

Confidential Release

**Case Number: 96-327-CT-ACE
96-658-TP-ACE**

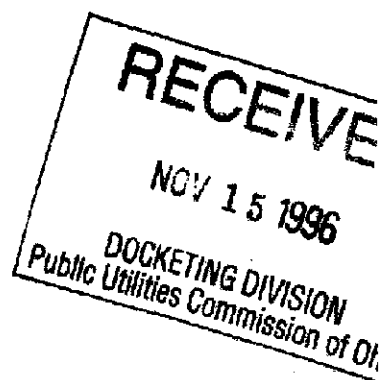
**Date of Confidential Document:
November 15, 1996**

**Today's Date:
August 25, 2009**

**Confidential portion of transcript for hearing held
on November 14, 1996. (FILED UNDER SEAL)**

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician Sm Date Processed AUG 25 2009

Confidential Transcript



Depo of Diana Cantu

11-14-96

Case# 96-327-CT-ACE
96-658-TP-ACE

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 451-1234

RECEIVED
NOV 15 1996
DOCKETING DIVISION
Public Utilities Commission of Ohio

PUBLIC UTILITIES COMMISSION

STATE OF OHIO

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

In the Matter of the Application)
of Ameritech Communications of)
Ohio, Inc. For Authority to)
Provide Competitive)
Telecommunications Services in)
the State of Ohio.)

Case No. 96-327-CT-ACE

In the Matter of the Application)
of Ameritech Communications of)
Ohio, Inc. For a Certificate of)
Public Convenience and Necessity)
to Provide Local Exchange)
Telecommunications Service)
Throughout the State of Ohio.)

Case No. 96-658-TP-ACE

Continued deposition of Diana Cantu, a witness
herein, called by the Intervenor for cross-examination under
the statute, taken before us, Deborah J. Holmberg, Registered
Merit Reporter, and Rose Marie Prater, Registered Professional
Reporter, and Notaries Public in and for the State of Ohio,
pursuant to notice and agreement, at the offices of Emens,
Kegler, Brown, Hill & Ritter, 65 East State Street, Columbus,
Ohio, on Thursday, November 14, 1996, beginning at 8:40 o'clock
p.m. and concluding on the same day.

*** CONFIDENTIAL TRANSCRIPT ***

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 APPEARANCES:

2 ON BEHALF OF AMERITECH COMMUNICATIONS INCORPORATED OF
3 OHIO AND AMERITECH COMMUNICATIONS INCORPORATED:

4 Albert Lucas, Esq.
5 Calfee, Halter & Griswold
6 1400 McDonald Investment Center
7 Cleveland, Ohio 44114-2688

8 ON BEHALF OF TIME WARNER COMMUNICATIONS OF OHIO, LP, AND
9 OHIO CABLE TELECOMMUNICATIONS ASSOCIATION:

10 Richard P. Rosenberry, Esq.
11 Emens, Kegler, Brown, Hill & Ritter
12 65 East State Street - 18th Floor
13 Columbus, Ohio 43215

14 ON BEHALF OF AT&T COMMUNICATIONS OF OHIO, INC.:

15 Stephen M. Howard, Esq.
16 Vorys, Sater, Seymour and Pease
17 52 East Gay Street
18 Columbus, Ohio 43215

19 - - -
20
21
22
23
24
25

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

Thursday, November 14, 1996
Evening Session

- - -
STIPULATIONS

It is stipulated by and among counsel for the respective parties herein that the deposition of Diana Cantu, a witness herein, called by the Intervenor for cross-examination under the statute, may be taken at this time and reduced to writing in stenotype by the Notaries, whose notes may thereafter be transcribed out of the presence of the witness; that proof of the official character and qualification of the Notaries is waived; that the witness may sign the transcript of her deposition before a Notary other than the Notaries taking her deposition; said deposition to have the same force and effect as though the witness had signed the transcript of her deposition before the Notaries taking it.

- - -

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1	I N D E X		
2	- - -		
3	WITNESS		PAGE
4	Diana Cantu		
	Cross-examination by Mr. Howard		9
5	Cross-examination by Mr. Rosenberry		43
6	- - -		
7	EXHIBITS	MARKED	RECEIVED
8	AT&T Deposition Exhibit No. 1 -	26	
	Chart		
9			
	TW/OCTA Exhibit No. 1 -	62	
10	Four pages from gray notebook		
11	- - -		
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

P R O C E E D I N G S

- - -

Thursday, November 14, 1996

Evening Session

- - -

MR. LUCAS: Let me make a statement up front.

This is the continuation of the deposition of Diana Cantu.

My understanding is that they're going to be asking questions about the network plan and, as a result, we ask that this transcript be designated as confidential.

Any objections?

MR. HOWARD: No.

MR. ROSENBERRY: No objection at this point. I would assume if at some point some of this stuff is deemed not to be confidential, that it will come in under whatever rule the Commission deems is appropriate at the time it's moved. That's all.

MR. HOWARD: Okay. Let the record reflect that my name is Stephen M. Howard of the law firm of Vorys, Sater, Seymour and Pease, 52 East Gay Street, Columbus, Ohio, appearing here today on behalf of AT&T Communications of Ohio, Inc.

MR. ROSENBERRY: On behalf of Time Warner Communications of Ohio, LP and the Ohio Cable Telecommunications Association, Richard P. Rosenberry of the firm of Emens, Kegler,

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Brown, Hill & Ritter, 65 East State Street, Columbus, Ohio
2 43215.

3 I'm going to have a brief statement after we take the
4 appearances of counsel, before you begin your examination,
5 Mr. Howard, if that's okay.

6 MR. HOWARD: Sure.

7 MR. LUCAS: My name is Al Lucas, I'm with the law firm
8 of Calfee, Halter & Griswold. I'm appearing here on behalf of
9 Ameritech Communications, Inc., and with me is Diana Cantu, who
10 is the witness.

11 MR. ROSENBERRY: Thank you.

12 For the record, what has been denoted as the full
13 service network fundamental plan issue of October 31, 1996, was
14 provided to Time Warner Communications of Ohio, LP and OCTA
15 yesterday, November 13th, 1996.

16 We picked it up at probably 8:00 o'clock a.m. at the
17 offices of Calfee, Halter & Griswold pursuant to a telephone
18 message at 4:59 in the evening before that it was available.

19 The Commission has directed that the deposition of
20 Ms. Cantu proceed. We object to that. The timing is terrible.
21 It's almost 9:00 o'clock; my watch has 8:45 p.m. We believe
22 that of being forced to proceed at this hour after the day we've
23 had, it is an undue burden. It denies the intervenors an
24 opportunity to conduct the full and ample discovery they are
25 entitled to by statute and by the Ohio and United States

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Constitutions. We're here; we will attend; we'll ask questions,
2 but we wish to preserve those objections for the record.

3 Thank you.

4 (Witness sworn.)

5 - - -

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 DIANA CANTU

2 of lawful age, being by us first duly sworn to testify to the
3 truth, the whole truth, and nothing but the truth, as
4 hereinafter certified, was deposed and testified as follows:

5 CROSS-EXAMINATION

6 BY MR. HOWARD:

7 Q. Good evening, Miss Cantu.

8 My name is Steve Howard, and you may recall from the
9 hearing a week ago. I have some questions for you. If you need
10 to take a break, just so indicate, please.

11 In your mind as a planner and engineer, what constitutes a
12 full service telecommunications network?

13 MR. LUCAS: Let me object. She's here to testify
14 about the changes in the network plan or the differences between
15 the network plan that you were sent yesterday as opposed to the
16 one that you were sent in discovery previously, and that is the
17 extent of my understanding of the scope of this deposition, and
18 I'm going to ask you to explain how that relates to that, and if
19 you can't, then I'm going to instruct her not to answer.

20 MR. HOWARD: Well, I would object to having to explain
21 that, but I will indicate that that phrase that I gave you
22 was -- is taken from this brand new full service network
23 fundamental plan issue of October 31, 1996, and that's why I've
24 propounded the question.

25 MR. ROSENBERRY: I would note that I have not seen any

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 order limiting the scope of the witness' cross-examination in
2 the entry of the Commission.

3 MR. LUCAS: Let me indicate for the record, and I will
4 be glad to attach it as an exhibit, and we'll mark it the
5 exhibit next in order here, Page 47 of the transcript of the
6 hearing that was had yesterday and the very question of the
7 scope of Miss Cantu's deposition here today was discussed by the
8 Hearing Examiner, and -- and let me quote from that section of
9 Page 47.

10 Mr. Sullivan said with regard to Miss Cantu, "And is
11 the purpose of her testimony to describe the network plan or the
12 difference?" And Examiner See said, "The changes and difference
13 in the network plan; the first network plan that we received
14 versus the new, the second version of the network plan that we
15 received".

16 That is the scope of the deposition of Miss Cantu and
17 that's what we're going to limit it to. That's what the Hearing
18 Examiner asked us to make her available to talk about, and
19 that's what we're here for today. If you've got questions
20 beyond that scope, discovery has long ago passed, and it's
21 inappropriate.

22 MR. HOWARD: Okay.

23 MR. LUCAS: You want to ask questions that relate to
24 the difference between the two and the --

25 MR. HOWARD: Yeah. I will get to that. My question

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 that I just propounded had a phrase in it which was contained in
2 the new plan. I'd like her to simply tell me what that means in
3 her mind.

