

LDC INTERROGATORY #19

INTERROGATORY

Reference: Report of John Todd, filed September 26, 2003, Page 6, lines 23-25

“I am not aware of any convincing evidence that demonstrates that there is either a maximum or minimum size of area that can be served efficiently.”

Has Wirebury, its shareholders and/or affiliates performed any analyses or are they individually or collectively in possession of any analyses performed to determine the minimum number of customers that a distributor would need to serve to achieve minimum efficient scale? If so, please provide details of the results of any such analyses, together with copies of the analyses.

RESPONSE

Wirebury has not carried out any of the described analyses.

