

**Trevor R. Roycroft**  
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Information and Telecommunication Systems  
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## **Education**

Ph.D., Economics, University of California, Davis, 1989.

M.A., Economics, University of California, Davis, 1986.

B.A., Economics, with honors, California State University, Sacramento, 1984.

## **Ph.D. Fields of Specialization**

Industrial Organization and Regulation

Public Finance

Economic History

## **Experience**

Professor, J. Warren McClure School of Information and Telecommunication Systems, Ohio University, September 1994 to November 2004, and August 2013 to present. Granted tenure, spring 2000 and on rehire in 2013. Promoted to full professor in March 2016. Conducts graduate and undergraduate courses in regulatory policy and law, and the economics of the telecommunications industry, as well as general education courses covering telecommunications technology, markets, and the social impact of telecommunication technology. Conducts research with a focus on the telecommunication and information industries. Provides academic advising to graduate and undergraduate students within the school and across the university. Serves on department, college, and university committees.

Independent Consultant, June 1994 to present. Provides economic and policy research and analysis for clients. Presents expert testimony in state and federal venues. Performs economic and statistical studies. Evaluates economic and policy issues in public utility, telecommunications, and information technology industries. Develops economic and policy recommendations. Matters addressed include market structure analysis and competition, merger evaluation, low-income programs, broadband policy, pricing plans, alternative regulatory frameworks, productivity growth, service quality, automatic metering infrastructure, smart grid deployment, cost calculations, cost allocation, cost modeling, network unbundling, capital costs, wireless markets, and economic damages.

Scripps Visiting Professional, spring 2012. J. Warren McClure School of Information and Telecommunication Systems, Ohio University. Conducted undergraduate courses in regulatory policy and law, and the economics of the telecommunications industry, and a general education course covering telecommunications technology, markets, and the social impact of telecommunication technology.

Lecturer, fall 2006. Telecommunication Systems Management program in the Graduate School of Engineering at Northeastern University, Boston, MA. Conducted graduate seminar titled "Perspectives on Telecommunications Policy: Governments, Markets, and Technological Change."

## **Experience (Continued)**

Interim Director, J. Warren McClure School of Information and Telecommunication Systems, Ohio University, July 2000 to June 2002. Responsibilities included: program planning, evaluation, and assessment; recruiting faculty and staff; managing fiscal resources; administering the School's curriculum; and establishing and maintaining relationships with internal and external constituencies of the school.

Chief Economist/Acting Chief Economist/Assistant Chief Economist/ Principal Economist, Indiana Office of Utility Consumer Counselor, May 1991 to June 1994. Conducted research and prepared testimony, cross examination, and legal briefs to be presented before the Indiana Utility Regulatory Commission in major cases involving gas, water, electric, and telecommunications utilities. Prepared analysis and comments to be presented before the Federal Communications Commission. Advised Director of Utility Analysis and the Utility Consumer Counselor on policy issues; assisted in formulation of policy. Coordinated technical analysis in major cases. Presented agency policy positions to outside groups. Supervised Economics and Finance Staff of eight professionals. Reviewed and provided extensive analysis of Economics and Finance Staff testimony.

Visiting Assistant Professor, Kenyon College, September, 1989 to May, 1991. Conducted courses in Introductory Economics (Macro and Micro), Economics of the Public Sector, Industrial Organization, and Economic Development in the Third World. Rendered college service on award and hiring committees.

Lecturer, California State University, Sacramento, Fall 1987, academic year 1988. Conducted courses in Intermediate Microeconomic Theory, Introductory Macroeconomic and Microeconomic Theory.

Teaching Assistant, University of California, Davis, 1985-1988. Assisted the professor in conducting courses in Introductory Macroeconomic Theory, Introductory Microeconomic Theory, and Public Finance.

## **Working Paper**

“Empirical study of telephone service choice and food security using data from the 2012 National Health Interview Survey,” March 2016.

## **Publications**

“Empirical Study of Broadband Adoption Using Data from the 2009 Residential Energy Consumption Survey,” *Journal of Regulatory Economics*, Vol. 43, Issue 2, pages 214-228, April 2013.

“Low-Income Reality Check, Evaluating the Impact of Dynamic Pricing,” *Public Utilities Fortnightly*, March 2011, Volume 149, No. 3.

