

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

**Cross Examination Exhibit**

**Henry J. Roth**

Embarq Response to ATT DR-178 (7-27-09)

Docket No. UT-081393  
United's Response to AT&T Data Request No. 178  
Date 7/27/2009  
Preparer: Henry Roth – Director Economic Costing

## **AT&T 7-178**

Mr. Roth states at pages 10 and 11 of his surrebuttal testimony that switch vendors, including Nortel, offer switch processors of differing sizes.

- a) Does Embarq's ECM size switch processors in its development of switching costs? If so, specifically identify where this sizing of switch processor is done in Embarq's ECM.
- b) Admit or deny that the only price for processor hardware found in Embarq's ECM is at cell C24 on the "Switch\_Unit\_Pricing" tab of the Inputs Module. If the response is anything other than an unqualified admission, provide an explanation and location for each additional processor price found in ECM.
- c) Admit or deny that the work paper titled "Highly Confidential Circuit Switching Unit Price Support.xls" contains a hardware price for only one processor size. If the response is anything other than an unqualified admission, provide an explanation and location for each additional processor price found in this work paper.
- d) Admit or deny that every switch processor modeled in Embarq's ECM is the same. If the response is anything other than an unqualified admission, provide an explanation, including any documents relied upon in developing the explanation.
- e) Admit or deny that every Embarq non-remote switch currently operating in Washington has different busy hour call attempts based on Embarq's most current information. If the response is anything other than an unqualified admission, provide an explanation, including any documents relied upon in developing the explanation.
- f) Explain what Mr. Roth means by a processor's "throughput capacity."

## **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 (e) 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 (e).

**RESPONSE:**

(a) United relies upon its Network Engineering team for development of switch processor sizing and replacement. In Washington, the sizing and placement decisions are driven in part by incongruent and geographic determinations.

(b) Refer to the response in (a) above, also, see United's cost study.

(c) Refer to the response in (a) above, also, see Highly Confidential "Circuit Switching Unit Price Support.xls".

(d) Refer to the response in (a) above, also, see United's cost study.

(e) This request is referring to current information and would require a burdensome special study and therefore a response cannot be provided.

(f) Please see Nortel's DMS 100/200 Hardware Planning Guide chart in Roth surrebuttal testimony, page 11.