

Exhibit No. ____ (WGR-10)

Docket No. UT-023003

**WUTC Docket No. UT-023003
AT&T and MCI Joint Response to Qwest 4th Set of Data Requests**

Data Request No. 83:

On page 24 of his direct testimony Mr. Donovan states that “other” low voltage providers will share 25% of the aerial structure costs. Please provide any studies or contracts that support this assumption that CATV or other low voltage providers will pay that portion of the construction and placement costs for aerial structure.

Response:

AT&T and MCI object to this Data Request on the grounds that it mischaracterizes Mr. Donovan’s testimony. The appropriate paragraph, starting on page 23 states the following:

The HM 5.3 input value for aerial structure sharing for feeder and distribution plant is 50% in density zone 0-5, 33% in density zone 5-100, and 25% in the remaining higher density zones. These input values are very reasonable since pole structure is normally divided equally between high voltage users (electric companies) and low voltage users such as telephone and other communications companies (50% Electric – 25% Telco – 25% Others). In the lower density zones, there is less possibility of cable TV (“CATV”) being available, and therefore fewer sharing opportunities. However as population densities increase, so do the opportunities for increased sharing of pole space.

Mr. Donovan does not state that he assumes that CATV or other low voltage providers have paid for the embedded investments in existing pole structures. His cost allocation is based on the allocation of space consumed on the pole.

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Data Request No. 85:

On page 24 of his direct testimony Mr. Donovan cites a study that concludes that “at least 40 percent of the feeder routes also included distribution cable.” Please provide a copy of this study and all associated workpapers.

Response:

Mr. Donovan cited a study by the Kansas Corporation Commission’s consultant, Dr. Ben Johnson. Mr. Donovan is not the author of that study, nor does he have a copy of that study or Dr. Johnson’s workpapers.