

Jim Jones (ISB #1136)  
**JIM JONES & ASSOCIATES**  
1275 Shoreline Lane  
Boise, Idaho 83702  
(208) 385-9200

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Petitioners

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

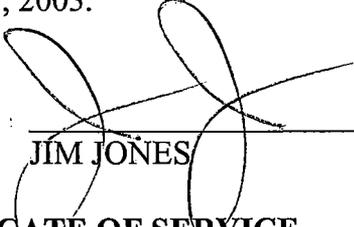
IN THE MATTER OF THE JOINT )	Case No. USW-T-99-24
PETITION OF ROBERT RYDER, d/b/a )	
RADIO PAGING SERVICE, JOSEPH B. )	
MCNEAL, d/b/a PAGEDATA AND )	
INTERPAGE OF IDAHO, FOR )	<b>OBJECTION TO AGENCY</b>
DECLARATORY ORDER AND )	<b>RECORD ON APPEAL</b>
RECOVERY OF OVERCHARGES )	
FROM U.S. WEST )	
COMMUNICATIONS INC., )	
_____ )	

The Petitioners and Appellants object to the Agency Record on Appeal in the following respects:

1. In paragraph 6(b) of the Notice of Appeal Appellants had requested inclusion of the Petition to Intervene, dated January 24, 2000, a copy of which is attached hereto.
2. A pertinent order – Order No. 28282 – was not included in the record. A copy of the same is attached.

It is respectfully requested that the petition and order identified above be made part of the Agency Record on Appeal. It is requested that this petition be considered without the necessity of a hearing.

DATED this 2<sup>nd</sup> day of December, 2003.



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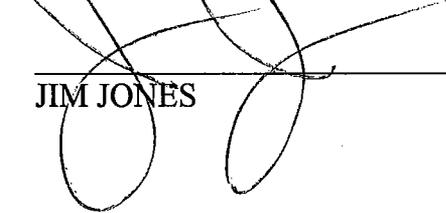
JIM JONES

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of December, 2002, I caused to be served a true and correct copy of the foregoing OBJECTION TO AGENCY RECORD ON APPEAL by depositing the same in the United States mail, postage prepaid, in an envelope addressed to the following:

WILLIAM J. BATT  
Marshall & Batt  
P.O. Box 1308  
Boise, ID 83701

DON HOWELL  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702



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JIM JONES

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**JIM JONES & ASSOCIATES**  
1275 Shoreline Lane  
Boise, Idaho 83702  
(208) 385-9200

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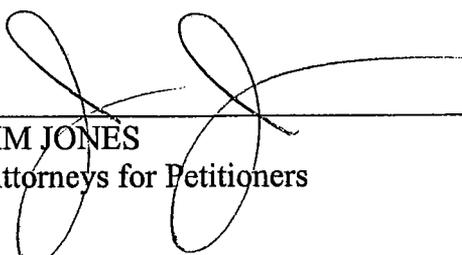
Attorney for Petitioners

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE JOINT )	Case No. USW-T-99-24
PETITION OF ROBERT RYDER, d/b/a )	
RADIO PAGING SERVICE, JOSEPH B. )	
MCNEAL, d/b/a PAGEDATA AND )	
INTERPAGE OF IDAHO, FOR )	PETITION TO INTERVENE
DECLARATORY ORDER AND )	
RECOVERY OF OVERCHARGES )	
FROM U.S. WEST )	
COMMUNICATIONS INC., )	
_____ )	

Tel-Car, Inc., an Idaho corporation, hereby petitions the Commission, pursuant to IDAPA 31.01.01.071, for an order granting intervention in the above-entitled proceeding. Tel-Car is a customer of US West and has operated a paging service in Idaho since September of 1996. Tel-Car has not negotiated or entered into a written interconnection agreement with US West. The interests of Tel-Car are identical to those of the other Petitioners, Robert Ryder and Joseph McNeal. Tel-Car incorporates the Petition filed herein by said Petitioners and requests relief identical to that sought by said Petitioners.

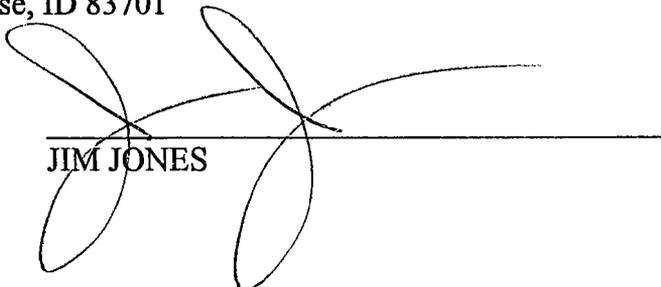
DATED this 24<sup>th</sup> day of January, 2000.

  
\_\_\_\_\_  
JIM JONES  
Attorneys for Petitioners

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of January, 2000, I caused to be served a true and correct copy of the foregoing PETITION TO INTERVENE by depositing the same in the United States mail, postage prepaid, in an envelope addressed to the following:

WILLIAM J. BATT  
Marshall & Batt  
P.O. Box 1308  
Boise, ID 83701



JIM JONES

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE JOINT APPLICATION )  
OF ROBERT RYDER DBA RADIO PAGING ) CASE NO. USW-T-99-24  
SERVICE, JOSEPH B. McNEAL DBA PAGEDATA )  
AND INTERPAGE OF IDAHO, FOR )  
DECLARATORY ORDER AND RECOVERY OF ) ORDER NO. 28282  
OVERCHARGES FROM U S WEST )  
COMMUNICATIONS, INC. )**

Tel-Car, Inc. petitioned to intervene in this case on January 24, 2000, pursuant to Rules of Procedure 71 through 75 of the Idaho Public Utilities Commission, IDAPA 31.01.01.071-.075.

**FINDINGS OF FACT**

We find that no party timely opposed this Petition to Intervene.

We further find that based on the pleadings and other documents filed in this case, intervention by this party would serve the purposes of intervention as described by Rule 74 of the Rules of Procedure and should be granted.

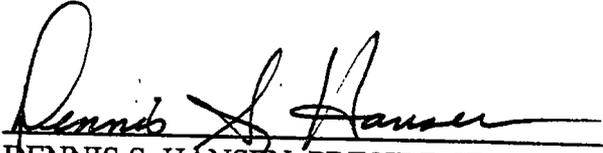
**ORDER**

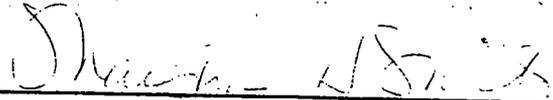
IT IS THEREFORE ORDERED that the Petition to Intervene filed by Tel-Car, Inc. is hereby granted.

IT IS FURTHER ORDERED that all parties in this proceeding serve all papers hereafter filed in this matter on all parties of record. This Intervenor is represented by the following for purposes of service:

Jim Jones  
Jim Jones & Associates  
1275 Shoreline Lane  
Boise, ID 83702

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho, this 8th day of February 2000.

  
DENNIS S. HANSEN, PRESIDENT

  
MARSHA H. SMITH, COMMISSIONER

  
PAUL KJELLANDER, COMMISSIONER

ATTEST:

  
Myrna J. Walters  
Commission Secretary

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