

WUTC Docket No. UT-083041
Charter Responses to Qwest First Data Requests
October 31, 2008

Data Request No. 12:

Please describe how Charter believes Qwest would determine whether Charter's insurance coverage is adequate.

Response:

All general objections and all objections to definitions and instructions are incorporated into the specific objection regarding this Request. Charter further objects to this request on the grounds that the Request is vague, ambiguous, and overly broad in that the Request asks Charter to hypothesize about any standards that Qwest might utilize to make an "adequacy" determination. In addition, the Request seems to presume that Charter agrees that Qwest has the right to determine whether or not Charter's insurance coverage is adequate. Charter does not agree that Qwest has this right. Subject to, and without waiver of, these objections, Charter responds as follows: An insurer in good standing will have obtained necessary authorizations from state and federal insurance regulators to provide coverage and engage in the provision of related services. Such insurers will also be subject to all applicable rules, regulations, and standards governing the provision of insurance in the state of Washington, and other jurisdictions.

Prepared by: Counsel (objections); Bill Pruitt
Date: October 31, 2008