

Wirebury Connections Inc. INTERROGATORY #27

Interrogatory

Networks suggests that LDCs might claim that they do not have an “obligation to serve” a new customer if service territories were allowed to overlap.

Reference: Appendix A, p.5, L 3-5

- a) Under what conditions could a LDC claim that it does do not have an obligation to respond to a request to connect by a customer in their licensed service area?
- b) Where two licensed service areas overlap why would both LDCs not have an obligation to respond to a written request for an offer to connect from the customer, either as required by Section 28 or as a condition of their license?
- c) If Networks does not agree that the obligations to connect or to offer to connect in overlapped service areas are not the same as they are under single license coverage, please explain why providing the legislative or regulatory justification for the difference.

Response

(a), (b) and (c) Please see Networks Exhibit J8-12-20(a).