

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of	)	
	)	
MOUNT ST. HELENS TOURS, INC.	)	DOCKET NO. UT-991930
	)	
For Designation of a Telecommunications Common Carrier	)	
to Serve an Unserved Community, or Portion Thereof.	)	
.....	)	
In the Matter of the Petition of	)	
	)	
BARBARA BRADY	)	DOCKET NO. UT-991931
	)	
For an Exchange Area Boundary Change.	)	
.....	)	
In the Matter of Designation of a	)	
Telecommunications Common Carrier to Serve	)	
WILDERNESS LAKE COMMUNITY, or Portion	)	DOCKET NO. UT-993000
Thereof, on the Commission's Own Motion	)	
	)	
U S WEST COMMUNICATIONS, INC.	)	
	)	
GTE NORTHWEST INCORPORATED	)	
	)	
	)	
_____	)	

**RESPONSE TESTIMONY OF**  
**THERESA A. JENSEN**

June 12, 2000

1

**I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT**  
3 **POSITION.**

4 A. My name is Theresa A. Jensen and my business address is 1600 7<sup>th</sup> Ave, Room 3206,  
5 Seattle, Washington 98191. I am employed by U S WEST Communications, Inc.  
6 ("U S WEST") as a Director of Washington Regulatory Affairs in the Public Policy  
7 organization.

8 **Q. PLEASE DESCRIBE YOUR RESPONSIBILITIES.**

9 A. As a Director of Washington Regulatory Affairs, I am responsible for advocacy of  
10 U S WEST Communications, Inc. issues before the Washington Utilities and  
11 Transportation Commission ("Commission").

12 **Q. PLEASE DESCRIBE YOUR BACKGROUND AND WORK EXPERIENCE.**

13 A. I have been employed by U S WEST or its predecessors since 1972 and in my current  
14 assignment since 1991. I began my career in telecommunications in 1972 as a  
15 directory assistance operator. I also worked as a customer service representative for  
16 about six years. I then spent several years in Marketing holding various job  
17 responsibilities, including, market administrator, account executive, sales manager,  
18 instructor, market manager, data systems manager and product manager. From 1987  
19 until 1991 I worked in Strategic Planning and was responsible for developing and

1 implementing U S WEST's Open Network Architecture Plan. In my current  
2 assignment, I am responsible for regulatory issues, including, rulemakings, service  
3 quality, product and service offerings, depreciation, petitions for competitive  
4 classifications and the Washington financial results of operation.

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

6 A. Yes. I have testified as a company policy witness in a number of proceedings before  
7 this Commission.

8 **PURPOSE**

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. The purpose of my testimony is to state that U S Cellular is the designated eligible  
11 telecommunications carrier ("ETC") in the Castle Rock and Toledo exchanges and  
12 therefore is the common carrier designated as an ETC that is the closest in proximity to  
13 the Mount St. Helens Tours, Inc. area.

14 **Q. WHAT IS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC)?**

15 A. An ETC is a common carrier that is eligible to receive state and/or federal universal  
16 service funds. An ETC has certain duties and responsibilities to fulfill as a condition to  
17 receiving this public funding, including an obligation to provide universal service  
18 throughout the area in which the carrier was designated, 47 U.S.C. §214(e)(1).

1 Q. **WHEN DID U S CELLULAR RECEIVE THE ETC DESIGNATION FOR THE CASTLE ROCK**  
2 **EXCHANGE?**

3 A. In 1997, in Docket No. UT-970345, the Commission designated U S Cellular as the Castle Rock ETC.

4 Q. **DID U S WEST REQUEST OR RECEIVE ETC DESIGNATION FOR THE CASTLE ROCK**  
5 **EXCHANGE?**

6 No. U S WEST did not request ETC designation for the Castle Rock Exchange nor has the Commission  
7 designated U S WEST as an ETC in the Castle Rock Exchange.

