

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

**Cross Examination Exhibit**

**Henry J. Roth**

Embarq Response to ATT DR-181 (7-27-09)

Docket No. UT-081393  
United's Response to AT&T Data Request No. 181  
Date 7/27/2009  
Preparer: Henry Roth – Director Economic Costing

### **AT&T 7-181**

Mr. Roth at page 25 of his surrebuttal testimony states “some level of installed plant inventory is necessary to account for the time delay in designing and engineering additional capacity.”

- a) Provide the average “construction time” required for switching equipment.
- b) Quantify the impact of the average “construction time” required for switching equipment on the fill factors found on the “SwitchInputs” tab of the Inputs Module.
- c) Provide the average “construction time” required for transport circuit equipment.
- d) Quantify the impact of the average “construction time” required for transport circuit equipment on the fill factors found on the “TransInputs” tab of the Inputs Module.
- e) Provide the average “construction time” required for outside plant cable.

### **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 (a) 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.

### **RESPONSE:**

- (a) This request would require a burdensome special study to answer as United does not track construction intervals in these categories. There are multiple factors and circumstances that can cause great variation on a site-by-site basis in “construction time” intervals.
- (b) See response to AT&T 7-181 (a).
- (c) See response to AT&T 7-181 (a).
- (d) See response to AT&T 7-181 (a).
- (e) See response to AT&T 7-181 (a).