

**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 3.7:** Admit that LTD has not posted any openings for jobs in Indiana.

**OBJECTION:** LTD objects to Data Request 3.7 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 3.7 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 foregoing objection, LTD admits that it has not posted any openings or jobs in Indiana because to do so would be premature given that the dates for commencement of service and construction are uncertain at this time.