8 Q. **WHAT RELEVANCE DOES THE ETC DESIGNATION OF U S CELLULAR IN THE**  
9 **CASTLE ROCK EXCHANGE HAVE TO THIS CASE?**

10 A determination now that this same ETC should not be held to the same standards as a wireline carrier in  
11 the designation of a non-voluntary ETC is contrary to good public policy and the Federal  
12 Telecommunications Act.. Designation of an ETC, albeit voluntary or involuntary, requires the carrier to  
13 meet the requirements of Section 54.201(d). The Commission should not discriminate in favor of wireline  
14 service in designating an involuntary ETC. Any decisions made in designating an involuntary ETC must  
15 be competitively and technologically neutral.

16 Q. **WHAT IS YOUR RESPONSE TO MR. SHIRLEY'S SUGGESTION THAT U S CELLULAR DOES**  
17 **NOT PROVIDE "RELIABLE BASIC TELEPHONE SERVICE" IN THE AREA AROUND MOUNT**  
18 **ST. HELENS TOURS, INC. AT COMPARABLE RATES?**

19 A. When U S Cellular requested ETC designation it agreed to comply with Federal law. At page 12 of Mr.  
20 Shirley's testimony, he discusses the principles articulated in the Communications Act at Section 254(b)(1).  
21 Specifically Mr. Shirley focuses on the principle that quality services should be available at just, reasonable  
22 and affordable rates.

23

1 When U S Cellular filed its December 1999 amended petition in Docket No. UT-970345, it stated the  
2 following:

3 “Amending the designation of USCC to incorporate the additional exchanges is in the public  
4 interest because it supports the efforts of wireless carriers to serve rural areas and provide  
5 competitive, lower-cost telecommunications alternatives to rural customers. This supports federal  
6 universal service policies as most recently articulated in the FCC’s Ninth Report and Order and  
7 Eighteenth Order on Reconsideration issued November 2, 1999 in CC Docket No. 96-45. That  
8 Order recognized that wireless carriers are both contributors and potential recipients of federal  
9 universal service funds. This Order also stated that wireless carriers should receive federal  
10 universal service support if they meet the criteria for ETC status under the 1996 Act.”  
11

12 Clearly, U S Cellular considers itself able to offer reliable basic service at just, reasonable and affordable  
13 rates.

14

15 **HAVE OTHER STATE COMMISSIONS ALSO APPROVED CELLULAR OR WIRELESS PROVIDERS**  
16 **AS ETCS?**

17 A. Yes.

18 **Q. WHEN U S CELLULAR REQUESTED ETC DESIGNATION FOR THE CASTLE ROCK**  
19 **EXCHANGE, HOW DID U S CELLULAR IDENTIFY THE AREA IT CURRENTLY SERVED?**

20 A. U S Cellular defined the area for which it provided cellular service as either an Metropolitan Statistical  
21 Area (“MSA”) or a Rural Service Area (“RSA”). I believe the Castle Rock Exchange is in Washington  
22 RSA #6 for which U S Cellular is the licensed cellular service provider. Toledo clearly is in this  
23 same RSA. RSA boundaries typically differ from wireline exchange boundaries.

24 **Q. DOES THE U S CELLULAR COVERAGE AREA INCLUDE THE MOUNT ST. HELENS**  
25 **TOURS, INC. AREA ?**

26 A. Yes.

1 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

2 A. U S Cellular is the Commission designated ETC for the Castle Rock exchange which is  
3 located closest to Mount St. Helens Tours, Inc. U S Cellular's serving area, which is an  
4 RSA, includes the Mount St. Helens Tours, Inc. area. The RSA license under which U  
5 S Cellular operates, is the same license and RSA the Mount St. Helens Tours, Inc area  
6 is in. And finally, U S Cellular currently serves customers located in the Mount St.  
7 Helens Tours, Inc. area.

8  
9 Based on the above facts, I can only conclude that Mr. Shirley raises issues that need not  
10 be decided when he suggests that the Commission needs to address the supposed  
11 requirement in 47 U.S.C. § 214(e)(3) concerning comparability of rates and services in  
12 deciding what carriers to order to serve because the undisputed evidence is that an ETC  
13 has already been designated for the closest exchange that exists to the area and is serving  
14 the area. Nor has Mr. Shirley provided evidence that U S Cellular rates are unjust,  
15 unreasonable and unaffordable.

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

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