

1 **Wirebury Connections Inc. INTERROGATORY #31**

2
3 **Interrogatory**

4
5 Networks suggests that an application for alternate distribution service should indicate
6 why the applicant is better suited to connect the customer than the incumbent distributor.

7
8 Reference: Appendix B, p.1, L 30-31

- 9
10 a) In situations where both the applicant and incumbent are licensed distributors,
11 why would one distributor need to demonstrate that its offer to connect was
12 any better than the competing offer to connect? Why would the customers not
13 be in the best position to decide which distributor would serve them best?
14
15 b) Assuming both offers were based on Board approved rates and meet all of the
16 requirements of the Board approved conditions of service, why would the
17 Board need to be involved in any additional review or approval except to
18 confirm that the customer(s) had signed the connection agreement?
19
20

21 **Response**

- 22
23 a) Please see Networks' Exhibit J8-12-20. While both the applicant and the incumbent
24 may be "licensed" distributors, only the incumbent licensed distributor has the
25 obligation to plan for and serve the area. The Board is required to determine whether
26 an amendment application is in the overall public interest.
27
28 b) This interrogatory is hypothetical. Currently, the connection of customers outside an
29 LDC's licensed service area requires Board approval.
30