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IDAHO PUBLIC
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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

DIRECT TESTIMONY OF

LANCE A. TADE

ON BEHALF OF

CITIZENS TELECOMMUNICATIONS COMPANY OF IDAHO

1 **Q. Please state your name, business address, and position with Citizens**
2 **Telecommunications Company of Idaho (“CTC-Idaho”).**

3 A. My name is Lance A. Tade. My business address is 4 Triad Center, Suite 200, Salt
4 Lake City, Utah, 84180.

5 **Q. Please describe your current duties and responsibilities.**

6 A. My responsibilities include the management of regulatory and government affairs for
7 CTC-Idaho. I am responsible for the implementation of all regulatory policies,
8 oversight of all regulatory activities including CTC-Idaho’s intrastate rates and tariffs,
9 and the management of state regulatory and legislative proceedings and relations. I
10 have similar responsibilities for Citizens’ affiliates operating in Montana, North
11 Dakota and Washington.

12 **Q. Please describe your educational background.**

13 A. I have a bachelors of science degree in Business Administration from San Diego State
14 University. I also hold a certificate as a Certified Public Accountant in the State of
15 Washington.

16 **Q. Please describe your work experience in the telecommunications industry.**

17 A. Prior to my current position, I served as Staff Manager - Regulatory Accounting with
18 GTE from 1991 to 1994 in Irving, Texas. In that capacity, I was responsible for the
19 coordination, development and analysis of financial justification of revenue
20 requirement, minimum filing requirements and testimony associated with state
21 regulatory commission filings. Other telecommunications experience includes various

1 positions held with Contel, including: Customer Services Supervisor in Lynden,
2 Washington (1989-1991); Finance Manager in Bellevue, Washington (1988-1989);
3 and Supervisor - Budgets in Bellevue, Washington (1982-1988).

4 **Q. What is the purpose of your testimony?**

5 A. The purpose of my testimony is to express concerns about both Clear Talk's and
6 Nextel's request for designation as an Eligible Telecommunications Carrier ("ETC").

7 **Q. Please summarize your concerns.**

8 A. Clear Talk and Nextel are individually requesting the Commission designate them as
9 eligible to receive all available support from the federal Universal Service Fund
10 ("USF"). Before designating Clear Talk, Nextel or any other company as a
11 competitive ETC ("CETC") in the service territories of rural incumbent local
12 exchange carriers such as CTC-Idaho, the Commission must find that (a) requesting
13 company will provide the basic services as described by the Federal Communications
14 Commission ("FCC") throughout the area for which it will be designated as an ETC,
15 and (b) granting the requesting company ETC status is in the public interest. 47
16 C.F.R. § 54.201(c)-(d).

17 As the Commission considers Clear Talk's and Nextel's request to be designated as
18 ETCs, there are at least three important points it should consider:

- 19 1. Whether to modify CTC-Idaho's study area to accommodate requests of Clear
20 Talk and Nextel. Neither company is requesting ETC designation throughout
21 CTC-Idaho's service territory in Idaho. Clear Talk is only seeking to serve a
22 portion on one of CTC-Idaho's exchanges. CTC-Idaho is concerned that granting

1 secondary ETC status only over a portion of its study area fosters asymmetric
2 regulation. Asymmetric regulation is harmful because it distorts the competitive
3 process. This Commission should endorse the principle of competitive parity and
4 require both Clear Talk and Nextel to undertake the obligations of an ETC
5 throughout the whole of CTC-Idaho's study area.

6 2. Whether Clear Talk's and Nextel's intended use of federal funding is consistent
7 with the purpose of USF support. In compliance with the principle of competitive
8 parity, this Commission should ensure that both Clear Talk and Nextel are subject
9 to the same minimum requirements for unlimited free local usage that it has
10 applied to CTC-Idaho and other rural LECs in Idaho.

11 3. Whether Clear Talk and/or Nextel have demonstrated that it is in the public
12 interest for it to be designated as an ETC. Granting multiple carriers ETC
13 designation in the same geographic area imposes costs in addition to producing
14 benefits. The public interest is not served unless the benefits from supporting
15 multiple ETCs outweigh the costs of supporting multiple networks.

