
BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

COMCAST CABLE COMMUNICATIONS, INC.,)	
)	
)	Docket No. 03-035-28
)	
Claimant,)	
v.)	
)	PREPARED REBUTTAL
PACIFICORP, dba UTAH POWER,)	TESTIMONY OF NORMA FANNING
)	FOR PACIFICORP
)	
Respondent.)	July 14, 2004
)	

1 **Q. Please state your name and business address.**

2 A. My name is Norma Fanning. My business address is 650 NE Holladay, Suite
3 700, Portland, Oregon 97232.

4 **Q. By whom are you employed and what is your position?**

5 A. I am employed by PacifiCorp as an Administrative Services Coordinator. I am
6 presently responsible for the Southwest Region. I began working for PacifiCorp on
7 July 11, 2002. I was the Administrative Services Coordinator for the Northeast Region
8 of PacifiCorp's service area from that time until mid-May 2003. The service areas
9 included in the Northeast Region were Northern Utah, Idaho, and Wyoming.

10 **Q. Attached to your written testimony are Exhibits PC 6.1 through 6.3. Were these**
11 **prepared by you or under your direction?**

12 A. Yes.

13

1 **Q. What areas will your testimony address?**

2 A. My testimony will respond to certain claims made by Martin J. Pollock in his
3 July 2, 2004, testimony regarding my responsibilities and actions in connection with
4 pole attachment applications that were submitted to PacifiCorp by Mr. Pollock.

5 **Q. As background, please describe your responsibilities as the Administrative**
6 **Services Coordinator for PacifiCorp's Northeast Region during 2002 and 2003.**

7 A. As part of PacifiCorp's formal mechanism for the processing of pole
8 attachment applications, I was responsible for reviewing and working on applications
9 filled out by a licensee requesting to attach, remove or modify attachments in
10 PacifiCorp's Northeast Region. I verified the information on each application to
11 ensure that all of the required fields were accurately completed. For example, I would
12 validate the facility point to see if the applicant had current attachments and to make
13 sure the pole information that the applicant submitted was accurate and complete. If
14 any of the information on the application was missing or inconsistent with our data, I
15 then would request that the licensee provide the missing information or clarify their
16 intentions.

17 **Q: Turning specifically to Mr. Pollock's testimony, he states: "Norma rarely, if ever**
18 **sent Comcast any response to the applications I sent her. I sent her the same**
19 **information that I send the coordinators of other regions, but she rarely**
20 **responded." Do you have a reaction to this testimony?**

1 A. It is simply wrong. I clearly recall that I began working with Mr. Pollock in
2 approximately November of 2002. By that time, I had brought all applications I was
3 processing to a current status. That status remained current through the time that I left
4 the Northeast Region, which, as I previously mentioned, was around the middle of May
5 2003.

6 **Q. Please explain what you mean by “current status?”**

7 A. By current status, I mean that I was reviewing and working—within a 30-day
8 cycle—on every document that was submitted to my desk. I processed everything that
9 came to my desk. Moreover, I kept a weekly log of every request that I worked on. A
10 copy of that log, attached as Exhibit PC 6.1, shows that I kept my desk at a current
11 status. For example, if you look at Joint Pole Notice (JPN) #002208902, you will see
12 that I logged entries for the 13 new pole attachments in Layton, Utah, on the weeks
13 ending January 10, 2003, February 14, 2003, and on March 14, 2003.

14 **Q. Mr. Pollock claims that you were not responsive to applications he submitted to**
15 **you. Do you agree?**

16 A. Absolutely not. Everything that Mr. Pollock submitted to my desk was
17 reviewed and worked on within the same 30-day cycle I described above, and I
18 communicated with him on numerous occasions and in a timely fashion. The reason I
19 can so clearly recall working on applications that came in to PacifiCorp from Mr.
20 Pollock is that I often had to ask him to provide additional information because the
21 applications were not accurately completed.

1 **Q. Please describe the inaccuracies and what you did about them.**

2 A. In reviewing documents Mr. Pollock submitted to PacifiCorp, I discovered
3 many problems with the data. Accordingly, I would identify and forward the erroneous
4 data back to Mr. Pollock, asking him, for example, to provide accurate location
5 information.

6 I remember instances where Mr. Pollock applied for overlash attachments.
7 When I validated the facility points, I discovered that Comcast already had a pending
8 or resolved overlash attachment request. I would then go back to Mr. Pollock,
9 corresponding via e-mail or fax, and ask whether the submission was a duplicate
10 request in error or for a second overlash attachment. See Ex. PC 6.2. Most times, after
11 corresponding with Mr. Pollock, it would turn out that the application was for a second
12 or third overlash attachment request.

13 Moreover, the form that Comcast used at that time enabled Comcast to list two
14 poles on a page. Mr. Pollock's application would have the same address information in
15 both sections of the form, because it appeared that a photocopy of the form was made,
16 and then someone at Comcast later filled in the different pole numbers. The result was
17 that Mr. Pollock submitted to PacifiCorp a several-mile stretch of poles, all having the
18 same address. So I would have to get back to him, either via e-mail or by fax, to
19 inquire about the pole locations. In other instances, the applications submitted by Mr.
20 Pollock were unclear as to the equipment for which attachment was requested. I would
21 again ask for more information from Mr. Pollock. See Ex. PC 6.3

1 As demonstrated in Exhibits PC 6.1 – 6.3, not only did I work on the
2 applications submitted by Mr. Pollock in a timely fashion, but there was much
3 correspondence between the two of us.

4 **Q: Do you have any other observations on the location information submitted to**
5 **PacifiCorp by Comcast?**

6 A. Yes. It appeared that, with regard to the location information, Comcast was
7 trying to save itself time by submitting general address information associated with an
8 area where Comcast was interested in attaching or overlashing. We would then have to
9 look at maps and pole numbers to try and figure out where Comcast was actually
10 requesting its attachments.

11 **Q. Does this conclude your testimony?**

12 A. Yes it does.