

**Exhibit No. \_\_\_\_\_**

**Cross Examination Exhibit**

**Christian M. Dippon**

Embarq Response to ATT DR-53 (4-7-09)

**AT&T 2-53:**

For each Embarq affiliate that operates in the State of Washington and provides local exchange services in the State of Washington, please provide the following:

- (a) Number of exchanges;
- (b) Number of exchanges with cable digital voice;
- (c) Number of exchanges with a CLEC; and,
- (d) Number of exchanges with a wireless provider.

**OBJECTION:**

Embarq objects to this request on the grounds that it seeks information that is irrelevant and it is not reasonably calculated to lead to the discovery of admissible evidence. Further, with respect to subparts (b) through (d), the questions seek information that is publicly available to AT&T and seeks information that is not in Embarq's possession. Notwithstanding this objection and without waiving it, Embarq provides the following response.

**RESPONSE:**

- (a) Embarq provides service in 31 exchanges in Washington.
- (b) Embarq does not have the data in the manner requested and has not identified every Embarq exchange where a cable company offers digital voice services. To the best of Embarq's knowledge, 19 of its exchanges have at least one cable provider.
- (c) Embarq has not identified every Embarq exchange where a CLEC provides services, but to the best of Embarq's knowledge, 21 of its exchanges have at least one CLEC offering services.
- (d) To the best of Embarq's knowledge, all 31 of its exchanges have at least one wireless provider.