

Exhibit No. _____

Cross Examination Exhibit

Henry J. Roth

Embarq Response to ATT DR-177 (7-27-09)

Docket No. UT-081393
United's Response to AT&T Data Request No. 177
Date 7/27/2009
Preparer: Henry Roth – Director Economic Costing

AT&T 7-177

Mr. Roth states at page 10 of his surrebuttal testimony that “[s]witch processors can and do exhaust requiring replacement.”

- a) Provide all documents relied upon by Mr. Roth to support this statement.
- b) Identify all Embarq switch processors in Washington that have exhausted and required replacement since 2004. For each identified switch processor describe the capacity characteristics of the exhausted processor, the capacity characteristics of the replacement processor, identify the applicable switch vendor(s), describe the engineering decision in selecting the replacement processor in the context of its capacity characteristics relative to “anticipated demand,” describe any other capacity additions performed at the same time that the processor was replaced for the same switch, and provide the “anticipated demand” associated with the decision.
- c) Identify all Embarq switch processors in Washington that Embarq expects before the end of 2015 to exhaust because of “anticipated demand” and, thereby, require replacement.

OBJECTION:

United objects to this request and all its subparts on the grounds that they are vague and ambiguous, overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible information. In addition United objects to subpart (c) of this request on the grounds that it would require the preparation of a special study. Notwithstanding, but without waiving, any objection United provides the following response to all but subpart (c).

RESPONSE:

- (a) Mr. Roth's comment is based on discussions with Embarq network engineering personnel.
- (b) There have been no switch processors that have exhausted in the state of Washington since 2004.
- (c) See objection.