2. If the answer to 1 above is yes, please provide all pole attachment applications where Comcast has sought riser access to two Consolidated poles for Comcast solely owned conduit.

## **Response:**

Objection. Comcast objects to this Data Request on the grounds that it is unduly burdensome, requires Comcast to perform custom analysis, and unnecessarily calls for the review, compilation and/or production of a voluminous number of documents that are either irrelevant or of questionable relevance and that would require a significant amount of resources at significant expense to compile and produce. In addition, Comcast objects on the ground that the question calls for information that Consolidated, as the pole owner, should already have in its possession.

Without waiving this objection, as examples, please refer to Attachment 8 of Comcast's Petition in DT 20-111 and the documents submitted herewith labeled Response to Consolidated Data Request #2.