

STATE OF INDIANA



INDIANAPOLIS, 46204

INDIANA UTILITY REGULATORY COMMISSION
302 W. WASHINGTON STREET, ROOM E306

October 14, 1998

Hon. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RECEIVED

OCT 15 1998

FCC MAIL ROOM

Re: Applications of Ameritech Corp., Transferor, and SBC Communications Inc.,
Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses
and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and
Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commission's Rules, CC Docket No. 98-141

Dear Secretary Salas:

The Indiana Utility Regulatory Commission files the enclosed comments in response to the July 30, 1998 Public Notice, SBC Communications, Inc. and Ameritech Corporation Seek FCC Consent for a Proposed Transfer of Control and Commission Seeks Common on Proposed Protective Order Filed by SBC and Ameritech, CC Docket No. 98-141.

Included in this filing are an original and 13 copies. Please stamp one copy "received" and return it to the Indiana Utility Regulatory Commission in hte self-addressed, stamped envelope that is enclosed.

The contact person for the IURC is as follows:

Sandy Ibaugh, Director
Telecommunications Division
Indiana Utility Regulatory Commission
302 W. Washington Street, Rm E306
Indianapolis, IN 46204

Please contact Joel Fishkin, Senior Telecommunications Analyst, at 317/233-3464 if there are any problems with this filing.

Cordially,

Sandy Ibaugh
Director of Telecommunications

Enclosures

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Indiana Utility Regulatory Commission

OCT 15 1998

October 15, 1998

Before the
Federal Communications Commission
Washington, D.C. 20554

FCC MAIL ROOM

In re Applications of)
Ameritech Corp., Transferor,)
)
and)
)
SBC Communications Inc.,)
)
Transferee, For Consent to Transfer Control of)
Corporations Holding Commission Licenses and)
Authorizations Pursuant to Sections 214)
and 310(d) of the Communications Act and)
Parts 5, 22, 24, 25, 63, 90, 95 and 101)
of the Commission's Rules)

CC Docket No. 98-141

**COMMENTS OF
INDIANA UTILITY REGULATORY COMMISSION (IURC)**

In the Public Notice seeking comments on the proposed transfer of control from Ameritech Corporation to SBC Communications, Inc., the FCC said "Interested parties may file comments regarding or petitions to deny the applications no later than September 15, 1998."¹ While the IURC does not have formal comments it can file today, we would like to inform the FCC of our proceeding and its respective time line.

On September 2, 1998 the IURC formally opened an investigation of the merger of Ameritech Corporation and SBC Communications Inc. in Cause No. 41255 (see Attachment 1). The purpose of the investigation is "to provide its perspective to the FCC on the possible impact of the merger in Indiana." (page 2). In that Order the IURC informed all parties they may intervene and submit questions. The IURC staff compiled a list of questions (see Attachment 2) and asked Ameritech Indiana, Ameritech Corporation, and SBC Communication Inc. to respond. On October 1, 1998 the IURC held a prehearing conference to determine a schedule. The schedule is as follows: Respondents must submit answers to Staff questions on or before October 16, 1998; additional questions may be submitted to respondents on October 23, 1998, Respondents must submit answers to the additional questions on or before November 20, 1998;

¹ That date was later changed to October 15, 1998 in an Order released September 1, 1998 in the same docket.

an evidentiary hearing will be held on December 1, 1998. On October 8, 1998 the IURC clarified those questions with a list of instructions (see Attachment 3).

The IURC will work diligently to provide formal comments and recommendations regarding the impact of the merger in Indiana to the FCC after completion of the evidentiary hearing.

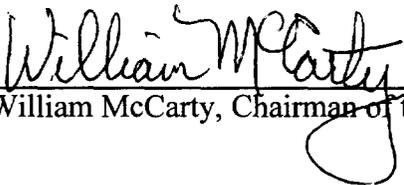
INDIANA UTILITY REGULATORY COMMISSION

Submission of Comments to the Federal Communications Commission

October 14, 1998

In re: Applications of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commission's Rules, CC Docket No. 98-141

The Indiana Utility Regulatory Commission submits the foregoing comments to the Federal Communications Commission in response to the FCC's Order on September 1, 1998 in CC Docket No. 98-141.