4 MR. LUCAS: I think we need to understand what you
5 have in front of you, and I think the witness -- the witness
6 will explain to you that what we've provided to you is an
7 updated version of drafts that people have made, which
8 Miss Cantu may or may not have seen, and -- and, obviously, if
9 you're asking her to testify about things that others may have
10 written that she hasn't seen before, I think that's
11 objectionable; so if you want to point her to a specific page
12 and ask her if she's prepared something, she's reviewed it, she
13 understands what it means, I've got no problem. General
14 questions about subjects like that, I think, are inappropriate.

15 BY MR. HOWARD:

16 Q. Okay. With that, I'll ask the question as a planner and an
17 engineer what constitutes a full-service telecommunications
18 network?

19 MR. LUCAS: Again, I'm going to object, and I'm going
20 to instruct her not to answer. You want to point her to
21 something specific in the document you've got and ask her if she
22 prepared it and what it means to her, that's fine; otherwise,
23 I'm going to object.

24 BY MR. HOWARD:

25 Q. All right. Miss Cantu, do you have a copy of the document

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 entitled "Ameritech Communications, Inc. Full Service Network
2 Fundamental Plan Issue of October 31, 1996"?

3 MR. LUCAS: Is that the document that was provided
4 several days ago to the intervenors? Is that what you're
5 referring to?

6 MR. HOWARD: I'm not sure about several days ago, but
7 yeah, that's the one that was provided to the intervenors.

8 MR. LUCAS: I've asked her to bring a copy with her,
9 which I will hand to her.

10 MR. HOWARD: Okay.

11 BY MR. HOWARD:

12 Q. Let's look at Page 2, Miss Cantu.

13 MR. LUCAS: Can we hold on for just a second?

14 MR. HOWARD: Sure.

15 (Pause)

16 MR. LUCAS: Pardon me. Go ahead.

17 BY MR. HOWARD:

18 Q. On Page 2, Miss Cantu, there's a reference to Ameritech
19 Communications, Inc. planning to deploy a full-service
20 telecommunications network.

21 Would you define what you as a planner and engineer mean by
22 a full-service telecommunications network?

23 MR. LUCAS: Let me just object on the foundation
24 grounds. You're referring to a page that we haven't established
25 that this witness prepared or has reviewed. If you're asking

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 her generally what she means by that phrase, I will let her
2 answer, but if you're asking for it with reference to that page,
3 I'm going to object on foundation grounds.

4 MR. HOWARD: I think it's a bit ironic that you've
5 asked me to identify a specific page which -- which I've done,
6 and I asked her at the outset generally what she meant. Now
7 you're asking me to go back to my first form of the question,
8 sir.

9 MR. LUCAS: But you certainly understand that proper
10 foundation would have you identify whether she prepared the
11 document and if you're asking her what that document means for
12 her to lay -- you have to lay a foundation that she was the one
13 involved in preparing it.

14 BY MR. HOWARD:

15 Q. Let's try again, Miss Cantu.

16 I'm not -- I'm asking you as a planner and an engineer,
17 what does the phrase "full-service telecommunications network"
18 mean to you?

19 THE WITNESS: Do I answer?

20 MR. LUCAS: Yes, you can go ahead and answer.

21 THE WITNESS: A communications network that is capable
22 of providing a multitude of services.

23 BY MR. HOWARD:

24 Q. What would be that multitude of services? Could you
25 elaborate?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Well, for our example, regular long distance dialing, 800
2 services, operator services.

3 Q. Would local exchange services be in that listing?

4 A. In reference to this document and what my planners have
5 been working on, no.

6 Q. Okay. But in terms of what in your mind as an engineer and
7 a planner the term "full-service telecommunications network"
8 means, would that mean the capability of providing local
9 exchange service?

10 MR. LUCAS: I'm going to object. I think she's
11 already told you in the context of this plan, which is what
12 we're here to talk about, it doesn't mean that.

13 MR. HOWARD: Were you instructing her not to answer?

14 MR. LUCAS: Well, unless you're going to ask her about
15 the plan, which is why we're here today, yes, I'm going to
16 instruct her not to answer. You want to ask her about the plan,
17 which is why we're here today, then she can answer.

18 MR. HOWARD: I'm going to ask the court reporter to
19 instruct the witness to answer.

20 THE NOTARY: Answer the question.

21 MR. LUCAS: I'll instruct her not to, unless you can
22 establish that we're here to talk about this new plan and why
23 it's different, which is what the Hearing Examiner asked us to
24 do.

25 BY MR. HOWARD:

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Do you recall the ACI network plan that we had at the
2 hearing and you were cross-examined on?

3 A. Do I remember its existence? Yes.

4 Q. Okay. Do you recall that that ACI network plan did not
5 have a Table of Contents?

6 A. I don't remember if it did or didn't.

7 Q. Okay.

8 MR. LUCAS: Let me just say for the record that
9 whatever you got, you got. We don't need to waste time as to
10 whether she remembers it.

11 BY MR. HOWARD:

12 Q. Could you open up the -- I'm going to hand you what was
13 the old network plan.

14 A. I have it. Okay.

15 Q. Does it have a Table of Contents?

16 A. No. No.

17 Q. Okay. I'm now going to turn your attention to the
18 October 31 network plan, full-service network fundamental plan.
19 Do you have that?

20 A. Yes, I do.

21 Q. Okay. Does it have a Table of Contents?

22 A. Yes, it does.

23 Q. Why does the new network plan have a Table of Contents and
24 the old one does not?

25 A. I don't know.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Do you know why -- Do you know if a Table of Contents
2 existed in the old network plan, and -- Okay.

3 MR. LUCAS: I'm just going to object to the reference
4 to old network plan versus new network plan. We haven't
5 established what the new one is, or what it is, and what it
6 means and, obviously, you're here to ask those questions.

7 MR. HOWARD: Okay. How would you like me to refer to
8 it?

9 MR. LUCAS: You want to give it a name by which the
10 court has referred to it, which is exhibit whatever it is? That
11 would make it easier. Do you know what exhibit number it is?

12 MR. HOWARD: I want to say it's OCTA Exhibit No. 1.

13 MR. ROSENBERRY: It's TW/OCTA Exhibit No. 1.

14 BY MR. HOWARD:

15 Q. Okay. And that's the document that we talked about at the
16 hearing. Do you understand that reference?

17 A. (Nodded head.)

18 Q. Okay. Very good.

19 If I refer to the October 31 full-service network
20 fundamental plan, do you understand what I'm referring to, that
21 being the updated document that the intervenors were provided
22 recently?

23 A. Yes.

24 Q. Do you know why the October 31 full-service network
25 fundamental plan does not contain diagrams and sketches that

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 were contained in TW/OCTA Exhibit 1?

2 A. Yes.

3 Q. Okay. Why?

4 A. This document --

5 MR. ROSENBERRY: Which document? You need to state
6 it.

7 THE WITNESS: I'm sorry. The October 31st document
8 was taken off of what we call the T drive and it is on our LAN,
9 or local area network, and on that T drive are copies of the
10 text, the textual contents of this plan, and the drawings come
11 from a variety of sources and are not on that T drive file.

12 BY MR. HOWARD:

13 Q. Are the -- Are the drawings and sketches on another
14 drive -- type of a drive?

15 A. I wouldn't say that they're all in one place. They come
16 from a variety of sources and when the plan is put together,
17 they're kind of consolidated, but -- so I wouldn't say that, no.

18 Q. Is the October 31, 1996 full-service network fundamental
19 plan the latest updated version?

20 A. It is the version as of the date that it was printed off of
21 the T drive.

22 Q. Okay.

23 A. It changes --

24 Q. Okay.

25 A. -- constantly.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Okay. Excuse me.

2 Has it changed since November 12, 1996?

3 A. It might have.

4 Q. Okay. Who would know if it changed?

5 A. Anybody that logged on to the T drive and printed a copy
6 and did a stare and compare.

7 Q. Did persons under your supervision in the engineering and
8 planning group have input into the October 31, 1996 full-service
9 network -- network fundamental plan?

10 A. Yes.

11 Q. Which persons specifically had input into the October 31
12 document?

13 A. They all have access to the -- Okay. When it's on the T
14 drive, it's just a collection of working papers in Word --
15 probably in Word, so if somebody -- and it kind of gives the
16 engineers an opportunity to send -- to kind of broadcast
17 sections and put them out for comment, et cetera, as they're
18 work in progress.

19 So I couldn't give you a specific person or a name, but I
20 know that people in my group have access and could have made
21 changes. I don't know whether they did or didn't, but whenever
22 new information comes about they go in there and add
23 information, whatever.

24 Q. Did the same persons who had input into the October 31,
25 1996 plan also have input into what has been marked as TW/OCTA

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Exhibit 1?

2 A. Yes.

3 Q. Were there any new or different persons that had input into
4 the October 31, 1996 plan that did not have input into TW/OCTA
5 Exhibit 1?

6 A. I couldn't give you a definitive no, but I don't see any
7 reason why they would be different.

8 MR. LUCAS: Just to make things go faster, if you want
9 to call that one the October 31 plan instead and that one No. 1,
10 that's fine with me.

11 MR. HOWARD: Okay.

12 MR. LUCAS: That way it will speed it up.

13 MR. HOWARD: I'm sorry, I thought you wanted me to
14 specifically identify it.

15 MR. LUCAS: We can shorten it up if we call that the
16 October 31 one and that No. 1. We all understand what that
17 means. Is that fair with you?

