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July 30, 2009

David Danner  
Executive Director and Secretary,  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

*RE: Verizon Select Services, Inc.; MCIMetro Access Transmission Services, LLC; MCI Communications Services, Inc.; Teleconnect Long Distance Services and Systems Co. d/b/a Telecom USA; and TTI National, Inc., v. United Telephone Company of the Northwest, d/b/a Embarq, Docket UT-081393*

Dear Filing Office:

Pursuant to the electronic mail sent by Judge Torem on Tuesday, July 28, 2009, AT&T submits the attached cross-examination exhibit list.

Sincerely,

*Cindy J. Manheim*  
Cindy J. Manheim  
*By SH w/Permission*

# EXHIBIT LIST

Docket UT-081393

NUMBER	SPONSOR	A/R	DATE	DESCRIPTION
<b>BENCH EXHIBITS</b>				
<b>B-X</b>				
<b>JOINT TESTIMONY AND EXHIBITS RE STIPULATIONS</b>				
<b>JT-X T</b>				

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AND IN CASE OF PARTIES REACHING SETTLEMENT*

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Docket UT-081393

NUMBER	SPONSOR	A/R	DATE	DESCRIPTION
<b>VERIZON ACCESS WITNESS</b>				
<b>Paul B. Vasington, Director of State Public Policy, Verizon</b>				
PBV-1T <b>C</b>	Paul B. Vasington		2-18-09	Prefiled Direct Testimony supporting Verizon complaint seeking reduction of Embarq's intrastate switched access rates (32 pgs)
PBV-2T <b>HC</b>	Paul B. Vasington		6-5-09	Prefiled Rebuttal Testimony questioning Embarq's justification for subsidizing universal service through intrastate access rates and critiquing Embarq's cost study and policy arguments (50 pgs)
PBV-3T <b>HC</b>	Paul B. Vasington		7-15-09	Prefiled Final Reply Testimony reiterating critique of Embarq's justification for ongoing subsidies, calling for Embarq to file a rate case in order to recover lost access revenue, and arguing Embarq rates anticompetitive (13 pgs)
<b>CROSS-EXAMINATION EXHIBITS</b>				

# EXHIBIT LIST

Docket UT-081393

## AT&T WITNESSES

**Sharon L. Mullin, Director of Regulatory Affairs for 8 Western States, External Affairs, AT&T**

SLM-1T	Sharon L. Mullin		2-18-09	Prefiled Direct Testimony re WA statutes and rules and WUTC authority to reduce intrastate switched access charges (7 pgs)
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## CROSS-EXAMINATION EXHIBITS

**Lawrence J. Bax, Public Policy and State Activity Review, Access Management, AT&T**

LJB-1T HC	Lawrence J. Bax		2-18-09	Prefiled Direct Testimony re excessive, unjust, unfair, and unreasonable rates of Embarq for intrastate switched access charges (26 pgs)
LJB-2	Lawrence J. Bax			Embarq's Access Revenue Calculations (1 pg)
LJB-3T HC	Lawrence J. Bax		6-5-09	Prefiled Rebuttal Testimony re Embarq rationale for intrastate access charges (33 pgs)
LJB-4 HC	Lawrence J. Bax			Embarq's WA Access Cost & Rate Summary (1 pg)
LJB-5 HC	Lawrence J. Bax			Embarq's WA MOU Trend (1 pg)
LJB-6	Lawrence J. Bax			National Exchange Carrier Ass'n (NECA) Universal Service Fund (USF) Study (2 pgs)
LJB-7	Lawrence J. Bax			NECA 2008 USF Data Submission to FCC (1 pg)

