

Request No. 9: All documents that evidence, reflect, or refer to Comcast's build-out and/or overbuild plans for the State of Utah.

Response: Comcast fully incorporates its response to Interrogatory No. 13.
Objection and answer prepared by Angela W. Adams, Esq. and Genevieve D. Sanir, Esq.

Interrogatory 13: Identify and describe Comcast's build-out and/or overbuild plans for the State of Utah. In particular, identify and describe: (a) where Comcast has installed new and/or updated pole attachments, including but not limited to maps or reports depicting the location of Comcast's pole attachments; (2) where Comcast intends to install pole attachments; and (c) any internal documents regarding deployment permitting in Utah (attachment timetables for attaching and permitting).

Response: Comcast objects to this Request on the grounds that it is overly broad and unduly burdensome as to time, scope and geographic location. Further, Comcast objects on the grounds that the Request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Comcast's future deployment plans have no bearing on this litigation.

Subject to the foregoing objections, as well as the General Objections, Comcast states that, beginning in approximately mid-2001 when PacifiCorp began requiring permits, Comcast provided to PacifiCorp, in the normal course of its business, applications identifying each pole to which it seeks or sought to attach and/or overlash facilities.

Objection and answer prepared by Angela W. Adams, Esq. and Genevieve D. Sapir, Esq.
