

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF  
IAT COMMUNICATIONS, INC., d.b.a.  
NTCH-IDAHO, INC. OR CLEAR TALK  
FOR DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER

Case No. GNR-T-03-08

IN THE MATTER OF THE APPLICATION  
OF NPCR, INC. d.b.a. NEXTEL PARTNERS  
SEEKING DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS  
CARRIER

Case No. GNR-T-03-16

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**DIRECT TESTIMONY OF LARRY CURRY ON BEHALF OF  
IAT COMMUNICATIONS, INC. DBA CLEAR TALK**

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**DIRECT TESTIMONY OF LARRY CURRY**

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**I. IDENTIFICATION OF WITNESS, FACTUAL BACKGROUND, AND PURPOSE OF TESTIMONY**

**Q. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT, AND BUSINESS ADDRESS.**

A. My name is Larry Curry. I am a director of IAT Communications, Inc., a Delaware corporation, and the president and general manager of NTCH-Idaho, Inc., an Idaho corporation, collectively doing business as Clear Talk (“Clear Talk”). Clear Talk’s offices are located at 233 N. Main Street, Pocatello, Idaho, 83204. I live and work in Pocatello, Idaho.

**Q. WHAT ARE YOUR RESONSIBILITIES WITHIN CLEAR TALK?**

A. My primary responsibilities are to oversee Clear Talk’s operations in Idaho. I was responsible for the design and buildout of Clear Talk’s wireless network in Idaho. I have also supervised the design and buildout of wireless networks in several other states. In my capacity as president and general manager of NTCH-Idaho, I have substantial knowledge about the products and services offered by Clear Talk, as well as Clear Talk’s network and business operations. I have substantial knowledge about the service offerings Clear Talk offers in Idaho, including their features, pricing, and services.

**Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.**

A. I have been employed by NTCH-Idaho, Inc. since 2000 when I was hired as general manager. Prior to my present employment I was Pre-Development Manager for NTCH, Inc. in Eureka, California. Prior to that, I was a commercial construction project manager for an excavation company and a construction superintendent for a construction company. I have also been

1 licensed in Oregon as a general contractor and was self-employed in that  
2 capacity for eleven years.

3 **Q. DOES CLEAR TALK CURRENTLY PROVIDE**  
4 **TELECOMMUNICATIONS SERVICE IN IDAHO?**

5  
6 A. Clear Talk currently provides mobile wireless service (also known as  
7 “Commercial Mobile Radio Service,” “CMRS,” “Personal Communication  
8 Services” or “PCS”) in Idaho, as shown on the maps submitted with its  
9 Petition for ETC Designation (the “Application”).

10 **Q. TURNING TO THE MATTER OF UNIVERSAL SERVICE, DOES**  
11 **CLEAR TALK CURRENTLY CONTRIBUTE TO THE FUNDING**  
12 **FOR UNIVERSAL SERVICE?**

13  
14 A. Yes. Clear Talk submits quarterly reports to the Universal Service  
15 Administration Company. Clear Talk also contributes to the Idaho  
16 Telecommunications Service Assistance Program (“ITSAP”) on a quarterly  
17 basis.

18 **Q. IS THE COMPANY PRESENTLY ABLE TO DRAW FROM THE**  
19 **FEDERAL UNIVERSAL SERVICE FUND FOR THE PROVISION**  
20 **OF THE SUPPORTED SERVICES IN IDAHO?**

21  
22 A. No. Until Clear Talk is designated as an ETC in the requested service areas  
23 within Clear Talk’s FCC-licensed boundaries, Clear Talk is not able to draw  
24 from the federal universal service fund for those areas. Without access to  
25 universal service funding, a competitive carrier like Clear Talk can be limited  
26 in its ability to provide a competitive telecommunications service to  
27 consumers, especially in high-cost areas such as those served by rural  
28 telephone companies in Idaho.

1 Q. DID CLEAR TALK FILE AN APPLICATION FOR DESIGNATION  
2 AS AN ETC IN THE STATE OF IDAHO?  
3

4 A. Yes. Clear Talk's Application in this proceeding was filed with the Idaho  
5 Public Utilities Commission on February 3, 2003.