William McCarty, Chairman of the IURC

Attachment 1
Page 1

ORIGINAL
STATE OF INDIANA



UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE INVESTIGATION)
ON THE COMMISSION'S OWN MOTION) CAUSE NO. 41255
INTO ALL MATTERS RELATING TO THE)
MERGER OF AMERITECH CORPORATION) APPROVED:
AND SBC COMMUNICATIONS INC.)

SEP 02 1998

RESPONDENT: INDIANA BELL TELEPHONE COMPANY, INCORPORATED
D/B/A AMERITECH INDIANA

BY THE COMMISSION:

G. Richard Klein, Commissioner
William D. McCarty, Chairman
Clayton C. Miller, Chief Administrative Law Judge

The Ameritech Corporation ("Ameritech") of Chicago, Illinois announced on May 11, 1998 that it had agreed to merge with SBC Communications, Inc. ("SBC") of San Antonio, Texas. Ameritech is the corporate parent of Indiana Bell Telephone Company, Inc. d/b/a Ameritech Indiana, which affiliate operates approximately 2.2 million local exchange telephone access lines in Indiana pursuant to authority granted by the Indiana Utility Regulatory Commission ("Commission").

On July 9, 1998, representatives of the American Association of Retired Persons ("AARP") and the Citizens Action Coalition of Indiana ("CAC") sent a joint letter to Commission Chairman William McCarty enumerating several concerns relating to the proposed merger. Counsel for Ameritech Indiana replied to that joint letter with a letter of her own dated July 28, 1998, suggesting among other things that a Commission investigation into the merger is not warranted at this time.¹

On July 24, 1998 SBC and Ameritech filed an application with the Federal

¹ Because we find that both letters, as well as a third and fourth letter addressed to Chairman McCarty from counsel for Time Warner Telecom, dated August 4, 1998, and August 25, 1998, respectively, as well as another letter for the AARP and the CAC, also dated August 25th, and another letter from Ameritech Indiana, dated August 31st, all constitute "prior communications" as described in 170 IAC 1-1.5-5, all of these letters and accompanying materials are now incorporated into the record of this cause. This Order should serve as the memorandum called for in 170 IAC 1-1.5-6(a)(1)(C), and we further note that no oral ex parte communications have been received nor has the Commission or its employees made any oral or written response to the aforementioned written communications.

Communications Commission ("FCC") seeking that agency's consent to the transfer of control of FCC authorizations held by subsidiaries of Ameritech to SBC. One of those subsidiaries is Ameritech Indiana. In a public notice issued July 30, 1998, the FCC invited interested parties to submit comments to its Common Carrier Bureau as it reviews the aforementioned transfer application (CC Docket No. 98-141), and it is this Commission's intent to provide its perspective to the FCC on the possible impact of the merger in Indiana.

On August 18, 1998, representatives from SBC, Ameritech and Ameritech Indiana appeared before the Commission at a public meeting in Indianapolis to discuss the reasons they believe the proposed merger would be in the public interest. At the conclusion of their presentation, these representatives responded to questions from the Commissioners and the Commission staff regarding the particular impact of the merger on Ameritech Indiana and its customers. While this public presentation was helpful in understanding the impetus for the merger, the Commission believes it might also benefit from other perspectives before the Commission takes an official position to be communicated to the FCC.