18 MR. ROSENBERRY: Do what you want to.

19 MR. LUCAS: Okay.

20 BY MR. HOWARD:

21 Q. Okay. Would you turn to Section 4 of the October 31 plan,
22 please?

23 A. I don't have the tabs.

24 Q. And specifically, could you turn to Page 4 of Section 4,
25 which is entitled "ACI Facility Transition Plan"?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Okay.

2 Q. In the title, "ACI Facility Transition Plan", what does
3 "transition" mean to you?

4 A. I'd have to read the section to see what it means in
5 context.

6 Q. Is it --

7 A. Just a minute. Just give me a minute. Let me read -- skim
8 it.

9 MR. LUCAS: Is this -- Can you represent to me that
10 this is a difference between the old plan and the new plan?

11 MR. HOWARD: I believe so, yes, sir. That's why I'm
12 asking the question.

13 MR. LUCAS: Okay. And, again, let me object on the
14 grounds that we haven't established that this witness had
15 anything to do with the changes and that this witness -- or,
16 that this witness has had an opportunity to review that. So I'm
17 going to object on foundation grounds. Again, she's established
18 that various people have come in and made changes and we're
19 asking her to testify about what somebody else might have
20 changed in the drafts.

21 BY MR. HOWARD:

22 Q. Okay. Could you answer the question?

23 A. Having skimmed this section --

24 Q. Sure.

25 A. -- on the October 31st version, correct, it refers to our

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 fiber builds and our interexchange business, we're currently
2 leasing facilities from various carriers and we have plans to
3 replace those leased facilities with built fiber point-to-point
4 systems, or rings, et cetera, and this describes how we're going
5 to transition from leasing facilities to building facilities for
6 our -- again, our interexchange business.

7 Q. At the hearing, I believe you indicated that Exhibit 1 was
8 changed before it became implemented, did you not?

9 MR. LUCAS: Do you want to just refresh her
10 recollection as to what Exhibit 1 was?

11 THE WITNESS: I don't know what you mean.

12 BY MR. HOWARD:

13 Q. I don't know if I'm allowed to say this. Exhibit 1, I'd
14 like to refer to the old plan, Exhibit 1 being OCTVA -- excuse
15 me, TW/OCTA Exhibit 1.

16 A. Oh, that one?

17 Q. Yes, the old one.

18 A. I don't remember.

19 Q. Okay. With respect to Appendix G --

20 A. Which is what?

21 Q. Which is the National Directory Assistance.

22 A. Yes. Yes.

23 Q. -- didn't you testify that that plan was changed, correct?

24 A. Yes.

25 Q. Okay. And was the change in that plan reduced to writing,

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 and specifically Appendix G?

2 A. If it has, I haven't seen it; so I don't know.

3 Q. Was -- Did ACI implement a plan for National Directory
4 Assistance?

5 MR. LUCAS: Let me just object. I think the witness
6 has testified at length with regard to the plan that ACI has
7 implemented. If you want to ask her if it has changed since her
8 testimony, that's a different question, but she's testified at
9 length about the plan they implemented.

10 BY MR. HOWARD:

11 Q. Yeah. Okay. You may answer the question.

12 A. Can they read questions back?

13 Q. Sure.

14 THE WITNESS: Can you read the question back?

15 (Record read back as requested.)

16 THE WITNESS: Did we implement a plan?

17 BY MR. HOWARD:

18 Q. Yes.

19 A. Yes.

20 Q. But the changed plan was not reduced to writing, to your
21 knowledge, correct?

22 A. As I said before, if it was, I haven't seen it; so I can't
23 tell you whether it has or hasn't.

24 I would -- I would assume if one had been written, I would
25 have seen it.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Okay. If it -- If the changed plan was not reduced to
2 writing, how did your group go about implementing that changed
3 plan?

4 A. Good question. I don't know.

5 Q. Okay. I'm going to turn your attention to the October 31
6 plan and the first paragraph under -- on Page 4, and there's a
7 reference to Sketch 1 provides a drawing that depicts the
8 current planned arrangement.

9 A. Uh-huh.

10 Q. Is Sketch 1 contained in the October 31 plan?

11 A. Just a second.

12 Again, these drawings come from various -- What does this
13 one say? Is this titled at all?

14 MR. LUCAS: I think he's asking you whether the
15 October 31 document has a document that is described as Sketch 1
16 in it.

17 Is that what you're asking her?

18 THE WITNESS: I know. That's what I'm looking at. If
19 the sketch is referred to, it would have been in the same
20 section.

21 MR. LUCAS: I understand that. Just answer his
22 question. All he's asking you is whether the October 31 plan --

23 THE WITNESS: No.

24 MR. LUCAS: -- contains Sketch 1.

25 THE WITNESS: I don't see one, no.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 BY MR. HOWARD:

2 Q. For purposes of reference, I'm going to hand you a document
3 from the TW/OCTA Exhibit No. 1, and that's a chart entitled "ACI
4 Dual Network". Do you recognize that?

5 A. Yes.

6 Q. Am I correct, that is not Sketch 1, or do you know what
7 Sketch 1 is?

8 A. I don't know what Sketch 1 is.

9 MR. LUCAS: Let me object on foundation grounds.

10 BY MR. HOWARD:

11 Q. Had you finished your response?

12 A. I said I don't know what Sketch 1 is.

13 Q. Okay. In the second paragraph on Page 2, the ACI Facility
14 Transition plan indicates that developing this network will
15 require time and substantial construction. Do you see that?

16 A. Yes.

17 Q. How much time are we talking about in terms of the
18 transition?

19 A. Years.

20 Q. Can you be more specific than just years?

21 A. No. Years.

22 Q. Okay.

23 A. I mean --

24 Q. So at least two years, since you used plural?

25 A. Well, this page goes to 1999, and so this discusses plans

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 at least out to '99.

2 Q. Okay. Now, in the next sentence you talk about partnering
3 opportunities with Ameritech business units, and is there a
4 particular division or a subsidiary called Ameritech Business
5 Units?

6 MR. LUCAS: Let me again object. You, in your
7 question, said "you talk about", and we haven't established that
8 this witness prepared any of the changes that were made in this
9 section or has had a chance to review them; so I'm going to
10 object to the form of the question.

11 BY MR. HOWARD:

12 Q. Okay. Do you recall the question?

13 A. (Nodded head.)

14 Q. Okay. You may respond.

15 A. I think the question was: Is there a specific business
16 unit called Ameritech Business Unit?

17 Q. Yes.

18 A. No.

19 Q. Which Ameritech business units are referenced there? I'll
20 use lower case business units.

21 MR. LUCAS: Rather than me objecting every time, can I
22 have a continuing objection until you lay a foundation that this
23 witness prepared this -- the changes to this document?

24 MR. HOWARD: Okay. So noted.

25 THE WITNESS: You're asking me again?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 BY MR. HOWARD:

2 Q. Okay. Which subsidiaries are the Ameritech business units
3 that -- with which there are going to be partnering
4 opportunities?

5 A. I'm not aware of any specific business units.

6 Q. In the next paragraph it talks about in 1996 fiber
7 facilities will be established from the Worldcom points of
8 presence in -- POPs in Chicago and Detroit to ACI's POPs at
9 Hudson and Troy.

10 I'm now going to refer you to the ACI Dual Network and ask
11 you is the point of presence for Worldcom depicted on ACI Dual
12 Network?

13 A. Well, probably one of these (indicating).

14 MR. HOWARD: Okay. First of all, let's mark the chart
15 as AT&T Deposition Exhibit No. 1 for identification purposes.

16 - - -

17 Thereupon, AT&T Deposition Exhibit No. 1 was marked
18 for purposes of identification.

19 - - -

20 BY MR. HOWARD:

21 Q. Miss Cantu, when you made reference to that, were you
22 making reference to the left side of the chart where it says
23 "POP" next to "Willie Network" and "POP" next to the box marked
24 "Franklin"?

25 A. Yes.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Okay. Now, the 1996 fiber facilities, are those different
2 than what is depicted on AT&T Deposition Exhibit 1?

3 A. Yeah. I don't believe those are shown here.

4 Q. Okay. AT&T Deposition Exhibit 1 depicts SONET rings, does
5 it not?

6 A. Yes.

7 Q. And the fiber facilities that are to be established in 1996
8 are going to be different than the SONET rings, correct?

9 A. Yes.

10 Q. How will the fiber facilities that will be established in
11 1996 relate to the SONET ring on the left side? Can you
12 describe where it will connect?

13 A. Yes. On the left side of the drawing, the Hudson ACI box
14 is the same as the Hudson POP that's referred to here, and
15 really what it is is you just draw a straight line to either one
16 of these POP designations, which would be the Worldcom POP, and
17 it would be a point-to-point SONET system that's designed to
18 off-load traffic on the ring.

19 Q. Okay.

20 A. So it's not a ring, it's a point-to-point system.

21 Q. Thank you.

22 I notice the point-to-point system is referenced in the
23 next sentence. What is the function of a point-to-point system?

24 A. It just means it goes from A to Z versus in a ring. It's a
25 direct route.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Now, in the -- I guess it's the fourth sentence in that
2 paragraph, it says, "Demand from ACI to Worldcom that currently
3 routes over the OC48 rings in Chicago and Detroit". Is that
4 reference to the rings contained on AT&T Deposition Exhibit 1?

5 A. Yes.

6 Q. Okay. And this demand from ACI to Worldcom will be rolled
7 over to these facilities. Does "these facilities" refer to the
8 fiber facilities that will be established in 1996?