16 STUDY AREA CONCERNS

17 **Q. Why must the commission consider whether to modify CTC-Idaho's study area?**

18 A. Neither applicant is seeking ETC designation throughout CTC-Idaho's entire study
19 area. Clear Talk is seeking ETC designation for only a portion of the Aberdeen
20 exchange, which is one of eighteen exchanges that comprise CTC-Idaho's study area.
21 Nextel, on the other hand, is not proposing to assume the obligations of an ETC on
22 those portions of CTC-Idaho's study area consisting of the following exchanges:

23 Cascade (382)

24 Horseshoe Bend (793)

25 Riggins (628)

26 Fairfield (764)

27 Whitebird (839)

28 Elk City (983)

1 **Q. What is meant by the term “study area”?**

2 A. A study area is a geographic segment of an incumbent local exchange carrier’s
3 (“ILEC”) telephone operations. Generally, a study area corresponds to an ILEC’s
4 entire service territory within a state. Thus, ILECs operating in more than one state
5 typically have one study area for each state, and ILECs operating in a single state
6 typically have a single study area. Study area boundaries are important because
7 ILECs perform jurisdictional separations, determine high cost loop support amounts,
8 and generally tariff their rates at the study area level.

9 **Q. Please describe CTC-Idaho’s study area.**

10 A. CTC-Idaho’s study area consists of eighteen exchanges defined in CTC-Idaho’s
11 General Exchange Tariff on file with the Idaho Public Utilities Commission
12 (“Commission”). The eighteen exchanges in CTC-Idaho’s study area are the
13 following: Aberdeen, Carey, Cascade, Donnelly, Elk City, Fairfield, Garden Valley,
14 Homedale, Horseshoe Bend, McCall, Marsing, New Meadows, Parma, Riggins,
15 Springfield, Sweet, White Bird and Wilder.

16 **Q. What is the significance of CTC-Idaho’s service area insofar as this proceeding is**
17 **concerned?**

18 A. In the context of ETC issues, the term “service area” describes the geographic area
19 which a state commission assigns to an ETC for purposes of determining universal
20 service obligations and support mechanisms. 47 C.F.R. § 54.207(a). An ETC must
21 provide the elements of basic service, as defined by the FCC, throughout that “service

1 area.” By Order No. 27273, dated December 1997, the Idaho Public Utilities
2 Commission designated CTC-Idaho an ETC in Case No. CTC-T-97-6.

3 The Telecommunications Act of 1996 specifies that for rural LECs the ETC “service
4 area” means that company’s “study area” unless and until the FCC and the state
5 regulatory commission establish a different “service area.” Section 214(e)(5) states
6 explicitly: “In the case of an area served by a rural telephone company, ‘service area’
7 means such company’s ‘study area’ unless and until the [FCC] and the States, after taking
8 into account recommendations from a Federal-State Joint Board instituted under section
9 410(c), establish a different definition of service area for such company.” Thus, for most
10 rural LECs including CTC-Idaho, the ETC “service area” and “study area” are identical.
11 If a competitive carrier like Clear Talk or Nextel seeks to be an ETC in the territory
12 served by a rural LEC, the competitive carrier’s ETC “service area” must be the same as
13 the rural LEC’s; that is, the competitive ETC’s service must coincide with the rural
14 LEC’s study area, unless the rural LEC’s study area is redefined by the FCC and a state
15 Commission.

16 **Q. What obligations does the Telecommunications Act of 1996 impose upon an ETC**
17 **within its service area?**

18 A. Pursuant to section 214(e)(1) of the Telecommunications Act of 1996, a common
19 carrier designated as an ETC must offer and advertise the services supported by the
20 federal universal service mechanisms throughout its designated service area. The FCC
21 has defined the services that are to be supported by the federal universal service

1 support mechanisms to include: (1) voice grade access to the public switched network;
2 (2) local usage; (3) Dual Tone Multifrequency (DTMF) signaling or its functional
3 equivalent; (4) single-party service or its functional equivalent; (5) access to
4 emergency services, including 911 and enhanced 911; (6) access to operator services;
5 (7) access to interexchange services; (8) access to directory assistance; and (9) toll
6 limitation for qualifying low-income customers. 47 C.F.R. § 54.101(a).

7 **Q. What are your concerns regarding the geographic extent to which Clear Talk**
8 **and Nextel propose to assume the service obligations of an ETC?**

9 A. Granting Clear Talk or Nextel ETC status over only a portion of a rural LEC's study
10 area fosters asymmetric regulation. Asymmetric regulation may be defined as the
11 practice of imposing market constraints on the incumbent firm not likewise borne by
12 its competitors. If the Commission designates secondary ETC over only a portion of a
13 rural LEC's service territory, it will be imposing asymmetric regulation on the rural
14 LEC. Specifically, designating Clear Talk or Nextel as an ETC with respect to only
15 parts of a rural LEC's service area will allow them to pick and choose the geographic
16 extent of its ETC obligations while at the same time requiring the rural LEC to
17 maintain its obligations over a wider geographic area.