The Indiana General Assembly has given this Commission broad discretion to investigate matters pertinent to public utilities operating within the state. According to I.C. 8-1-2-58, "[w]henver the commission shall believe that . . . an investigation of any matter relating to any public utility should for any reason be made, it may, on its own motion, summarily investigate the same, with or without notice." Because we believe the merger of SBC, which also operates various telephone subsidiaries in Indiana, with Ameritech Indiana's parent could affect the state of telephone competition in Indiana, and might also impact employment levels, quality of service, and even rates, the Commission now finds that it should open an investigation into the merger pursuant to Indiana Code section 8-1-2-58 and related statutes, including I.C. 8-1-2-83 and -84. Any interested parties wishing to intervene in this investigation should also file with the Commission by September 14, 1998 any questions such parties wish to propose, and the Commission staff should by September 30, 1998 prepare a list of questions to be asked of Ameritech Indiana. The presiding officers should convene a prehearing conference pursuant to 170 IAC 1-1-16 on Thursday, October 1, 1998 to arrange a schedule for Ameritech Indiana to respond to the Commission's questions and for any other proceedings in this investigation.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:

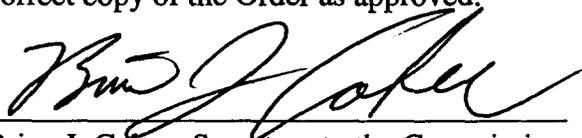
1. An investigation shall be, and hereby is, commenced on the Commission's own motion into all matters relating to the merger of Ameritech Corporation and SBC Communications, Inc.
2. A prehearing conference shall be held in this Cause on Thursday, October 1, 1998, at 10:00 a.m. EST in Room TC-10 of Indiana Government Center South, 302 West Washington Street, Indianapolis, Indiana.
3. A copy of this Order shall be mailed to Ameritech Indiana and to the Office of Utility Consumer Counselor.

4. This Order shall be effective on and after the date of its approval.

McCARTY, SWANSON-HULL AND ZIEGNER CONCUR; KLEIN ABSENT:
APPROVED:

SEP 02 1998

I hereby certify that the above is a true and correct copy of the Order as approved.



Brian J. Cohee, Secretary to the Commission

STATE OF INDIANA



INDIANAPOLIS, 46204

INDIANA UTILITY REGULATORY COMMISSION
302 W. WASHINGTON STREET, ROOM E306

FILED

SEP 30 1998

**IN THE MATTER OF THE INVESTIGATION)
ON THE COMMISSION'S OWN MOTION)
INTO ALL MATTERS RELATING TO THE)
MERGER OF AMERITECH CORPORATION)
AND SBC COMMUNICATIONS, INC.)**

CAUSE NO. 41255

INDIANA UTILITY
REGULATORY COMMISSION

APPROVED:

**RESPONDENTS: INDIANA BELL TELEPHONE COMPANY, INCORPORATED
D/B/A AMERITECH INDIANA; AMERITECH CORPORATION;
AND SBC COMMUNICATIONS, INC.**

You are hereby notified that the Indiana Utility Regulatory Commission has, on this date, caused the following entry to be made:

In its Order initiating this Cause on September 2, 1998, the Commission directed its staff to prepare by September 30, 1998 a list of questions to ask Indiana Bell Telephone Company Incorporated, d/b/a Ameritech Indiana, related to the merger of Ameritech Indiana's parent, Ameritech Corporation, with SBC Communications, Inc. The Commission also invited any party seeking to intervene in this investigation to file proposed questions by September 14, 1998.

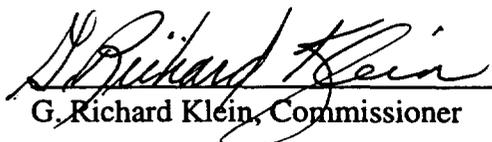
The Commission has received Petitions to Intervene from the following entities: the American Association of Retired Persons, Inc.; AT&T Communications of Indiana, Inc. ("AT&T"); the Citizens Action Coalition of Indiana, Inc.; the Consolidated City of Indianapolis and Marion County, Indiana; the Indiana Cable Telecommunications Association, Inc. ("ICTA"); the Indiana Payphone Association ("IPA"); KMC Telecom II, Inc.; Sprint Communications Company L.P. and United Telephone Company of Indiana, Inc. d/b/a Sprint; Time Warner Communications of Indiana, L.P. ("Time Warner"); and WorldCom, Inc. Additionally, the Commission received a letter from the Communications Workers of America ("CWA") seeking intervention.

