

EXHIBIT LIST

Docket UT-081393

STAFF CROSS-EXAMINATION EXHIBITS				
	Henry J. Roth			United's Response to Staff Data Request No. 38 (1 pg)
	Henry J. Roth			United's Response to Staff Data Request No. 50 (HIGHLY CONFIDENTIAL) (2 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 39 (HIGHLY CONFIDENTIAL) (2 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 31 (1 pg)
	Henry J. Roth			United's Response to Staff Data Request No. 40 (1 pg)
	Henry J. Roth			United's Response to Staff Data Request No. 48 (HIGHLY CONFIDENTIAL) (8 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 47 (HIGHLY CONFIDENTIAL) (2 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 54 (8 pgs)
	Henry J. Roth			U.S. Census Map, Jefferson County, WA
	Henry J. Roth			United's Response to Staff Data Request No. 43 (HIGHLY CONFIDENTIAL) (2 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 34 (HIGHLY CONFIDENTIAL) (8 pgs)
	Henry J. Roth			United's Response to Staff Data Request No. 45 (1 pg)
	Henry J. Roth			United's Response to Staff Data Request No. 49 (HIGHLY CONFIDENTIAL) (2 pgs)

REDACTED

Docket No. UT-081393

United's Response to Staff Data Request No. 38.

Date 7/13/2009

Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 38:

Referring to Mr. Roth's testimony (HJR-5T) at page 7 ["The bottom line is that total costs exceed total revenues."]: Does United contend that it is entitled to intrastate revenues at least equal to the "total costs" referred to by Mr. Roth?

OBJECTION:

United objects to this request on the grounds that it is vague and ambiguous and not reasonably calculated to lead to the discovery of admissible information. Notwithstanding any objection, United provides the following response.

RESPONSE:

Mr. Roth's testimony at the referenced cite was related to his comparison of the TSLRIC costs of intrastate retail services and the associated intrastate retail revenues. Mr. Roth's surrebuttal testimony states, "Any reduction in revenues will even more unreasonably expand the gap that exists of costs over revenue." (Roth surrebuttal, page 7, lines 17-18). Mr. Roth's contention is that the Commission should not reduce United's access rates in this proceeding, which would result in a greater gap between costs and revenue.

Docket No. UT-081393
United's Response to Staff Data Request No. 50
Date 7/17/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 50:

Project all calculations and work papers supporting the analysis reported at page 39, starting at line 3, of Mr. Roth's testimony (HJR-5T).

OBJECTION: United objects to this request on the grounds that it is vague, overly broad and ambiguous, not reasonably calculated to lead to the discovery of admissible information, and irrelevant. Notwithstanding any objection, United provides the following response.

RESPONSE: See Attachment Staff 50 HC.

Benchmark Cost Proxy Model Results

Key Elements

TOTAL SUMMARY
SPRINT

WASHINGTON
WIRE CENTERS [31]

Investment: UnCapped

Plant Type	UnCapped Annual Investment	UnCapped Annual Investment: TPI Adj	2007 Y/E Inv. Source: Embarq Input File	Embarq ECM
2111 Land	\$ 258,439			
2121 Building	\$ 1,630,155			
2210 Switching Equipment	\$ 22,642,638	\$ 16,981,978		
2230 Circuit Equipment	\$ 34,815,653	\$ 33,855,222		
2230 IOF Equipment	\$ 2,425,965			
2411 Pole Investment	\$ 13,655,998	\$ 26,169,859		
2421 Aerial Cable - Copper	\$ 25,351,812	54,277,448		
2421 Aerial Cable - Fiber	\$ 2,672,913	\$ 3,440,664		
2421 Aerial Cable	\$ 28,024,724	\$ 57,718,112		
2422 Underground Cable - Copper	\$ 1,202,387	\$ 2,706,852		
2422 Underground Cable - Fiber	\$ 1,892,191	\$ 2,514,281		
2422 Underground Cable	\$ 3,094,579	\$ 5,221,134		
2423 Buried Cable - Copper	\$ 67,533,299	\$ 121,131,155		
2423 Buried Cable - Fiber	\$ 37,510,773	\$ 47,787,697		
2423 Buried Cable	\$ 105,044,072	\$ 168,918,852		
2441 Conduit Investment	\$ 11,455,693	\$ 47,683,100		
Total Plant Investment	\$ 223,047,918	\$ 356,548,256		

Description	Docket 980311	TPI adj
Total Monthly Cost per Loop	\$44.17	
Intrastate Statewide Avg Cost	\$33.13	\$52.96
Statewide Avg Intrastate Regulated Retail Revenue		

REDACTED

Docket No. UT-081393
United's Response to Staff Data Request No. 39
Date 7/13/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 39:

Referring to Mr. Roth's testimony (HJR-5T) at page 16, lines 6-15:

- a) Does Mr. Roth agree that the total investment level calculated by the Embarq Cost Model for United's Washington service area exceeds the total investment recorded on United's financial records for the Washington service area?
- b) Has United restricted its investment in telephone plant in the Washington service area as a result of the rate of return realized by United in Washington state? If so, state the type and/or amount of investments that have not occurred due to the "low rate-of-return on investment in Washington."
- c) Identify the factors that United believes to have contributed to the "low rate-of-return on investment in Washington."
- d) Identify the actions taken by United, if any, to remedy the purported low rate of return.
- e) Identify the actions, if any, that Mr. Roth believe that the Washington Utilities and Transportation Commission should have taken to remedy the purported low rate of return.
- f) Provide any document that demonstrates how United factors realized intrastate rates of return into state-level investment decisions or the allocation of investment capital across its incumbent service areas.
- g) Provide the business case analysis and ranking of capital investment opportunities referred to at line 11.