“E-Auctioning: The U.S. Federal Communications Commission and Spectrum Management.” *Electronic Government: Concepts, Methodologies, Tools, and Applications*, Ari-Veikko Anttiroiko, ed. Information Science Reference, New York, 2008.

## **Publications (Continued)**

“Empirical Analysis of Entry in the Local Exchange Market: the Case of Pacific Bell.” *Contemporary Economic Policy*, Vol. 23, No. 1, January 2005.

“Internet Access.” Johnson, D. ed. *Encyclopedia of International Media and Communications*, Academic Press, April 2003.

“Internet Subscription in Africa: Policy for a Dual Digital Divide.” (With Siriwan Anantho.) *Telecommunications Policy*, Vol. 27, Nos. 1-2, February/March 2003.

“The Impact of State and Federal Alternative Regulation Plans on the RBOCs--a State Level Analysis.” in *Telecommunications for the 21<sup>st</sup> Century*. Special issue of *The International Journal of Development Planning Literature*. William Baumol and Victor Beker eds. Vol. 16, Nos. 1 & 2, January and April 2001.

“Trouble Reports as an Indicator of Service Quality: The Influence of Competition, Technology, and Regulation.” (With Martha Garcia-Murrilo.) *Telecommunications Policy*, Volume 24, No. 10, November, 2000.

“The Telecommunications Act--Law of Unintended Consequences?” *Public Utilities Fortnightly*, Volume 138, No. 3, February 1, 2000.

“Alternative Regulation and the Efficiency of Local Exchange Carriers--Evidence from the Ameritech States.” *Telecommunications Policy*, Volume 23, No. 6, July, 1999.

“The Billy Goats Gruff. A Fairy Tale for the Third Anniversary of the Telecommunications Act of 1996.” *Info: The Journal of Policy, Regulation and Strategy for Telecommunications, Information and Media*, \Volume 1, No. 2, April, 1999.

“A Dynamic Model of Incumbent LEC Response to Entry Under the Terms of the Telecommunications Act of 1996.” *Journal of Regulatory Economics*, Volume 14, November, 1998.

“Ma Bell’s Legacy: Time for a Second Divestiture?” *Public Utilities Fortnightly*. Vol 136, No. 12, June 15, 1998.

“The Telecommunications Act of 1996: An Unfunded Mandate for the States.” (With Phyllis Bernt.) *Central Business Review*, Volume XV, No. 2, Summer 1996.

## **Reports and White Papers**

“Partial Reclassification will not Support an Open Internet—Section 706, Title II, and Forbearance Will,” November 11, 2014.

“Investment Race or Race to the Bottom?—Key Policy Issues with the IP-Broadband Transition A Response to Anna-Maria Kovacs’ “Telecommunications competition: the infrastructure-investment race.” Prepared for the National Association of Utility Consumer Advocates (NASUCA). November 15, 2013. [http://www.nasuca.org/archive/NASUCA\\_Response\\_to\\_Kovacs\\_Final.pdf](http://www.nasuca.org/archive/NASUCA_Response_to_Kovacs_Final.pdf)

## **Reports and White Papers (Continued)**

“On the Importance of Regulatory ‘Toughness.’” Roycroft Consulting Policy White Paper, March 1, 2013. Available at:

[http://www.roycroftconsulting.org/Roycroft\\_Importance\\_of\\_Regulatory\\_Toughness\\_3-1-13.pdf](http://www.roycroftconsulting.org/Roycroft_Importance_of_Regulatory_Toughness_3-1-13.pdf)

“Review of the Structure Group Report on PG&E’s Smart Meter Debacle,” Prepared for The Utility Reform Network (TURN), April 8, 2011.

“The Impact of Dynamic Pricing on Low Income Consumers: Evaluation of the IEE Low Income Whitepaper,” November 29, 2010. Available at:

[http://www.roycroftconsulting.org/Roycroft\\_Dynamic\\_Pricing\\_Low\\_Income\\_11-29-10.pdf](http://www.roycroftconsulting.org/Roycroft_Dynamic_Pricing_Low_Income_11-29-10.pdf)

“The Limits of Choice in California’s Residential Telecommunications Markets: Why ‘Competition’ is Failing to Protect Consumers,” Published by the Utility Reform Network (TURN). March 25, 2009.