18 **Q. Is asymmetric regulation harmful?**

19 A. Yes. Asymmetric regulation is harmful because it distorts the competitive process.
20 Truly effective competition can only emerge when all sellers in an industry enjoy the
21 same freedoms, bear the same responsibilities and endure the same constraints.

1 **Q. What role should regulation play in the presence of competition?**

2 A. The role of economic regulation is to substitute for competition, where competition is
3 absent. In some cases, certain public service obligations are regulatorily imposed on
4 firms (e.g., universal service and carrier-of-last-resort obligations) as an instrument to
5 effect certain social policies that may not otherwise be addressed in a competitive
6 marketplace. In any event, the pursuit of these social policies should be largely
7 transparent to the competitive process. The primary objective of regulation in a
8 competitive environment should be to foster an equal opportunity to compete among
9 market providers without pre-ordaining marketplace outcomes. In other words, this
10 Commission should endorse the principle of competitive parity. Competition can be a
11 means by which to enhance social welfare and economic efficiency in
12 telecommunications markets. Competition is not, however, an end unto itself.
13 Maximizing economic welfare is not synonymous with maximizing the absolute
14 number of competitors in telecommunications markets.

15 **Q. What is the best way for regulators to promote an equal opportunity to compete
16 among market providers?**

17 A. The most effective way to promote economic efficiency in competitive markets is to
18 allow competitive market forces to entice and discipline the behavior of firms.
19 Effective competition requires that all firms must compete on the merits of their
20 respective efficiencies. By contrast, imposing artificial restrictions on one competitor
21 but not another, such as asymmetric rules and responsibilities, can mask the relative
22 efficiencies of firms and thereby allow inefficient firms to displace efficient firms.

1 While such a circumstance may give appearances of competition, this form of rivalry
2 does not constitute effective competition. A level competitive playing field should be
3 encouraged and maintained, not by handicapping the efficient players, but by allowing
4 fair and equitable competition to sort the efficient firms from the inefficient firms.

5 **Q. How might this commission put the principle of competitive parity into practice**
6 **in this docket?**

7 A. One way in which the Commission could put the principle of competitive parity into
8 operation is to require all carriers to undertake the obligations of an ETC throughout
9 the whole of each targeted rural LEC's study area. The Commission should require
10 each carrier to submit a plan for building out its network once it receives ETC
11 designation and to demonstrate progress toward achieving its build-out plan in order to
12 retain ETC designation.

13 **Q. Are there any other concerns about these applications to become an ETC over**
14 **less than the entirety of a study area?**

15 A. Yes. Absent service area redefinition by the FCC and this Commission, neither Clear
16 Talk or Nextel can be designated as an ETC in the respective rural LEC's study area.
17 Nextel has asked this Commission to grant conditional approval of its request for ETC
18 designation pending FCC redefinition of CTC-Idaho's service area from a study area
19 to individual exchanges. Clear Talk, on the other hand, appears to be proposing that
20 CTC-Idaho's study area be disaggregated, for ETC service area purposes, to the sub-
21 exchange level. In other words, both Clear Talk and Nextel are seeking to have

1 certain of CTC-Idaho's study area disaggregated and established as separate ETC
2 service areas. Such an action will require both Commission and FCC review and
3 approval pursuant to 47 C.F.R. Section 54.207(c).

4 **Q. What is CTC-Idaho's reaction to Clear Talk's apparent proposal to disaggregate**
5 **the Aberdeen exchange to the sub-exchange level?**

6 A. CTC-Idaho is very much opposed to the sub-exchange disaggregation. Sub-exchange
7 disaggregation, would allow a competitive carrier to unfairly arbitrage the federal
8 universal support system and choose to serve only the least expensive section of an
9 exchange but to receive federal support based on exchange-wide costs. CTC-Idaho is
10 also concerned about the ongoing customer confusion and administrative burdens
11 associated with the sub-exchange disaggregation. At some point, another CMRS
12 provider may seek to be designated as an ETC in different portions of the Aberdeen
13 exchange to match its unique territory. Ultimately this will result in disaggregation
14 down to the customer specific level, which would be unworkable from a cost
15 calculation and universal service funding perspective.

16 **CONCERNS ABOUT USE OF USF SUPPORT**

17 **Q. What are your concerns with respect to applicants' intended use of federal USF**
18 **support?**

19 A. CTC-Idaho supports the goal of fostering competition. However, this Commission
20 has the responsibility to ensure that all ETCs uphold specified minimum standards of
21 service in order to further the public interest and comport with the FCC's universal

1 service principles. In particular, as required by the Telecommunications Act of 1996
2 and FCC's rules, CTC-Idaho urges the Commission to ensure that both applicants
3 provide all supported services, including local usage, as a condition of any grant of
4 ETC status. In compliance with the principle of competitive parity, this Commission
5 should ensure that Clear Talk and Nextel are subject to the same minimum
6 requirement for free local usage that the Commission has applied to CTC-Idaho and
7 other rural LECs in Idaho.