OBJECTION:

United objects to this request and all of its subparts on the grounds that it is vague and ambiguous and not reasonably calculated to lead to the discovery of admissible information. Furthermore, some of the subparts misstate Mr. Roth's testimony. Notwithstanding, but without waiving, any objection United provides the following response.

RESPONSE:

- a) United's total modeled investment does exceed United's total telephone plant in service on the balance sheet for Washington because a forward-looking cost model will not produce results that match actual booked cost of telephone plant in service on the balance sheet. For example, United's modeled switching costs are lower than current switching investment as described in Mr. Roth's surrebuttal testimony, page 19, lines 9-11, "The cost results I have filed with my responsive testimony using United's actual cost inputs demonstrate modeled switching investment that is 41% less than what United actually experiences." Changes in technology, costs of

materials, labor, etc. all affect the total investment calculated in a current cost model when compared to actual investment in service today.

- b) Mr. Roth did not state that United has restricted its investment in telephone plant in Washington. Mr. Roth's statement simply points out the implications of Staff's proposed access rate reductions. Specifically, as demonstrated by Mr. Felz's Exhibit No. __ (JMF-8HC), Staff's proposed access rate decreases would result in a **Begin Highly Confidential** **End Highly Confidential** rate of return for United's Washington intrastate operations.
- c) Mr. Roth made no statement concerning factors that contribute to a low rate of return on investment in Washington. See response to UTC Staff data request No. 39b.
- d) Mr. Roth presented a cost study with evidence of United's cost for intrastate switched access and local service and has demonstrated the high costs that United incurs to serve Washington customers, the vast majority of whom are in rural areas. Mr. Felz presented the actual intrastate rate of return and the impact of staff's proposed access rate reductions. Mr. Roth has not endeavored to speculate on any specific actions related to United's past or current rate of return. Rather, Mr. Roth's testimony focuses on why the Commission should not reduce United's access rates as the Commission Staff has proposed in their testimony.
- e) See response to UTC Staff data request No. 39d.
- f) There are no documents responsive to this request, nor are any necessary, as this follows as a matter of basic economic principles. The cost of capital utilized in the Washington cost study is informative when compared to the current rate of return. The current rate of return found in Mr. Felz's Exhibit No. __ (JMF-8HC) is lower than the cost of capital in the Washington cost study Roth Exhibit No. __ (HJR-4HC). Absent United's COLR obligation, which requires continued capital and expense dollars to meet, United's current returns in Washington do not provide the necessary incentive for incremental investment in Washington when compared with other potential investment opportunities. This situation would only be made worse if Commission Staff's proposed access reductions were ordered in this proceeding.
- g) There are no documents responsive to this request, as no projects have been brought forward specifically for intrastate regulated retail services. See response to UTC Staff data request No. 39f.

REDACTED

Docket No. UT-081393
United's Response to Staff Data Request No. 31
Date 5/15/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 31:

Please provide the depreciation rates used in the cost study presented by Henry J. Roth. Please provide support and study for those rates. Did Mr. Roth use the last Commission authorized depreciation lives and salvage values for UTNW? If not, please explain.

RESPONSE:

Refer to Exhibit No. HC(HJR-4HC) Page 159 which includes both Economic Life and Economic Depreciation Rates. A formal depreciation study was not performed for the current study. Rather, the economic lives and salvage values utilized in the cost study were determined by Embarq's capital recovery team to be appropriate forward-looking economic depreciation values for purposes of these studies. Economic life is defined here as the forward-looking life of new plant placed in the network today.

No, Mr. Roth did not use the last Commission authorized depreciation lives and salvage values. As stated above, forward-looking economic lives and salvage values were utilized in United's cost study.

Docket No. UT-081393
United's Response to Staff Data Request No. 40
Date 7/13/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 40:

Provide any study or document that supports the statement made by Mr. Roth at page 20, lines 13-16 (HRJ-5T).

RESPONSE:

A formal depreciation study was not performed for the current cost study in Washington. Rather, the economic lives and salvage values utilized in the cost study were determined by Embark's Capital Recovery team to be appropriate forward-looking economic depreciation values for purposes of these studies. Economic life is defined here as the forward-looking life of new plant placed in the network today.

Docket No. UT-081393
United's Response to Staff Data Request No. 48
Date 7/17/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 48:

Referring to the process described at pages 27-28 of HJR-5T, provide a list, by wire center, of the service addresses that United was unable to geocode.

OBJECTION: United objects to this request on the grounds that it is vague, overly broad and ambiguous and not reasonably calculated to lead to the discovery of admissible information. The locations United was "unable to geocode" if taken literally would be a small subset of records that had the MapMarker geocode of "N"⁴. In the interest of being responsive we have broadened staff's request to include records for locations that the Geographic Module would determine needed to be surrogated. Notwithstanding any objection, United provides the following response.