“Reverse Auctions for Universal Service Funding?”, February 1, 2008. Available at

[http://www.roycroftconsulting.org/Roycroft\\_Consulting\\_Auction\\_White\\_Paper\\_2-1-08.pdf](http://www.roycroftconsulting.org/Roycroft_Consulting_Auction_White_Paper_2-1-08.pdf)

“Evaluating Telecommunications Trends: Commission Responsibilities in Evolving Markets.” Policy White Paper Prepared for the Public Counsel Section of the Washington State Office of Attorney General, September 5, 2007.

“Economic Analysis and Network Neutrality: Separating Empirical Facts from Theoretical Fiction,” May 2006. Available at: [http://www.freepress.net/sites/default/files/resources/roycroft\\_study.pdf](http://www.freepress.net/sites/default/files/resources/roycroft_study.pdf)

“Network Neutrality, Product Differentiation, and Social Welfare. *A Response to Phoenix Center Policy Paper No. 24.*” Roycroft Consulting Policy White Paper. May 3, 2006. Available at:

[http://www.roycroftconsulting.org/response\\_to\\_Ford.pdf](http://www.roycroftconsulting.org/response_to_Ford.pdf)

“Network Diversity—A Misguided Policy. A Response to Christopher S. Yoo’s ‘Promoting Broadband Through Network Diversity’.” Roycroft Consulting Policy White Paper. March 1, 2006. Available at:

[http://www.roycroftconsulting.org/response\\_to\\_Yoo.pdf](http://www.roycroftconsulting.org/response_to_Yoo.pdf)

“Wireless Consumer Protection: A Model Bill for the States.” AARP Research Center, September, 2003.

“The End of Telecommunications? An Epilogue to Tangled Web: The Internet and Broadband Open Access Policy.” AARP Research Center, June, 2002.

“Tangled Web: The Internet and Broadband Open Access Policy.” AARP Research Center, January, 2001. Available at:

[http://www.aarp.org/research/ppi/cons-prot/telecom/articles/tangled\\_web\\_the\\_internet\\_and\\_broadband\\_open\\_access\\_policy.html](http://www.aarp.org/research/ppi/cons-prot/telecom/articles/tangled_web_the_internet_and_broadband_open_access_policy.html)

## **Conference Papers**

“The Impact of State and Federal Alternative Regulation Plans on the RBOCs--a State Level Analysis,” July 1999. Presented at the Western Economic Association International Annual Meeting, San Diego, California.

## **Conference Papers (Continued)**

“The Billy Goats Gruff. A Fairy Tale for the Third Anniversary of the Telecommunications Act of 1996,” June, 1999. Presented at the Academic Seminar at the 1999 National Cable Television Association Convention, Chicago, Illinois.

“Alternative Regulation and the Efficiency of Local Exchange Carriers--Evidence from the Ameritech States.” November, 1998. Presented at the 68<sup>th</sup> Annual Conference of the Southern Economic Association, Baltimore, Maryland.

“A Dynamic Model of Incumbent LEC Response to Entry Under the Terms of the Telecommunications Act of 1996.” July 1998. Presented at the Western Economic Association International Annual Meeting, Lake Tahoe, Nevada.

“Do We have the Bugs Out of Telephone Deregulation?” April 1998. Presented at the Law and Policy Division of the Broadcast Education Association, Las Vegas, Nevada.

“The Telecommunications Act of 1996 and Imposed Costs in the Local Exchange Market: A Dynamic Model of Incumbent Behavior.” September 1997. Presented at the *Telecommunications Policy Research Conference*, Arlington Virginia.

“Towards an Advanced Information Infrastructure,” August 1995. Presented to the National Association of Regulatory Utility Commissions' Annual Regulatory Studies Program at Michigan State University.

“Sorting, Bonding, and Barriers to Entry: Strategies of the Entry Concerned Firm,” July 1990. Presented at the Western Economic Association Meetings, San Diego, California.

## **Additional Presentations**

“Considering the Impact of Changes to the FCC’s Universal Service Contribution Base.” Presented at the 2008 Annual Meetings of the National Association of Utility Consumer Advocates. November 2012. Baltimore, MD.

“Dynamic Pricing: An Idea Whose Time has Come or a Ticking Time Bomb?” National Energy and Utility Affordability Conference, June 2011. Fort Lauderdale, FL.

“Regulatory Response to Rising Residential Rates.” Presented at the Mid-Year Meetings of the National Association of Utility Consumer Advocates. June 2009. Boston, MA.

