

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

**Cross Examination Exhibit**

**Henry J. Roth**

Embarq Response to ATT DR-179 (7-27-09)

Docket No. UT-081393  
United's Response to AT&T Data Request No. 179  
Date 7/27/2009  
Preparer: Henry Roth – Director Economic Costing

### **AT&T 7-179**

For each DMS SuperNode Processor line shown in the chart found at page 11 of Mr. Roth's surrebuttal testimony, provide the following information:

- a) "Throughput capacity"
- b) BHCA capacity
- c) Number of processors, if any, in Embarq's Washington operations.

### **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. Notwithstanding, but without waiving, any objection United provides the following response.

### **RESPONSE:**

- (a) Please see Nortel's DMS 100/200 Hardware Planning Guide chart in Mr. Roth's surrebuttal testimony, page 11.
- (b) Please see Nortel's DMS 100/200 Hardware Planning Guide chart in Mr. Roth's surrebuttal testimony, page 11.
- (c) United's Washington operations currently has 3 processors.