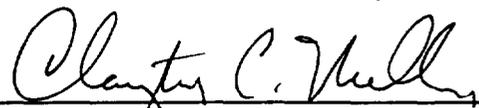
The following entities filed proposed questions with the Commission by the September 14 deadline: AT&T; CWA; ICTA; IPA; the Office of Utility Consumer Counselor ("OUCC"); Time Warner; and Sprint.

Having reviewed the proposed questions submitted by the OUCC and others, the presiding officers and technical staff have prepared several questions for and requests for information from Ameritech Indiana. Ameritech Indiana should be prepared to respond within the timetable to be determined at the prehearing conference previously scheduled for later this week. These questions, which are attached to this Docket Entry, are intended to explore in

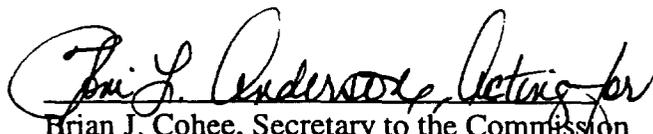
greater detail the effect of the proposed merger within Indiana. Some of the issues covered include the identification and allocation of specific merger benefits, as well as the merger's anticipated impact on Ameritech Indiana's operations, organizational structure, employment levels, and the quality of its telephone service. Because many of the questions necessarily involve Ameritech Indiana's existing and prospective corporate parents, Ameritech Corporation and SBC Communications, Inc. should also be named as respondents in this investigation pursuant to 170 IAC 1-1-6(c).

IT IS SO ORDERED.


G. Richard Klein, Commissioner


Clayton C. Miller, Chief Administrative
Law Judge

Date: 9-30-98


Brian J. Cohee, Secretary to the Commission

Questions for Ameritech Corporation, Ameritech Indiana, and SBC Communications, Inc. in the Indiana Utility Regulatory Commission's Investigation of the Proposed Merger of SBC and Ameritech, I.U.R.C. Cause No. 41255:

I. Identification of Merger Benefits

A. Financial

1. Please provide the yearly dollar quantification of cost savings, presented on both a total company and jurisdictional basis, that each post-merger operating company has or will realize, as a result of the merger between Ameritech Indiana's holding company and SBC for the period 1998 through 2003. Separately identify cost savings by discernible asset and expense categories, and differentiate between one-time cost savings and annual cost savings. If cost savings cannot be provided on an actual basis, provide estimates.

2. SBC and Ameritech have represented that the proposed merger would result in "merger-generated cost savings, efficiencies, and synergies." Did SBC make similar assertions in California, Nevada, or Connecticut? Has SBC made similar assertions in Illinois, Ohio, or any other state in which Ameritech operates? If so, please cite specific statements or testimony. Also if so, how have those representations been borne out in any state in which SBC has completed an acquisition or merged with an incumbent local exchange carrier or holding company? Please cite specific statements such as annual reports and press releases.

B. Other

3. Please explain how the "national-local strategy" advanced as a justification for the merger by Ameritech and SBC in their FCC filing as well as in their presentation to the IURC would materially benefit Indiana consumers. Set forth the facts relied upon and provide any supporting documentation.

4. Please identify any other short-term or long-term benefits of the proposed merger for customers of Ameritech Indiana. Will all classes of customers benefit equally? If not, please explain.

II. Allocation of Merger Benefits

5. Has the impact of the proposed merger on SBC's residential basic local exchange rates in any of the states within SBC's current local exchange service territory been determined? If so, please specify.

