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Exhibit EDM-11

Perez, Martha

From: Hanschen, Peter W. [PHanschen@mofo.com]
Sent: Wednesday, January 12, 2011 1:32 PM
To: Moldavsky, Ed; Morris, Harvey Y.
Subject: Verizon Wireless's Supplemental Response to CPSD Data Requests 2-1 and 2-5

Dear Ed and Harvey,

This Supplemental Response to CPSD's November 29, 2010 data request is prepared and submitted by Verizon Wireless in accordance with the discussion at our meet and confer teleconference on January 5, 2011 regarding CPSD Data Requests 2-1 and 2-5 and the Respondents' December 10, 2010 answers thereto. Even before the meet and confer teleconference, Mr. Moldavsky advised the Respondents in an e-mail dated December 24, 2010 that, with respect to Data Requests 2-1 and 2-5, CPSD would be seeking clarification on several items including the identities of all witnesses to the alleged destruction of evidence as well as information establishing a clear factual record of how evidence was allegedly destroyed. This Supplemental Response incorporates by reference the Preliminary Statement and General Objections set forth in Verizon Wireless's December 10, 2010 Objections and Responses to the November 29, 2010 Data Request of the Consumer Protection and Safety Division.

In its December 10, 2010 response to Data Requests 2-1 and 2-5, Verizon Wireless mistakenly advised that its fiber optic line on the subject poles at the time of the fire was replaced and discarded. Verizon Wireless has now verified that the fiber optic cable and messenger cable that was on pole numbers 1169252 and 1169253 in Malibu Canyon at the time of the fire were **not** damaged. Rather than being replaced and discarded following the fire, the fiber optic cable and messenger cable were in fact re-attached to the replacement poles by Bouchard Communications.

We apologize for any inconvenience that our previous answers may have caused the CPSD. Verizon Wireless discovered its error following CPSD's December 24, 2010 e-mail inquiry, when it requested Bouchard Communications find a location in the Malibu Canyon area where the original fiber cable had not been replaced so that CPSD could verify the size and weight of the original fiber. Verizon Wireless was trying to assist the CPSD in its investigation because Verizon Wireless was under the mistaken belief that the original cable had been replaced and discarded. To Verizon Wireless's surprise, Bouchard Communications reported back that the original fiber and messenger cable on pole numbers 1169252 and 1169253 had not been replaced, but instead had been re-attached to the new replacement poles. Malcolm Brown, formerly of Verizon Wireless, subsequently went to the site with Bouchard Communications and verified this fact.

The 48 count fiber optic cable was manufactured by Sicom, now Corning Cable Systems. It has a nominal outside diameter of 0.48 inches and a nominal weight of 91 pounds per 1000 feet. The messenger cable is 1/4 inch diameter and its weight is 117 pounds per 1000 feet.

You also asked about the identities of the people who were involved following the fire. Malcolm Brown of Verizon Wireless coordinated with Bouchard Communications regarding restoring service following the fire. Mr. Brown met with Bouchard Communications the day after the fire. Mr. Brown and Mr. Vargas of Bouchard Communications familiarized themselves with the general area of the fire and thereafter, Mr. Brown met with the Bouchard Communications work crew and talked to them about safety concerns. Mr. Brown instructed Bouchard Communications to replace whatever Verizon Wireless facilities needed

replacing so that wireless service could be restored. Bouchard Communications advises that the personnel that worked on the restoration were as follows:

Kirk Bouchard
Juan Vargas
Phil Urena
Sergio Pacheco
Josh Rivas
Dave Reyes
Marco Mendoza
Refugio Chavez
Roy Girtman
Eddie Estrada
Tony Natividad

Again, we apologize for any inconvenience that we may have caused.

To the extent that this Supplemental Response also may be responsive to CPSD Data Requests 2-3 and 2-4, Verizon Wireless, without waiving any General Objection or Specific Objection thereto, requests that those data requests also be supplemented by this Supplemental Response.

Malcolm Brown has reviewed this Supplemental Response.

Regards,

Peter Hanschen

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