RESPONSE: See Attachment Staff 48 HC.

⁴ See MapInfo MapMarker User Guide for details:
http://reference.mapinfo.com/software/mapmarker_plus/english/13_2/MM_USA_v13_2_UserGuide.pdf

Attachment to Staff 48 HC
Pages 1-56 Intentionally Omitted

A	B	C	D	E	F
Row	GLLI Code	Wire Center Number	Address	Zip Code	State
2688	QLCNWAXA	1251			
2689	QLCNWAXA	1251			
2690	QLCNWAXA	1251			
2691	QLCNWAXA	1251			
2692	QLCNWAXA	1251			
2693	QLCNWAXA	1251			
2694	QLCNWAXA	1251			
2695	PLSBWAXX	1211			
2696	PLSBWAXX	1211			
2697	PLSBWAXX	1211			
2698	PLSBWAXX	1211			
2699	PLSBWAXX	1211			
2700	PLSBWAXX	1211			
2701	PLSBWAXX	1211			
2702	PLSBWAXX	1211			
2703	PLSBWAXX	1211			
2704	PLSBWAXX	1211			
2705	PLSBWAXX	1211			
2706	PLSBWAXX	1211			
2707	PLSBWAXX	1211			
2708	PLSBWAXX	1211			
2709	PLSBWAXX	1211			
2710	PLSBWAXX	1211			
2711	PLSBWAXX	1211			
2712	PLSBWAXX	1211			
2713	PLSBWAXX	1211			
2714	PLSBWAXX	1211			
2715	PLSBWAXX	1211			
2716	PLSBWAXX	1211			
2717	PLSBWAXX	1211			
2718	PLSBWAXX	1211			
2719	PLSBWAXX	1211			
2720	PLSBWAXX	1211			
2721	PLSBWAXX	1211			
2722	PLSBWAXX	1211			
2723	PLSBWAXX	1211			
2724	PLSBWAXX	1211			
2725	PLSBWAXX	1211			
2726	PLSBWAXX	1211			
2727	PLSBWAXX	1211			
2728	PLSBWAXX	1211			
2729	PLSBWAXX	1211			
2730	PLSBWAXX	1211			
2731	PLSBWAXX	1211			
2732	PLSBWAXX	1211			
2733	PLSBWAXX	1211			
2734	PLSBWAXX	1211			
2735	PLSBWAXX	1211			

REDACTED

Attachment to Staff 48 HC
Page 58 Intentionally Omitted

Attachment Staff DR 48 HC

A	B	C	D	E	F
Row	CLLI Code	Wire Center Number	Address	Zip Code	State
2784	PLSBWAXX	1211			
2785	PLSBWAXX	1211			
2786	PLSBWAXX	1211			
2787	PLSBWAXX	1211			
2788	PLSBWAXX	1211			
2789	PLSBWAXX	1211			
2790	PLSBWAXX	1211			
2791	PLSBWAXX	1211			
2792	PLSBWAXX	1211			
2793	PLSBWAXX	1211			
2794	PLSBWAXX	1211			
2795	PLSBWAXX	1211			
2796	BRNNWAXX	1252			
2797	BRNNWAXX	1252			
2798	BRNNWAXX	1252			
2799	BRNNWAXX	1252			
2800	BRNNWAXX	1252			
2801	BRNNWAXX	1252			
2802	BRNNWAXX	1252			
2803	BRNNWAXX	1252			
2804	GRNRWAXX	1254			
2805	GRNRWAXX	1254			
2806	PLSBWAXX	1211			
2807	SNSDWAXX	1151			
2808	BCTNWAXX	1156			
2809	BCTNWAXX	1156			
2810	SNSDWAXX	1151			
2811	LYLEWAXA	1353			
2812	LYLEWAXA	1353			
2813	LYLEWAXA	1353			
2814	LYLEWAXA	1353			
2815	LYLEWAXA	1353			
2816	LYLEWAXA	1353			
2817	LYLEWAXA	1353			
2818	LYLEWAXA	1353			
2819	LYLEWAXA	1353			
2820	LYLEWAXA	1353			
2821	LYLEWAXA	1353			
2822	LYLEWAXA	1353			
2823	LYLEWAXA	1353			
2824	LYLEWAXA	1353			
2825	LYLEWAXA	1353			
2826	LYLEWAXA	1353			
2827	LYLEWAXA	1353			
2828	LYLEWAXA	1353			
2829	LYLEWAXA	1353			
2830	LYLEWAXA	1353			
2831	LYLEWAXA	1353			