6 Q. HAS CLEAR TALK PREVIOUSLY BEEN DESIGNATED AS AN ETC  
7 IN IDAHO?

8 A. This Application is Clear Talk's first application for ETC designation in  
9 Idaho. In connection with this Application, Clear Talk has already been  
10 designated as an ETC in certain exchange areas in Idaho.<sup>1</sup>

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12 A. The purpose of my testimony is to describe how Clear Talk provides the  
13 supported services in Idaho, to identify Clear Talk's plans for providing  
14 universal service offerings within the state of Idaho in compliance with the  
15 statutory ETC criteria, and to show how the designation of Clear Talk as an  
16 ETC in the proposed exchange areas and/or wirecenters is in the public  
17 interest.  
18

19 Q. WHY IS CLEAR TALK SEEKING DESIGNATION AS AN ETC?

20 A. Clear Talk is not eligible for universal service support unless and until it is  
21 designated as an ETC by the Commission. Clear Talk wants to continue to  
22 expand and enhance its service in Idaho and to try to bring high-quality  
23 telecommunications services at the lowest possible prices to Idaho  
24 consumers.

25 Q. IS IT CLEAR TALK'S INTENT TO OBTAIN UNIVERSAL SERVICE  
26 SUPPORT FOR THE PROVISION OF TELECOMMUNICATIONS  
27 SERVICES TO THE PUBLIC?

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<sup>1</sup> Idaho Public Utilities Commission, Order No. 29261, dated June 10, 2003, Docket No. GNR-T-03-8.

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A. Yes.

**II. DESCRIPTION OF CLEAR TALK'S SERVICE**

**Q. IN WHAT AREAS IS CLEAR TALK SEEKING DESIGNATION AS AN ETC?**

A. Clear Talk is seeking designation as an ETC in certain exchange areas and/or wirecenters within the FCC-defined Basic Trading Areas Nos. 451 (Twin Falls), 202 (Idaho Falls), and 353 (Pocatello), which cover a substantial portion of southeast Idaho and for which Clear Talk has been granted a license in Idaho. A list of Clear Talk's proposed designated service areas is attached as Exhibit A to this testimony.

**Q. UNDER THE TELECOMMUNICATIONS ACT OF 1996, WHAT ARE THE PREREQUISITES FOR DESIGNATION AS AN ETC?**

A. I am informed that a telecommunications carrier, including wireless carriers such as Clear Talk, are eligible for ETC designation if the carrier is: (1) is a common carrier; (2) will offer the supported services; (3) will advertise the availability of the supported services; and (4) will make the supported services available throughout a designated service area.

**Q. WHAT ARE THE SUPPORTED SERVICES THAT MUST BE OFFERED BY CLEAR TALK IN CONNECTION WITH ETC DESIGNATION?**

A. I am informed that Clear Talk must offer the following services as a condition of any ETC designation:

1. voice-grade access to the public switched network;
2. local usage;
3. dual tone multi-frequency signaling or its functional equivalent;

- 1 4. single-party service or its functional equivalent;
- 2 5. access to emergency services;
- 3 6. access to operator services;
- 4 7. access to interexchange services;
- 5 8. access to directory assistance; and
- 6 9. toll limitation for qualifying low-income consumers.

7 47 C.F.R. § 54.101(a).

8 **Q. COULD YOU EXPLAIN EACH OF THE SUPPORTED SERVICES**  
9 **AND HOW CLEAR TALK PROVIDES THESE SERVICES?**

10  
11 A. Yes. Clear Talk currently offers and is able to provide its Idaho customers  
12 those services and functionalities within its designated service areas.

13 a. Voice-grade access to the public switched telephone network. Clear  
14 Talk meets this requirement of providing voice-grade access to the public  
15 switched network. Through its interconnection arrangement Qwest, all  
16 customers of Clear Talk are able to make and receive calls on the public  
17 switched network within the specified bandwidth.