9 A. Yes.

10 Q. Okay. Now, why will you need to free up capacity on the
11 rings?

12 A. I guess they're out of capacity.

13 Q. Okay. Are they being used now to provide service?

14 A. They're being used now in order for us to provide a
15 switching function to cellular, so yes. I wouldn't call it a
16 service, it's a switching function.

17 Q. All right. In the next paragraph you talk about fiber
18 being established from Hudson to a new major facility hub
19 located south of Chicago called the Harvey Hub.

20 Who will build that Harvey Hub?

21 A. I'm not sure if that refers to a Worldcom POP in Riverdale,
22 and Riverdale is near Harvey.

23 Q. Okay. Had you concluded your answer?

24 A. Yes.

25 Q. Okay. Do you know -- You don't know -- You said you

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 thought this might refer to Worldcom.

2 A. Right. But I'm not sure.

3 Q. Okay. Do you know what arrangement there would be between
4 ACI and whoever is going to construct the Harvey Hub, what type
5 of arrangement there is?

6 MR. LUCAS: Let me just object, that we haven't
7 established that it will be constructed; so it assumes facts not
8 in evidence. I think she's testified it may already be an
9 existing point of presence for Worldcom.

10 BY MR. HOWARD:

11 Q. Well, let's go back then.

12 The sentence reads, "In 1997, fiber will be established
13 from Hudson to a new major facility hub located south of Chicago
14 called Harvey Hub".

15 Does that say to you that the Harvey Hub will be
16 established?

17 A. Okay. This is what I do know, okay?

18 Q. Okay.

19 A. I do know that Worldcom is in the process of putting a
20 Riverdale POP in. Whether this refers to the same POP or not,
21 I'm not sure.

22 Q. Okay. Do you know how the facility will be then extended
23 to South Bend, Grand Rapids, et cetera, as referenced in the
24 next sentence?

25 A. That is a 1997 plan to build fiber from the Chicago area to

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 the Detroit area. How specifically, I don't know. No details.
2 Q. Okay. Do you know if, in fact, in the third sentence the
3 cable that was placed in 1996 from the Worldcom POP to ACI's
4 Troy office, do you know if that actually was installed or
5 placed?

6 A. Again, that's part of what we're currently constructing
7 over here (indicating) on this side like this one (indicating).

8 Q. On the right?

9 A. Right. On the right side of the drawing, just like we're
10 constructing from the Hudson to the Worldcom POP, we're doing
11 the same in the Detroit area, point-to-point, to off-load the
12 OC48 ring. They're in the process of being built.

13 Q. Okay. Now, let's talk about that.

14 What you're saying is that somehow there will be a
15 connection from the Harvey Hub over to the Troy office?

16 A. From the Worldcom POP to South Bend, to Lansing, to Pontiac
17 to Troy.

18 Q. Okay. And you don't know any details as to who will build
19 that?

20 A. We'll probably outsource it. We haven't -- It's a '97.
21 We're still trying to get our '96 work done.

22 Q. Okay. Will you -- Will you put that project up for bid?

23 A. I don't know.

24 Q. Okay.

25 A. I assume so, yes.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 Q. Okay. Is your group responsible for construction of such
2 facilities, responsible in the sense that you have to plan them
3 and engineer them --
- 4 A. Yes.
- 5 Q. -- and take responsibility for them coming to fruition?
- 6 A. Yes.
- 7 Q. Okay. I'm going to drop down to the next paragraph about
8 the 1998 fiber, and when we talk about 1998 fiber, we're not
9 talking about a SONET ring, are we, or are we?
- 10 A. It could be.
- 11 Q. Okay. Do you know what this particular 1998 fiber is
12 talking about from Hudson to Milwaukee?
- 13 A. You see all these rings or all these systems will
14 eventually be parts of rings.
- 15 Q. Okay.
- 16 A. But just because a leg is built, it's not automatically
17 defined a ring. It's kind of a ring on its way to become a
18 ring. So these -- So to try to answer your question, these,
19 although they might look like a point-to-point, they're
20 eventually going to be part of a ring. So while it's being
21 built as a point-to-point, strictly speaking, it's not a ring
22 yet, okay?
- 23 Q. Okay. That's helpful. Thank you for clarifying that.
24 Sort of like a segment of a ring, if you will --
- 25 A. Yes.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 Q. -- or ring in progress?
- 2 A. Right.
- 3 Q. Now, you don't know then any of the details as to who is
- 4 going to build that ring?
- 5 A. No.
- 6 Q. Do you know who will own the ring?
- 7 A. ACI.
- 8 Q. Okay. Now, the SONET ring that's on AT&T Deposition
- 9 Exhibit No. 1, I believe you testified that that is going to be
- 10 owned by Ameritech, correct?
- 11 A. Right. These two rings that we got out of the tariff are
- 12 owned by Ameritech, either Illinois or Ameritech Michigan, and
- 13 we're strictly leasing capacity on those rings.
- 14 Q. Okay.
- 15 A. These builds are ACI owned that are referred to in the
- 16 October 31st document.
- 17 Q. Okay. And would that be the case for 1996, '97, '98 and
- 18 '99?
- 19 A. Yes.
- 20 Q. Okay. Will those builds be dedicated solely to ACI's use?
- 21 A. I mean, it's possible that we could do a fiber swap. I
- 22 mean, if we built a section with 96 fibers and we were in a
- 23 section that MCI had 96 fibers, we could swap 48 and 48, but,
- 24 technically speaking, we wouldn't have access to those 48 that
- 25 we swapped. Those that we still owned would be dedicated to

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 ACI.

2 Q. Will the fiber that is going to be established in 1996
3 through 1999, as referenced on Page 4, be utilized in providing
4 both interexchange services and local exchange services?

5 A. I know for sure, yes, for interexchange. I don't know
6 about local. I haven't planned anything for local.

7 Q. Could it be used for local?

8 A. Depends. I'm not sure if it would be economical. I'd have
9 to look at the specific routes.

10 Q. Are economics and costs a consideration that you need to
11 take into account when planning and engineering plant?

12 A. Yeah. Yes. But these are more like backbone facilities,
13 and when I think of local service, I think more of like spikes
14 off of a hub. These are -- I mean, I don't think they would be
15 conducive to local, but they might.

16 Q. Okay. Can we turn the page to Page 5, and on the first
17 paragraph you indicate -- excuse me, it reads, "In addition to
18 the construction discussed above, there is potential for ACI to
19 acquire fibers from Worldcom", and then it goes on.

20 Is there a plan for ACI to purchase fibers from Worldcom?

21 MR. LUCAS: Let me just object again. You again said
22 "you say", and we haven't established that this is her language
23 or that she even reviewed it; so I'm going to object to the
24 question.

25 BY MR. HOWARD:

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 Q. I'll try to rephrase it.
- 2 Is there a plan that you know of for ACI to purchase or
- 3 acquire fibers from Worldcom?
- 4 A. Some discussions have been held, but nothing definitive.
- 5 Q. When were those discussions held?
- 6 A. They're being held now.
- 7 Q. Okay. Who on behalf of ACI has participated in such
- 8 discussions?
- 9 A. My facility planner, Corey Parollina.
- 10 Q. Mr. Parollina's name is found in this document, is it not?
- 11 A. Probably.
- 12 Q. Is Mr. Parollina responsible for portions of some of this
- 13 document?
- 14 A. Yes.
- 15 Q. Okay. And does Mr. Parollina work for you and under your
- 16 supervision?
- 17 A. Yes.
- 18 Q. Are the fibers which are the subject of the first sentence
- 19 in Paragraph 1 on Page 5 already in existence?
- 20 A. Okay. First paragraph?
- 21 Q. Yes.
- 22 (Pause.)
- 23 A. I'm not sure if they are or not.
- 24 Q. Okay. All right. Can we turn back to the ACI Dual Network
- 25 diagram which has been marked as AT&T Deposition Exhibit 1?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 We talked about the ACI National Directory Assistance
2 database earlier this evening; do you recall that? We made a
3 reference to Appendix G.

4 A. To the service.

5 Q. The service.

6 Okay. And ACI is going to have its own National Directory
7 Assistance database platform, is it not?

8 A. Yes.

9 Q. Okay. Taking AT&T Deposition Exhibit No. 1 and looking,
10 let's say, at the left-hand side, where would the platform fit
11 in or connect? Would it connect with the SONET ring?

12 A. Let me think. I don't think so, no.

13 Q. You don't think so?

14 A. No.

15 Q. Would there be a connection from the SONET ring to the --
16 to the ACI National Directory Assistance database?

17 MR. LUCAS: Are you asking her if that's the plan, to
18 have a connection?

19 MR. HOWARD: No.

20 THE WITNESS: Wasn't that the same question?

21 MR. LUCAS: Yeah. It's either the same question or
22 it's my question, or I don't understand it, either.

23 THE WITNESS: Try it again.

24 BY MR. HOWARD:

25 Q. Okay. Will the connection between the ACI National

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Directory Assistance database be to the SONET ring?
2 MR. LUCAS: You had asked that and she said no.
3 THE WITNESS: No.
4 BY MR. HOWARD:
5 Q. Will the connection be to the ACI switch at Hudson?
6 A. From where?
7 Q. From the ACI National Directory Assistance database --
8 A. Right.
9 Q. -- will there be a connection from that database to the
10 switch?
11 A. Yes.
12 Q. Okay. And who will own that connection?
13 A. Probably going to be Worldcom or some other carrier's
14 leased facility.
15 Q. Okay. Would it be -- Would that connection be dedicated to
16 ACI?
17 A. Yeah. Yes.
18 Q. Okay. Could we turn to Appendix Q of the October 31 plan?
19 A. Okay.
20 Q. Okay. This appendix is entitled "Synchronization".
21 A. Uh-huh.
22 Q. Did you or anybody under your supervision have input into
23 the preparation of this appendix?
24 A. Me personally, no; Corey wrote it, looks like.
25 Q. Okay. And Corey works for you; is that correct?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Yes.