REDACTED

Attachment to Staff 48 HC
Pages 60-82 Intentionally Omitted

A	B	C	D	E	F
Row	CELLI Code	Wire Center Number	Address	Zip Code	State
3936	GDVWWAXA	1153			
3937	GDVWWAXA	1153			
3938	GDVWWAXA	1153			
3939	PRSRWAXA	1154			
3940	QLCNWAXA	1251			
3941	QLCNWAXA	1251			
3942	QLCNWAXA	1251			
3943	STSNWAXA	1381			
3944	STSNWAXA	1381			
3945	PLSBWAXX	1211			
3946	PLSBWAXX	1211			
3947	PLSBWAXX	1211			
3948	PLSBWAXX	1211			
3949	CNTRWAXX	1253			
3950	CNTRWAXX	1253			
3951	CNTRWAXX	1253			
3952	CNTRWAXX	1253			
3953	CNTRWAXX	1253			
3954	CNTRWAXX	1253			
3955	QLCNWAXA	1251			
3956	QLCNWAXA	1251			
3957	QLCNWAXA	1251			
3958	QLCNWAXA	1251			
3959	QLCNWAXA	1251			
3960	QLCNWAXA	1251			
3961	QLCNWAXA	1251			
3962	QLCNWAXA	1251			
3963	QLCNWAXA	1251			
3964	QLCNWAXA	1251			
3965	QLCNWAXA	1251			
3966	QLCNWAXA	1251			
3967	QLCNWAXA	1251			
3968	QLCNWAXA	1251			
3969	QLCNWAXA	1251			
3970	QLCNWAXA	1251			
3971	QLCNWAXA	1251			
3972	QLCNWAXA	1251			
3973	QLCNWAXA	1251			
3974	BRNNWAXX	1252			
3975	BRNNWAXX	1252			
3976	BRNNWAXX	1252			
3977	BRNNWAXX	1252			
3978	BRNNWAXX	1252			
3979	BRNNWAXX	1252			
3980	BRNNWAXX	1252			
3981	BRNNWAXX	1252			
3982	BRNNWAXX	1252			
3983	GRNRWAXX	1254			

REDACTED

Attachment to Staff 48 HC
Pages 84-170 Intentionally Omitted

Docket No. UT-081393
United's Response to Staff Data Request No. 47
Date 7/17/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 47:

For each of the 10 terminal locations that are the subject of Staff's Data Request 34 (and referred to at page 16, line 9 of HJR-5T), if that location represents a surrogate location located using the process Mr. Roth describes at pages 27-28 of HJR-5T, provide the following information (and any documents that represent the source of the information):

1. The census block associated with that location.
2. The number of housing units in the census block.
3. The number of occupied housing units in the census block.
4. The number of housing units subscribing to telephone service.
5. The location of the United telephone network facilities located nearest to the census block.

RESPONSE:

1. The Geographic Module (GM) uses two types of demographics in order to place a surrogate customer. If the demand for the surrogated customer is derived from a residential service, US Census information is used to place that customer. The residential placement process uses the following fields: Population, Households and Housing Units. If the demand for the surrogated customer is derived from a business customer, Dun & Bradstreet demographic information is used to place that customer. The business placement process uses the following fields: Business Firms and Business Lines. Additionally, the GM uses units-in-structure information at the Census Block Group level, to guide the surrogation of Multi Dwelling Unit locations to an appropriate Census block.

[Begin Highly Confidential]

A	B	C	D	E	F
Row	Element Number	Census Block FIPS Code	Population	Households	Housing Units
1	1381018001001				
2	1251022001001				
3	1152001001001				
4	1352001001001				
5	1156001001003				

REDACTED

A	B	C	D	E	F
Row	Element Number	Business Firms	Business Lines	Airline Distance to Nearest Network Facility (ft)	Facility Type
1	1381018001001				
2	1251022001001				
3	1152001001001				
4	1352001001001				
5	1156001001003				

[End Highly Confidential]

2. See response to UTC STAFF DATA REQUEST NO. 47 - 1.
3. Occupied Housing Units are not used by the Geographic Module for surrogation.
4. Housing Units Subscribing to Telephone Service³ are not used by the Geographic Module for surrogation.
5. See response to UTC STAFF DATA REQUEST NO. 47 - 1.

REDACTED

² Copper Feeder Routes are the most granular network facility tracked in United's mapping systems, more adjacent facilities may exist.

³ U.S. Census Bureau, 2000 Census of Population and Housing, Summary File 3: Technical Documentation, 2002 (issued July 2007), Page 1-2. The datum Housing Units Subscribing to Telephone Service is only available at the less detailed block group level.

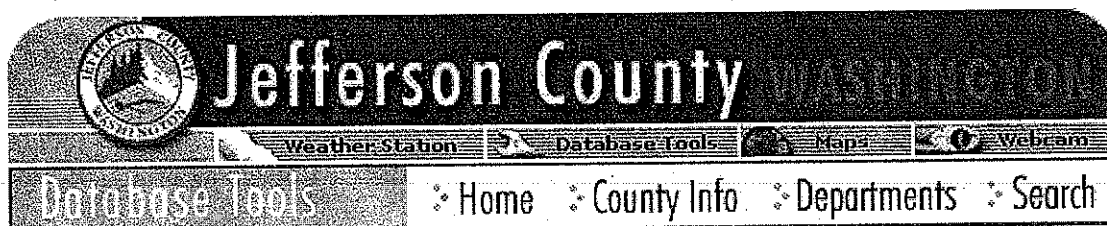
Docket No. UT-081393
United's Response to Staff Data Request No. 54
Date 7/30/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 54:

Please admit that the property identified in the attached Jefferson County Assessor Map is the 4th location on the list contained in Dr. Blackmon's Exhibit No. ____ (GB-4HC) (334 Lee Way in the Quilcene wire center).