“Overview of Technology Transformation in the PSTN.” Presented at the 2008 Annual Meetings of the National Association of Utility Consumer Advocates. November 2008. New Orleans, LA.

“Economics and Network Neutrality.” Presented at the 2006 Mid-year Meetings of the National Association of Utility Consumer Advocates. June 2006. Memphis, TN.

“Consumer Education and Telecommunications Competition.” Presented at the 2006 Mid-year Meetings of the National Association of Utility Consumer Advocates. June 2006. Memphis, TN.

## **Additional Presentations (Continued)**

“Broadband Open Access.” Presented to AARP’s National Legislative Council. October, 2000. Washington, D.C.

“Telecommunications Policy, Markets, and Regulation–Who’s On First?” Presented to the Maryland Office of Peoples’ Counsel and Maryland Public Service Commission. October, 2000. Baltimore, MD.

“Broadband Open Access–Implications for the Internet and Consumers.” November 1999. Panelist at the National Association of Utility Consumer Advocates Annual Convention. San Antonio, Texas.

“Validation of Proxy Cost Models.” January 1997. Panel discussant at the Federal Communications Commission workshops on proxy cost models (CC Docket 96-45).

“Impact of the Telecommunications Act of 1996 on Telecommunications Managers.” December 1996. Presented to members of the *Association of Telecommunications Professionals*. Columbus Ohio.

“Caveat emptor! Local competition, possible effects on prices and the reality of choice.” October 1995. Presented at the Public Information Session on Telephone Competition. Dayton, Ohio.

“Cost Allocation in Network Industries,” August 1995. Presented to the National Association of Regulatory Utility Commissions' Annual Regulatory Studies Program at Michigan State University.

“Incremental Cost Methodology in Telecommunications,” June 1995. Presented to the Ohio Office of Consumers' Counsel.

“Regulatory Issues Connected with the Implementation of the Clean Air Act Amendments of 1990,” August 1993. Presented at the Indiana Bar Association's Utility Law Section Summer Meetings.

“Consumer Perspectives on the Ameritech Customer's First Plan,” August 1993. Presented at the Ameritech Regional Regulatory Committee Ad Hoc Working Group Meeting.

“Consumer Perspectives on Universal Telecommunications Service,” December 1992. Presented at the Indiana Utility Regulatory Commission Workshops on Regulatory Flexibility in Telecommunications.

## **Honors**

Competitive paper finalist. The Academic Seminar at the 1999 National Cable Television Association Convention, Chicago, Illinois. Paper title: “The Billy Goats Gruff. A Fairy Tale for the Third Anniversary of the Telecommunications Act of 1996.”

## **Courses Taught**

Perspectives in Telecommunications Policy:

Governments, Markets, and Technological Change, *Northeastern University*

Competition and Market Structure in Network Industries, *Ohio University*

Policy and Regulation for ITC Markets, *Ohio University*

Information and Telecommunication Policy I, *Ohio University*

Communication Regulatory Policy, *Ohio University*

Applications of Common Carrier Regulation, *Ohio University*

### **Courses Taught (Continued)**

Strategic Decision Making in Information and Telecommunication Industries, *Ohio University*  
Introduction to Common Carrier Regulation, *Ohio University*  
Introduction to Communication Systems Management, *Ohio University*  
Consumer Issues in Communication Systems Management, *Ohio University*  
Topical Seminar (New Technologies and Telecommunication Policy), *Ohio University*  
Topical Seminar (The Telecommunications Act of 1996), *Ohio University*  
Special Studies in Communication Systems Management, *Ohio University*  
Economics of the Public Sector, *Kenyon College*  
Industrial Organization, *Kenyon College*  
Economic Development in the Third World, *Kenyon College*  
Intermediate Microeconomics, *California State University, Sacramento*  
Microeconomic Principles, *Kenyon College; California State University, Sacramento*  
Macroeconomic Principles, *Kenyon College; California State University, Sacramento*

