Qwest Corporation (“Qwest”) objects to data request No. WD-4-97(C), (D) and (E), and No. WD-4-121 including all subparts on the grounds that they are overbroad and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. Specifically, the requests ask for information regarding a DSL service that is not provided by the regulated telecommunications company.

Qwest further objects to data request No. WD-4-117(B), (D) and (F) on the grounds that these subparts are overbroad and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. This data request asks for information relating to Qwest’s revenues. The wholesale
pricing matter is based on costs, not revenues. Thus, the revenue information requested is not relevant.

DATED this 22nd day of December, 2000.

FENEMORE CRAIG, P.C.

By

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ORIGINAL and ten copies of the foregoing filed this 22nd day of December, 2000 with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered this 22nd day of December, 2000.

Chief Counsel
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Phoenix, Arizona 85007

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