RESPONSE:

This information is not in United's possession. If Jefferson County cannot attest to the accuracy of their data neither can United. See statement on page 6 of Staff attachment *Jefferson Assessor Map Quilcene 334 Lee Way 7-23-09.pdf*. "Jefferson County does not attest to the accuracy of the data contained herein and makes no warranty with respect to its correctness or validity." Accuracy is at the heart of why United uses professional geocoding software to identify locations. Professional geocoding software provides feedback as to how accurately a location has been placed; if that feedback does not meet United's accuracy guidelines an approximate surrogate location is used.



Parcel Search Tool

Only fill in one line of the search fields then click on the search button next to it. Street Name can be a partial name. EG: **Hast** will retrieve any street that starts with **Hast** like, **Hasting Ave** and **Hasting Ave W**

Parcel Number:

SEARCH

OR

House Number: **AND** Street Name:

SEARCH

OR

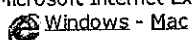
Street Name:

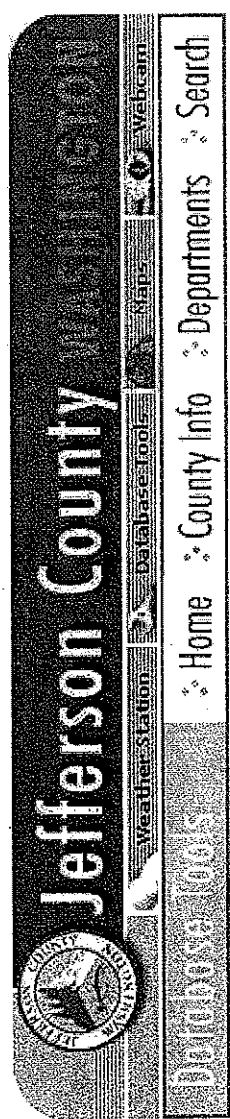
SEARCH

Parcel Number	House Number	Street Name
602231003	94	LEE WAY
602231005	244	LEE WAY
602231006	256	LEE WAY
936000216	283	LEE WAY
936000214	303	LEE WAY
602234031	334	LEE WAY
936000212	353	LEE WAY
936000209	395	LEE WAY



Best viewed with Microsoft Internet Explorer 6.0 or later





Parcel Number: 602234031

Parcel Number: 602234031

[Printer Friendly](#)

Owner Mailing Address:

MICHAEL MC DONOUGH
PO BOX 889

BRINNON WA983200889

Site Address:

334 LEE WAY
BRINNON 98320

Section: 23

Qtr Section: SE1/4

Township: 26N

Range: 2W

School District: Brinnon (46)

Fire Dist: Brinnon (4)

Tax Status: Taxable

Tax Code: 441

Planning area: Brinnon (11)

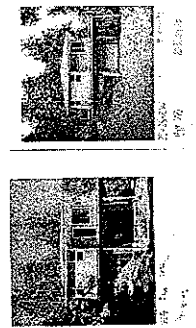
Sub Division:

Assessor's Land Use Code: 1100 - HOUSES (single units, non-farm)

Property Description:

S23 T26 R2W | TAX 28 | |


Click on photo for larger image.



[Permit Data](#) [Assessor Bldg Data](#) [Tax, A/V, Sales Info](#) [Map Parcel](#) [Plats & Surveys](#)

 **Jefferson County**

[HOME](#) | [COUNTY INFO](#) | [DEPARTMENTS](#) | [SEARCH](#)

Best viewed with Microsoft Internet Explorer 6.0 or later
 [Windows](#) - [Mac](#)

Parcel Number: 602234031

Site Address:
334 LEE WAY
BRINNON 98320



334 Lee Way

9-10-92

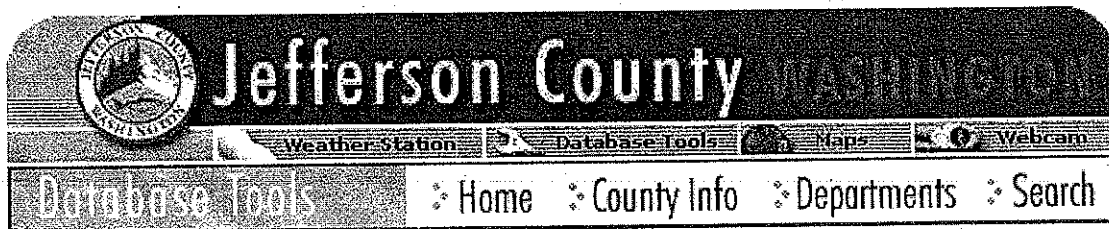


23-26-2W

TAX 28

8-21-94

602234031



Valuation Information for Parcel Number: 602234031

Assessed Fair Market Value

Improvements: \$272320

Improved Land: \$50000

Unimproved Land: \$20000

Taxable Value: \$342320

Property Sales InformationAffidavit Number: 107374

Legal Document Description: SWD

8/17/06

Sales Amount: \$360000

Sales Code: IMP

Current and Prior Year Taxes

Tax Year	Tax Amount	Taxes Paid
2009	2331.18	1165.59
2008	2536.34	2536.34
2007	2840.86	2840.86
2006	1949.06	1949.06
2005	2017.42	2017.42
2004	2042.04	2042.04
2003	2060.7	2060.7
2002	1892.64	1892.64
2001	1926.54	1926.54
2000	1975.9	1975.9
1999	1562.96	1562.96
1998	1491.42	1491.42
1997	869.14	869.14