## CROSS-EXAMINATION EXHIBITS

# EXHIBIT LIST

Docket UT-081393

<b>Dr. Kent A. Currie, Area Manager – Rates/Tariffs, Cost Analysis Division, AT&amp;T</b>				
<b>KAC-1T</b> <b>HC</b>	Dr. Kent A. Currie			Prefiled Direct Rebuttal Testimony re flaws and deficiencies in Embarq cost study (80 pgs)
<b>KAC-2</b>	Dr. Kent A. Currie			Curriculum Vitae (10 pgs)
<b>KAC-3</b> <b>HC</b>	Dr. Kent A. Currie			Quantifiable Corrections to Embarq's Cost Study: Intrastate Switched Access Direct Cost per Minute (2 pgs)
<b>KAC-4</b> <b>HC</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 111 (1 pg)
<b>KAC-5</b> <b>HC</b>	Dr. Kent A. Currie			Embarq Response to Staff Data Request No. 2 (1 pg)
<b>KAC-6</b> <b>HC</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 121 (2 pgs)
<b>KAC-7</b> <b>HC</b>	Dr. Kent A. Currie			Letter from Nortel Networks to Sprint dated April 4, 2003 re: price proposal (1 pg)
<b>KAC-8</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 96 (1 pg)
<b>KAC-9</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 133 (1 pg)
<b>KAC-10</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 134 (1 pg)
<b>KAC-11</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 104 (1 pg)
<b>KAC-12</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 105 (1 pg)
<b>KAC-13</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 103 (1 pg)
<b>KAC-14</b>	Dr. Kent A. Currie			Embarq Response to Public Counsel Data Request No. 48 (from UT-082119) (2 pgs)
<b>KAC-15</b>	Dr. Kent A. Currie			Embarq Response to AT&T Data Request No. 123 (1 pg)
<b>CROSS-EXAMINATION EXHIBITS</b>				

# EXHIBIT LIST

Docket UT-081393

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## EMBARQ WITNESSES

### John M. Felz, Director – State Regulatory, Embarq

JMF-1T HC	John M. Felz		4-17-09	Prefiled Direct Testimony re Embarq's intrastate switched access rates as just and reasonable, impacts on Embarq of proposed rate reductions, and why Verizon / Qwest precedent inapplicable to Embarq (17 pgs)
JMF-2	John M. Felz			Excerpts from UTC "Terminating Access Charges Rule" (WAC 480-120-540) (1 pg)
JMF-3	John M. Felz			Embarq's calculation of universal cost support requirement (from Docket UT-980311) (2 pgs)
JMF-4 HC	John M. Felz			Estimate of impact on Embarq intrastate access revenues after proposed rate reductions (1 pg)
JMF-5T HC	John M. Felz		6-30-09	Prefiled Surrebuttal Testimony re universal service obligations, rural nature of service area, and need for rate rebalancing (23 pgs)
JMF-6	John M. Felz			Comparison of Bundle Prices (1 pg)
JMF-7 HC	John M. Felz			Embarq's Estimated Impact on Operations of Increasing Local Rates to Verizon's \$\$ (1 pg)
JMF-8 HC	John M. Felz			Embarq's 12 Month Rate of Return (1 pg)
JMF-9 HC	John M. Felz			Embarq's Analysis of Per Line Impacts of Proposed Access Reductions (1 pg)

### CROSS-EXAMINATION EXHIBITS

	John M. Felz		9-18-07	SEE Dippon Cross-Examination Exhibits WA UTC Docket UT-071575 Order 01 Granting In Part Petition For Minimal Regulation of Bundled Telecommunications Services (14 pgs)
	John M. Felz		8-12-03	SEE Dippon Cross-Examination Exhibits WA UTC Docket UT-020406 Eleventh Supplemental Order Sustaining Complaint,



# EXHIBIT LIST

Docket UT-081393

				Directing Filing of Revised Access Charge Rates (59 pgs)
	John M. Felz		4-12-05	SEE Dippon Cross-Examination Exhibits WA UTC Docket UT-040788 Order No. 15 Order Approving and Adopting Proposed Settlement; Rejecting Filed Rates; Accepting Proposed Settlement Rates  WA UTC Docket UT-040520 Order No. 3 Order Approving and Adopting Proposed Settlement (20 pgs)
	John M. Felz		4-11-96	SEE Dippon Cross-Examination Exhibits WA UTC Docket UT-950200 Fifteenth Supplemental Order Commission Decision and Order Rejecting Tariff Revisions: Requiring Refiling (138 pgs)
<b>Henry J. Roth, Director – Economic Costing, Finance Department, Embarq</b>				
HJR-1T HC	Henry J. Roth		4-17-09	Prefiled Direct Testimony re results of Embarq's cost study showing that intrastate switched access rates are just and reasonable (27 pgs)
HJR-2 HC	Henry J. Roth			Cost Study Summaries: (a) Intrastate Access Costs – Switched Access Cost per Minute of Use; and (b) Intrastate Regulated Retail Services – (1) Cost and Revenue Summary Analysis and (2) Monthly Recurring Wire Center Cost and Revenue (4 pgs)
HJR-3	Henry J. Roth			Cost Module Narratives: Methodologies for Switch Cost, Transport Cost, Loop Cost, etc. (81 pgs)
HJR-4 HC	Henry J. Roth			Cost Study – Model & Work Papers (246 pgs)
HJR-5T HC	Henry J. Roth		6-30-09	Prefiled Surrebuttal Testimony re accuracy of TSLRIC study and Embarq's economic cost modeling (45 pgs)
HJR-6	Henry J. Roth			AT&T Response to Embarq DR No. 3 (1 pg)
HJR-7	Henry J. Roth			Commission Staff Response to Embarq

