Act of 1996.
11. The term “market area” means a Frontier franchise area or a transaction market area.
12. The term “adjacent exchange area” means the Frontier local exchange areas that border the transaction market areas.
13. The term “fixed broadband services” means broadband services that enable users to originate and receive high-quality voice, data, graphics, and video telecommunications using a digital subscriber line (DSL), a cable modem, a fiber-optic cable, fixed wireless, satellite, or broadband over power line (BPL) technology.

II. Instructions

1. Responses to this Initial Information and Document Request shall be submitted in the following manner:
 - a. Unless otherwise indicated, Verizon and Frontier each should respond separately to each specification. Verizon Wireless should respond only to the specifications regarding Verizon Wireless.
 - b. Responses shall be complete and, unless privileged, unredacted (confidential materials should be filed in accordance with the Commission's rules). Documents shall be submitted as found in the company's files. Individual documents shall be separated from one another by a divider (such as a colored sheet of paper). An electronic mail message and any attached files shall be treated as a single document.
 - c. Verizon, Frontier, and Verizon Wireless should submit photocopies (with color photocopies where necessary to interpret the document) in lieu of original hardcopy responses.
 - d. Unless otherwise indicated, requests for data or spreadsheets should be submitted in Microsoft Excel format. Each spreadsheet should contain or be accompanied by instructions and/or documentation sufficient to describe the spreadsheet's purpose, organization, and contents.
 - e. Verizon, Frontier, and Verizon Wireless should submit electronic copies in lieu of original electronic responses. The electronic copies shall be submitted in a searchable format, formatted in Microsoft Word, PDF, or such other format as may be approved by the Wireline Competition Bureau.
 - f. Each page of the responses shall be marked with a corporate identification and consecutive document control numbers.
 - g. Responses to interrogatories and data requests shall be grouped based on the particular specification to which they are responsive.
 - h. Responses to document requests requiring a search of individuals' documents shall be grouped based on the individual from whom the documents were obtained. All documents produced should be placed in file folders. Each file folder should be labeled with corporate identification and the name of the person whose documents are in the folder; provide equivalent information for any documents provided in electronic form.
2. Provide a master index listing of:
 - a. each specification;
 - b. with respect to interrogatories, the corresponding consecutive document control number(s) for each response;
 - c. the name and location of all data files submitted; and
 - d. the name of the individual(s) from whom responsive documents are most likely to be submitted in response to the particular specification.
3. Unless otherwise specified, each request for documents is limited to documents created from January 1, 2009, to December 31, 2009, and each request for data is limited to quarterly data from December 31, 2008 through December 31, 2009.

III. Initial Information Request

A. OSS Issues

1. For West Virginia and each of the 13 legacy GTE states that are the subject of this application, please describe in detail:
 - a. The current state of the OSS in use by Frontier in each of these areas (to the extent applicable), including:

