

46. Please confirm that, without a refinancing, BT will need to obtain additional funds from the City cash pool in order to make the payments on the Citi Capital financing that are due in May 2010. If this cannot be confirmed, please explain fully why not, and provide the accounting and financial information and budgets showing how BT expects to make the payments on the Citi Capital financing in the absence of a refinancing.

**Response: Yes. See BT Exhibit Response DPS 3-1 and BT Exhibit Response 4-24(a).**

**Person Responsible for Response: Christopher Burns**  
**Title: General Manager**  
**Date: March 26, 2010**