

Docket No. UT-081393  
United's Response to Verizon Data Request No. 31  
Date 5/29/2009  
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31. Please admit or deny that the level of competition Verizon Northwest faces in its more densely populated exchanges in Washington is at least as great as the level of competition Embarq faces in its service territory. If you deny, please provide all analyses and evidence indicating that Embarq may face higher levels of competition.

**OBJECTION:**

United objects to this request on the grounds it seeks information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the question would require a burdensome, time-intensive and costly special study to produce the requested information. Notwithstanding and subject to any stated objection, United provides the following response.

**RESPONSE:**

United has not conducted any study on the level of competition faced throughout Verizon's territory. Furthermore, it is unclear how Verizon defines "more densely populated exchanges."