## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

# NOTICE TO TAKE DEPOSITIONS UPON ORAL EXAMINATION AND REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that Frontier Communications Corporation ("Frontier") will take the oral deposition of Susan M. Baldwin, witness for the Communications Workers of America and International Brotherhood of Electrical Workers, Local 986. The deposition will take place at a location to be determined in Hartford, Connecticut, and will begin at 10:00 a.m. on October 28, 2009. Deponent will appear at the designated time with documents and remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to, the subject matter of the deponent's direct testimony or the deponent's knowledge and expertise with the subject matter of this proceeding. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions and will continue from day to day, except for holidays and weekends, until completed.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce at the time of her deposition all documents relating to her direct testimony or the deponent's knowledge and expertise with the subject matter of these proceedings,

including, but not limited to, the results of any studies done for these proceedings and any backup documentation, including raw data, for those studies.

### Respectfully submitted,

#### FRONTIER COMMUNICATIONS CORPORATION

By: /s/ Carolyn S. Flahive
Thomas E. Lodge
Carolyn S. Flahive
THOMPSON HINE LLP
41 South High Street, Suite 1700

Columbus, Ohio 43215-6101

(614) 469-3200 (614) 469-3361 FAX

Tom.Lodge@thompsonhine.com Carolyn.Flahive@thompsonhine.com

#### Of Counsel:

Kevin Saville Associate General Counsel Citizens/Frontier Communications 2378 Wilshire Blvd. Mound, MN 55364 (952) 491-5564 (952) 491-5564 FAX Kevin.Saville@frontiercorp.com

Its Attorneys

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was electronically served on the parties listed below on this 19<sup>th</sup> day of October, 2009.

John Jones Assistant Attorney General Ohio Attorney General Public Utilities Section 180 East Broad Street, 9<sup>th</sup> Floor Columbus, OH 43215-3793 John.Jones@puc.state.oh.us

Douglas E. Hart 441 Vine Street Suite 4192 Cincinnati, Ohio 45202-2821 dhart@douglasehart.com Attorney for Cincinnati Bell Extended Territories LLC

Theodore E. Meckler
20525 Center Ridge Road, Room 700
Cleveland, Ohio 44116
tmeckler@cwa-union.org
Attorney for Communications Workers of
America

David A. Turano
Shoemaker & Howarth, LLP
471 East Broad Street, Suite 2001
Columbus, OH 43215
<a href="mailto:dturano@midohiolaw.com">dturano@midohiolaw.com</a>
Attorney for Level 3 Communications, LLC

Terry E. Etter, Counsel of Record David C. Bergmann Mary V. Edwards Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, Ohio 43215-3485 etter@occ.state.oh.us

Christine A. Reardon
KALNIZ, IORIO & FELDSTEIN CO., LPA
5550 W. Central Avenue
P.O. Box 352170
Toledo, OH 43635
creardon@kiflaw.com
Attorney for International Brotherhood of
Electrical Workers, Local 986

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815
scott.j.rubin@gmail.com
Counsel of Record, IBEW and CWA

Henry T. Kelly, Esq.
Michael Dover, Esq.
Julie Musselman Oost
Kelley Drye & Warren LLP
333 West Wacker Drive
Chicago, IL 60606
HKelly@KelleyDrye.com
MDover@KelleyDrye.com
JMusselman@KellyDrye.com
Attorneys for Level 3 Communications, LLC

Rogelio Pena Regulatory Counsel Level 3 Communications, LLC 1025 Eldorado Boulevard Broomfield, CO 80021 rogelio.pena@level3.com Attorney for Level 3 Communications, LLC

K. C. Halm, Esq. Davis Wright Tremaine LLP 1919 Pennsylvania Avenue, NW Suite 200 Washington, DC 20006 kchalm@dwt.com Attorney for Comcast Phone of Ohio, LLC Mark A. Whitt Joel E. Sechler Carpenter Lipps & Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 whitt@carpenterlipps.com sechler@carpenterlipps.com Attorneys for Comcast Phone of Ohio, LLC

Michael C. Sloan, Esq. Davis Wright Tremaine LLP 1919 Pennsylvania Avenue, NW Suite 200 Washington, DC 20006 michaelsloan@dwt.com Attorney for Comcast Phone of Ohio, LLC

/s/ Carolyn S. Flahive Carolyn S. Flahive

627899.1

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

10/19/2009 11:09:48 AM

in

Case No(s). 09-0454-TP-ACO

Summary: Notice of Deposition --Notice to take depositions upon oral examination and request for production of documents electronically filed by Carolyn S Flahive on behalf of Frontier Communications, New Communications Holdings, Inc. and Verizon Communications Inc.