# EXHIBIT LIST

Docket UT-081393

				DR No. 19 (1 pg)
HJR-8	Henry J. Roth			Commission Staff Response to Embarq DR No. 2 (1 pg)
<b>CROSS-EXAMINATION EXHIBITS</b>				
	Henry J. Roth		8-8-96	Excerpt of FCC First Report & Order, FCC 96-325, CC Docket Nos. 96-98, 95-185 (6 pgs)
	Henry J. Roth		10-9-08	Vogt Letter to Dortch (FCC) (2 pgs)
	Henry J. Roth		12-31-03	Nortel Networks Discontinuance of Manufacture- XA-Core Pack NTLX02CA (2 pgs)
HC	Henry J. Roth		5-20-09	Excerpt of Embarq Response to ATT DR-79 Highly Confidential (7 pgs)
	Henry J. Roth		1997-1998	DMS-100/200 System Hardware Planning Guide (110 pgs)
	Henry J. Roth		7-27-09	Embarq Response to ATT DR-177 (1 pg)
	Henry J. Roth		7-27-09	Embarq Response to ATT DR-178 (2 pgs)
	Henry J. Roth		7-27-09	Embarq Response to ATT DR-179 (1 pg)
	Henry J. Roth		7-27-09	Embarq Response to ATT DR-181 (1 pg)
<b>Christian M. Dippon, Economist, Vice President of NERA Economic Consulting</b>				
CMD-1T HC	Christian M. Dippon		4-17-09	Prefiled Direct Testimony re Reasonableness of Embarq Rates and Consequences to Consumers of Lower Access Charges (88 pgs)
CMD-2	Christian M. Dippon			Witness Qualifications (21 pgs)
CMD-3	Christian M. Dippon			Article: "Access Charges, Universal Service, and Competition" (April 17, 2009) (17 pgs)
CMD-4	Christian M. Dippon			Impact of Access Rate Reduction on AT&T and Verizon Long Distance Prices (1 pg)
CMD-5	Christian M. Dippon			Verizon Response to Embarq DR-8 (1 pg)
CMD-6T	Christian M. Dippon		6-30-09	Prefiled Surrebuttal Testimony re Failure of Parties to Recognize Characteristics of Embarq's Service Area (58 pgs)
<b>CROSS-EXAMINATION EXHIBITS</b>				
	Christian M. Dippon			Mercatus Center, Regulatory Studies Program Public Interest Ex Parte Comment on



# EXHIBIT LIST

Docket UT-081393

				Intercarrier Compensation and Universal Service (8 pgs)
	Christian M. Dippon		October 2008	Phoenix Center Policy Bulletin No. 22 Do High Call Termination Rates Deter Broadband Deployment? (9 pgs)
	Christian M. Dippon		1-4-08	NERA Economic Consulting Can Competition Regulate Rates for Basic Services? (15 pgs)
	Christian M. Dippon		9-18-07	WA UTC Docket UT-071575 Order 01 Granting In Part Petition For Minimal Regulation of Bundled Telecommunications Services (14 pgs)
	Christian M. Dippon		8-12-03	WA UTC Docket UT-020406 Eleventh Supplemental Order Order Sustaining Complaint, Directing Filing of Revised Access Charge Rates (59 pgs)
	Christian M. Dippon		8-1-08	Before the FCC WC Docket No. 08-160 Petition for Waiver of Embarq (41 pgs)
	Christian M. Dippon		9-5-08	Before the FCC WC Docket No. 08-160 Reply Comments of Embarq (20 pgs)
	Christian M. Dippon		4-11-96	WA UTC Docket UT-950200 Fifteenth Supplemental Order, Commission Decision and Order Rejecting Tariff Revisions: Requiring Refiling (138 pgs)
	Christian M. Dippon		4-12-05	WA UTC Docket UT-040788 Order No. 15 Order Approving and Adopting Proposed Settlement; Rejecting Filed Rates; Accepting Proposed Settlement Rates  WA UTC Docket UT-040520 Order No. 3 Order Approving and Adopting Proposed Settlement (20 pgs)
	Christian M. Dippon		June 12-16, 2006	Communications Regulation and Policy Under Convergence: Advancing the State of the Debate (28 pgs)
HC	Christian M. Dippon		2-13-09	Embarq Response to ATT DR-1 Highly Confidential (2 pgs)
	Christian M. Dippon		2-13-09	Embarq Response to ATT DR-26 (1 pg)
	Christian M. Dippon		2-13-09	Embarq Response to ATT DR-53 (1 pg)
	Christian M. Dippon		5-20-09	Embarq Response to ATT DR-54 (1 pg)

