

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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<b>Proceeding on Motion of the Commission to</b>	)	<b>Case 16-C-0122</b>
<b>Consider the Adequacy of Verizon</b>	)	
<b>New York Inc.'s Retail Service Quality</b>	)	
<b>Processes and Programs</b>	)	
	)	

**Affidavit of Randy Barber**

My name is Randy Barber, and I reside in Silver Spring, Maryland.

I serve as an expert advising CWA District 1 in this Proceeding examining primarily financial data in preparation for the filing of testimony and comments, and appearance at evidentiary hearings.

I have been previously retained by CWA in many proceedings before regulatory bodies. These include FairPoint Communications' acquisition of Verizon's Northern New England landline business; the merger of Embarq and CenturyTel that formed CenturyLink Communications; Frontier Communications' acquisition of Verizon landline businesses in fourteen states; Windstream Communication's spinoff of certain telecommunications assets into a Real Estate Investment Trust (Communications Sales and Leasing); CenturyLink's acquisition of Qwest Communications; Frontier Communications' acquisition of AT&T's Connecticut landline business (Southern New England Telephone); and, and Frontier Communications' acquisition of Verizon Communications landline assets in three states (California, Florida and Texas).

In addition, I have testified as an expert witness (either at trial or by deposition) in several judicial proceedings and arbitrations. These have included, for example, a class action law suit involving A.P. Moeller-Maersk/BTT, a National Mediation Board Single Carrier proceeding, the Big Sky Airlines Bankruptcy, and an court-appointed Examiner's Investigation into the Bankruptcy of Eastern Air

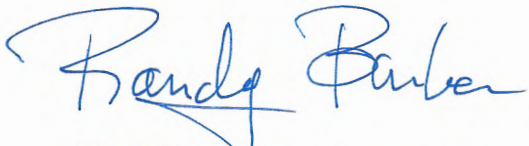
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I have also served as an expert consultant in various proceedings where it was not necessary for me to testify, such as an airline fitness investigation involving ATX, a cross-border airline merger investigation (American Airlines-Canadian Airlines), and a number of major arbitrations.

I am fully conversant with the events that are subject to this Motion. At no time did Mr. Rubin reveal confidential information. I have worked with him on many of the telecommunications cases listed above. His knowledge of both telecommunications law and telecommunications policy and practice is highly unusual if not unique. I know him to be experienced, intelligent, honest and effective and able to provide necessary legal and practical advice. We have a unique and efficient working relationship.

It was my suggestion that Mr. Rubin help with information subject to the Protective Order because of his particular legal and policy expertise, his understanding of the matters at issue in this Proceeding, and the ease and efficiency of our working relationship. Recruiting, training and cooperating with a different expert would be time-consuming and delay the Proceeding. It would be expensive and enormously disruptive of CWA's ability to participate fully and fairly in this proceeding.

Respectfully submitted,

  
October 24, 2016

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