

Exhibit No. _____

Cross Examination Exhibit

Christian M. Dippon

Embarq Response to ATT DR-1 (2-13-09)

REDACTED VERSION

Docket No. UT-081393
Embarq's Response to AT&T Data Request No. 1
Date 2/13/2009
Preparer: John Felz

AT&T 1-1:

Please identify the total number of revenue-producing access lines at year end for each of the last seven years (2001 to 2007) for the following: (Note: Include 2008 if already available).

- (a) Single line Residential lines in service;
- (b) Single line Business lines in service;
- (c) Multi-line Residential lines in service
- (d) Multi-line Business lines in service
- (e) Other revenue producing access lines not included in your response to (a) to (d). Please specifically describe the types of lines that constitute the "other" category and identify the total number for each type.

OBJECTION:

Embarq objects to providing information for the period requested (2001 through 2008). As to the timeframe associated with years 2001 through and including 2004, the request is overbroad, burdensome, and not relevant and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request at subpart (e) for "other revenue producing access lines" is vague, overbroad, and burdensome; and, to the extent the phrase includes wholesale access lines, Embarq objects on the grounds that such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding and without waiving any objection, Embarq provides the following response.

RESPONSE:

Refer to **HIGHLY CONFIDENTIAL** Attachment VZ-12, provided in response to Verizon's first set of data requests, and updated to include information for 2008.

BEGIN HIGHLY CONFIDENTIAL

END HIGHLY CONFIDENTIAL