18 b. Local usage. Clear Talk will comply with any and all minimum local  
19 usage requirements adopted by the FCC, and any applicable minimum local  
20 usage requirements adopted by the Commission.

21 c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional  
22 equivalent. Clear Talk currently uses out-of-band digital signaling and in-  
23 band multi-frequency (“MF”) signaling that is functionally equivalent to  
24 DTMF signaling. Clear Talk therefore meets the requirement to provide  
25 DTMF signaling or its functional equivalent.

- 1           d.     Single-party service or its functional equivalent. “Single-party  
2           service” means that only one party will be served by a subscriber loop or  
3           access line, in contrast to a multi-party line. Clear Talk meets this  
4           requirement by providing a dedicated message path for the length of all  
5           customer calls.
- 6           e.     Access to emergency services. Clear Talk presently provides E911  
7           service to its subscribers and is currently working with PSAPs within its  
8           designated universal service areas to make Phase 11 E911 service available.
- 9           f.     Access to operator services. Clear Talk meets this requirement by  
10          providing all of its customers with access to operator services provided by  
11          either Clear Talk or other entities (e.g. LECs, IXCs, etc.).
- 12          g.     Access to interexchange service. Clear Talk presently meets this  
13          requirement by providing all of its customers with the ability to make and  
14          receive interexchange or toll calls through direct interconnection  
15          arrangements Clear Talk has with several interexchange carriers (IXCs).  
16          Additionally, customers are able to reach their IXC of choice by dialing the  
17          appropriate access code.
- 18          h.     Access to directory assistance. Clear Talk meets this requirement by  
19          providing all of its customers with access to directory assistance by dialing  
20          “411” or “555-1212.”
- 21          i.     Toll limitation for qualifying low-income consumers. Upon  
22          designation an ETC, Clear Talk will participate in Lifeline and other lower-  
23          income programs, as required, and will provide toll blocking in satisfaction of  
24          federal requirements. Clear Talk currently provides toll-blocking services, at

1 no charge, for international calls and customer selected toll calls. Clear Talk  
2 can and will utilize the same toll blocking technology to provide this service  
3 to its Lifeline and other lower-income customers, at no charge, as part of its  
4 universal service offerings once designated as an ETC.

5 **Q. HOW WILL CLEAR TALK COMBINE THE SUPPORTED**  
6 **SERVICES INTO A UNIVERSAL SERVICE OFFERING?**

7  
8 A. Clear Talk will deliver the supported services to consumers using the same  
9 antennae, cell sites, towers, trunk lines, mobile switching center, and  
10 interconnection facilities used for its existing PCS service. Clear Talk also  
11 regularly deploys additional cell sites, as necessary, to maximize signal  
12 coverage and service availability. In order to meet service requests  
13 throughout of the entirety of designated exchange areas and/or wirecenters,  
14 Clear Talk may contract, as needed, to use the facilities of other facilities-  
15 based carriers, as allowed by federal law.

16 Clear Talk intends to offer the supported services to universal service  
17 customers in a basic universal service offering, using Clear Talk's PCS  
18 network in conjunction with fixed wireless local loop equipment. Clear  
19 Talk's BUS can be offered and provided without any changes to Clear Talk's  
20 existing network.

21 **Q. WHAT IS WIRELESS LOCAL LOOP SERVICE?**

22  
23 A. A wireless local loop involves the use of a wireless access unit at a  
24 customer's location to transmit the signal to the nearest cell site. The wireless  
25 access unit is a piece of equipment that serves as the interface to the Clear  
26 Talk network over the CMRS spectrum in the same manner as a conventional

1 PCS handset. A wireless access unit is typically a desk unit that is more  
2 powerful than a conventional handset and simulates dial-tone.

3 **Q. HOW IS WIRELESS LOCAL LOOP SERVICE DIFFERENT FROM**  
4 **CONVENTIONAL PCS SERVICE?**

5  
6 A. The network cannot distinguish wireless local loop equipment and mobile  
7 handset equipment. The only difference is in the capabilities of the  
8 customer's transmitter/receiver, and the wireless local loop provides stronger  
9 transmitting/receiving capabilities than a mobile handset. However, although  
10 wireless local loop technology is identical to conventional PCS service, it is  
11 generally marketed more as a residence-based service that competes with  
12 landline service offerings. Clear Talk's advertising materials and customer  
13 service agreement would reflect this difference accordingly.