### **College and University Service**

Scripps College of Communication Curriculum Committee, *Ohio University*, 2013-2015  
Faculty Advisor, Women in Information and Telecommunication Systems, *Ohio University*, 2014-2015  
Chair, McClure School Diversity Committee, *Ohio University*, 2014-2015  
Member, Scripps College of Communication Diversity Committee, *Ohio University*, 2014-2015  
Member, Scripps College of Communication Dean's Advisory Committee, *Ohio University*, 2014-2015  
Member, Scripps College of Communication E-Learning Committee, *Ohio University*, 2014-2015  
Faculty Advisor, University College, *Ohio University*, 1998-2004  
Member, Baker Fund Committee, *Ohio University*, 2003-2004  
Member, College of Communication Curriculum Committee, *Ohio University*, 2003-2004  
Chair, College of Communication Dean's Evaluation Committee, *Ohio University*, 2003-2004  
Faculty Advisor, Communication Week, *Ohio University*, 1994-2002, 2013-2015  
Faculty Advisor, Students in Communication Systems Management, *Ohio University*, 1994-1996  
Member, University General Education Review Committee, *Ohio University*, 1998-1999  
Member, College of Communication Curriculum Committee, *Ohio University*, 1998-2000  
Member, College of Communication Graduate Committee, *Ohio University*, 1997-2002  
Member, University Calendar Review Task Force, *Ohio University*, 1996-1997  
Member, Outstanding Civil Service Award Committee, *Ohio University*, 1995-1996  
Member, Mathematics Department Search Committee, *Kenyon College*, 1990-1991  
Member, Williams Memorial Award Committee, *Kenyon College*, 1989-1991

### **Professional Membership**

American Economic Association  
Institute of Electrical and Electronics Engineers

### **Ph.D. Dissertation Supervision**

"The Examination of Strategic Interactions in One Local Access Telephone Market, the Effects on Expected Price for Access and Universal Access." Judith Ann Molka-Danielsen. School of Information Sciences, Telecommunications Program, University of Pittsburgh, 1998.

## **Referee Service**

*Journal of Regulatory Economics*

*Journal of Economic Studies*

*Telecommunications Policy*

*Southern Economic Journal*

*Social Science Computer Review*

*Utilities Policy*

*Communications of the Association for Information Systems*



## Expert Testimony Presented

### California (On behalf of The Utility Reform Network [TURN])

<b><u>CPUC Cause No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
Rulemaking 11-12-001 (November 13, 2014) (March 1, 2012) (January 31, 2012)	Service Quality Performance for Telephone Corporations	Evaluation of service quality performance and appropriate service quality framework.
Rulemaking 11-11-007 (July 11, 2014) (August 15, 2014)	California High-Cost Fund A	Appropriate treatment of broadband revenues for ratemaking purposes.
Investigation 11-06-009 (July 6, 2011) (August 29, 2011)	Investigation of AT&T's Proposed Acquisition of T-Mobile	Market definition, market concentration, spectrum management, merger impact.
Rulemaking 09-06-019 (March 19, 2010)	Order Instituting Rulemaking into the Review of the California High Cost Fund B Program	Reverse auction evaluation. Alternative support mechanism.
Rulemaking 06-06-028 (June 24, 2008)	Order Instituting Rulemaking into the Review of the California High Cost Fund B Program	Reverse auctions for universal service funding.
Rulemaking 05-04-005 (March 30, 2007)	Order Instituting Rulemaking to Assess and Revise Regulation of Telecommunications Utilities	Post-deregulation monitoring.
Rulemaking 06-06-028 (October 16, 2006)	Review of the California California High Cost Fund B Program	Approach to Calculating High Cost Funding.
Rulemaking 06-05-028 (September 15, 2006)	Review of Telecommunications Public Policy Programs	Affordability of Basic Service.
Application: 05-04-020 (August 15, 2005)	Verizon/MCI Merger	Market Structure and Market Power.

**California (On behalf of The Utility Reform Network [TURN]) (Continued)**

<b><u>CPUC Cause No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
Rulemaking 05-04-005 Direct Declaration (May 31, 2005) Reply Declaration (September 2, 2005)	Order Instituting Rulemaking to Assess and Revise Regulation of Telecommunications Utilities	Local exchange Competition and Policy.
Applications: 01-02-024, 01-02-035 02-02-031, 02-02-032 02-02-034, 02-03-002 (February 7, 2003) Reply Declaration (March 12, 2003) Rebuttal Declaration	Review of UNE Rates	TELRIC Compliance of UNE Rates. Progress of local exchange competition.
Rulemaking 93-04-003 Investigation 93-04-002 (Phase II) (July, 2001)	Permanent Line Sharing Phase II	Pricing and Cost Allocation for the High Frequency Portion of the Local Loop in the NGDLC Environment.
Rulemaking 93-04-003 Investigation 93-04-002 (Phase I) (June, 2001)	Permanent Line Sharing Phase I	Pricing and Cost Allocation for the High Frequency Portion of the Local Loop.