- (1) whether those systems are wholly manual;
 - (2) the extent to which any automated processes exist in the current systems;
 - (3) the order volumes and trouble ticket volumes handled by the systems at present, both retail and wholesale, along with copies of all supporting documentation for this response;
 - (4) how much Frontier currently spends on running and maintaining its existing OSS.
 - b. Copies of all notes, minutes, memoranda, or other documents prepared (whether internally or by outside advisors) for, or in the course of, discussing, or memorializing the monthly cutover planning committee meetings between the parties.
 - c. Copies of all notes, minutes, memoranda, or other documents prepared (whether internally or by outside advisors) for, or in the course of, discussing, or memorializing any “business-to-business point of contact calls” between the parties regarding the OSS conversion/cutover processes.
 - d. If your response to (b) and (c) is that no such documents exist, please explain how the companies are monitoring their progress in the cutover planning process.
2. In their May 29, 2009 filing with the West Virginia PUC (at ¶ 36), the parties state that they “have developed a formal process that will govern the conversion of retail and wholesale customer data from Verizon to Frontier’s existing back office systems” and that “This transaction will follow the standard process used in successful consolidations within the industry today.”
- a. Please provide copies of all documents prepared (whether internally or by outside advisors) for, or in the course of, discussing, or memorializing the development of the formal process governing the West Virginia conversion, as referenced in the May 29 filing.
 - (1) Is this formal process the same as the “standard process in successful consolidations within the industry today” referenced in the May 29 filing?
 - (2) If not, describe how and why it differs from the “standard process in successful consolidations within the industry today” referenced in the May 29 filing.
 - b. Please describe in detail how this formal conversion process has been refined or revised since the May 29 filing, and provide copies of all documents prepared (whether internally or by outside advisors) for, or in the course of, discussing, or memorializing such refinements or revisions.
 - c. Please describe in detail all testing plans and protocols that the parties have developed and plan to or have begun to implement prior to the cutover in West Virginia, including the timeframe(s) for such testing plans and protocols.
 - (1) Are there any plans in place for independent, third-party testing of the West Virginia OSS prior to cutover? If so, please provide details; if not, explain why you believe such independent testing is not necessary.
 - (2) Explain in detail how the “shadow environment” for the West Virginia OSS cutover process is being conducted, and what plans are in place for migrating the “shadow environment” to the live system at cutover.
 - (3) Explain in detail how the data extract from Verizon’s West Virginia systems to Frontier’s existing OSS (“mapping comparables”) is addressing the differences that exist between the two systems (*e.g.*, where Frontier’s current system does not include all of the same categories of information as Verizon’s).
 - d. Please describe in detail all plans Frontier has made or is in the process of making to ensure continuity of service to customers should the West Virginia OSS fail after going live post-closing. Please provide copies of all supporting documentation for your response.
3. Please describe in detail all testing plans and protocols the parties have developed and plan to or have begun to implement prior to the cutover in the 13 legacy GTE territories, including the timeframe(s) for such testing plans and protocols.
- a. Are there any plans in place for independent, third-party testing of the 13 legacy GTE territories’ OSS prior to cutover? If so, please provide details; if not, explain why you believe such independent testing is not necessary.

- b. To the extent there are results available from ongoing or completed tests, please provide details of those results and any supporting documentation.
 - c. With respect to the Fort Wayne OSS center, please describe in detail (and provide copies of all supporting documentation for your responses to each section below):
 - (1) An explanation of how Verizon currently ensures continuity of service (e.g., network and equipment redundancies, or other back-up measures in the event of system failures) in the Fort Wayne OSS center;
 - (2) whether Frontier plans to build in similar back-up measures or network and equipment redundancies to ensure continuity of service for the merged entity's OSS, and if so, the types and extent of those measures; and
 - (3) all plans Frontier has made or is in the process of making to ensure continuity of service to customers should the Fort Wayne OSS fail upon going live at closing/cutover.
 - d. Provide copies of all documents prepared (whether internally or by outside advisors) for, or in the course of, discussing or memorializing the replication test plan developed as of November 2009 for the Fort Wayne center.
4. What motivated Frontier to purchase the Synchronoss wholesale ordering gateway product for use in Frontier's existing 24-state footprint at this time?
 - a. Will all wholesale OSS functions in those areas be handled through Synchronoss? If not, please specify which functions will be placed on Synchronoss immediately, and which will not.
 - (1) Of those wholesale functions that will not immediately be placed on Synchronoss, please describe all plans and schedules for converting these functions to Synchronoss in detail.
 - (2) How will Frontier address the wholesale OSS functions that will not be placed on Synchronoss right away?
 - (3) What is the current status of the company's plans to incorporate CLEC testing into the protocol for the transfer to Synchronoss, and what additional plans for CLEC input into this transfer have been made?
 5. What are the company's long-term plans for post-merger OSS, both in the legacy Frontier franchise areas and the transaction market areas? Please provide copies of all documents prepared (whether internally or by outside advisors) for, or in the course of, discussing or memorializing the development and refining of such plans.
 - a. Does Frontier plan to outsource to consultants any aspect of the conversion of the OSS (e.g., functions, maintenance, support, etc.) it plans to use in the market area? If so, please describe in detail (and provide copies of all supporting documentation for your response) what specifically will be outsourced, to whom, and why.
 6. What plans or efforts has Frontier made to ensure that, post-closing, it will have sufficient trained staff to operate, maintain, and support the OSS that Frontier will need to serve all of its customers in both the legacy Frontier territories and the territories to be acquired from Verizon? Please provide copies of all supporting documentation for your response.
 7. With respect to Verizon's prior experience replicating its OSS, please describe in detail (and provide copies of supporting documentation for your responses to each section below):
 - a. each prior instance in which Verizon has replicated its OSS or any portion of it for transfer to another entity;
 - b. the length of time it took to complete each such replication and transfer;
 - c. what types of problems arose in the course of testing the replicated systems prior to cutover;
 - d. how long Verizon provided maintenance, troubleshooting, and other support for the system post-cutover, and at what cost to the transferee;
 - e. whether there were any serious or catastrophic OSS failures post-transfer, and if so, how and when they were resolved;