8 **Q. Please explain your concern about the amount of local usage the applicants**
9 **intend to provide.**

10 A. It's unclear how much local usage either applicant intends to provide as part of a
11 universal service offering. They both cite lack of definition provided by the FCC and
12 are apparently waiting to be told how much local usage must be included in their
13 universal service offerings. Clear Talk provides no details on its current or proposed
14 rate plans. Nextel provided its current service plans and standard customer service
15 agreement. Exhibit No. 102 of Mr. Scott Peabody's Direct Testimony sets out the
16 maximum amount of usage included in Nextel's current rate plans. According to this
17 exhibit, a National Value 300 subscriber will receive 300 "Anytime Minutes," 3200
18 "Night & Weekend Minutes" and 100 "Direct Connect" for a \$35.99 monthly
19 subscription charge. 300 "Anytime Minutes" is at best only 10 minutes per day. In
20 contrast, CTC-Idaho provides its Lifeline subscribers, unlimited local usage at a
21 monthly recurring charge of \$10.70.

1 **Q. How should this commission approach the issue of minimum local usage?**

2 A. The Commission should require the applicants to disclose the details of their proposed
3 universal service offerings, including the monthly amount of free local usage included
4 in each service plan. Without any commitment to provide a minimum level of local
5 usage, the applicants may be able to maximize universal service support payments by
6 winning many customers with nearly free monthly access, while minimizing the cost
7 of service by discouraging its use through extremely high per-minute usage charges.
8 Before granting ETC status to a secondary applicant in a rural LEC service area, the
9 Commission should consider whether related offerings of the applicants satisfy the
10 definition of “local usage” within the meaning and spirit of the Telecommunications
11 Act of 1996.

12 **PUBLIC INTEREST CONCERNS**

13 **Q. What are your public interest concerns regarding the designation of Clear Talk
14 and Nextel as ETCs within the service territories proposed in this docket?**

15 A. Granting multiple carriers ETC designation in the same geographic area imposes costs
16 in addition to producing benefits. The public interest is not served unless the benefits
17 from supporting multiple ETCs outweigh the costs of supporting multiple networks.
18 The costs of having multiple ETCs include (a) the growth in the size of the federal
19 USF needed to support multiple ETCs and (b) the consequent increase in the interstate
20 contribution factor required to finance that growth. This Commission should carefully

1 balance the expected costs against the potential benefits before designating Clear Talk
2 or Nextel as ETCs in CTC-Idaho's study area.

3 **Q. Why is growth in the size of the federal USF a concern?**

4 A. As second and subsequent ETCs enter rural LEC service territories, additional
5 demands will be placed on the federal USF causing it to grow. First, to the extent that
6 rural telephone subscribers substitute wireless for wireline services, the rural LEC's
7 costs of supplying local exchange service will rise. Customer density is the most
8 important factor in providing wireline local service, and as rural LEC access line
9 growth slows, or even reverses, the cost per line of providing wireline service will
10 increase. This increase in rural LEC cost per line will put upward pressure on the high
11 cost portion of the USF. Second, to the extent that wireline and wireless services are
12 complementary, many rural customers may subscribe to both services, again placing
13 upward pressure on the USF.

14 CTC-Idaho's primary concern is that as the size of the federal USF gets larger, the
15 interstate contribution factor needed to fund it will, everything else remaining the same,
16 increase also. The FCC has already announced that the contribution factor for the third
17 quarter of 2003 will be 9.5%. As public resistance to this surcharge escalates, political
18 pressure will mount to cap the fund. Consequently, rural LECs like CTC-Idaho may see
19 their annual USF draw decline. Such a decline may well endanger the existence of
20 affordable basic local exchange service in rural areas.

21 **Q. Have the concerns you have discussed been presented to the FCC?**

1 A. Yes. Citizens Communications and its affiliates along with various trade
2 organizations have voiced similar concerns before the FCC. The other organizations
3 voicing similar concerns include the Idaho Telephone Association (“ITA”), the
4 Independent Telephone and Telecommunications Alliance (“ITTA”), the United States
5 Telecom Association (“USTA”), the National Telecommunications Cooperative
6 Association (“NTCA”), and the Organization for the Promotion and Advancement of
7 Small Telecommunications Companies (“OPASTCO”). All have commented in CC
8 Docket No. 96-45. USTA, NTCA and OPASTCO commented in May and June of this
9 year on the FCC’s rules relating to high-cost universal service support and the ETC
10 designation process. All three organizations’ comments stressed the importance of
11 applying public interest principles when considering ETC applications for rural
12 service areas.

