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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)
EXCHANGE SERVICES)
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_____)

CASE NO. QWE-T-02-25

OBJECTIONS TO REBUTTAL
TESTIMONY OF
DAVID TEITZEL

COMES NOW Intervenors Meierotto et al who hereby pursuant to IPUC Rule 261 who hereby submit the following objections to the Rebuttal Testimony of David Teitzel. These objections are made and filed at this time so that they may be considered in a more expeditious manner and more easily decided without unduly delaying the proceedings.

Objection No. 1: Intervenors object to testimony on Page 8, Lines 7-17 and object to Exhibit 23 unless it is offered only for the limited purpose that it is a "claim" made by Clear Talk, and not evidence or the proof of that "claim" is true. The objection is based on lack of foundation, hearsay, and no personal knowledge.

Objection No.2: Intervenors object to testimony on Page 8 Lines 21-28, Page 9 Lines 1-8 and Exhibit 24 on the basis that this is hearsay and completely lacks any foundation. The underlined testimony on page 9 does not even identify the "independent ... reports". Again, this objection is made unless this material is offered as a "claim" made by T Mobile and not evidence or proof that the "claim" is true.

Objection No.3: Intervenors object to Mr.Teitzel's opinion on page 9, Line 10-17 in that it is based on research that is not reliable and does not even identify the persons or authors upon which his opinion is based, if this opinion is based upon the matters objected to in Objection.No.1

and Objection No.2.

Objection No. 4: Intervenors object to testimony on page 11 L 5 -13 in that it is irrelevant, hearsay and lacks foundation. The “customer” lives in Florida, and there is no detail in the article concerning the cost of a land line in Florida, extra features, or any facts to support the double hearsay statement regarding savings.

Objection No.5: Intervenors object to testimony on Page 11 L 15-29 which purports to summarize the article and is double hearsay. Further, the article speaks for itself and in fact the summary is an inaccurate statement of what is contained therein. For example the author on page 3 states:

“For those whose wireless providers do not offer unlimited local calls, there is a risk that cellphone bills will be higher than those for conventional telephone service.”

This is contrary to the witnesses statement on page 11 Line 18-19.

Objection No.6: Intervenors object to testimony on P 22 L 24-27 and Page 23 L 1-33 on the basis that Qwest has refused to make public the entire report, and foundation. It is contrary to public policy to allow a witness to select a part of a confidential report for public testimony and then claim the balance cannot be reviewed not only by parties, but by the public in a public setting because it is confidential.

Further, there is no foundation for the quoted material. Essentially, there is double or even triple hearsay since the source for many of the statements, “facts” and conclusions in the report are other researchers or persons, who are not even identified.

Objection 7: Intervenors object to testimony on Page 40, L 1-13 which discusses an article which discusses “new research” by two companies. There is no foundation for the article and this is again, at the least double hearsay, since it is an article discussing two studies. There is no showing that the witness has even seen the two studies.

Objection 8: Intervenors object to testimony concerning Taher Bouzayen on Page 42 L 4-19 on the basis of foundation and that again, this is double hearsay.

Objection 9: Intervenors object to testimony on Page 45 L 22 and P46 L 1-3; and on P 52 L 20-21 and P 53 L 1- 9 on the basis that there is no foundation for the conclusions in this report; this is double or triple hearsay; and this report is not available to the general public, as a request has been made to keep it confidential.

Objection 10: Intervenors object to testimony on Page 53 L 15-19, P 54 L 1-2 on the basis there is no foundation; his quote is double hearsay and not within the personal knowledge of the

witness.

Objection 11: Intervenors object to testimony on Page 55 L 1-10 on the basis of foundation; double hearsay and unreliability in that there is no evidence that any newspaper even published this article.

Objection 12: Intervenors object to testimony on Page 55 L 11-24 on the basis that there is no foundation; it is hearsay or even double hearsay, and irrelevant since it took place in another state, and it appears to have taken place, if at all, in a rural area which is a different area generally from the exchanges which are the subject of the Qwest application.

Objection 13: Intervenors object to Insight Research Corp testimony on P 66 L 7-26 on the basis that there is no foundation; and this report is not available to the general public, as a request has been made to keep it confidential.

Objection 14: Intervenors object to IDC testimony on P 72 L 4-14 on the basis that there is no foundation; and this report is not available to the general public, as a request has been made to keep it confidential.

Objection 15: Intervenors object to IDC testimony on P 73 L 14-19 on the basis that there is no foundation; and this report is not available to the general public, as a request has been made to keep it confidential.

Dated this 3rd day of June, 2003

By 