

# EXHIBIT A

11/15/2005 Campbell, Constance

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
In re: Chapter 11,  
ADELPHIA COMMUNICATIONS Case No. CORPORATION, et al.,  
Debtors.

-----x  
November 15, 2005  
9:35 a.m.

Deposition of CONSTANCE CAMPBELL, pursuant  
to Notice, at the offices of Willkie, Farr &  
Gallagher, LLP, 787 Seventh Avenue, New York, New  
York, before SUZANNE PASTOR, a Shorthand Reporter  
and Notary Public within and for the State of New  
York.

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2       describing the entire Adelpia family of  
3       companies.

4                    A.       Mm-hmm.

5                    Q.       Do you understand that that company  
6       is comprised of various legal entities?

7                    A.       Yes.

8                    Q.       Are there also cost centers within  
9       the Adelpia family of companies?

10                   MR. McLAUGHLIN:  Objection to the  
11       form.

12                   A.       Can you describe what you mean by a  
13       cost center?

14                   Q.       For accounting purposes, does  
15       Adelpia use the concept of cost centers within  
16       the company?

17                   A.       Our financial system utilizes that  
18       concept, yes.

19                   Q.       Is there a direct correlation between  
20       cost center and legal entity?

21                   A.       Cost centers can be mapped to legal  
22       entities.  And are mapped to legal entities  
23       within the financial system.

24                   Q.       So there can be more than one cost  
25       center per legal entity?

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2                    A.     Yes.

3                    Q.     And would each legal entity have at  
4     least one cost center?

5                    A.     I believe so, yes.

6                    Q.     Did you have any role in determining  
7     what particular cost centers would be?

8                                    MR. McLAUGHLIN:  Objection to the  
9     form.

10                   A.     Help me out with what you're trying  
11     to get at there.  Or restate it for me.

12                   Q.     Sure.  You said that the Adelp<sup>h</sup>ia  
13     accounting or financial systems do use the  
14     concept of cost centers.  Did you play any role  
15     in determining what would constitute certain cost  
16     centers?

17                   A.     The cost centers in large part are  
18     representative of historic situations in terms of  
19     where management -- how management was  
20     organized.  So many of the cost centers have been  
21     there for quite a while.  Certainly preceding my  
22     involvement with Adelp<sup>h</sup>ia.

23                                    As we have organized the company, we  
24     have set up additional cost centers to  
25     accommodate bucketing results in the way we

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2       wished to follow them in terms of the way the  
3       management is structured. For instance, there  
4       was no organization that was constituted the way  
5       mine is, so we created a cost center for my  
6       organization that will track the results so that  
7       I can be measured against my budgeted expenses.

8                                   So cost centers in reality are really  
9       a combination of historical actions and more  
10      recent ones in terms of the way the company is  
11      organized.

12                   Q.     Are certain cost allocated among more  
13      than one cost center?

14                   MR. McLAUGHLIN:  Objection to the  
15      form.

16                   A.     Can you restate that for me?

17                   Q.     Sure.  Are there costs that are borne  
18      by the Adelpia family of companies that are  
19      allocated among more than one cost center within  
20      that family?

21                   A.     Yes, certainly.

22                   MR. TRUITT:  Let me mark as Campbell  
23      Exhibit 1 a multipage document which bears the  
24      number on every page of SBD 00023243 and is  
25      captioned on the first page "Adelpia

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2            Communications corporate departments and shared  
3            service presentation, November 2nd, 2004."

4                                    (Campbell Exhibit 1 for  
5            identification, Adelphia Communications Corporate  
6            Departments and Shared Service Presentation,  
7            November 2, 2004.)

8                    Q.     If you'd take a minute to flip  
9            through that document.

10                                   Have you seen Campbell Exhibit 1  
11           before?

12                   A.     Yes, I have. My organization  
13           prepared this document.

14                   Q.     Did you personally have a role in  
15           preparing it?

16                   A.     Yes.

17                   Q.     And what was that?

18                   A.     I reviewed it. Tony Naes, his  
19           organization prepared the bulk of it. I reviewed  
20           it.

