## **AFFIDAVIT**

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Before me, the undersigned notary, on this day personally appeared Debbie Goldman, a person whose identity is known to me. After I administered an oath to her, upon her oath she stated:

"My name is Debbie Goldman. I am capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

"I am employed as a Research Economist for the Communications Workers of America. For approximately the previous six months, one of my principle duties has been to research and assess the Sprint Nextel proposed stock and asset transfer of its local wireline operations to a stand-alone entity. Sprint Nextel is seeking regulatory approval of this proposed transfer in 14 states.

"With the assistance of CWA attorneys, I have acknowledged and signed Sprint Nextel non-disclosure agreements in Pennsylvania, New Jersey, Kansas, and Tennessee. Said non-disclosure agreements have allowed me access to Sprint Nextel confidential information in each of these states. In none of these states was there any requirement that access to confidential information be limited to analysts not employed by a party to the instant action.

"All of the confidential information that has been provided to me by Sprint Nextel in Missouri has been provided in each state.

"I have prepared testimony concerning Sprint Nextel confidential information in the states of Pennsylvania and Tennessee."

Debbie Goldman, Research Economist Communications Workers of America

SWORN AND SUBSCRIBED TO BEFORE ME, the undersigned notary, on this the day of January 2006, which witness my hand and seal of office.

Notary Public in and for the District of Columbia

My Commission expires: 4 2010