
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 JOYCE RUSSELL
)	FOR PACIFICORP
)	
Respondent.)	July 14, 2004
)	

1 Q. Please state your name and business address.

2 A. My name is Joyce Russell. 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 processing pole attachment applications and coordinating pole
7 transfers for PacifiCorp's poles in northern Oregon and Washington. I began working
8 for PacifiCorp in late July or early August of 2001. At that time I was a contractor for
9 PacifiCorp. In March, 2003, I became an employee of PacifiCorp.

10 Q. What areas will your testimony address?

11 A. My testimony will address the claims made by Martin J. Pollock in his July 2,
12 2004, testimony regarding my alleged work for PacifiCorp during 1999.

13 Q. Have you reviewed the testimony of Martin J. Pollock?

14 A. Yes.

1 **Q. Mr. Pollock states that, when he started working for AT&T in 1999, you were**
2 **coordinating pole attachment issues for PacifiCorp, but that you and he “hardly,**
3 **if ever, spoke about pole attachment permits because there was no process in**
4 **place.” Do you have a reaction to this statement?**

5 A. Yes. It is nonsensical. The reason Mr. Pollock and I never spoke about pole
6 attachment permits when he started at AT&T was that I was not employed by
7 PacifiCorp in 1999 in any capacity. In fact, I was employed by Gilchrist & Associates,
8 Inc. as a bookkeeper and administrative assistant from 1989 and 2001. During that
9 time, I would have had no occasion to speak with Mr. Pollock about pole attachments
10 or any other topic.

11 **Q. So when did you actually first begin working on pole attachment issues for**
12 **PacifiCorp?**

13 A. I began working on pole attachment applications when I started working for
14 PacifiCorp in August of 2001. At that time, I was a contractor for PacifiCorp.

15 **Q. When you started working for PacifiCorp in 2001, was there a formal permitting**
16 **process in place?**

17 A. Yes. When I began working on pole attachment applications, PacifiCorp had in
18 place permitting requirements that all third-party attachers were required to follow and
19 that I used for the processing of pole attachment applications.

20

1 **Q. Starting in 2001, when you began processing applications for attachments to**
2 **PacifiCorp poles in Utah, did you communicate with Mr. Pollock?**

3 A. Yes. We communicated regularly and frequently. Typically, we exchanged
4 information electronically, either by e-mail or facsimile. He would send me joint use
5 applications. I would process those applications and either send him notices of
6 approval or requests for corrections/clarification regarding the information he
7 submitted in the applications.

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

9 A. Yes it does.