14 **Q. HOW DOES WIRELESS LOCAL LOOP SERVICE GIVE CLEAR**  
15 **TALK AN ADVANTAGE AS IT PROVIDES UNIVERSAL**  
16 **SERVICES?**

17  
18 A. There are spots within Clear Talk's coverage area where a conventional PCS  
19 customer may not have strong signal coverage. In those areas, the wireless  
20 local loop technology offering might be more appropriate for the customer  
21 because the wireless access unit is typically more powerful than a  
22 conventional handset and reception is greatly improved. This offering gives  
23 Clear Talk another option as it seeks to meet requests for universal services  
24 within its designated ETC service areas. At the same time, Clear Talk is able  
25 to provide all of its customers with a larger "local" calling area than a  
26 landline carrier, so that a Clear Talk universal service customer will likely  
27 incur fewer toll calls.

1       **Q.    WHAT OTHER MEANS CAN CLEAR TALK EMPLOY TO MEET**  
2       **REQUESTS FOR SERVICE?**  
3  
4       A.    I am informed that the FCC has determined that an ETC must be given an  
5           opportunity to expand its network, over time, to meet reasonable requests for  
6           service. Clear Talk accepts that obligation, and fully expects that as its  
7           network expands over time, it will be able to meet all such requests. If Clear  
8           Talk receives a request for service in an area outside its existing PCS signal  
9           coverage, there are numerous ways for Clear Talk to provide service. A  
10          technician can install a high-gain antenna at the location, or the power at an  
11          existing cell site can be turned up or redirected, or antennae can be adjusted  
12          (e.g., azimuth and downtilt), or microwave equipment can be installed, or  
13          new cell sites can be built, or Clear Talk can, if necessary, contract for the use  
14          of another carrier's facilities. Through one or more of these options, Clear  
15          Talk will be able to meet requests for service throughout the entirety of its  
16          designated ETC service areas, either using its own facilities or through  
17          combination of its own facilities and resale of another carrier's facilities.

18

19                                   **III.    ADVERTISING OF CLEAR TALK SERVICE**

20

21       **Q.    WILL CLEAR TALK ADVERTISE THE AVAILABILITY OF THE**  
22       **SUPPORTED SERVICES?**

23

24       A.    Clear Talk currently advertises its wireless services through several different  
25           media, including newspaper, television, radio, and billboard advertising.  
26           Clear Talk also maintains various retail store locations throughout its  
27           authorized service areas, which provide an additional source of advertising.

1 Clear Talk's current advertising includes publications targeted to the general  
2 residential market. Clear Talk will use the same media of general distribution  
3 that it currently employs to advertise its universal service offerings  
4 throughout the service areas designated by the Commission. Clear Talk will  
5 also comply with all form and content requirements that apply to ETCs.

6  
7 **IV. SERVICE AREAS IN WHICH CLEAR TALK SEEKS ETC**  
8 **DESIGNATION**

9  
10  
11 **Q. FOR WHAT SERVICE AREAS IS CLEAR TALK SEEKING ETC**  
12 **DESIGNATION?**

13  
14 A. At this time, Clear Talk seeks designation as an ETC in certain  
15 exchange areas and/or wirecenters (as set forth in Exhibit A) that fall within  
16 the boundaries of Clear Talk's FCC licenses. Exhibit A is a listing of the  
17 specific exchange areas and/or wirecenters in which Clear Talk is seeking  
18 ETC designation. Clear Talk is committed to making the supported services  
19 available to consumers within its designated service areas, using its own  
20 facilities and/or a combination of its own facilities and those of other  
21 facilities-based carriers, as necessary.

