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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION
OF QWEST CORPORATION FOR PRICE
DEREGULATION OF BASIC LOCAL

CASE NO. QWE-T-02-25

GARY NEAL'S RESPONSE TO

Augustana College on the 29th day of May 1983 I received a Doctor of Jurisprudence Degree from

the University of Oregon on the 16th day of May 1993. I do not have any specific education or experience relevant to the wireless industry or technology. Vocationally, my credentials are as set forth in my prepared testimony. I have not authored any studies, reports, or publications relevant to the wireless industry or wireless technology but I have conducted first hand research on the internet regarding the telecommunications industry, long distance and pay phone issues and issues regarding Qwest charges. However, most of my testimony relates to my expertise in knowing what a law office requires for its communications needs..

INTERROGATORY NO. 2: Are you aware that there are multiple competing telephone companies (known as competitive local exchange carriers or "CLECs") registered in Idaho that can provide residential and small business telephone service to Neal and Uhl PLLC?

RESPONSE TO INTERROGATORY NO. 2: Gary Neal objects to this interrogatory in that it deals with an issue that is not involved in the case before this Commission. Without waiving this objection Gary Neal answers as follows: No. In fact, I did not know that Neal & Uhl, PLLC could be provided residential telephone service by any provider. There may be a CLEC that can provide business service.

INTERROGATORY NO. 3: When Neal and Uhl PLLC replaced its older telephone system in 2002, did it research or contact any CLECs to determine if Neal and Uhl PLLC could obtain its telephone service from a CLEC? If yes, please fully describe all such contacts and why Neal and Uhl PLLC opted to obtain service from Qwest. If no, please fully explain why it did not.

RESPONSE TO INTERROGATORY NO. 3: Gary Neal restates his Objection to

preferred to obtain service from Qwest, primarily as a consequence of its name recognition. Other providers considered were C.A. Affinity. That company was rejected as a consequence of customer service issues.

INTERROGATORY NO. 4: When Neal and Uhl PLLC replaced its older telephone system in 2002, did it research or contact any wireless providers to determine if Neal and Uhl PLLC could obtain all its telephone service from a wireless provider? If yes, please fully describe all such contacts and why Neal and Uhl PLLC opted to obtain wireline service from Qwest. If no, please fully explain why it did not.

RESPONSE TO INTERROGATORY NO. 4: No. In my opinion there is no wireless

considered. The primary focus related to communication issues is flexibility. This is a choice thus left to the individual attorneys or the runner. I seldom, if ever, make a long distance call over the cell phone when a wireline is available. Problems with batteries, reception, transmission, and voice quality render the Qwest wireline a superior product.

INTERROGATORY NO. 7: Do you admit that, if you were so inclined, Neal and Uhl, PLLC could publicize its cell phone numbers to the public? If you answer this other than by simply stating "admit," please fully explain your answer and identify all facts or documents supporting your answer.

RESPONSE TO INTERROGATORY NO. 7: Yes.

REOUEST FOR PRODUCTION NO. 1: Produce all documents identified in response to Interrogatory No. 7.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: No documents have been identified in response to Interrogatory No. 7.

INTERROGATORY NO. 8: Are you aware that many attorneys publicize their cell phone numbers?

RESPONSE TO INTERROGATORY NO. 8: No. My experience is just the opposite. Attorney's cell phone numbers are extremely difficult to come by.

INTERROGATORY NO. 9: Did the Commission take action against Qwest in connection with the informal complaint you mentioned on page 7 of your testimony? If yes, please fully explain such action and identify all facts and documents relating to the informal complaint. If no, please fully explain why the Commission did not take action and identify all facts and documents relating to the informal complaint.

RESPONSE TO INTERROGATORY NO. 9: I do not think the Commission took any

action against Qwest in connection with the informal complaint, which was possibly just a phone inquiry, mentioned on page 7 of my testimony. This was an issue that both the commission and Qwest had significant knowledge of. In fact, this issue appeared to be significantly similar to issues raised with the Washington Utilities and Transportation Commission (WUTC), which penalized Qwest \$30,000.00 for violating state rules that required company operators to offer consumers a quote of the rates, charges, and fees for collect calls made from pay phones within the state. It was my intent to pursue a claim against Qwest to recover my damages. However, it would appear that Qwest was protected from such suit by statute and/or rule. Further efforts to pursue this issue were deterred when I attempted to obtain additional information from Qwest. Qwest was not helpful in providing additional information. I concluded it would take too much effort to recover a relatively modest sum of money. However, Qwest's uncooperative attitude heightened my interest in everything related to Qwest activities in the state of Idaho and makes me feel less secure should Qwest local service ever become deregulated.

