

Docket No. UT-081393
United's Response to Staff Data Request No. 17
Date 5/14/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 17:

Please provide for each wire center the number of residential and business lines that would, according to Mr. Roth's cost study, require an incremental investment of more than \$50,000 per line.

OBJECTION:

United objects to this request on the grounds that it is vague, ambiguous, overly broad, and unduly burdensome. United also objects on the grounds that the information sought is not relevant, and it is not reasonably calculated to lead to the discovery admissible information. Notwithstanding, but without waiving, any objection United provides the following response.

RESPONSE:

See response to UTC Staff Data request No. 16.