

Docket No. UT-050814
Verizon and MCI Objections and Responses to WA Public Counsel Data Request
Set 4, Nos. 134-149
July 21, 2005

DATA REQUEST NO. 134:

Please provide a copy of all merger savings models developed by joint petitioners. Please provide the models in executable electronic format.

Response:

In addition to its General Objections, Verizon objects to Data Request No. 134 because it seeks information that is neither relevant to this proceeding nor likely to lead to the production of admissible evidence. Subject to and without waiving these objections, Verizon notes that it does not have a merger savings "model".

Prepared By: James Miggans

Date: July 21, 2005

Witness: To be determined

ATTACHMENT A

Docket No. UT-050814

Verizon and MCI Objections and Responses to WA Public Counsel Data Request
Set 4, Nos. 134-149

July 21, 2005

DATA REQUEST NO. 135:

Please provide a copy of the merger savings "Synergy" model developed by Verizon for use in the California merger proceeding. Please provide the model in executable electronic format.

Response:

In addition to its General Objections, Verizon objects to Request No. 135 because it seeks information that is neither relevant to this proceeding nor likely to lead to the production of admissible evidence. Verizon also notes that it does not have a synergy "model". Verizon performed a synergy analysis of the synergies attributable to certain services provided in California because of a ruling in the SBC/AT&T proceeding requiring the submission of a state-specific analysis of synergies. Verizon's analysis for California used California-specific inputs. There is no such statutory requirement in Washington, and the California-specific inputs are unquestionably irrelevant to and inappropriate for the proceeding here.

Prepared By: James Miggans

Date: July 21, 2005

Witness: To be determined