2 Q. Okay. Now, in the second paragraph there's a sentence that
3 reads, "In other words, we must time the network so that every
4 digital device is in time or synchronized with all other
5 devices".

6 A. Right here.

7 Q. It's in the second paragraph. Do you see that?

8 A. Yes.

9 Q. Now, is that a problem -- is synchronization a problem if
10 Ameritech Illinois builds a SONET ring?

11 MR. LUCAS: I'm going to object to that. The same
12 language, I believe, appears in the original plan. That's not a
13 difference in the plan, and I don't see your question relating
14 to changes in the No. 1 versus the October 31 plan, and if it
15 is, just tell me that it is and we'll just talk about it.
16 I'm willing -- I'm also going to object on foundation grounds.
17 She already said she didn't prepare this, but go ahead and you
18 can respond, if you can, as to how this is reflective of a
19 difference.

20 MR. HOWARD: You're seriously objecting when the
21 person who she supervises has -- and works under her supervision
22 has written this, which is what she just testified to?

23 MR. LUCAS: What she specifically means, then, I would
24 object, sure. She doesn't know what everybody who's working for
25 her means by every sentence in every document, nor would you

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 know from some associate working for you writing a brief.

2 MR. HOWARD: Okay. Had you concluded your remarks?

3 MR. LUCAS: I did. Thank you.

4 MR. HOWARD: Thank you.

5 BY MR. HOWARD:

6 Q. Okay. Miss Cantu, my section -- my copy of Appendix Q of
7 OC- -- TW/OCTA Exhibit No. 1 is blank. Do you see that?

8 A. I think it was misfiled, but the text should be in here
9 because it was in mine. It's right here (indicating). It was
10 just misfiled.

11 Q. Okay.

12 A. The title page got messed up.

13 Q. Okay.

14 A. It's stuck under -- It's behind your local number
15 portability section. I apologize. I don't know how that
16 happened.

17 MR. LUCAS: It was misfiled, apparently.

18 BY MR. HOWARD:

19 Q. Well, do you know who misfiled it?

20 A. No.

21 Q. I'm going to jump back now to Page 4 of Section 4.

22 Is the fiber that is going to be built in 1996, 1997, 1998
23 and 1999 going to be fully lit when it is constructed?

24 A. So I think what you're asking me is if we put 48 fibers in
25 the ground and we only use four, then the other 44 are not lit,

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 yeah, probably yes, we wouldn't use all 48 at the same time.

2 MR. LUCAS: So your answer is no? He asked if it was
3 going to be fully lit.

4 THE WITNESS: No.

5 MR. HOWARD: Okay.

6 THE WITNESS: But I'm defining what I think he means
7 by "fully lit."

8 MR. LUCAS: That's fine. I just want to make sure you
9 understood what the question was.

10 BY MR. HOWARD:

11 Q. When you said that the fiber facilities that are
12 referenced on Page 4 are going to be outsourced, I think was
13 your word, is it possible that an Ameritech operating company
14 could be constructing those facilities?

15 MR. LUCAS: I'm going to object. It calls for
16 speculation.

17 BY MR. HOWARD:

18 Q. You may respond unless he instructs you not to respond.

19 A. Well, my understanding is that we can use LEC resources
20 only if they're available on a nondiscriminatory basis to all
21 other interexchange carriers. To the extent that that's true, I
22 guess so, but...

23 Q. What does the phrase "spare capacity" in terms of fiber
24 mean to you?

25 MR. LUCAS: I guess let me just object.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Are you specifically referring to a change in the
2 plan?

3 MR. HOWARD: (Shakes head.)

4 MR. LUCAS: Okay. Then I'm going to object. He shook
5 his head no. I'm going to object and instruct her not to answer
6 unless we can refer to it in connection with a difference in the
7 two documents.

8 BY MR. HOWARD:

9 Q. When you indicate that the fiber will eventually become
10 SONET rings -- Do you recall that?

11 A. Yes.

12 Q. -- will those SONET rings be uni-directional or
13 bi-directional?

14 A. I don't know which kind we're going to build.

15 Q. Do you know what the rating or capacity of those SONET
16 rings will be?

17 MR. LUCAS: Let me object on relevancy grounds.

18 THE WITNESS: Well, this -- Do I answer?

19 MR. LUCAS: If you can.

20 THE WITNESS: These -- I mean, these refer to 48s, but
21 the technology is changing so quickly. I mean, right now 192 is
22 like pushing the envelope, so....

23 BY MR. HOWARD:

24 Q. Okay.

25 A. I don't know that we've determined what rates they will be.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Okay. Will all the fiber that ACI is going to build or
2 acquire be titled in the name of ACI or in ACI-Ohio?

3 A. I don't know.

4 Q. Let me just -- On Page 4, the fifth paragraph, the fourth
5 line, there's a reference to folded rings. Do you see that?

6 A. Yes.

7 Q. Can you explain to me what folded rings is?

8 A. That's the term I couldn't remember in the hearing. A
9 folded ring is a ring on its way to becoming a ring; so it's --
10 it's just an interim step before it becomes a ring. It's just a
11 term.

12 Q. All right. Am I correct that you build a ring a segment at
13 a time --

14 A. Yes.

15 Q. -- is that correct?

16 A. Right.

17 Q. Okay.

18 MR. HOWARD: I may be close to done here, Miss Cantu.

19 MR. LUCAS: You get any better at this, she's going to
20 hire you, you know.

21 BY MR. HOWARD:

22 Q. Miss Cantu, would you turn to Appendix U of the October 31
23 plan?

24 A. You like my tabs?

25 Yes.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. And this section is titled "Echo Cancellation".

2 A. Yes.

3 Q. And this was not either a part of or provided with respect
4 to the Time Warner -- excuse me, TW/OCTA Exhibit No. 1 plan. Do
5 you recall that?

6 A. You're telling me it was not in this one?

7 Q. Correct. Is that your understanding?

8 A. Yeah, it appears that way.

9 Q. Okay. Now, with echo cancellation, am I correct that the
10 longer the circuits, the more potential problem you have for
11 echo; is that correct?

12 A. Yes.

13 Q. Okay. And is this section discussing what ACI proposes to
14 do to cancel echo problems?

15 A. Yes.

16 MR. LUCAS: Let me object on foundation grounds. We
17 haven't established that this witness prepared this or reviewed
18 it.

19 BY MR. HOWARD:

20 Q. Okay. Did you or someone under your group have input into
21 the preparation of Appendix U?

22 A. Yes. I believe Corey prepared this section.

23 Q. Is the technology that you will be employing to counteract
24 or cancel echo echoes coming from Ameritech operating companies?

25 A. No.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Where is ACI receiving its information regarding this
2 technology?

3 A. For echo cancellation?

4 Q. Yes.

5 A. From the suppliers.

6 Q. Can you name some of the suppliers?

7 A. Yes.

8 Q. Would you?

9 A. TellLabs and DSC.

10 MR. HOWARD: Thank you very much, Miss Cantu. I have
11 no more questions.

12 THE WITNESS: You're welcome.

13 MR. ROSENBERRY: Want to take a break before I begin?

14 THE WITNESS: Let's go straight through.

15 - - -

16 CROSS-EXAMINATION

17 BY MR. ROSENBERRY:

18 Q. I will ask you a number of questions. If a question is
19 unclear, you are not certain about what I'm asking, please feel
20 free to tell me that you don't understand what I'm asking --

21 A. Okay.

22 Q. -- so that we can be clear between us what the question is
23 so the answer then relates to the question; is that okay?

24 A. Yes.

25 Q. You have in front of you a three-ring binder that's gray in

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 color, do you not?

2 A. Yes.

3 Q. What is that binder?

4 A. This is the binder that I referred to in my, I guess it
5 was, the original deposition. When I was asked about a network
6 plan, this is the binder that was in my office that is a
7 collection of working papers that we kind of call the network
8 plan.

9 Q. Now, would you please flip all the papers that are inside
10 the binder back? There is a pocket on the inside front, is
11 there not?

12 A. Yes.

13 Q. There are documents in it, aren't there?

14 A. Yes.

15 Q. Would you describe them for the record?

16 A. There's a document dated 8-15-96 that says the -- looks
17 like a title page. "The Ameritech Communications, Inc. Full
18 Service Network Fundamental Plan Issue of August 15, 1996,
19 Confidential".

20 Q. Can I take a quick look at that one, please?

21 All right. Thank you.

22 A. Uh-huh.

23 There's a page titled "Table of Contents", and it says,
24 "Sections, Appendices", also dated 8-15.

25 Q. May I look at that, please?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 A. Uh-huh.
- 2 Q. There are, am I not correct, handwritten words, checkmarks
3 and X's on the document that you've pulled out of the pocket
4 from the front of your notebook, which you just described as a
5 Table of Contents, correct?
- 6 A. Correct.
- 7 Q. Did you make those indications on there?
- 8 A. No.
- 9 Q. Do you recognize the handwriting as being -- handwriting of
10 any of your personnel who report to you?
- 11 A. No.
- 12 Q. Okay. Do you -- When you sent this notebook -- Let me ask
13 you first: The notebook was sent to Ohio, is that right; if you
14 know? Let me back up. I'll ask more foundation.
- 15 Do you know how this notebook -- Let me back up.
- 16 MR. LUCAS: I can tell you if you want me to
17 short-circuit it.
- 18 BY MR. ROSENBERRY:
- 19 Q. Were you asked to send this notebook to your counsel?
- 20 A. Yes.
- 21 Q. When?
- 22 A. I don't know.
- 23 Q. Was it after your deposition?
- 24 A. Yes, probably.
- 25 Q. Okay. Now, did you send it to your counsel?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Yes.