13 **Q. Do you have any other concerns regarding how approval of these pending**
14 **applications may adversely impact rural Idaho?**

15 A. Yes. I would like to address two other areas of concern associated with these
16 applications: inter-carrier compensation and accountability.

17 Many wireless carriers, including Clear Talk and Nextel, do not properly compensate
18 rural ILECs for wireless calls terminated on ILECs’ local networks. Thus, both Clear
19 Talk and Nextel enjoy the benefit of the ILECs’ networks without paying for the use of
20 those networks. If designated ETCs, the applicants will actually receive Federal monies

1 to use for free the networks that were constructed and paid for by the ILECs. Such a
2 result defies all reason, and is certainly contrary to the intent of the federal USF.

3 There is little or no accountability to ensure possible monies received by the applicants
4 from the federal USF would be used to construct infrastructure in rural Idaho. For
5 example, what would prevent Nextel from receiving distributions from the Federal fund
6 based on service provided to rural Idaho and using those distributions to construct
7 infrastructure in metropolitan Boise, or worse, in other states? To allow Nextel to obtain
8 Federal universal service funds without an accompanying requirement that the funding be
9 used dollar-for-dollar to construct infrastructure in rural Idaho could result in the
10 siphoning of limited resources that were designated for rural areas.

11 **Q. If the Commission agrees with the concerns expressed by CTC-Idaho in this case,**
12 **is the Commission nevertheless required to wait until the FCC acts to change**
13 **ETC procedures and rules before it takes its own action to protect the public**
14 **interest in Idaho?**

15 A. No. This Commission may deny applications of Clear Talk and Nextel on public
16 interest grounds or condition its approval as other state commissions have done. For
17 example, the Commission might attach the following conditions to its grant of ETC
18 status:

- 19 1. Require the applicants to publish and adhere to a tariff approved by the
20 Commission.
- 21 2. Applicants must file service area maps for the areas it is granted ETC status by
22 the Commission.

1 3. Applicants must provide service quality data within thirty (30) days of a request
2 by the Commission.

3 4. Applicants must respond to consumer complaints that may arise from its offering
4 as an ETC to the Consumer Assistance Section, provide a regulatory contact and
5 comply with the provisions of the IPUC's Customer Relations Rules.

6 **Q. Have other state commissions determined that it was not in the public interest to**
7 **designate a competitive ETC for an area already served by an incumbent carrier**
8 **designated as an ETC?**

9 A. Yes. The Utah Public Service Commission decided it was not in the public interest to
10 add a second ETC in the service territories of Utah's rural carriers by an order issued
11 on July 21, 2000, in Docket No. 98-2216-01. This order was subsequently upheld by
12 the Utah Supreme Court in *WWC Holding Co v. Public Service Commission* (March 5,
13 2002).

14 CONCLUSION

15 **Q. Should Clear Talk's or Nextel's requests for ETC designation be granted?**

16 A. No. Clearly, Congress had questions about whether it was wise to have competing
17 ETCs in rural areas. In fact, the Act presumes that a single ETC will be the norm for
18 areas served by rural carriers. Only in instances where the state commission is
19 convinced that the public interest is served are competing ETCs allowed.

20 CTC-Idaho believes it is not in the public interest to continue to increase the size of the
21 federal USF and corresponding contribution factor so that customers in rural, high cost
22 areas may have both a wireline and a wireless telephone in their homes and businesses.

1 Neither Clear Talk nor Nextel have affirmatively established that their ETC designation
2 is in the public interest; therefore the Commission should deny both requests.

3 **Q. Does this conclude your testimony?**

4 A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of October, 2003, I caused a true and correct copy of the foregoing **DIRECT TESTIMONY OF LANCE A. TADE ON BEHALF OF CITIZENS TELECOMMUNICATIONS COMPANY OF IDAHO** to be served by the method indicated below, and addressed to the following:

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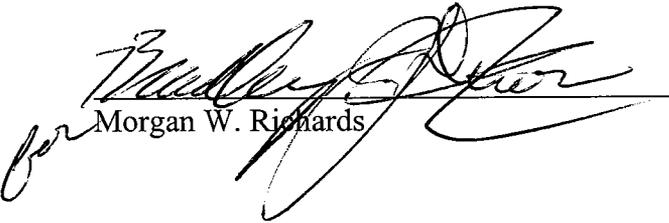
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