- f. how you anticipate this OSS replication will compare with the instances described in the foregoing responses, and what assumptions underlie your expectations; and
 - g. what incentives Verizon has to ensure the ongoing success of the transaction, including the robustness of OSS operations in the transaction market areas, after closing.
8. With respect to Frontier's prior experiences with post-merger conversions/cutovers, please describe in detail (and provide copies of supporting documentation for your responses to each section below):
- a. the size and scope of each prior conversion/cutover Frontier has completed to date;
 - b. how much time elapsed between the closing of each transaction and final completion of the entire conversion/cutover process;
 - c. the scope, extent, and nature of the planning and testing that was conducted prior to the cutover;
 - d. what effect the conversion and cutover process had on Frontier's service quality levels in each of the service territories subject to the conversion/cutover (please provide performance data for Frontier's service quality in each of the affected areas for the periods before, during, and after the conversion/cutover process was completed); and
 - e. how you anticipate the conversion/cutover and OSS replication processes in this transaction will compare with the prior instances described in the foregoing responses, and what assumptions underlie your expectations.

B. Financial Model/Business Case

9. Provide, along with copies of all documents used to create each response to this specification:
- a. An explanation of the transaction summary on pages 14-15 of the November 2009 presentation to Frontier's investors, including the following:
 - (1) How is the value to the merged entity affected by modifying the price/share and debt issuance assumptions?
 - (2) Explain how the transaction summary would be affected with the final year-end 2009 financial results for Frontier and Spinco rather than year-end 2008 financial results.
 - (3) Provide copies of all documents prepared expressly for Frontier (whether prepared internally or by outside advisors) used to create the aforementioned summary.
 - b. An explanation of the key *pro forma* Financial Data summarized on page 16 of the November 2009 presentation to Frontier's investors, including:
 - (1) the basis of the \$500 million in synergies;
 - (2) how net debt is defined in this presentation;
 - (3) the impact of excluding severance, early retirement costs, and legal settlement costs on this analysis;
 - (4) the meaning of the phrase, "2008 audited financial statements adjusted for certain matters";
 - (5) how the key *pro forma* financial data would be affected if Frontier issues shares at either end of the share price collar; and
 - (6) copies of all documents prepared expressly for Frontier (whether prepared internally or by outside advisors) used to create the summary on page 16 of the November 2009 presentation to Frontier's investors.
 - c. Please describe in detail the current status of Frontier's and Spinco's pension balances. In particular, explain whether and how the value of Frontier's or Spinco's pension plan assets or pension obligations in the next three to five years could affect the combined entity's financials and risk.
 - d. A detailed explanation of the transaction's rationale as summarized on page 18 of the November 2009 presentation to Frontier's investors, including copies of all documents prepared expressly for Frontier (whether prepared internally or by outside advisors), which discuss:
 - (1) the rationale for the transaction;
 - (2) the underlying assumptions; and
 - (3) the risks of the proposed transaction.

- e. A detailed explanation of the operational potentials from the proposed transaction as summarized on page 24 of the November 2009 presentation to Frontier's investors. Specifically, please provide an explanation and all supporting documentation for the following:
 - (1) how critical customer metrics (access line losses, high-speed Internet penetration, long distance penetration, and video penetration) will be achieved with the proposed transaction; and
 - (2) the risks and impact on the merged entity if the assumptions underlying Spinco's operational performance are not achieved and instead remain at their current level or decline further.

