

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc. and New Lisbon Broadband
and Communications, LLC's Third Set of Requests
For Production of Documents and Other Discovery

Request 3.1: How many of LTD's current employees spend more than 1/3 of their regular work hours designing, engineering, or constructing a fiber-to-the home ("FTTH") communications network?

OBJECTION: LTD objects to Data Request 3.1 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 3.1 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the forgoing objection, none.