22 **Q. IS CLEAR TALK SEEKING ETC DESIGNATION IN EACH**  
23 **AREACONTAINED WITHIN ITS AUTHORIZED PCS LICENSED**  
24 **AREA?**

25  
26 A. Yes. Clear Talk has reviewed and analyzed its PCS license areas and its  
27 existing signal coverage. Using publicly available mapping software and  
28 Clear Talk's own radio frequency signal propagation information (i.e.,  
29 coverage), Clear Talk determined the extent to which each exchange and/or

1 wirecenter within its PCS-licensed area is currently covered, and where  
2 coverage could be extended if necessary to respond to a request for service.

3

4 **Q. WHERE CLEAR TALK'S FCC-LICENSED BOUNDARIES DO NOT**  
5 **APPEAR TO EXTEND OVER AN ENTIRE WIRECENTER, DOES**  
6 **THE COMPANY REQUEST DESIGNATION AS AN ETC IN ONLY**  
7 **PART OF THE WIRECENTER?**

8

9 A. Yes. Clear Talk requests that the Commission designate Clear Talk as an  
10 ETC throughout the entirety of Clear Talk's FCC-licensed boundaries in  
11 Idaho, including any partial wirecenters, insofar as Clear Talk is committed to  
12 responding to service requests throughout any service areas in which Clear  
13 Talk obtains ETC designation.

14

15

#### V. PUBLIC INTEREST

16 **Q. IS THE DESIGNATION OF CLEAR TALK AS AN ADDITIONAL**  
17 **ETC IN THE PUBLIC INTEREST?**

18

19 A. Yes. Designating Clear Talk as an ETC in Idaho will bring competition to  
20 rural, high-cost areas, and competition is in the public interest. One of the  
21 underlying purposes of the Telecommunications regulations is to promote  
22 competition and reduce regulation in order to secure lower prices and higher  
23 quality services for telecommunications consumers and encourage the rapid  
24 deployment of new telecommunications technologies." I am informed that the  
25 applicable statutory public interest standards emphasize competition and  
26 consumer benefits-- not incumbent protection.

27

28

Failure to designate Clear Talk as an ETC would deprive consumers  
of the benefits of competition, including increased choices, higher quality

1 service, and lower rates. Rural consumers should be allowed to choose  
2 services from a carrier that best meets the consumer's communications needs.  
3 Absent a choice of service providers, the consumer is unable to make a  
4 selection based upon service quality, service availability, or service rates.  
5 The incumbent provider has little or no incentive to introduce new, innovative  
6 or advanced service offerings. Competition promises to bring new and  
7 beneficial services to rural consumers in Idaho, at competitive prices.

8 Clear Talk will offer universal services to rural consumers, as well as  
9 services not currently provided by the landline LEC. For example, Clear Talk  
10 may provide an expanded local calling area, which will benefit rural  
11 consumers who currently pay toll charges to reach family, friends,  
12 government offices, health care providers, and businesses located outside of a  
13 landline's restricted local calling area.

14 In addition to increased choices, Idaho rural consumers may also  
15 experience lower rates. When compared side-by-side with other ETCs'  
16 universal offerings, the rates for Clear Talk's BUS will be comparable to, if  
17 not less than, the local service rates charged by the incumbent LEC, and Clear  
18 Talk will provide equivalent – or better – services and features. Otherwise,  
19 Clear Talk will not likely attract any customers. Likewise, Clear Talk's  
20 service quality will need to meet or exceed the quality of services provided by  
21 the incumbent LEC in order for Clear Talk to obtain – and retain --  
22 customers. Designating Clear Talk as an ETC will also further the  
23 deployment of Clear Talk's facilities-based network in Idaho.

1                   If the Commission establishes a competitive universal service system,  
2 rural consumers will be better able to keep pace with, and quite possibly  
3 outpace, urban consumers in terms of the availability – and price -- of  
4 telecommunications services. Clear Talk stands ready, willing and able to  
5 bring competition to consumers in Idaho, which will result in better consumer  
6 pricing, better service quality, immediate service availability, and better  
7 customer service. The increased choices for rural consumers will advance  
8 universal service.