2 Q. Were the marks on the page captioned "Table of Contents"
3 that I'm showing you on this Table of Contents page when you
4 sent it to your counsel?

5 A. I don't know.

6 MR. LUCAS: Let me just object that we haven't
7 established that that particular page was included in the stuff
8 that she sent us.

9 THE WITNESS: I mean, I literally took it off the
10 shelf and I...

11 BY MR. ROSENBERRY:

12 Q. Do you recall whether or not the four pages -- Let me back
13 up.

14 There were four pages which you took out of the pocket from
15 the front of the gray notebook, correct?

16 A. Correct.

17 Q. Do you know whether or not those pages were in that
18 notebook when it was sent to your counsel?

19 A. I do not know.

20 Q. Do you see at the top of -- well, at the top of the Table
21 of Contents page that you showed me a -- which appears to be a
22 line having a fax date, time and address?

23 A. Uh-huh. Yes.

24 Q. Do you know what the acronym FRACI External Affairs refers
25 to?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 A. Other than what it says, no.
- 2 Q. Does ACI have a division or a subgroup called External
3 Affairs?
- 4 A. I would assume this is Gockley's group, but I'm not sure.
- 5 Q. And Gockley refers to Mr. John Gockley?
- 6 A. Yes.
- 7 Q. And he's the general counsel of ACI; is that right?
- 8 A. I'm not sure what his title is; I know he's an attorney.
- 9 Q. (847) 928-8778 is a telephone number, isn't it?
- 10 A. Yes.
- 11 Q. (847) is the area code for the Chicago area?
- 12 A. Yes.
- 13 Q. Do you know whether or not 928-8778 is the number of
14 Mr. Gockley's fax machine?
- 15 A. I do not know.
- 16 Q. Please describe the next document that you pulled out of
17 the pocket in the front of the gray notebook.
- 18 A. This is labeled "Page 2", dated 8-15-96, prepared by David
19 Rubenstein, with his phone number; Corey Parrolina, phone
20 number, with a premise statement.
- 21 Q. May I see that, please?
- 22 The final document that was contained in the pocket, would
23 you please identify it?
- 24 A. It doesn't really have a title, or if it does, it got cut
25 off. It says, "Page 1, 8-15". It looks like a table of

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 contents with the section titles. It says, "Latch release,
2 owner name, owner phone, and section name".

3 Q. May I look at that, please?

4 A. Sure.

5 Q. The date on the top of all four of the pages that you
6 withdrew from the pocket is, at least on the fax line, indicated
7 as October 28, 1996; is that right?

8 A. Yes.

9 Q. And the untitled page numbered 1 at the bottom right, that
10 appears to be a listing of authors, among other things, of the
11 network plan -- Let me back up.

12 Do you see on the -- on the page that's in front of you
13 that is -- has a list of names under "owner name"?

14 A. Yes.

15 Q. Okay. Are the owner names the names of those who authored
16 various portions of the network plan?

17 A. It's supposed to be, at least the way it probably was as of
18 the date that this was written, but it changes. For example --
19 Well, I guess, yeah, you could say that. If Dave Rubenstein is
20 responsible, for example, for the cellular long distance
21 section, he could put it out on the T drive for comment, and
22 it's an interactive T drive so people can add text, delete text,
23 whatever; so I guess, strictly speaking, he would be responsible
24 for what it would contain, but he wouldn't be the only person
25 putting stuff into the section.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. You could put stuff in the section based upon your review,
2 couldn't you?

3 A. I could, but I haven't.

4 Q. My question was not whether you had not, but whether or not
5 you have that ability as the --

6 A. Yes, I do.

7 Q. -- as the supervisor of all of these folks?

8 A. Yes, I do.

9 MR. ROSENBERRY: Okay. Let me take from in front of
10 you the table of contents page and ask counsel if counsel knows
11 how the marks got on this page?

12 MR. LUCAS: It's not my deposition, but I can tell
13 you. I don't know.

14 MR. ROSENBERRY: I'd like to make a copy of this
15 before we leave this evening; and, in fact, I'd like to make a
16 copy of all four pages.

17 THE WITNESS: Sure.

18 BY MR. ROSENBERRY:

19 Q. Do you know why -- Let me back up.

20 Are you aware that when Time Warner/OCTA Exhibit No. 1 was
21 provided to the parties, the table of contents page and the
22 other three pages that you pulled from the pocket in the gray
23 notebook were not provided as a part of what was called the ACI
24 network plan?

25 MR. LUCAS: I'm just going to object, and you know

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 that Mr. Sullivan at the hearing explained why that was, but
2 I'll let her go ahead and answer it if she knows.

3 THE WITNESS: I don't know.

4 BY MR. ROSENBERRY:

5 Q. Can you tell me, do you still have in front of you a copy
6 of the October 31st version of the network plan?

7 A. Yes.

8 Q. I'm going to call that the updated plan --

9 A. Okay.

10 Q. -- for your reference, okay?

11 How many copies of the appendix are contained in your
12 version of the updated plan?

13 MR. LUCAS: And I'm going to object to your reference
14 to the updated plan as being misleading; but you can go ahead
15 and answer.

16 THE WITNESS: It appears that there's some additional,
17 I think it was, and some other ones for some reason got printed
18 at the end. I don't know why. It looks like the printing is
19 goofy, too. I'm not sure what happened there.

20 MR. LUCAS: There may have been some garbage at the
21 end of the T drive, whatever it's called.

22 BY MR. ROSENBERRY:

23 Q. Were you asked to print out and send to counsel the
24 October 31, 1996 issue of the full-service network fundamental
25 plan?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 A. I did not pull this or print this.
- 2 Q. Who did; if you know?
- 3 A. I don't know who did.
- 4 Q. Who has access to the T-drive from which this document, and
- 5 I'm referring the issue of October 31, 1996, could be extracted?
- 6 A. Anyone on the LAN.
- 7 Q. Now, what's the LAN?
- 8 A. They're the local area network is what it stands for that
- 9 our office uses to connect your desk top computer -- PCs
- 10 together. They're like Lotus notes. It's on the server so that
- 11 we can all communicate via e-mail back and forth, and then
- 12 there's something called the T drive that's like you have a C
- 13 drive on your PC; that's only on your PC, well, is on a -- For
- 14 some reason I don't know why it's called the T drive. You put
- 15 stuff on there and anybody can access it, even though it's not
- 16 like on your hard drive.
- 17 Q. It's like a server for a computer network?
- 18 A. Yeah, that's an easy way to say it, yes.
- 19 Q. Is everybody in ACI connected to your LAN?
- 20 A. I don't know.
- 21 Q. Let me direct your attention to Section 4 in the issue of
- 22 October 31, 1996.
- 23 A. Okay.
- 24 Q. All right. Page 5 of Section 4.
- 25 A. Okay.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Do you see a reference in the very last paragraph to
2 "attached sketch"?

3 A. Yes.

4 Q. And there is no attached sketch, is there?

5 A. No.

6 Q. And I think you indicated before in response to questions
7 by Mr. Howard that those sketches may be resident elsewhere and
8 can be inserted at a later point; is that right?

9 A. Yes.

10 Q. Okay. However, there are sketches that are provided for
11 some of the sections, are there not?

12 A. Yes.

13 Q. Do you know why there would be some sketches provided and
14 some not?

15 A. Well, I don't -- I don't know for sure, but what I'm
16 thinking is when you -- a lot of these documents that are text
17 are probably on Word and Word has the capability to insert a
18 diagram. So if somebody used a Word program and inserted a
19 diagram, it would have printed on the T drive; and I know Dave,
20 for instance, uses EXCEL, the EXCEL program, which is a
21 spreadsheet program and draws pictures on it. So that would not
22 be -- So that would probably be on a C drive someplace and be
23 printed separately and inserted separately; so it wouldn't be
24 part of these Word text documents and various people will
25 connect, some might use Powerpoint, so they're all over the

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 place and they're different. It's the only thing I can think
2 of.

3 Q. The "Dave" you referred to is Rubenstein?

4 A. Right.

5 Q. Now, does Mr. Rubenstein have in his office a three-ring
6 notebook or some other binder that has in it his copy of the
7 network plan?

8 A. Yes, probably.

9 Q. Would Mr. Rivera similarly have a binder with a plan in it?

10 A. It's a woman.

11 Q. Ms. Rivera?

12 A. I don't know for sure, but it's possible.

13 Q. Is it possible that Anika -- Would you pronounce her
14 last --

15 A. Madarasz, M-a-d-a-r-a-s-z.

16 Q. Similarly has a notebook in her office?

17 A. Probably. Possibly, yes.

18 Q. And the same would be true for Mr. Parrolina?

19 A. Yes.

20 Q. And Anup Karnalkar?

21 A. Yes.

22 Q. And if you would, look at the table of contents in the
23 Fundamental Plan, issue date October 31, 1996, there is a page
24 which identifies sections, appendices, release dates and owner
25 names, correct?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Right.