C. Financing

- 10. How will Frontier finance the acquisition? Please provide a detailed account of the sources of funding to be used for the transaction, including but not limited to:
 - a. Balance Sheet Cash;
 - b. New equity (common or preferred) issued;
 - c. Rollover Equity
 - d. Third-party debt (bank or bonds);
 - e. Vendor-provided debt; and
 - f. Seller-provided debt.
- 11. With respect to 10(d), please state the type of debt (bank or bonds, etc.) and supply copies of any existing agreements relating thereto, specimen term sheets relating thereto, or similar.
- 12. With respect to 10(e) and (f), please provide copies of all existing documentation relating or referring to the availability or provision of any vendor-provided or seller-provided debt financing with respect to the transaction. Documents should be provided by both Frontier and Verizon in response to this specification.
- 13. With respect to 10(d), (e), and (f), if the transaction were to close on the date of your replies to these questions:
 - a. What interest rate would be available to Frontier, and from whom, for either bank borrowing or the bond market?
 - b. What positive and negative financial covenants would Frontier be required to agree to?
 - c. Please provide draft documentation or term sheets concerning the above, to the extent they are available. If not available, please treat this as a continuing request and supply the requested documentation as it becomes available, up to and including the date of the Commission's order disposing of this matter.
- 14. Please provide examples of documentation for bonds or bank debt that Frontier has entered into most recently, or a list of principal terms and positive and negative financial covenants from such instruments.
- 15. Please provide an explanation of the rationale and the timing of Frontier's recent debt covenant amendments. Provide any documents that discuss these debt covenants as they relate to the proposed transaction.
- 16. Please provide Frontier's detailed *pro forma* statement of cash flows for the most recent period as of the closing date. Please treat this as a continuing request, and provide updates as and when available.
- 17. Please provide Frontier's leverage ratio (debt to EBITDA) for 2009, as well as Frontier's *pro forma* debt-to-EBITDA ratio for the most recent period.

18. For Frontier's borrowings, including bond issuances, for the past five years, please state the type of borrowing and the interest rate for each such borrowing.
19. Under what conditions (*i.e.*, combination of business metrics) will Spinco's financials hinder Frontier's ability to: (1) service the debt from the deal; (2) be cash-flow negative; (3) be EBIT negative; (4) be EBITDA negative; (5) be dilutive (*i.e.*, reduce Frontier's margins)? What combination of residential and business line loss, declines in average revenue per user (both in price and in mix of products), offset by what gains in broadband or video penetration, leads to each of the above?

D. Synergies Model

20. Please provide:
 - a. All documents prepared expressly for Frontier (whether prepared internally or by outside advisors) that discuss the potential for annual synergies from the proposed transaction.
 - (1) Describe each step Frontier will take to achieve these synergies or efficiencies; the costs the company will incur to achieve these synergies or efficiencies; the risks involved in achieving these synergies or efficiencies; the underlying assumptions for achieving these synergies or efficiencies; and the time required to achieve these synergies or efficiencies, including whether these synergies or efficiencies are primarily short-term or long-term.
 - (2) Explain whether these synergies will represent savings in fixed costs or marginal costs, and describe the assumptions underlying your response to this specification.
 - (3) In addition, explain how these savings are directly related to the proposed transaction and why these synergies or efficiencies could not be reaped by Frontier alone or by merging with another firm.
 - b. A copy of all documents and spreadsheets prepared expressly for Frontier (whether prepared internally or by outside advisors) that were used to prepare any response to this specification; and
 - c. An explanation of what metrics or thresholds Frontier will use to determine whether actual experience is consistent with its model, as well as what Frontier's plans are to address deviations from the model.

E. Miscellaneous

21. In the adjacent exchange areas, are there unbundled network elements (UNE) rates or interconnection rights for network elements that differ from the UNE rates or interconnection rights in the transaction market area? If so, please list these differing service offerings and prices for wholesale customers in each area, and provide an explanation for the differences between the rates or interconnection rights in each adjacent exchange area.
22. Are there any Frontier franchise areas that currently claim a rural exemption under any circumstances? Please provide all documentation that discusses use of the rural exemption by Frontier in the Frontier franchise areas and/or the post-merger Verizon transaction market areas.
23. Provide an explanation of Frontier's co-marketing arrangements with Dish Network Satellite TV. To the extent that take rates for this service vary across Frontier's market areas, please explain why such variances arise, and explain what factors Frontier considered in its assumptions about the potential take rate for the Dish Network Satellite TV services in the transaction market areas.
24. For each transaction market area in which FiOS is currently offered, provide:
 - a. A description of the facilities that Frontier would need to acquire in order to provide video services. Could any of these facilities be used to provide video services in any Frontier franchise areas?

