

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: June 19, 2009
DOCKET: UT-081393
REQUESTER: United Tel. Co. of the NW
d/b/a Embarq

WITNESS: Jonathan C. Thompson
Glenn Blackmon
RESPONDER: Jonathan C. Thompson
Glenn Blackmon
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REQUEST NO. 19: In reference to the notes in Blackmon Exhibit No. ____ HC (GB-4HC), for the ten locations addressed in the note in that Exhibit, please provide the following:

- a) The surrogation status for each row. If the surrogate locations are unknown, please state unknown.
- b) Identify the criteria that were used to determine if a location was or was not a match.

RESPONSE: OBJECTION: Staff objects to this data request as unduly burdensome to the extent it seeks information already within Embarq's possession and which Dr. Blackmon did not, in some cases, utilize in developing his testimony. Notwithstanding this objection, Staff provides the following response:

- a. Dr. Blackmon has not determined which locations are surrogates and which are verified customer locations.
- b. Dr. Blackmon used the Google Maps mapping service to plot the service address supplied by United and the latitude/longitude coordinates obtained from the LoopDesign database of the Embarq Cost Model. There was no specific criterion used to classify a location as matching its service address and its latitude/longitude coordinates, but the ones noted as not matching (3,4,7,8,10) are each off by more than a mile. The maps used in this process are attached as Attachment EQ-STAFF 19-1.