Current and Prior Year Port Ludlow Drainage District Taxes

Year	Tax Amount	Taxes Paid
Not applicable for this Parcel		

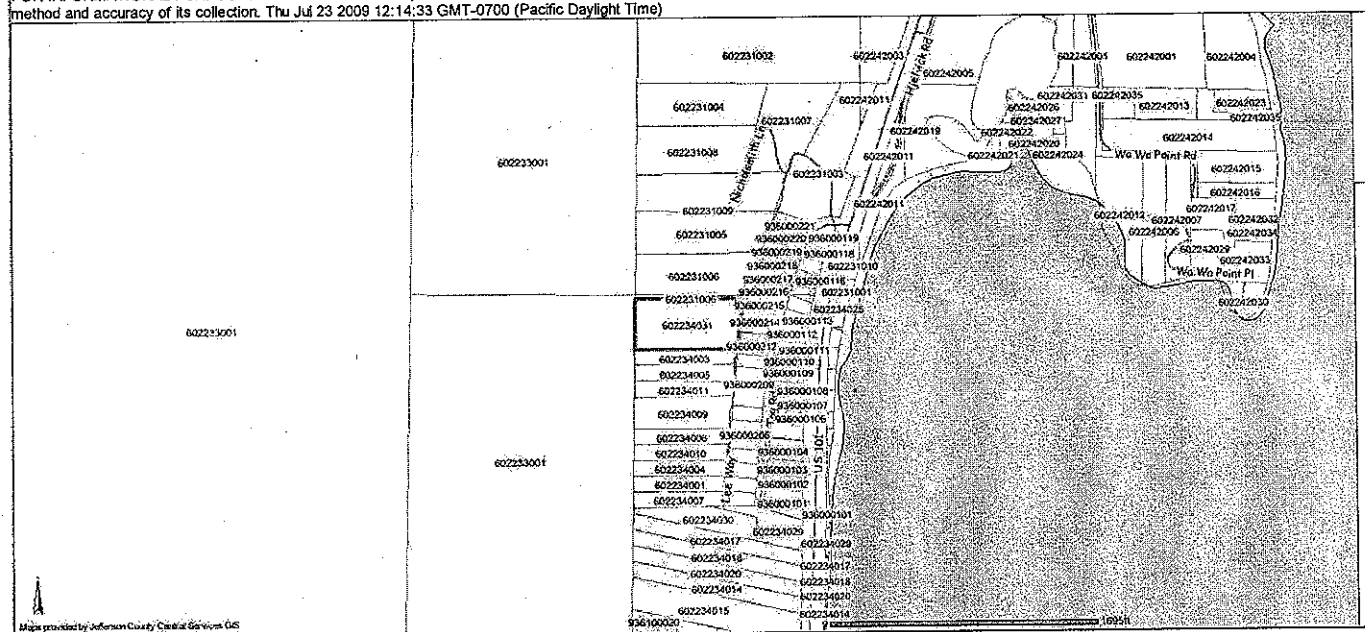
Property TransactionsAffidavit Number: 107374Affidavit Number: 92128Affidavit Number: 77203

NOTE: This is for informational use only. **Do not** pay taxes based off this information. Please refer to your current tax statement or contact the Treasurer's office at (360)385-9150

Page 7

Parcel Number: 602234451

FOR INFORMATIONAL PURPOSES ONLY-Jefferson County does not attest to the accuracy of the data contained herein and makes no warranty with respect to its correctness or validity. Data contained in method and accuracy of its collection. Thu Jul 23 2009 12:14:33 GMT-0700 (Pacific Daylight Time)



Docket No. UT-081393
United's Response to Staff Data Request No. 43
Date 7/13/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 43:

Referring to Mr. Roth's testimony (HJR-5T) at page 28, line 21, and page 29, line 1:

- a) Provide the source documents (or a specific reference if the document has already been provided) for the amounts stated.
- b) Provide the comparison of actual and modeled cable sheath feet for each wire center.
- c) Provide the comparison of actual and modeled cable sheath feet for each type of cable (metallic and fiber) and each type of support structure (aerial, buried, and underground).

OBJECTION:

United objects to this request on the grounds that it is overly broad, unduly burdensome. United further objects to the extent the question seeks information that United does not maintain in the regular course of business and would have to conduct a special study to produce. Notwithstanding, but without waiving, any objection United provides the following response.

RESPONSE:

- a) See Attachment Staff 43 HC.
- b) Actual cable sheath feet is not available at a wire center level, thus this comparison cannot be made.
- c) See Attachment Staff 43 HC.