- b. An explanation of how Frontier will provide these services in the future.
- c. An estimate of the cost for Frontier to provide video services to former FiOS customers post-closing.
- d. An explanation of any contractual arrangements that will either continue or need to be negotiated to enable Frontier to provide video services in the transaction markets in which Verizon currently offers FiOS. Could any of these contracts be used to provide video services in any Frontier franchise areas?

F. Public Interest Analysis

- 25. Provide copies of all documents prepared expressly for Frontier (either internally or by outside advisors) which discuss the impact of the transaction on broadband availability in the merged entity's market areas.
- 26. Please provide a description of, and copies of all documents prepared (either internally or by outside advisors) which discuss:
 - a. your company's existing broadband footprint, by data rate capacity, for residential customers, and for small- and medium-sized businesses, in each market area;
 - b. Frontier's plans to improve broadband availability in the transaction market areas, including:
 - (1) the percentage by which Frontier expects to improve broadband deployment over Verizon's current deployment rate of 62%, including assessments of the potential data rates capable, the anticipated cost per customer to achieve the projected improvements, and the timeframe for achieving these projected improvements;
 - (2) what assumptions are made about providing broadband to those currently unserved by Verizon's broadband service;
 - (3) the extent to which Frontier has tested (or is testing) Verizon's existing infrastructure that could be used to provide fixed broadband services in the transaction market areas;
 - (4) what facilities Frontier would need to construct in the transaction market areas to achieve its projected improvements in broadband deployment;
 - (5) what percent of homes in the transaction market areas will be broadband enabled as a function of time;
 - (6) whether/how these plans address competition from other broadband providers, in particular, the impact on these plans of expected LTE and DOCSIS 3.0 deployment in these areas;
 - (7) the estimated cost per home passed for each year in the construction plan;
 - (8) the cost for each incremental percent of broadband coverage (e.g., the cost to move from 79 percent to 80 percent coverage);
 - (9) what take rates will be required to break even on broadband buildout, and at what ARPU;
 - (10) what percentage of the transaction market areas have cable-based broadband available; and
 - (11) what percentage of the transaction market areas are within the Verizon Wireless 3G footprint.
- 27. Provide, including copies of all documents and spreadsheets prepared expressly for Frontier (either internally or by outside advisors) that were used to prepare any response to this specification:
 - a. An estimate of the yearly benefits, costs, and risks attributable to the merger within the first five years after closing, and an explanation of whether these benefits, costs, and risks will have a one-time or recurring effect.
 - b. A detailed explanation of the underlying assumptions and the methodology used to estimate the benefits, costs, and risks attributable to the merger within the first five years after closing.
 - c. A detailed explanation of whether and how these benefits will be passed on to consumers. In addition, please quantify the size of these benefits to these customers, and whether this will be a one-time or recurring benefit.

28. For each transaction market area, please describe, and provide copies of all documents prepared (either internally or by outside advisors) expressly for Verizon or Verizon Wireless that discuss:
 - a. competition between Verizon's wireless broadband services and mass market fixed broadband services within the transaction market areas, including but not limited to market studies, product strategies, and marketing strategies;
 - b. the company's business plans in the transaction market areas for mass market wireless broadband service offerings designed to compete against mass market fixed broadband services, including strategic plans and financial projections for such services;
 - c. consumer willingness and ability to substitute or use wireless broadband services in lieu of wireline broadband services, and to substitute or use mobile broadband in lieu of fixed broadband;
 - d. what fixed wireless broadband service Verizon Wireless plans to offer in the transaction market areas, at what download and upload speeds (Mbps), and at what price; and
 - e. what average effective load per user (kbps) is assumed in designing and sizing the wireless and backhaul portions of the network.
29. Provide all documents cited in the Public Interest Statement and supporting declarations, as well as any data or competitive analyses relied upon in preparing those documents, grouped by declaration/Public Interest Statement.
30. Provide all documents received from the Department of Justice and submitted by Verizon or Frontier to DoJ as part of DoJ's Hart Scott Rodino Act review, including but not limited to the correspondence and attachments relating to DoJ's March 12, 2009 and May 8, 2009 letters to the parties.