6. Does SBC/Ameritech/Ameritech Indiana intend to return merger related cost savings to Indiana jurisdictional customers? If so, by what method, and to which customer classes? Please provide a yearly dollar quantification for the period 1998 through 2003 of how any monetary

benefits will be allocated between the following Ameritech Indiana customer classes: BLS, BLS Related, and Other. Please provide a yearly dollar quantification for the period 1998 through 2003 of how these monetary benefits will be allocated within each of these three Ameritech Indiana customer classes (residential / single-line business/ multi-line business BLS; intraLATA MTS / other intra LATA; local Rate Group x / local Rate Group y; etc.).

7. Does Ameritech Indiana believe that either a rate case or a proceeding conducted pursuant to I.C. 8-1-2.6 will be necessary in order to ensure that some merger-related benefits are included in Ameritech Indiana's rates? If not, how will any benefits be passed through to Indiana customers?

8. Please provide a narrative description of the basis used to allocate grand total Ameritech and SBC incurred related costs and cost savings to Ameritech Indiana and to the Indiana jurisdiction.

9. Please provide the yearly dollar quantification of costs, presented on both a total company and jurisdictional basis, that each post-merger operating company has or will realize as a result of the proposed merger for the period 1998 through 2003. Separately identify costs by discernible asset and expense categories, and differentiate between one-time costs and annual costs. If cost savings cannot be provided on an actual basis, provide estimates.

10. Provide a narrative description of how Ameritech and Ameritech Indiana intend to account for the costs of the merger on their books of account.

III. Impact of Merger on Operations and Organizational Structure

11. How would the proposed merger impact Ameritech Indiana's network operations?

12. What specific resources, if any, would the merged entity devote to improving the telecommunications infrastructure in Indiana.?

13. Please describe any post-merger plans for Ameritech Indiana to increase or decrease the percentage of its central offices that provide high-end services such as CLASS, ISDN, T-1, T-3, ATM, frame relay, dry copper, FX and DSL. Describe any safeguards intended to ensure that such services are provided to Internet service providers and others on a competitively neutral basis.

14. Should the merger take effect, does Ameritech Indiana anticipate any changes in the number or location of its customer care service/care centers or the staffing levels at such centers?

15. Ameritech presently employs local CLEC Account Managers. Would the proposed merger have any effect on the number or location of CLEC contact personnel, or on current CLEC interface procedures?

16. Does Ameritech Indiana anticipate any changes to its Operational Support Systems should the merger take effect?

17. Please describe in detail both the current and the proposed organizational structure of Ameritech Corporation and Ameritech Indiana, including subsidiaries, affiliates and agents. Also identify any changes anticipated in the structure, role or budget of AIIS.

18. Please identify all affiliates or agents of SBC currently licensed to operate in Indiana, including their locations, type of service offered, and jurisdictional assets, as well as their relationship to Ameritech or Ameritech Indiana in the post-merger corporate structure.

IV. Impact of Merger on Quality of Service

19. Has SBC been found by any state or federal regulatory body to have violated any service quality requirements or fallen below any service quality benchmarks within the past five years? If so, please describe the date, location and nature of the violation or failure, as well as any remedial action taken by SBC and a cite to any regulatory action related thereto.

20. Ameritech Indiana's most recent quarterly quality of service filings with the IURC indicate room for improvement in such areas as phone repair intervals for residential and business customers, percentage of incoming business office calls answered within twenty seconds, and number of customer complaints. Should the merger take effect, what will Ameritech Indiana or its corporate parent(s) do to maintain or improve these or other quality of service in these and any other areas?

V. Impact of Merger on Local Exchange Competition

21. Prior to announcing the proposed merger, had SBC or any of its affiliates or subsidiaries at any point pursued the possibility of providing competitive local exchange service in Indiana. If so, describe in detail the nature of any such steps undertaken, including any evaluation of prospects for market penetration as well as any plans or strategies to provide competitive local exchange service in Indiana. Also identify any cities, towns or rural areas that were targeted, the projected entry date, and the nature of any conditions that had to be satisfied before the plans or strategies were to be implemented.

22. Does SBC contend that it could not on its own enter and compete in local exchange markets in Indiana as a non-incumbent unless it merges with Ameritech? If so, please set forth the factual basis for this contention and any supporting documentation.

