

Interrogatory 5: Identify and describe any and all documents, communications or conversations between and among any agents, representatives or employees of Comcast or its predecessors in interest, TCI and/or AT&T, regarding the negotiation of the Pole Contact Agreement entered into between AT&T and PacifiCorp on December 20, 1999.

Response: Comcast objects to this Request on the grounds that it is overly broad and unduly burdensome in seeking the identification of hundreds of conversations and communications that may or may not have occurred more than five years ago. Further, Comcast objects to this Request on the grounds that it is vague and ambiguous. Comcast also objects to this Request on the grounds that it seeks information protected by the attorney-client privilege; pole attachment agreement negotiations are often conducted by attorneys on behalf of the company. Finally, Comcast objects to this Request on the grounds that it seeks information that

is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Counsel for PacifiCorp has stated that "there is only one over arching factual issue; whether Comcast has unauthorized attachments on PacifiCorp's facilities" (see Letter from C. Zdebski to J.D. Thomas, dated Mar. 25, 2004). As such, Comcast does not believe that the information requested in this Interrogatory is reasonably calculated to lead to the discovery of admissible evidence.

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

Request No. 2: All documents that evidence, reflect, or refer to communications or conversations between and among any agents, representatives or employees of Comcast or its predecessors in interest, TCI and/or AT&T, regarding the negotiation of the Pole Contact Agreement entered into between AT&T and PacifiCorp on December 20, 1999.

Response: Comcast fully incorporates its response to Interrogatory No. 5. Objection and answer prepared by Angela W. Adams, Esq. and Genevieve D. Sapir, Esq.