21                   Q.     And why was this prepared?

22                   A.     This was prepared as part of the due  
23           diligence effort. Adelphia is a very centralized  
24           company in terms of the way it runs its  
25           organization compared to many cable companies.

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2       And we needed to provide a view to the various  
3       bidders, particularly if they were bidding for a  
4       cluster, they needed to understand that as they  
5       looked at the assets that were locally in place  
6       in a various geography, that there were many  
7       centralized services that were being provided  
8       elsewhere and were not part of that local  
9       geography.

10                                So we put this presentation together  
11       to give all of the bidders, whether they were  
12       looking at a cluster or the whole company, a few  
13       of those shared services.

14                Q.       So this is a document that was  
15       provided to bidders?

16                A.       The initial use of this was actually  
17       a webcast, which I believe was done on  
18       November 2nd, and then there were various -- that  
19       was a one-way webcast that was Tony Naes and  
20       myself providing and walking through this  
21       document and providing some additional  
22       information on it. Then bidders were allowed to  
23       sign up for one-on-one conversations.

24                                The last page alludes to the specific  
25       dates, November 3rd and 4th, although I think

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2           A.     That's correct.

3           Q.     Does Adelphia currently use a  
4 centralized cash management system?

5           A.     Yes.

6           Q.     Are you aware of one of the Adelphia  
7 entities known as Adelphia Cablevision LLC?

8           A.     Yes.

9           Q.     That's commonly referred to as the  
10 Bank of Adelphia?

11          A.     I understand that name, yes.

12          Q.     Does it have a role in the  
13 centralized cash management system at Adelphia?

14          A.     The centralized cash management  
15 system provides for cash to be managed on a  
16 centralized basis so that we sweep the daily cash  
17 balances in all of our various depository banks  
18 so that we're optimizing the use of the cash.  
19 All of that cash is swept to a centralized bank  
20 account which is under the name of Adelphia  
21 Cablevision LLC, or the Bank of Adelphia. And  
22 any expenditures that are made are made out of  
23 that and then either directly assigned or  
24 allocated down to the various cost centers.

25          Q.     And did Adelphia use that centralized

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2       cash management system prior to the Chapter 11  
3       filing?

4                   MR. McLAUGHLIN:  Objection to the  
5       form.  You can answer if you know.

6                   A.     I am not familiar with the cash  
7       management system that they utilized.  I do know  
8       they did not have the kind of systematic  
9       record-keeping that we do today.  We have a  
10      treasury workstation that we installed in 2003  
11      called Selkirk, which is a very recognized brand  
12      name for treasury cash management systems.  I'm  
13      not familiar with their exact method of operating  
14      on the cash management function prior to when I  
15      came in 2003.

16                  Q.     Other than the exact workings of that  
17      system, do you know if there was a centralized  
18      cash management system?

19                  A.     My understanding is that they had a  
20      centralized cash, I would not call it a system  
21      because they did not have the record-keeping to  
22      be able to deal with this many entities and this  
23      many bank accounts without a systematic  
24      record-keeping capacity.

25                  Q.     Thank you, Ms. Campbell.  I have no

1 light of the centralized cash management  
2 system?

3 A. No. In my opinion, the intercompany accounts  
4 were a product of the centralized cash  
5 management system.

6 Q. Do you recall, in the post-petition period,  
7 being interviewed or have information or other  
8 input requested from you regarding whether or  
9 not it was appropriate to re-point pre-petition  
10 intercompany accounts through the Bank of  
11 Adelphia? Do you know what I mean by that?

12 A. I'm not sure I do.

13 Q. All right. If you look at -- that's why I put  
14 out Chambers 4.

15 If you look at the first paragraph in  
16 your e-mail to Scott Macdonald.

17 A. Okay.

18 Q. The third sentence says -- well, actually, it's  
19 not. It's under the heading 2 period.  
20 Providing a method in which we can continue to  
21 utilize this tax structure and still be  
22 consistent with our new IC methodology.

23 What did you mean by the new IC  
24 methodology?

25 A. I believe the new IC methodology was just that,