**Canadian Radio-Television and Telecommunications Commission  
(On Behalf of Action Réseau Consommateur, et al.)**

<b><u>CRTC Case No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
Public Notice CRTC 2006-5 (July, 2006)	Review of Price Cap Framework	Price Cap Plan, Productivity and Advanced Services, Competition.
Public Notice CRTC 2001-37 (August, 2001)	Price Cap Review and Related Issues	Price cap regulation and productivity growth. Accommodative entry policy.

**Colorado (On behalf of AARP)**

<b><u>CPUC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
04A-411T (February, 2005)	In the Matter of Qwest Corporation Application	Analysis of local exchange market. For Service Reclassification and Deregulation.

**Indiana (On behalf of the AARP and Citizens Action Coalition of Indiana)**

<b><u>IURC Cause No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
42405 (October, 2003)	SBC Indiana's Request for Alternative Regulation	Analysis of local competition, Price Cap Regulation and Productivity.
41911 (July, 2001)	Commission's Investigation of Ameritech Indiana Service Quality	Service Quality Performance.
40785-S1, 40849, 41058 (January, 2001)	Approval of Settlement Agreement between Ameritech and other Parties	Alternative Regulation, Advanced Services Deployment, Service quality.
41058 (August, 2000)	Agreement between Ameritech And other Parties	Cost of Service, Cost Modeling, Compliance with §254(k)of the Telecommunications Act of 1996.
40785-S1 (September, 1999)	Commission's Investigation Ameritech Indiana's Compliance With Section 254(k) of the Telecommunication Act	Economic Cost of Service/ Cost Allocation.
40849 (November, 1997)	Commission's Own Motion On Ameritech Indiana's Request for Interim Relief	Interim and Permanent Alternative Regulation/Rate Design.
40849 (September, 1997)	Ameritech Indiana Request for Interim Relief	Interim Alternative Regulation/Rate Design.

**Kansas (On behalf of the Citizens' Utility Ratepayer Board [CURB])**

<b><u>KCC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
05-SWBT-997-PDR (May, 2005)	In the Matter of SWBT's Application for Price Deregulation of Certain Residential and Business Services	Analysis of local exchange market.

**Maryland (On behalf of the Maryland People's Counsel)**

<b><u>MPSC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
8730 (Direct Testimony, October, 1996) (Rebuttal Testimony, November, 1996)	Bell Atlantic ISDN Tariff Proposal	ISDN pricing and cost of service.
8715 (Direct Testimony, March, 1996) (Rebuttal Testimony, April, 1996)	MCI Request for Alternative Regulation for Bell Atlantic Maryland	Price Cap Regulation, Cost Allocation and Loop Cost Recovery.

**Ohio (On behalf of the Ohio Consumers' Counsel)**

<b><u>PUCO Case Nos.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
10-2387-TP-COI (December, 2010)	Investigation into Intrastate Access Reform	Intrastate Access Charge Reform
09-454-TP-ACO (October, 2009)	Frontier/Verizon Merger Approval	Evaluation of Proposed Frontier/ Verizon Merger
07-829-GA-AIR et al. (June, 2008)	Dominion East Ohio Gas Rate Case	Automatic Meter Reading, Prudency of Investment.
06-1013-TP-BLS (October, 2006)	AT&T Ohio Request for Alternative Regulation For Basic Local Exchange	Competition for Basic Local Exchange Service.
06-1002-TP-BLS (September, 2006)	Cincinnati Bell Request for Alternative Regulation For Basic Local Exchange Service	Competition for Basic Local Exchange Service.