FCC Paper Report 43-08 Format (Not filed with FCC, Highly Confidential)

	Aerial Cable		Underground Cable		Buried Cable		Intrabldg Network Cable		Total Cable	
	Sheath Km of Metallic (d)	Sheath Km of Fiber (e)	Sheath Km of Metallic (f)	Sheath Km of Fiber (g)	Sheath Km of Metallic (h)	Sheath Km of Fiber (i)	Sheath Km of Metallic (n)	Sheath Km of Fiber (o)	Sheath Km of Metallic (p)	Sheath Km of Fiber (q)
WA	Embedded									

Information above previously provided in response to AT&T DR 150

	Aerial Cable		Underground Cable		Buried Cable		Intrabldg Network Cable		Total Cable	
	Sheath Km of Metallic (d)	Sheath Km of Fiber (e)	Sheath Km of Metallic (f)	Sheath Km of Fiber (g)	Sheath Km of Metallic (h)	Sheath Km of Fiber (i)	Sheath Km of Metallic (n)	Sheath Km of Fiber (o)	Sheath Km of Metallic (p)	Sheath Km of Fiber (q)
WA	Modeled									

Embedded Modeled

Ttl Km

Km to Miles

Ttl Miles

Ft per mile

Ttl Feet

REDACTED

Docket No. UT-081393
United's Response to Staff Data Request No. 34
Date 5/20/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 34:

Below is a list of Outside Plant Element Numbers extracted from the file 2007 V2.0.1 LoopDesign.mbd of the Embarq Economic Cost Model.

1116001001001
1156008001001
1381018001001
1251022001001
1155005001001
1152002001001
1152001001001
1352001001001
1112001001001
1156001001003

For each element, please provide:

- a) The wire center and street address of the customer served by the element.
- b) The grade of service and number of lines subscribed to by the customer.
- c) A detailed description of all outside plant facilities used to provide service to the customer, including distances and types of support structures.
- d) The ability, if any, of the customer to obtain high-speed Internet service using the existing facilities.
- e) The book value of the telephone plant used to serve the customer.
- f) A detailed description of all outside plant facilities identified by the Embarq Economic Cost Model as used to provide service to the customer.
- g) The total outside plant investment required to provide service to the customer, as calculated by the Embarq Economic Cost Model.

OBJECTION:

United objects to subparts (d) and (e) on the grounds that they unduly burdensome. United does not maintain this information in the normal course of business and it would require a burdensome and costly special study to produce it. United further objects to the request for detailed information on 10 modeled terminal locations with outlying characteristics which are likely not a representative sample of the over 17,000 modeled terminal locations. Notwithstanding, but without waiving, any objection United provides the following response.

RESPONSE:

BEGIN HIGHLY CONFIDENTIAL

a) Wire center and street address:

A	B	C	D
Row	Element Number	GLLI	Address
1	1116001001001		
2	1156008001001		
3	1381018001001		
4	1251022001001		
5	1155005001001		
6	1152002001001		
7	1152001001001		
8	1352001001001		
9	1112001001001		
10	1156001001003		

b) Modeled Services at location:

A	B	C	
Row	Element Number	Service	Number of Lines
1	1116001001001		
2	1156008001001		
3	1381018001001		
4	1251022001001		
5	1155005001001		
6	1152002001001		
7	1152001001001		
8	1352001001001		
9	1112001001001		
10	1156001001003		

c) Elements listed are a function of the modeled network. Embedded facilities are not used by Embarg's cost model.

d) High-Speed Internet is not modeled. Customers that currently subscribe to High-Speed Internet:

A	B	C
Row	Element Number	Subscribed to HSI
1	1116001001001	
2	1156008001001	
3	1381018001001	
4	1251022001001	
5	1155005001001	
6	1152002001001	
7	1152001001001	
8	1352001001001	
9	1112001001001	
10	1156001001003	

REDACTED

e) Not available at requested level of granularity.

f) Modeled outside plant facilities:

A	B	C	D	E
Row	Element Number	Served By	Terminal Type	Route Distance To CO (ft.)
1	1116001001001			
2	1156008001001			
3	1381018001001			
4	1251022001001			
5	1155005001001			
6	1152002001001			
7	1152001001001			
8	1352001001001			
9	1112001001001			
10	1156001001003			

g) Total outside plant investment:

A	B	C	D	E
Row	Element Number	Electronics Investment	Outside Plant Investment	Total Investment
1	1116001001001			
2	1156008001001			
3	1381018001001			
4	1251022001001			
5	1155005001001			
6	1152002001001			
7	1152001001001			
8	1352001001001			
9	1112001001001			
10	1156001001003			

END HIGHLY CONFIDENTIAL

SUPPLEMENTAL RESPONSE - 5/29/09:

b) United's modeled network starts with the actual services at each actual location; therefore the supplied information meets the request.

c) Outside plant facilities used:

Highly Confidential per Protective Order in UT-081393

REDACTED

BEGIN HIGHLY CONFIDENTIAL

A	B	C	D	E	F	G
Row	Element Number	Feeder Type	Serving DLC Type	Working Lines at Serving DLC	Location DSL Capable	DSL Capable DLC
1	1116001001001					
2	1156008001001					
3	1381018001001					
4	1251022001001					
5	1155005001001					
6	1152002001001					
7	1152001001001					
8	1352001001001					
9	1112001001001					
10	1156001001003					

REDACTED

A	B	C	D	E	F	G
Row	Element Number	Distance to Serving DLC (ft.)	Distance to CO from Serving DLC (ft.)	Embedded Route Distance to CO (ft.)	Modeled Route Distance To CO (ft.)	Map Link
1	111600100100					
2	115600800100					
3	138101800100					
4	125102200100					
5	115500500100					
6	115200200100					
7	115200100100					
8	135200100100					
9	111200100100					
10	115600100100					
	3					

END HIGHLY CONFIDENTIAL

*There is no direct (key) link between United's billing system and the network systems. The results above required analyzing each location on network maps. In some cases it was not possible to find a corresponding location in the network systems. These locations are marked "Not Mapped."

