

Docket No. UT-081393  
United's Response to Verizon Data Request No. 30  
Date 5/29/2009  
Preparer: Christian Dippon

30. Please admit or deny that neither Mr. Dippon nor any other Embarq representative or employee has performed an elasticity or other type of study relating to Embarq's ability to collect more revenue from its end users through higher local retail rates. If you deny, please provide all such studies.

**OBJECTION:**

United objects to this request on the grounds it seeks information that is not relevant, it is not reasonably calculated to lead to the discovery of admissible evidence, and it is overly broad and unduly burdensome. Notwithstanding and subject to any stated objection, United provides the following response.

**RESPONSE:**

It is unclear what type of elasticity study Verizon is referring to. Particularly, it is unclear whether Verizon is referring to own-price elasticity (and if so for what service) or cross price elasticity (and if so between what services). Notwithstanding, no such analysis is required as Mr. Dippon's analyses does not depend on such analyses.