**Ohio (On behalf of the Ohio Consumers' Counsel) (Continued)**

<b><u>PUCO Case Nos.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
05-13050TP-ORD (December, 2005) (March, 2006)	Implementation of H.B. 218 Concerning Alternative Regulation of Basic Local Exchange Service.	Existence of entry barriers. Appropriate competitive test.
02-1280-TP-UNC (May, 2004)	SBC Ohio's TELRIC Costs for Unbundled Network Elements	TELRIC cost modeling, Local Competition.
98-1082-TP-AMT (December, 1998)	SBC/Ameritech Request for Approval of Merger	Sharing of cost saving. Total factor productivity growth.
96-899-TP-ALT (December, 1997)	Cincinnati Bell Alternative Regulation	Price Cap Regulation/ Rate Rebalancing/ Rate Design.
94-2019-TP-ACE (May, 1995)	MFS INTELENET	Financial, Managerial, and Technical Ability to Provide Local Exchange Service.
93-487-TP-ALT and 93-576-CSS (September, 1994)	Ohio Bell: Alternative Regulation	Incremental Costs/ Fully Distributed Costs/ Alternative Regulation.

**Pennsylvania (On behalf of the Pennsylvania Office of Consumer Advocate)**

<b><u>PPUC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
Docket No. P-2011-2218683 Direct Testimony March, 2011	Petition of West Penn for Approval of TOU Rates	Electric Service Time-of-Use Rate Design
Docket No. P-2011-2224781 Direct Testimony April, 2011	Petition of West Penn For Approval of Critical Peak Pricing Program	Electric Service Critical Peak Rate Design
Docket No. A-2010-2176733 Direct Testimony (July, 2010) Surrebuttal Testimony (August, 2010)	Qwest Change of Control	Evaluation of Proposed Qwest/ CenturyLink Merger

**Pennsylvania (On behalf of the Pennsylvania Office of Consumer Advocate, Continued)**

<b><u>PPUC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
Docket Nos. A-2009-2109528, A-2009-2109530, A-2009-2109531, and A-2009-3109532 (September, 2009)	Windstream/D&E Communications	Evaluation of Proposed Merger; Merger Approval
A-2008-2076038 (February, 2009)	CenturyTel/Embarq	Evaluation of Proposed Merger; Merger Approval

**Virginia (On behalf of Consumer Counsel Section of the Virginia Office of Attorney General)**

<b><u>SCC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
PUC-2007-00008 (June, 2007)	Verizon Petition for Deregulation and Detariffing	Local Exchange Competition; Market Analysis.

**Washington (On behalf of Public Counsel Section of the Washington Attorney General)**

<b><u>WUTC Docket No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
UT-12-1994 (April, 2013)	Frontier Request For Deregulation	Competition and Technology Transformation
UT-09-0842 (October, 2009)	Frontier/Verizon Merger Approval	Evaluation of Proposed Frontier/ Verizon Merger
UT-08-2119 (March, 2009)	CenturyTel/Embarq Merger Approval	Evaluation of Proposed Merger; Merger Conditions
UT-050814 (September, 2005)	Verizon/MCI Merger	Market Structure and Market Power. Merger Conditions.

**West Virginia (On behalf of the Consumer Advocate Division of the West Virginia Public Service Commission)**

<b><u>WVSPC Case No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
09-0871-T-PC (November, 2009)	Frontier/Verizon Merger Approval	Evaluation of Proposed Frontier/ Verizon Merger.

**Indiana (On behalf of the Indiana Consumer Counselor).**  
**\*Testimony prepared, but not filed due to case settlement.**

<b><u>IURC Cause No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
40611 (June, 1997)	Ameritech Indiana Approval of Statement of Generally Available Terms	Analysis of TELRIC studies.
39853 (March, 1994)	Teleport Communications Group of Indiana, Inc.	Authority to provide intraLATA and interLATA Private Line Services.
39705 (January, 1994)	Indiana Bell Telephone	Alternative Regulation/ Competition/Infrastructure Deployment/Imputation.
39474 (May, 1994)	Indiana Payphone Association v. Indiana Bell Telephone	Imputation/separate subsidiary.
39755 (September, 1993)	GTE North Inc./GTE Intelligent Network Service Inc.	Divestiture of Assets/Policy.
39718 (August, 1993)	Ameritech Advanced Data Services	Affiliate Relationships.
39475 (March, 1993)	Indiana Payphone Association	Dial-Around Compensation.
38269-S4 (February, 1993)	IntraLATA Toll Compensation	Toll Rate Deaveraging.
39369 (February, 1993)	IURC Investigation into Access Charge Parity	Access Charge Parity/Recovery of Non-Traffic-Sensitive Costs/Policy.
39618 (January, 1993)	IURC Investigation into Special Access Collocation	Collocation Policy.
39385 (October, 1992)	Indiana Bell Telephone: Competition and Pricing Flexibility	Evaluation of Competition in Dedicated Communications Market/Policy.
39353*	Indiana Gas Company	Temperature Normalization Tracker/Demand Side Management/Reproduction Cost of Rate Base/Capital Costs.

