

# **ATTACHMENT A**

**WUTC Docket No. UT-053041**  
**ICS Responses to WITA First Data Requests**  
**June 10, 2008**

**Data Request No. 10:**

At page 3, lines 12 through 13, Mr. Southard states as follows: "...but ICS plans to construct its own facilities in other parts of the exchange." Please identify what facilities ICS plans to construct and where ICS plans to construct the facilities. Please provide the date of the planned construction. Please provide a copy of any of the "plans" referenced by Mr. Southard.

**Response:**

ICS objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, those objections, attached is the HIGHLY CONFIDENTIAL Initial Phase Construction Area plan for ICS's expansion into the remainder of the Roslyn exchange, which is provided pursuant to the Protective Order in this docket.

Prepared by: Counsel (objections) and Keith Southard  
Date: June 10, 2008

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**Data Request No. 11:**

At page 4, line 14 of Mr. Southard's Testimony, he states there is 1.5 million dollars "already invested in network infrastructure to serve the Roslyn exchange." Provide a detailed list of the 1.5 million dollars in expenditures broken down by category of expenditure.

**Response:**

ICS objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, those objections, see the attached CONFIDENTIAL WATEL Capital Investment document, which is provided pursuant to the Protective Order in this docket.

Prepared by: Counsel (objections) and Keith Southard  
Date: June 10, 2008

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Data Request No. 14:

At page 6, lines 10 through 12, Mr. Southard states "ICS plans to invest more than 4.2 million over the next two years to expand its network into the remainder of the Roslyn exchange and into the adjacent Cle Elum Urban Growth Area." Please identify in detail, by classification of expenditure (e.g., fiber optic cable, copper cable, distribution facility, etc.) the expenditure of 4.2 million dollars and where such expenditures will occur in specific geographic relationship to the remainder of the Roslyn exchange and the Cle Elum Urban Growth Area.

Response:

ICS objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, those objections, attached is ICS's HIGHLY CONFIDENTIAL Capital Plan for expansion into the remainder of the Roslyn exchange and the Cle Elum Urban Growth Area, which is provided pursuant to the Protective Order in this docket. ICS notes that its most recent investment projections for this expansion over the next two and a half years now total over \$5 million.

Prepared by: Counsel (objections) and Keith Southard  
Date: June 10, 2008