

WUTC Docket No. UT-041394
AT&T Response to Qwest's First Set Of Data Requests
November 2, 2004

Qwest Data Request No. 7(c): In which states does [AT&T Communications of the Pacific Northwest, Inc.] provide telecommunications services directly to customers?

Claimants' Response: Claimants object to this interrogatory on the grounds that it seeks information that is not relevant to the claims or defenses in the proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, Claimants object that the request is unduly burdensome in seeking information concerning telecommunications services provided outside the State of Washington. Moreover, the request is ultimately ambiguous, as it is unclear what is meant by "provide telecommunications services directly to customers. . . ." (*i.e.*, is the question whether AT&T Communications of the Pacific Northwest, Inc. serves end user subscribers? or is it whether it provides service through an affiliate?). Subject to and without waiving the foregoing objections, Claimants confirm that AT&T Communications of the Pacific Northwest, Inc. provides telecommunications services directly to customers in the State of Washington. Information concerning other states is not relevant.

Objection and answer prepared on November 2, 2004 by Brian M. Josef, Esq.