REQUEST FOR PRODUCTION NO. 2: Produce all documents identified in response to Interrogatory No. 9.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: All documents in my possession related to Interrogatory No. 9 are attached to my testimony. I don't know of any others.

INTERROGATORY NO. 10: Since 1994, have you exclusively used U S WEST or Qwest business wireline service at the firm(s) at which you have worked? If no, please identify those time periods during which you used other carriers.

RESPONSE TO INTERROGATORY NO. 10: I am uncertain as to which business wireline

for which I worked did have some aspect of its service provided by C.A. Affinity during the 1990's. Usually it has been US WEST or Qwest.

INTERROGATORY NO. 11: Identify all billing disputes (other than the one discussed on page 7 of your testimony) which you have had with US WEST or Qwest since 1994. For each, identify whether the dispute was resolved to your satisfaction, involved a complaint to the Public Utilities Commission and, if so, how the complaint was resolved.

RESPONSE TO INTERROGATORY NO. 11: I do not recollect any additional billing disputes with U.S. West or Qwest since 1994. I have had some issues concerning linebacker service at my personal residence as well as collect call blocking. Neal & Uhl, PLLC also had a small dispute concerning payment related to inclusion in the white pages when in fact, no listing was printed. All billing disputes have been resolved with the exception of the Zero Plus dialing issue.

INTERROGATORY NO. 12: Please explain how you came to be involved in this case. Include in your description whether you or your representative was contacted by Commission Staff, Mr. Gannon or any other party and asked to participate. Also, if you or your representative was contacted and invited to participate, include in your description, to your best recollection, what was stated by that third party.

RESPONSE TO INTERROGATORY NO. 12: Prior to my involvement in this matter, I had discussed the Zero Plus dialing issue with John Gannon. Mr. Gannon was aware of my dissatisfaction with Qwest. I am a regular subscriber and reader of the Idaho Statesman and read an article from the Idaho Statesman concerning Qwest's attempt to deregulate its rates. The Statesman suggested that a means of presenting evidence and cross-examining witnesses at future hearings was to intervene in the action. Mr. Gannon and I explored the concept of intervention and I am participating as a party

in that effort. I was not contacted by Commission staff and asked to participate. I am unaware of Commission staff having contacted my representative. No other party, including but not limited to Qwest, has asked me to participate in this matter.

INTERROGATORY NO. 13: Do you receive cable television service at your home? If so, what cable company provides you service?

RESPONSE TO INTERROGATORY NO. 13: Gary Neal objects to this interrogatory because it deals with issues outside of the scope of this proceeding. Without waiving this objection, Gary Neal states: No.

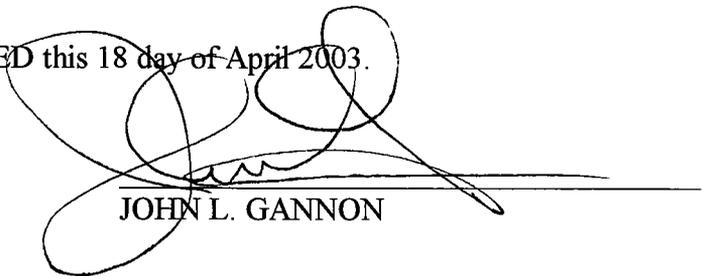
INTERROGATORY NO. 14: Please provide your home address.

RESPONSE TO INTERROGATORY NO. 14: My home address is 3255 N. Holl Drive, Eagle, Idaho 83616.

REQUEST FOR PRODUCTION NO. 3: To the extent not produced with regard to Request for Production Nos. 1 or 2, please produce all documents in your possession relevant to your responses to Interrogatory Nos. 1 -14.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: A copy of the Statesman Article is produced in Sharon Herricks responses..

DATED this 18 day of April 2003.



JOHN L. GANNON

Gary Neal

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THE 18th DAY OF APRIL, 2003, I SERVED THE FOREGOING PLEADING IN CASE NO QWE-T-02-25. BY MAILING A COPY THEREOF, POSTAGE PREPAID, (UNLESS OTHERWISE INDICATED) TO THE FOLLOWING:

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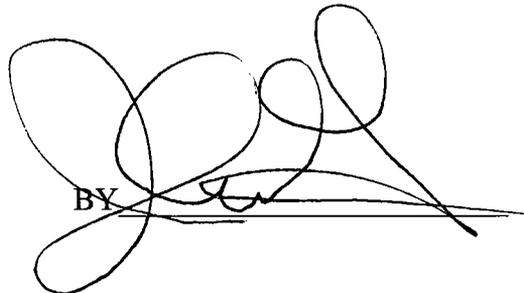
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