

**EQ-VZ DR-8:** Reference to page 2, lines 15-18 of Verizon witness Vasington's testimony:

- a. Please list all Verizon "retail services" that Mr. Vasington believes compete with Embarq's services.
- b. Please list all geographic areas in which Mr. Vasington believes Verizon competes with Embarq.
- c. Please explain the witness' use of the term "successful competitor."
- d. Provide all documents, studies, work papers, analyses, sources, calculations, cases, assumptions and related information supporting the witness' conclusion that "Embarq has emerged as a successful competitor in the market for providing long distance service to Washington residents."
- e. Provide all documents, studies, work papers, analyses, sources, calculations, cases, assumptions and related information supporting the witness' finding that the provision of long distance service is an economic market.

**RESPONSE:**

- a. Verizon can potentially compete with all of Embarq's services in Washington. Therefore, it does not have a specific, limited list.
- b. Verizon competes or potentially can compete with Embarq throughout Embarq's service territory.
- c. In this context, a successful competitor is a firm that is able to profitably maintain its presence in the marketplace and grow its business or its earnings.
- d. Mr. Vasington relied on Embarq's responses to discovery in this case and its public statements. *See, e.g.,* Vasington Testimony at 24-26.
- e. Verizon objects to this request on the ground that it misrepresents the witness's testimony. Mr. Vasington does not use the term "economic market" in his testimony.

Date: March 17, 2009  
Preparer/Witness: Paul Vasington