2 Q. Now, can Mr. Rubenstein, if he generates a new appendix,
3 have that appendix resident in his office while he's working on
4 it without it being on the T drive and accessible to others?

5 MR. LUCAS: Are you asking her if that's possible?

6 MR. ROSENBERRY: Yes.

7 THE WITNESS: I guess it's possible, but I don't know
8 whether it is on the T drive, or it isn't, or if it's on his C
9 drive.

10 BY MR. ROSENBERRY:

11 Q. He could be creating an appendix, for example, Appendix R
12 in his C drive, and you wouldn't necessarily know that it was in
13 the process of being created, correct?

14 A. Correct.

15 Q. Okay. The only way to determine whether or not something
16 was being created would be to go to Mr. Rubenstein and say, for
17 example, with respect to Appendix S, "Do you have something that
18 you have developed on legal/regulatory?"

19 A. Is his name by that?

20 Yes.

21 Q. Do you know whether or not there is an appendix on
22 reliability that is being drafted?

23 A. Again, that was one that kind of got goofed up. It's in
24 here, it's in the October 31, and it was right before the O.
25 The very, very end there's a page that says -- No, no. Look

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 right before Appendix O at the very end where -- Do you remember
2 where you had the duplicate? Keep going a little bit further.
3 There's one page right before it. It looks like this
4 (indicating). Sorry, I don't know what.

5 MR. LUCAS: Off the record.

6 (Discussion held off the record.)

7 BY MR. ROSENBERRY:

8 Q. Is Anup Karnalkar a man or a woman?

9 A. Man.

10 Q. Did Mr. Karnalkar prepare Appendix R, to your knowledge?

11 A. I don't know who wrote it.

12 Q. Are you familiar with any of the terms in Appendix R by
13 virtue of your position in ACI? Let's take network dispersion
14 as an example.

15 A. I have to read it. I'm not sure I'm familiar with the term
16 such as it is.

17 (Pause.)

18 It's a strange term for me, but I understand what they're
19 trying to describe.

20 Q. Do you know whether Mr. Rubenstein is working on
21 Appendix P?

22 A. Appendix P.

23 Q. "P" refers to TeleGlobe.

24 A. I don't know if he's working on this section.

25 Q. Do you know if Mr. Rubenstein is working on Appendix S?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 A. No, I don't.
- 2 Q. Do you know whether -- Excuse me for one second.
- 3 Is there an Appendix T in your copy of the October 31
- 4 version?
- 5 A. No.
- 6 Q. Do you know whether Mr. Rubenstein is working on
- 7 Appendix T?
- 8 A. I believe that the version they're calling 1 has whatever's
- 9 in that section. I believe it's just a drawing, and maybe
- 10 that's why it didn't come out in the October 31st. So whatever
- 11 is in that section right now consisted of a drawing --
- 12 Q. Okay.
- 13 A. -- to my knowledge.
- 14 Q. To your knowledge?
- 15 A. Right.
- 16 Q. But there could be a section that Mr. Rubenstein is
- 17 drafting describing out-of-region products that could be on his
- 18 C drive that you would not necessarily have seen, right?
- 19 A. That's correct.
- 20 Q. And the only way for us to determine that is to talk to
- 21 Mr. Rubenstein, right?
- 22 A. Yes; or I could ask him.
- 23 Q. Do you know why there is not in the issue of October 31,
- 24 1996, a page which lists sections, appendices, release dates and
- 25 owner names?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. No, I don't.

2 Q. Is the page that I just described to you, which contains
3 the sections, release dates and owner names typically contained
4 in the -- what has at various times been called a network plan?

5 A. Yes.

6 Q. Neither Time Warner Exhibit 1 nor the issue of October 31
7 of 1996 contains an Appendix A, product descriptions; is that
8 right?

9 MR. LUCAS: Are you going to ask her to look through
10 the documents and confirm whether those exist or not?

11 MR. ROSENBERRY: She can if she'd like.

12 MR. LUCAS: I'm going to object to the question. The
13 documents speak for themselves; whatever is there is there.

14 But if you can answer his question, you can.

15 THE WITNESS: Yeah, there's a cover sheet.

16 BY MR. ROSENBERRY:

17 Q. Do you know whether Mr. Rubenstein is working on product
18 descriptions for inclusion in a revised fundamental plan for
19 your full-service network?

20 A. I don't believe he is, no.

21 Q. What's the basis for your understanding that he is not
22 doing that?

23 A. I asked him.

24 Q. When did you ask him?

25 A. Today.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

- 1 Q. Why did you ask him?
2 A. So I could be up to date.
3 Q. Did you ask him about Appendix S or Appendix T?
4 A. No.
5 Q. Why not?
6 A. I don't know.
7 Q. Were you told by anyone to ask him specifically about
8 Appendix A?
9 A. No.
10 Q. Let me direct your attention to Appendix Q in the issue of
11 October 31, 1996.
12 A. Okay.
13 Q. Now, as I understand it, Appendix Q was simply misfiled in
14 the notebook, which was copied for the purpose of providing the
15 parties with the network plan, right?
16 MR. LUCAS: If you know.
17 BY MR. ROSENBERRY:
18 Q. If you know?
19 A. I don't know what happened.
20 Q. Do you recall that you were asked some questions by
21 Mr. Howard regarding fiber installations?
22 A. Yes.
23 Q. And he asked you a question about whether or not the fiber
24 being installed could be used for local service?
25 A. Correct.

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Q. Okay. I believe that you indicated at one point that you
2 thought it would not be conducive to local service; is that
3 right?

4 A. Inasmuch as they're backbone facilities, yes.

5 Q. All right. Could the facilities be used to provide local
6 service even if it's a backbone facility?

7 MR. LUCAS: You're asking her hypothetically?

8 MR. ROSENBERRY: Yes.

9 THE WITNESS: I mean, I can think of cases where it
10 could be, yes.

11 BY MR. ROSENBERRY:

12 Q. But you draw a distinction between whether it could be on a
13 technical basis and whether or not it would be economic to do
14 so; is that right?

15 A. Right.

16 Q. Okay. Would the economics change if you had a large number
17 of customers who were using those backbone facilities -- or let
18 me rephrase it.

19 Would the economics change if those backbone facilities
20 could be used to provide local service to a large number of
21 customers?

22 A. See, the thing that's throwing me is that these are
23 backbone facilities that are kind of like transmission
24 facilities only there aren't any switches associated with them.
25 You know, it's the transport network. And when I think of local

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 service, I think you have to have a switch to provide dialtone
2 for local service.

3 So it's hard for me to associate the two when there's no
4 switches to provide the dialtone. So if there was a switch that
5 was near a backbone facility, okay. And there was a large
6 customer near there, then it would make sense to use -- probably
7 in that hypothetical case to use the backbone to provide local
8 services.

9 Q. Before I conclude, I want to make a copy of those pages --

10 A. Sure.

11 Q. -- that were contained in the notebook. And let me ask a
12 quick question before I go do that. There appears to be an
13 envelope in the back of the notebook?

14 A. Uh-huh.

15 Q. Can we take a look at that?

16 A. All right.

17 (Handed.)

18 Q. Can we indicate for the record that the envelope appears to
19 be a UPS Next Day Air envelope.

20 I'm going to ask you to look at the shipping label that
21 appears on this envelope, okay?

22 A. Uh-huh.

23 Q. Do you see the name Ryan Julian on that?

24 A. Yes.

25 Q. Do you know who Mr. Julian is?

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 A. Yes.

2 Q. Who is he?

3 A. He works in Mr. Gockley's group.

4 Q. Okay. Do you know what his position is?

5 A. I don't know what his title is.

6 Q. Do you know whether Mr. Julian was asked -- Well, let me
7 back up.

8 Why, if you know, is this white envelope in the notebook?

9 A. I don't know.

10 Q. Do you know whether this is -- Do you know whether
11 Mr. Julian was the person who forwarded the notebook to
12 Mr. Sullivan?

13 A. I don't know.

14 MR. ROSENBERRY: I'll be right back.

15 (Discussion held off the record.)

16 MR. ROSENBERRY: Let's go back on the record.

17 BY MR. ROSENBERRY:

18 Q. Ms. Cantu, I have returned to you the four pages that you
19 showed me from your notebook that were in the inside front
20 pocket?

21 A. Yes.

22 Q. I'd like to hand you a copy of what I'm going to mark as
23 TW/OCTA Exhibit No. 1, and ask you if that's not an accurate
24 reproduction of the pages contained in the notebook?

25

- - -

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

1 Thereupon, TW/OCTA Exhibit No. 1 was marked for
2 purposes of identification.

3 - - -

4 THE WITNESS: Yes.

5 MR. ROSENBERRY: Thank you.

6 MR. LUCAS: Did you mark that No. 1?

7 MR. ROSENBERRY: That's 1.

8 That's all I have at this time, given the time
9 constraints under which we were given to review the document and
10 prepare for the deposition. Thank you, Miss Cantu.

11 THE WITNESS: Thank you.

12 MR. LUCAS: Thank you.

13 - - -

14 (Signature not waived.)

15 - - -

16 (Thereupon, the deposition was concluded at 10:27
17 o'clock p.m. on Thursday, November 14, 1996.)