9       **Q.    DOES THIS CONCLUDE YOUR TESTIMONY?**

10  
11  
12

A.    Yes.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IAT COMMUNICATIONS, INC., d.b.a.  
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SEEKING DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS  
CARRIER

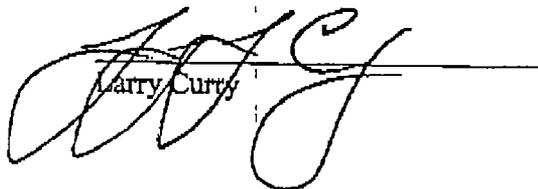
Case No. GNR-T-03-16

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AFFIDAVIT OF LARRY CURRY

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I HAVE READ the foregoing DIRECT TESTIMONY OF LARRY CURRY ON  
BEHALF OF IAT COMMUNICATIONS, INC. DBA CLEAR TALK and I swear under  
penalty of perjury under the laws of the State of Idaho and the United States of America  
that the statements contained therein are true and correct to the best of my knowledge,  
information and belief.

  
Larry Curry

CLEAR TALK COVERAGE AREA -- Idaho Exchanges and Wire Centers

Idaho PUC Docket No. GNR-T-03-8

EXHIBIT 1 TO CLEAR TALK DIRECT TESTIMONY

<u>Company</u>	<u>City</u>	<u>County</u>	<u>Wire Center Code</u>	<u>Exchange</u>
Qwest Communications/RBOC	American Falls	Power	AMFLIDMARS1	American Falls
	Blackfoot	Bingham	BLFTIDMADS0	Blackfoot
(Note: Pursuant to PUC Order No. 29261, dated 6/10/2003, Clear Talk was designated as an Eligible Telecommunications Carrier in these Listed Qwest Exchange Areas)	Bliss	Gooding	BLSSIDMARS1	Bliss
	Buhl	Twin Falls	BUHLIDMARS1	Buhl
	Burley	Cassia	BRLYIDMADS0	Burley
	Firth	Bingham	FRTHIDMARS1	Shelley
	Fort Hall	Bingham	RVSDIDMARS1	Pocatello
	Gooding	Gooding	GDNGIDMARS1	Gooding
	Idaho Falls	Bonneville	IDFLIDMADS1	Idaho Falls
	Inkom	Bannock	INKMIDMARS1	Pocatello
	Jerome	Jerome	JERMIDNMDS0	Jerome
	Kimberly	Twin Falls	KMBRIDMARS1	Kimberly
	Lava Hot Springs	Bannock	LHSPIDMARS1	Lava Hot Springs
	McCammon	Bannock	MCCMIDMARS1	McCammon
	Pocatello	Bannock	PCTLIDMADS1	Pocatello
	Rexburg	Madison	RXBGIDMADS0	Rexburg
	Rigby	Madison	RGBYIDMARS1	Rigby
	Shelley	Bonneville	SHLYIDMARS1	Shelley
	Twin Falls	Twin Falls	TWFLIDMADS0	Twin Falls
	Ucon	Bonneville	RGBYIDMARS1	Idaho Falls
	Wendell	Gooding	WNDLIDMARS1	Wendell
Fremont Telecom	Ashton	Fremont	ASTNIDMARS0	Ashton
	Chester	Fremont	STATIDMADS0	St. Anthony
	StAnthony	Fremont	STATIDMADS0	St. Anthony
Project Mutual	Heyburn	Minidoka	HYBNIDO1RSO	Qwest/Burley
	Paul	Minidoka	PAULIDXCRS0	Paul
	Rupert	Minidoka	RPRTIDXCDS0	Rupert
Citizen Telecom of ID	Aberdeen	Power	ABRDIDXCDS0	Aberdeen

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of September, 2003, I caused a true and correct copy of the foregoing **DIRECT TESTIMONY OF LARRY CURRY ON BEHALF OF CLEAR TALK** to be served by the method indicated below, and addressed to the following:

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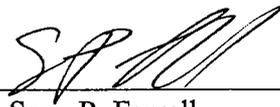
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