

Embarq DR-6

How many total end users does Comcast currently have in the State of Washington who are listed in printed directories? Identify how many of such total number of end users are included in printed directories through (1) directory listing services provided by Embarq; (2) arrangements directly between Comcast and the publisher; and (3) arrangements with others.

Response

Comcast objects to DR-6 to the extent that it is vague and confusing. The request also seeks information that is irrelevant and/or is not reasonably calculated to lead to the discovery of admissible evidence. The number of end users who are listed in printed directories in the State of Washington has no bearing on the legality of Embarq's proposed DSLM charge. Moreover, information on the actual number of DLs provided by Embarq, Comcast, or others is not kept in the ordinary course of business.

Subject to the foregoing, Comcast states it does not keep such information in the ordinary course of business, but that Comcast IP Phone has approximately <CONFIDENTIAL-REDACTED> CDV customers in Embarq's service territory in Washington, which should closely correspond to the number of end users included in printed directories through directory listing services provided to Comcast by Embarq. The actual number of directory listings may be greater or smaller depending on the number of customers that have requested unlisted numbers or customers that have multiple lines and, therefore, multiple listings.

Responsible Comcast Official:

Beth Choroser
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