# EXHIBIT LIST

Docket UT-081393

	Christian M. Dippon		5-20-09	Embarq Response to ATT DR-55 (2 pgs)
	Christian M. Dippon		5-20-09	Embarq Response to ATT DR-183 (2 pgs)
	Christian M. Dippon		5-20-09	Embarq Response to ATT DR-61, 69, 73 & 76 (5 pgs)
HC	Christian M. Dippon		5-20-09	Embarq Response to ATT DR-68 Highly Confidential (3 pgs)
	Christian M. Dippon		2-13-09	Embarq Response to ATT DR-27 (1 pg)
	Christian M. Dippon		10-9-08	SEE Roth Cross-Examination Exhibits Vogt Letter to Dortch (FCC) (2 pgs)

NUMBER	SPONSOR	A/R	DATE	DESCRIPTION
<b>STAFF WITNESSES</b>				
Timothy Zawislak, Telecommunications Regulatory Analyst, WUTC				
TWZ-1T	Timothy W. Zawislak		6-5-09	Prefiled Direct Testimony re Comparison of Embarq Retail Rates and Recommendation to Reduce Embarq's Interim Terminating Access Charges (10 pgs)
TWZ-2	Timothy W. Zawislak			Embarq Local Exchange Tariff Sheets (8 pgs)
TWZ-3	Timothy W. Zawislak			Local Exchange Rate Comparison for Washington ILECs (8 pgs)
TWZ-4	Timothy W. Zawislak			Average National Urban Local Exchange Rate (2 pgs)
TWZ-5 HC	Timothy W. Zawislak			Imputed Revenue Effects (3 pgs)
<b>CROSS-EXAMINATION EXHIBITS</b>				
Jing Liu, Telecommunications Regulatory Analyst, WUTC				

# EXHIBIT LIST

Docket UT-081393

JL-1T <b>HC</b>	Jing Liu		6-5-09	Prefiled Direct Testimony re Universal Service Policy and Methodology & Embarq's Classification as High Cost Company (11 pgs)
JL-2	Jing Liu			WA ILECs Average Cost per Loop (1 pg)
<b>CROSS-EXAMINATION EXHIBITS</b>				
<b>Rick Applegate, Telecommunications Regulatory Analyst, WUTC</b>				
RTA-1T <b>HC</b>	Rick T. Applegate		6-5-09	Prefiled Direct Testimony re Embarq Cost Study's Cost of Capital Assumptions (7 pgs)
RTA-2 <b>HC</b>	Rick T. Applegate			Cost of Capital Comparison (1 pg)
<b>CROSS-EXAMINATION EXHIBITS</b>				
NUMBER	SPONSOR	A/R	DATE	DESCRIPTION
<b>Glenn Blackmon, Economic and Policy Consultant in Telecommunications/Utilities (self-employed)</b>				
GB-1T <b>HC</b>	Glenn Blackmon		6-5-09	Prefiled Direct Testimony re: Staff recommendation to phase out Embarq's Interim Universal Service Terminating Access Rate Element (36 pgs)
GB-2 <b>HC</b>	Glenn Blackmon			Total Investment as Calculated from Embarq's Cost Model Results (2 pgs)
GB-3 <b>HC</b>	Glenn Blackmon			Comparison of Embarq's Calculation of TSLRIC Loop Cost to UNE Loop Rates (1 pg)
GB-4 <b>HC</b>	Glenn Blackmon			Sample of Customer Locations (1 pg)
GB-5 <b>HC</b>	Glenn Blackmon			TSLRIC Loop Cost with Revised Depreciation Parameters and Cost of Capital (1 pg)
GB-6	Glenn Blackmon			Residential Rates for Unlimited (Flat-Rate) Residential Service in Urban Areas (3 pgs)
GB-7	Glenn Blackmon			Adoption Order for WAC 480-120-540 (30 pgs)
GB-8	Glenn Blackmon			Tariff Compliance Filing Memo (12-9-1998)

# EXHIBIT LIST

Docket UT-081393

				(8 pgs)
CROSS-EXAMINATION EXHIBITS				