United's systems do not track support structures in a manner that can be directly assigned to a particular location.

d) See response to Staff Data Request No. 34 c).

Highly Confidential per Protective Order in UT-081393

¹ Locations marked "Not Mapped" are not included in the average.

REDACTED

SECOND SUPPLEMENTAL RESPONSE – 6/1/09

c) The second table in United's supplemental response above is revised as follows:

A	B	C	D	E	F	G
Row	Element Number	Distance to Serving DLC (ft)	Distance to CO from Serving DLC (ft)	Embedded Route Distance to CO (ft)	Modeled Route Distance To CO (ft)	Map Lin k
1	1116001001001					
2	1156008001001					
3	1381018001001					
4	1251022001001					
5	1155005001001					
6	1152002001001					
7	1152001001001					
8	1352001001001					
9	1112001001001					
10	1156001001003					

f) The table in United's response above is revised as follows:

A	B	C	D	E
Row	Element Number	Served By	Terminal Type	Route Distance To CO (ft)
1	1116001001001			
2	1156008001001			
3	1381018001001			
4	1251022001001			
5	1155005001001			
6	1152002001001			
7	1152001001001			
8	1352001001001			
9	1112001001001			
10	1156001001003			

REDACTED

Docket No. UT-081393

United's Response to Staff Supplemental Data Request No. 34

Date 6/26/2009

Preparer: Henry Roth – Director Economic Costing

UTC STAFF SUPPLEMENTAL DATA REQUEST NO. 34:

United's response to Staff DR 34 includes the following table in part (g):

A	B	C	D	E
Row	Element Number	Electronics Investment	Outside Plant Investment	Total Investment
1	1116001001001			
2	1156008001001			
3	1381018001001			
4	1251022001001			
5	1155005001001			
6	1152002001001			
7	1152001001001			
8	1352001001001			
9	1112001001001			
10	1156001001003			

The amounts listed do not appear to agree with the amounts shown in Columns M and N for each Element Number on Sheet H_Output in the Part 34.xls worksheets. For example, for Row 1, the Part 34.xls amounts associated with the listed Element Number are \$62,675.24 and \$507,417.20, respectively.

- If the amounts shown in the table above are correct, please provide an explanation of why these amounts differ from the amounts listed in the Part 34.xls worksheet.
- If the amounts shown in the table above are incorrect, please provide a corrected table.

RESPONSE:

The table in United's response to g) is revised as follows:

REDACTED

[Begin Highly Confidential]

A	B	C	D	E
Row	Element Number	Electronics Investment	Outside Plant Investment	Total Investment
1	1116001001001			
2	1156008001001			
3	1381018001001			
4	1251022001001			
5	1155005001001			
6	1152002001001			
7	1152001001001			
8	1352001001001			
9	1112001001001			
10	1156001001003			

[End Highly Confidential]

- (a) Revised table resolves this inconsistency.
- (b) Provided. Original inconsistencies caused by an improper sort, the values have not changed just the order.

REDACTED

Docket No. UT-081393
United's Response to Staff Data Request No. 45
Date 7/17/2009
Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 45:

State which, if any, of the following digital loop carrier systems is currently used by United in a greenfield (non-replacement) network environment. For each system not currently used by United, provide an explanation of why it is not used:

1. Alcatel LS2000
2. AFC UMC1000
3. Lucent SLC96
4. Seiscor S24DU
5. AFC DMAX

OBJECTION: United objects to this request on the grounds that it is vague, overly broad and ambiguous, not reasonably calculated to lead to the discovery of admissible information, and irrelevant. Notwithstanding any objection, United provides the following response.

RESPONSE: United would not deploy any of the above listed DLCs in a greenfield network environment. For new deployments, United has standardized on the Calix C7¹ platform. The Calix C7 digital loop carrier is a highly integrated, high capacity network platform that combines service delivery and transport technologies with high-density fiber and copper connectivity in the same chassis. The Calix C7 supports a broad range of fiber and copper based services, while providing the most flexibility to deliver future telecommunication services.

¹ The Entrisphere BLM1500 is also available as a secondary standard platform.

Docket No. UT-081393

United's Response to Staff Data Request No. 49

Date 7/17/2009

Preparer: Henry Roth – Director Economic Costing

UTC STAFF DATA REQUEST NO. 49:

Referring to Mr. Roth's testimony (HRJ-5T) at page 34 ["These customers are served using existing network that must be maintained and serviced."]: Provide the dollar amount of additions to and retirements from telephone plant in service for United's Washington service area for each year 2004 through 2008.

OBJECTION: United objects to this request on the grounds that it is vague, overly broad and ambiguous, not reasonably calculated to lead to the discovery of admissible information, and irrelevant. Notwithstanding any objection, United provides the following response.

RESPONSE: See Attachment Staff 49 HC.

United Telephone Company of the Northwest
Telecommunications Plant in Service - Washington
(millions)

	A	B	C	D	E	F
		Beginning Balance	Additions (net)	Retirements	Adjustments	Ending Balance

Row	1	2	3
	2006	2007	2008

REDACTED