

Data Request No. 5. With regard to the allegations of paragraph 6 of the Complaint, list and describe all "switched and non-switched local exchange and long distance services" being provided in Washington by AT&T. In your answer state the extent to which each such service (a) is being provided over facilities owned by AT&T, (b) is being provided over facilities owned by Verizon, and/or (c) is being provided over facilities owned by other companies.

Response to Data Request No. 5:

AT&T objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is unduly burdensome. Subject to, and without waiver of, that objection, information on all switched and non-switched local exchange and long distance services provided by AT&T in Washington is available in AT&T's Price Lists on file with the Washington Utilities and Transportation Commission. Information on the extent to which each such service (a) is being provided over facilities owned by AT&T, (b) is being provided over facilities owned by Verizon, and/or (c) is being provided over facilities owned by other companies is not available in the form requested.

Response by: Counsel

Data Request No. 6. With regard to the allegations of paragraph 11 of the Complaint, provide the following data, split on an interlata/intralata basis, for each year from 1997 through 2002:

- a. The number of originating intrastate switched access minutes of use ("MOUs") AT&T obtained from Verizon in Washington.
- b. The number of terminating intrastate switched access MOUs AT&T obtained from Verizon in Washington;
- c. The number of MOUs generated by calls for which AT&T obtain both originating and terminating switched access services from Verizon in Washington.

Response to Data Request No. 6:

AT&T objects to this request on the grounds that that the requested information is not reasonably calculated to lead to the discovery of admissible evidence, is overbroad and unduly burdensome, and the information requested is or should be in Verizon's possession.

Response by: Counsel

Data Request No. 7. Provide the following data, split on an interLATA/intraLATA basis, for each year from 1997 through 2002:

- a. The number for originating intrastate switched access MOUs AT&T obtained from providers other than Verizon in Washington – including AT&T itself, itemizing the amounts by provider.
- b. The number of terminating intrastate switched access MOUs AT&T obtained from providers other than Verizon in Washington – including AT&T itself, itemizing the amounts by provider.

Response to Data Request No. 7:

AT&T objects to this request on the grounds that the requested information is not reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome. AT&T further objects to this request to the extent it is seeking proprietary and confidential information related to third parties not participating in this proceeding.

Response by: Counsel

Data Request No. 8. Provide the following data for each year from 1997 through 2002:

- a. The number for originating interstate switched access MOUs AT&T obtained from providers other than Verizon in Washington – included AT&T itself, itemizing the amounts by provider.
- b. The number of terminating interstate switched access MOUs AT&T obtained from providers other than Verizon in Washington – including AT&T itself, itemizing the amounts by provider.

Response to Data Request No. 8:

AT&T objects to this request on the grounds that the requested information is not reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome. AT&T further objects to this request to the extent it is seeking proprietary and confidential information related to third parties not participating in this proceeding.

Response by: Counsel

Data Request No. 9. Provide the following data, split on an interLATA/intraLATA basis, for each year from 1997 through 2002:

- a. The number of MOUs for AT&T intrastate toll calls that both originated and terminated using Qwest's switched access services (i.e. Q-to-Q calls); and
- b. The number of MOUs for AT&T intrastate toll calls that both originated and terminated using local exchange carriers other than Verizon and Qwest.

Response to Data Request No. 9:

AT&T objects to this request on the grounds that the requested information is not reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome.

Response by: Counsel

Data Request No. 10. Provide all documents, studies and analyses showing the total volumes of originating and terminating access minutes for AT&T's Washington intrastate market and the volumes provided by each switched access provider, including Verizon.

Response to Data Request No. 10:

AT&T objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome. AT&T further objects to this request to the extent it is seeking proprietary and confidential information related to third parties not participating in this proceeding.

Response by: Counsel

Data Request No. 11. Provide all documents, studies and analysis that shows AT&T's share of the intrastate toll market in Washington State.

Response to Data Request No.11:

AT&T objects to this request on the grounds that it is overly broad and unduly burdensome. AT&T further objects on the grounds that Verizon, as the monopoly switched access provider in its service territory, has access to the same or better data, and that Verizon has the same access to publicly available data as AT&T.

Response by: Counsel

Data Request No. 14. With regard to the allegations of paragraph 18 of the Complaint, list each intrastate toll service rate of AT&T, and any other provider that is at a level that guarantees "a revenue shortfall and a zero or negative profit margin." Provide all documents and information demonstrating such revenue shortfall and profit margins.

Response to Data Request No. 14:

AT&T objects to this request on the grounds that requests for information specific to AT&T or other individual carriers other than Verizon (including its affiliates) is not reasonably calculated to lead to the discovery of admissible evidence. AT&T-specific data is not reasonably related to the issues of the reasonableness of Verizon's switched access charges and whether Verizon's toll rates satisfy imputation.

Response by: Counsel

Data Request No. 17. Provide the gross margins for all AT&T intrastate toll services offered in Washington, and all documents that support the calculation of these gross margins.

Response to Data Request No. 17:

AT&T objects to this request on the grounds that requests for information specific to AT&T are not reasonably calculated to lead to the discovery of admissible evidence. AT&T-specific data is not reasonably related to the issues of the reasonableness of Verizon's switched access charges and whether Verizon's toll rates satisfy imputation.

Response by: Counsel

Data Request No. 25. Identify all costs incurred by AT&T to provide intrastate toll service in Washington including, but not limited to marketing and billing and collection costs.

Response to Data Request No. 25:

AT&T objects to this request on the grounds that requests for information specific to AT&T are not reasonably calculated to lead to the discovery of admissible evidence. AT&T-specific data is not reasonably related to the issues of the reasonableness of Verizon's switched access charges and whether Verizon's toll rates satisfy imputation.

Response by: Counsel

Data Request No. 26. Provide all documents or information relied upon by AT&T to determine all costs identified in response to Data Request No. 25.

Response to Data Request No. 26:

AT&T objects to this request on the grounds that requests for information specific to AT&T are not reasonably calculated to lead to the discovery of admissible evidence. AT&T-specific data is not reasonably related to the issues of the reasonableness of Verizon's switched access charges and whether Verizon's toll rates satisfy imputation.

Response by: Counsel

Data Request No. 30. Please provide AT&T's LRIC studies that support their toll rates in Washington.

Response to Data Request No. 30:

AT&T objects to this requests on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, that objection, AT&T is not required to support its toll rates with LRIC studies and has undertaken no such studies.

Response by: Counsel