

Exhibit No. ____ (WGR-11)

Docket No. UT-023003

Data Request No. 9-36

Referring to page 47 of the Direct Testimony of John C. Donovan, state all facts and provide all documents upon which Mr. Donovan relied for the statement that “cable placing crews are generally made up of two technicians.”

Response:

AT&T and MCI object to this request on the grounds that the request is overbroad and unduly burdensome in seeking “all facts” and “all documents.” Subject to, and without waiver of that objection, Dean Fassett is adopting the testimony of John Donovan, including the statement referenced in this request. It has been Mr. Fassett’s experience that generally placing crews are made up of two technicians, especially for aerial placing. Depending upon the volume of work required, crews might be combined or augmented with an additional technician. In addition, Mr. Fassett’s understanding is that most ILECs currently competitively bid most placing work to contractors rather than using their internal work force.

Data Request No. 9-41

Referring to page 52 of the Direct Testimony of John C. Donovan and AT&T/MCI's response to Verizon NW's Data Request No. 2-7:

- a. Identify the number of technicians and supervisors comprising the "crew" interviewed and photographed in the redacted June 27, 2002 diary and work record entry that was supplied in response to Verizon NW's Data Request No. 2-7;
- b. Identify exactly how many feet of aerial cable were placed by the crew referred to in subpart (a) on the day they were photographed;
- c. Explain in detail all of the steps this "crew" performed during the entire placing process, including (but not limited to):
 - i. Whether the "crew" employed a stationary reel or moving reel;
 - ii. Whether the "crew" lashed fiber cable to an existing cable and strand or placed new strand and lashed the fiber cable to it;
 - iii. Whether the "crew" installed new throughbolts and strand clamps; and
 - iv. Whether any pre-lash process was employed, and if so, describe the process in detail;
- d. State whether the "crew" included a police detail or "flagman;"
- e. Describe the weather conditions when the 8,000-10,000 feet/day rates were attained;
- f. Describe the road conditions when the 8,000-10,000 feet/day rates were attained and state whether the roads were arterial, secondary, or local, and whether the roads were in urban, suburban or rural areas. Identify the width of the roads and whether they were aligned with sidewalks;
- g. Explain in detail the basis for Mr. Donovan's decision to contact the contract fiber placing technicians referenced on page 52 of his Direct Testimony, and provide all documents concerning, referring or relating to;
- h. State whether Mr. Donovan spoke to any other contract fiber placing technicians besides the ones referenced on page 52 of his Direct Testimony. If the answer is anything but an unqualified no, describe in detail the nature of such discussions and provide all documents concerning, referring or relating thereto;
- i. Provide the full name of the individual identified as "partner Eddie" in AT&T/MCI's response to Data Request No. 2-7;
- j. Confirm that "Mr. Goss and partner Eddie" are "the two contract placing technicians" referenced on page 52 of the Direct Testimony of John C. Donovan;
- k. Identify each and every question that Mr. Donovan asked "Mr. Goss and his partner Eddie," or any other placing technicians identified in response to subpart (i). To the

extent Mr. Donovan, AT&T or MCI is unable to provide the specific questions asked, describe in detail the nature of the questions posed;

- l. Provide the answers given by "Mr. Goss and his partner Eddie," or other any other placing technicians identified in response to subpart (i), to each of the questions identified in response to subpart (l). To the extent Mr. Donovan, AT&T or MCI is unable to provide the specific answers to the questions asked, describe in detail the nature of the answers provided; and
- m. Identify each and every answer, or the nature of the answers, provided in response to subpart (l) upon which Mr. Donovan relied to support his assumption that the placement of 8,000 to 10,000 feet of fiber cable per day is a typical placement rate.

Response:

AT&T and MCI object to this request on the grounds that the request is not relevant or reasonably calculated to lead to the discovery of admissible evidence. Dean Fassett is adopting Mr. Donovan's testimony and will remove the reference to, and will not be relying on, the interview that is the subject of this request and Request No. 2-7. Instead, Mr. Fassett will rely on his own experience to support these values in the HAI Model.