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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT)
PETITION OF ROBERT RYDER, d/b/a)
RADIO PAGING SERVICE, JOSEPH B.)
MCNEAL, d/b/a PAGEDATA AND)
INTERPAGE OF IDAHO, AND)
TEL-CAR, INC., FOR DECLARATORY)
ORDER AND RECOVERY OF)
OVERCHARGES FROM U.S. WEST)
COMMUNICATIONS INC.,)
_____)

ROBERT RYDER, d/b/a RADIO)
PAGING SERVICE, et al.,)

Petitioners/Appellants,)

vs.)

IDAHO PUBLIC UTILITIES)
COMMISSION,)

Respondent on Appeal,)

and)

QWEST CORPORATION,)

Respondent-Respondent on)
Appeal.)
_____)

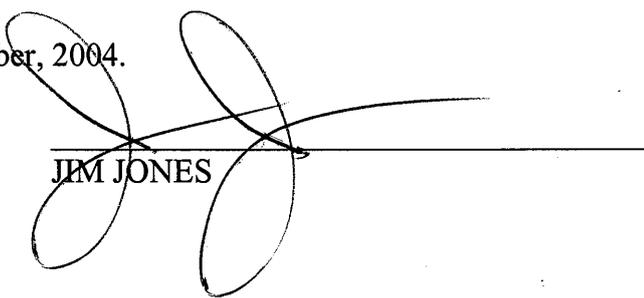
Docket No. 29175

IPUC Docket no. T-99-24

MOTION TO COMPEL PAYMENT

Petitioners, Robert Ryder, d/b/a Radio Paging Service, and Joseph B. McNeal, d/b/a PageData and Interpage of Idaho, hereby move the Idaho Public Utilities Commission to enter an order requiring Qwest Corporation to immediately pay the sum of \$57,467 to Petitioner Ryder and the sum of \$96,943 to Petitioner McNeal. This motion is made on the ground that Qwest Corporation has ignored orders of the Commission to make cash refunds to said Petitioners. In its Order Number 29555, the Commission ordered Qwest to make a refund to Petitioner Ryder in the sum of \$57,467 and a refund to Petitioner McNeal in the sum of \$101,950. The amount owing to Petitioner McNeal was reduced to \$96,943 pursuant to Commission Order Number 29603. Despite said orders, Qwest Corporation has failed and refused to make such refund payments. Qwest Corporation has not obtained a stay, either from the Commission or the Idaho Supreme Court, and is obligated to make immediate payment. The Commission should not allow Qwest Corporation to defy its orders and should enter an order compelling immediate payment.

DATED this 15th day of December, 2004.

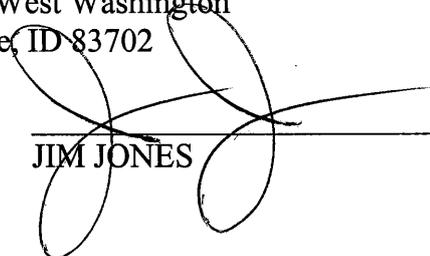

JIM JONES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of December, 2004, I caused to be served a true and correct copy of the foregoing MOTION TO COMPEL PAYMENT by depositing the same in the United States mail, postage prepaid, in an envelope addressed to the following:

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

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



JIM JONES