23. Please provide a detailed narrative description of how the proposed merger will enhance competition for Ameritech Indiana's customers. Please specify the service(s), customer class(es) and exchange(s) for which competition would be enhanced.

24. Federal regulations limit the dissemination of information about customers and competitors. Do SBC's internal security mechanisms relating to customer or competitive information differ in any material respects from those of Ameritech? Please describe how customer and competitive information from Ameritech Indiana will be safeguarded should the proposed merger take effect.

25. Has SBC been found by any state or federal regulatory body to have improperly shared or transferred customer or competitive information within the SBC corporate structure? If so, please provide a detailed explanation of such findings and related documentation.

VI. Impact of Merger on Employment

26. Please specify any changes in the total number of Ameritech Indiana employees by business unit or subsidiary anticipated to result from the proposed merger for 1998 through 2003.

27. Please provide any plans for consolidation or transfer of operations which would affect employees of Ameritech Indiana.

28. Please describe how the contracts that Ameritech or Ameritech Indiana has with other entities to provide construction maintenance, engineering, marketing or customer service for the provision of telecommunications services to Indiana customers would be affected by the proposed merger.

VII. Impact of Merger on Access Charges

29. Please explain the extent to which SBC and Ameritech will combine their interstate access filings and pool or average their interstate access rates if the proposed merger is consummated. In particular, please address whether or not Ameritech Indiana's interstate access rates will be pooled or averaged only with those of the other Ameritech Operating Companies, or if they will also be pooled with those of any other SBC operating companies or divisions. If applicable, please identify the SBC operating companies or divisions. Regardless of the method of any pooling, please identify the affected interstate access elements. Will Ameritech Indiana or its corporate parent(s) continue to file any Ameritech Indiana-specific interstate carrier access rates with the FCC if the proposed merger is consummated? If so, for which interstate access elements?

30. Will Ameritech Indiana's interstate or intrastate access filings be affected in any manner as a result of the proposed merger beyond what is described in the response to Question #29, above? If so, please explain.

VIII. Impact of Merger on Interconnection with Telecommunication Carriers

31. How many complaints by interconnecting carriers, including formal complaint filings, and requests for alternative dispute resolution, have been made against SBC or its operating companies in the states where it is the incumbent provider of local exchange service? How many were resolved through negotiation or mediation?
32. Of the complaints enumerated in the response to question 30, above, please provide a cause number or other official reference, as well as summaries of the complaint, SBC's response, and the outcome, and the length of time it took for the complaint to be resolved.
33. Has SBC or any of its operating companies ever refused to participate in any alternative dispute resolution relating to an interconnection agreement? If so, please describe.
34. Ameritech Indiana has signed several interconnection agreements with CLECs. Please identify how those interconnection agreements would be affected by the proposed merger, including any changes in the responsibility for administering and enforcing those agreements, as well as any changes in the responsibility for negotiating future agreements.
35. Would the proposed merger have any effect on existing policies or arrangements regarding pole attachments, trenching, or conduit sharing?

IX. Impact of Merger on Existing Regulatory Mechanisms

36. To what extent do anticipated merger savings assume a continuation of alternative or non-rate-of-return regulation of Ameritech Indiana?
37. Should the proposed merger take effect, does Ameritech Indiana anticipate the need for any additional declination of IURC jurisdiction over its operations or services? If so, please describe.

X. Additional Merger-Related Documentation

38. Please provide a copy of all proxy/prospectus statements and SEC filings related to the proposed merger, as well as the estimated consolidated capital structure and pro forma balance sheet for the proposed new entity on the date of its formation. Please also provide the proposed capital structure and pro forma balance sheet for Ameritech Indiana on the date of its formation.
39. Please provide any due diligence reports performed by or for the board of directors or officers of Ameritech or SBC concerning the financial and operational effects of the merger.
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STATE OF INDIANA



INDIANAPOLIS, 46204

INDIANA UTILITY REGULATORY COMMISSION
302 W. WASHINGTON STREET, ROOM E306

FILED

OCT 08 1998

IN THE MATTER OF THE INVESTIGATION)
ON THE COMMISSION'S OWN MOTION)
INTO ALL MATTERS RELATING TO THE)
MERGER OF AMERITECH CORPORATION)
AND SBC COMMUNICATIONS, INC.)

