

Exhibit No. _____

Cross Examination Exhibit

Christian M. Dippon

Embarq Response to ATT DR-55 (5-20-09)

Docket No. UT-081393

United's Response to AT&T Data Request No. 55

Date 5/20/2009

Preparer: Christian Dippon

AT&T 3-55 Mr. Dippon at page 8 of his Responsive Testimony indicates that competition is quite strong in United's non-rural areas using the FCC's definitions of rural and non-rural.

- (a) Identify United's "rural" areas by reference to wire centers in Washington.
- (b) Identify United's "non-rural" areas by reference to wire centers in Washington.
- (c) Provide all support upon which Mr. Dippon relies for the assertion that competition is quite strong in United's non-rural areas in Washington.
- (d) Does United price residential local service differently in "rural" wire centers versus "non-rural" wire centers due to differences in the strength of competition? If so, describe each such instance in Washington.
- (e) Does United price bundles and packages containing a residential access line subject to minimal regulation differently in "rural" wire centers versus "non-rural" wire centers due to differences in the strength of competition? If so, describe each such instance in Washington.

OBJECTION:

United objects to subpart c) of this request on the grounds that it is vague, ambiguous, overly broad, and unduly burdensome. United also objects on the grounds that the information sought is not relevant, and not likely to lead to the discovery admissible information. Notwithstanding, but without waiving, any objection United provides the following response.

RESPONSE:

- (a) United's rural wire centers include: Bickleton, Brinnon, Chimacum, Columbia, Dallesport, Gardiner, Glenwood, Goldendale, Granger, Harrah, Klickitat, Lyle, Mabton, Mattawa, Paterson, Prosser, Quilcene, Roosevelt, Stevenson, Sunnyside, Toppenish, Trout Lake, White Salmon, White Swan, Whitstran, Willard, Wishram, and Zillah.
- (b) United's non-rural wire centers include: Grandview, Poulsbo, and Wapato.
- (c) See Section III.C of Mr. Dippon's responsive testimony.

(d) No

(e) No