18 - - -

19

20

21

22

23

24

25

*** CONFIDENTIAL TRANSCRIPT ***

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

C E R T I F I C A T E

State of Ohio,)
County of Delaware,) SS:

I, Deborah J. Holmberg, Registered Merit Reporter and Notary Public in and for the State of Ohio, hereby certify that the foregoing is a true and accurate transcript of the deposition testimony, taken under oath on the date hereinbefore set forth, of

Diana Cantu
I further certify that I am neither attorney or counsel for, nor related to or employed by any of the parties to the action in which the deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in the action.

Deborah J. Holmberg,
Registered Merit Reporter
and Notary Public in and for
the State of Ohio.

My Commission Expires:
October 07, 2001.

*** CAUTION ***

This certification bears an original signature in nonreproducible ink. The foregoing certification of the transcript does not apply to any reproduction of the same not bearing the signature of the certifying court reporter. McGinnis & Associates, Inc. disclaims responsibility for any alterations which may have been made to the noncertified copies of this transcript

MC GINNIS & ASSOCIATES, INC.
COLUMBUS, OHIO (614) 431-1344

C E R T I F I C A T E

State of Ohio,)
County of Franklin,) SS:

I, Rose Marie Prater, Registered
Professional Reporter and Notary Public in and for the
State of Ohio, hereby certify that the foregoing is a
true and accurate transcript of the deposition
testimony, taken under oath on the date hereinbefore
set forth, of

Diana Cantu
I further certify that I am neither attorney
or counsel for, nor related to or employed by any of
the parties to the action in which the deposition was
taken, and further that I am not a relative or employee
of any attorney or counsel employed in this case, nor
am I financially interested in the action.

Rose Marie Prater,
Registered Professional
Reporter and Notary Public
in and for the State of
Ohio.

My Commission Expires:
September 16, 1997.

*** CAUTION ***

This certification bears an original signature in
nonreproducible ink. The foregoing certification of
the transcript does not apply to any reproduction of
the same not bearing the signature of the certifying
court reporter. McGinnis & Associates, Inc. disclaims
responsibility for any alterations which may have been
made to the noncertified copies of this transcript

**DEPOSITION
EXHIBIT**

TW/BCTH
(Confidential)
RMP 11-15-96

The Ameritech Communications, Inc

Full Service Network

Fundamental Plan

Issue of August 15, 1996

Confidential

Prepared by:
David Rubenstein 847-928-4270
& Corey Parollina 847-928-4284--
ACI Planning, Engineering, Research and Development

Premise: Ameritech Communications, Inc., in anticipation of being allowed into the inter-LATA telecommunications market, and in order to serve various internal needs, plans to deploy a full-service telecommunications network as described in this document.

Table of Contents

Sections

- I. Target Markets and Services ✓
- II. The day one network ✓
- III. The year-one network ✓
- IV. The network evolution ✓

Appendices

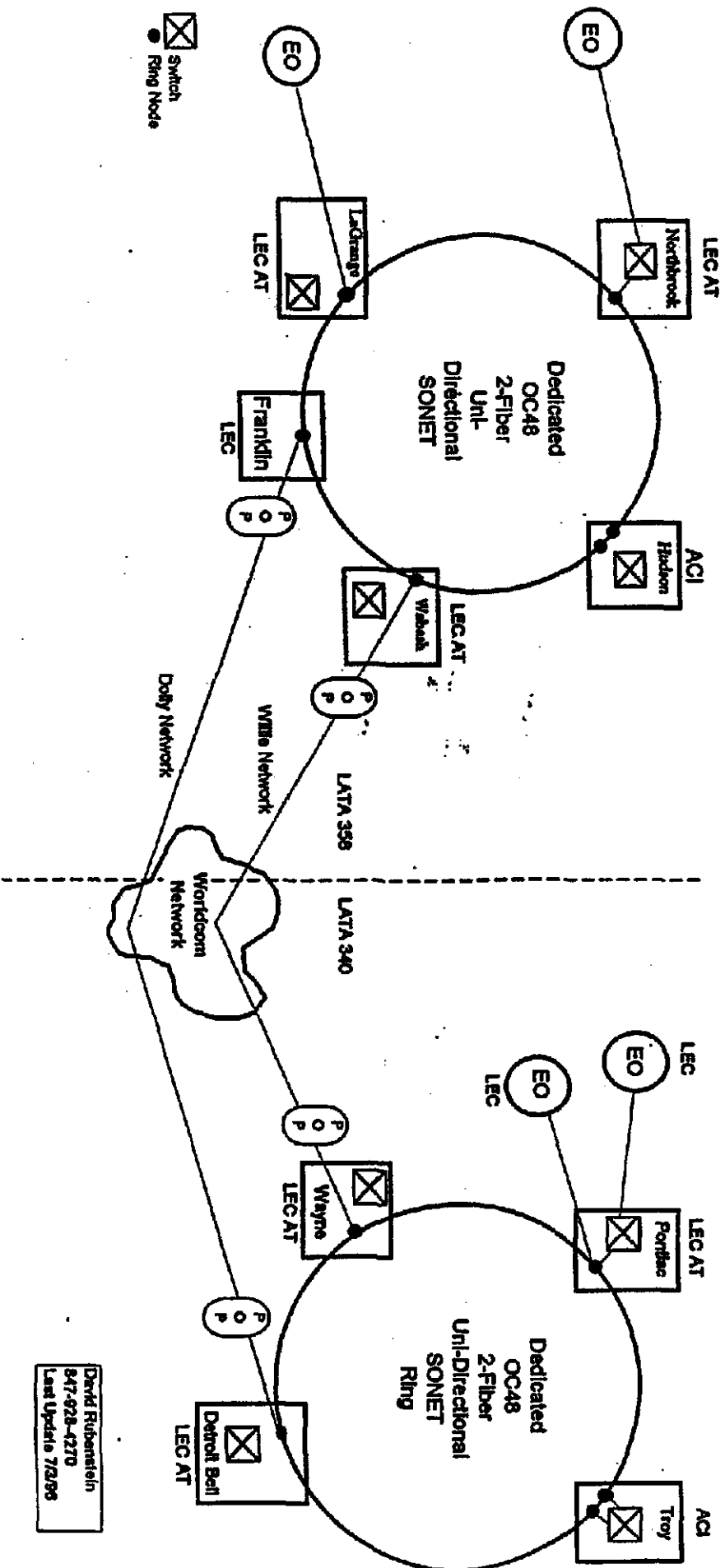
- A. Product descriptions ✓
- B. Call Flows ✓
- C. LATA layouts ✓
- D. Network diagrams ✓
- E. Switch demand and capacity charts ✓
- F. Forecasts ✓
- G. National Directory Assistance (NDA) ✓
- H. Ameritech Internal Communications Network (AICN) ✓
- I. Ameritech Cellular Long Distance ✓
- J. Circuit-switched Data Network ✓
- K. Network Recovery Plan ✓
- L. Fraud Control ✓
- M. ACI Sites ✓
- N. Local Number Portability ✓
- O. Fiber Cable and Supporting Electronics ✓
- P. Teleglobe ✓
- Q. Synchronization ✓
- R. Reliability ✓
- S. Legal/Regulatory ✓
- T. Out-of-Region Products ✓
- U. Echo Cancellation ✓
- V. SS7 Network ✓

	Section	Last Release	Owner Name	Owner Phone
	Introduction	6/20/96	David Rubenstein	847-928-4270
Target Markets & Services	Section I	6/20/96	David Rubenstein	847-928-4270
Day-one Network	Section II	6/20/96	David Rubenstein	847-928-4270
Year-one Network	Section III	6/20/96	David Rubenstein	847-928-4270
Network Evolution	Section IV	5/15/96	David Rubenstein	847-928-4270
Product Descriptions	Appendix A	5/15/96	David Rubenstein	847-928-4270
Call Flows	Appendix B	5/15/96	David Rubenstein	847-928-4270
LATA Layouts	Appendix C	5/15/96	DJ Rivera	847-928-4296
Network Diagrams	Appendix D	5/15/96	David Rubenstein	847-928-4270
Switch D&F Charts	Appendix E	5/15/96	David Rubenstein	847-928-4270
Forecasts	Appendix F	5/15/96	David Rubenstein	847-928-4270
NDA	Appendix G	5/15/96	David Rubenstein	847-928-4270
AICN	Appendix H	5/15/96	David Rubenstein	847-928-4270
Cellular Long Distance	Appendix I	5/15/96	David Rubenstein	847-928-4270
Switched 56/64	Appendix J	5/15/96	David Rubenstein	847-928-4270
Network Recovery Plan	Appendix K	6/20/96	David Rubenstein	847-928-4270
Fraud Control	Appendix L	5/15/96	David Rubenstein	847-928-4270
ACI Sites	Appendix M	5/15/96	Anika Madarasz	847-928-4276
Local Number Portability	Appendix N	5/15/96	David Rubenstein	847-928-4270
Fiber cable & electronics	Appendix O	5/16/96	Corey Parollina	847-928-4284
Teleglobe	Appendix P	New	David Rubenstein	847-928-4270
Synchronization	Appendix Q	New	Corey Parollina	847-928-4285
Reliability	Appendix R	New	Anup Karnalkar	847-928-4273
Legal/Regulatory	Appendix S	New	David Rubenstein	847-928-4270
Out-of-Region Products	Appendix T	New	David Rubenstein	847-928-4270
Echo Cancellation	Appendix U	New	Corey Parollina	847-928-4285
SS7 Network	Appendix V	New	David Rubenstein	847-928-4270

DEPOSITION EXHIBIT

AT&T (Confidential)
JSTU 11-18-96

ACI Dual Network



David Rubenstein
847-628-4270
Last Update 7/2/96