

Docket No. UT-040788 – General Rate Case
Verizon Supplemental Responses to Public Counsel, AARP, & WeBTEC
Data Request Nos. PC 108 - 214
September 23, 2004

DATA REQUEST NO. PC-155:

Please provide detailed Verizon Information Services (VIS) consolidating income statement and balance sheet work papers, including all consolidation entries, for the years 2002 and 2003, indicating separately the pre-consolidation stand-alone financial results of each entity identified in response to the immediately preceding question.

RESPONSE: *(filed July 22, 2004)*

Verizon objects to this data request because it calls for the production of information that is not relevant, or not likely to lead to the discovery of relevant information, to the issues in this matter. In addition, it calls for Verizon to produce information over which it has no custody or control. Without waiver of the foregoing objections, Verizon has provided the Verizon Directories Corp. consolidated financial statements within Section 3.g. of its annual affiliate interest report for both these years, and the information reflected therein is the only information that Verizon has that might be responsive to this request.

See Attachment PC-155 for a corrected 2003 income statement, which will be reflected in an amended filing of the 2003 affiliate interest report.

Prepared By: Judy Geise
Date: July 20, 2004
Witness: TBD

SUPPLEMENTAL REQUEST:

Please provide separate entity data and consolidation entries.

SUPPLEMENTAL RESPONSE:

Verizon continues to object for the same reasons mentioned in its July 22, 2004 response.

Prepared By: Judy Geise
Date: September 22, 2004
Witness: TBD