

STATE OF UTAH

AFFIDAVIT OF THOMAS B. MCCOY

STATE OF UTAH)
COUNTY OF Salt Lake)^{ss}

THOMAS B. MCCOY, being first duly sworn on oath, deposes and states as follows:

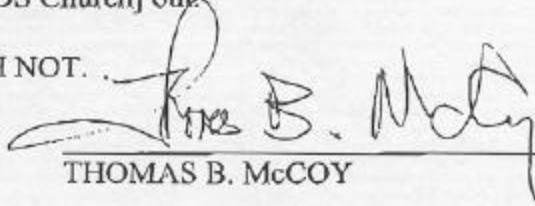
1. I am over 18 years of age and I am personally familiar with the facts and circumstances stated herein and I am competent to testify thereto as a witness.

2. I am independent agent engaged in selling telecommunications services on behalf of McLeodUSA Telecommunications Services, Inc. to business customers in the state of Utah. I have been selling telecommunications services to business customers on behalf of McLeodUSA since 2002. I maintain ongoing relationships with these business customers, one of which is the LDS Church that has been a McLeodUSA customer for local service since 2002. The LDS Church is one of the largest McLeodUSA customers, and purchases local service from McLeodUSA in all fourteen states in which Qwest is the incumbent Regional Bell Operating Company, including Utah, where McLeodUSA serves the LDS Church headquarters.

3. On April 13, 2005, after being informed by one of my employees that Qwest had contacted the LDS Church and discussed their local service situation, I called my contact at the LDS Church. The LDS Church representative informed me that a Qwest representative had contacted him earlier in the day and inferred that the thousands of access lines that LDS purchases from McLeodUSA throughout the Qwest region were in jeopardy of being disconnected because of millions of dollars in deposits that McLeodUSA owed Qwest. The LDS representative understood the Qwest representative to mean that Qwest was going to disconnect McLeodUSA. The Qwest representative further told the LDS representative that

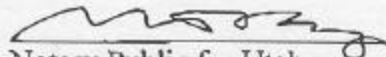
Qwest was ready to "bail [the LDS Church] out."

FURTHER AFFIANT SAYETH NOT.


THOMAS B. McCOY

SUBSCRIBED AND SWORN TO before me on this 14th day of April, 2005.

County of Salt Lake)
State of UTAH) SS:


Notary Public for Utah
Residing at Salt Lake County
My Commission Expires _____