INDIANA UTILITY
REGULATORY COMMISSION
CAUSE NO. 41255

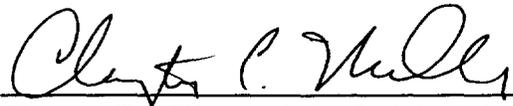
APPROVED:

**RESPONDENTS: INDIANA BELL TELEPHONE COMPANY, INCORPORATED
D/B/A AMERITECH INDIANA; AMERITECH CORPORATION;
AND SBC COMMUNICATIONS, INC.**

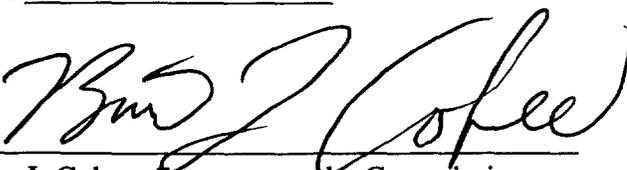
You are hereby notified that the Indiana Utility Regulatory Commission has, on this date, caused the following entry to be made:

By Docket Entry dated September 30, 1998, the presiding officers issued 39 questions for and requests for information from the Respondents in this Cause. In response to some procedural questions raised by various parties at the prehearing conference held the following day, the presiding Administrative Law Judge indicated that the Commission would also provide instructions for responding to the Docket Entry. These ten Instructions, which are attached, are based on similar instructions recently issued in another Cause which were provided to counsel for Ameritech Indiana at the conclusion of the aforementioned prehearing conference. The Respondents should ensure that their responses conform to these Instructions.

IT IS SO ORDERED.


Clayton C. Miller, Chief Administrative
Law Judge

Date: 10/8/98


Brian J. Cohee, Secretary to the Commission

Instructions for Responding to Questions for Ameritech Corporation, Ameritech Indiana, and SBC Communications, Inc. ("Respondents") in the Indiana Utility Regulatory Commission's Investigation of the Proposed Merger of SBC and Ameritech (I.U.R.C. Cause No. 41255):

- 1.) On or before October 16, 1998, Respondents should:
 - a) file with the Commission an original and thirteen copies of their responses; and,
 - b) serve upon all other parties of record in this Cause one copy of their responses.
 - 2.) Responses should be considered to be under oath.
 - 3.) Responses should be thorough, complete and specific.
 - 4.) In responding to each question or request for information, Respondents should first state the text of the question or request.
 - 5.) Unless a question or request states otherwise, responses requiring historical information should include information and materials pertaining to or in effect for the whole or any part of the calendar years 1996, 1997 and 1998. Should a Respondent acquire or discover additional or different information relevant to a question or request after responding, it should supplement its response immediately.
 - 6.) Each response should include all assumptions on which the response is based.
 - 7.) If Respondents assert that any or all of a response is privileged or proprietary, they should:
 - a) provide a general description of the information; and,
 - b) provide an otherwise complete public version of the response, redacting only those aspects of the response for which Respondents seek confidential treatment.
 - 8.) Any assertion by Respondents that any of the information sought is irrelevant or immaterial to this Investigation should include a specific basis for said assertion.
 - 9.) Each response should identify the person or persons responsible for preparing the response. Each such person should be prepared to testify concerning the matters contained in the response, including any supporting documentation.
 - 10.) References in the questions and requests to "documents" are intended to be broadly construed. The term includes but is not limited to reports, forecasts, statistics, data, assumptions, electric or written correspondence, work papers, testimony, computer analysis, and publications.
-