**Indiana (On behalf of the Indiana Consumer Counselor) (Continued)**

**\*Testimony prepared, but not filed due to case settlement.**

<b><u>IURC Cause No.</u></b>	<b><u>Title</u></b>	<b><u>Topic</u></b>
39314 (September, 1992)	Indiana Michigan Power Co.	Clean Air Act Amendments /Demand Side Management.
39221 (January, 1992)	American Telecommunications Corporation	Financial Viability.
39215 (January, 1992)	Indiana American Water Co.	Reproduction Cost of Rate Base/Capital Costs.
39166 (November, 1991)	Indiana Cities Water Co.	Reproduction Cost of Rate Base/Capital Costs.
39164/39165 (October, 1991)	Ohio Valley Gas Corp.	Reproduction Cost of Rate Base/Capital Costs.
39017*	IURC Investigation into Indiana Bell Earning	Reproduction Cost of Rate Base/Capital Costs.

**Comments Filed**

**Federal Communications Commission (On Behalf of AARP)**

In the Matter of Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174, Reply Comments, March 9, 2015.

In the Matter of Protecting and Promoting the Open Internet GN Docket No. 14-28, July 15, 2014. Prepared Comments.

In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, May 12, 2014. Prepared Comments.

In the Matter of Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, WC Docket No. 12-353, GN Docket No. 13-5, Prepared Comments, March 31, 2014 and Reply Comments, April 10, 2014.

In the Matter of Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 13-239, PS Docket No. 11-60, Prepared Comments, January 17, 2014 and Reply Comments, February 18, 2014.

In the Matter of Application of Verizon New Jersey Inc. And Verizon New York Inc. to Discontinue Domestic Telecommunications Services WC Docket No. 13-150, Comp. Pol. File No. 1115, July 29, 2013. Prepared Comments.



**Federal Communications Commission (On Behalf of AARP, continued.)**

In the Matter of Technology Transitions Policy Task Force Seeks Comments on Potential Trials, GN Docket No. 13-5. Prepared Comments, July 8, 2013 and Reply Comments, August 8, 2013.

In the Matter of AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, WC Docket No. 12-353. Prepared Comments and Reply Comments (January 28, 2013 and February 25, 2013).

In the Matter of Universal Service Contribution Methodology, A National Broadband Plan For Our Future, WC Docket 06-122, GN Docket No. 09-51. Prepared Comments and Reply Comments (July 9, 2012 and August 6, 2012).

In the Matter of High-Cost Universal Service Support Federal-State Joint Board on Universal Service, WC Docket No. 05-337; CC Docket No. 96-45 (Universal Service Reform and Reverse Auctions). Assisted AARP with preparation of Comments (Filed April 17, 2008), and Reply Comments (Filed June 2, 2008).

In the Matter of Inquiry into High-Speed Access to the Internet Over Cable and Other Facilities. GN Docket No. 00-185, FCC No. 00-355. "Tangled Web: The Internet and Broadband Open Access Policy." (January 10, 2001).

**Federal Communications Commission (On Behalf of National Association of Utility Consumer Advocates, Maine Office of Public Advocate, New Jersey Division of Rate Counsel, and The Utility Reform Network)**

In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund. WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208. Prepared Comments. (January 18, 2012.)

**Federal Communications Commission (On Behalf of National Association of Utility Consumer Advocates)**

In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link Up. WC Docket No. 10-90, GN Docket No. 09-51 WC Docket No. 07-135 WC Docket No. 05-337 CC Docket No. 01-92 CC Docket No. 96-45 WC Docket No. 03-109. Prepared Comments and Reply Comments. (April 18, 2011 and May 23, 2011.)

**Federal Communications Commission (On Behalf of the National Association of Utility Consumer Advocates, Maine Public Advocate Office, Ohio Consumers' Counsel, TURN)**

In the Matter of Connect America Fund, A National Broadband Plan for Our Future, High-Cost Universal Service Support, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 05-337. Affidavit in support of NASUCA's Comments on universal service reform, use of high-cost model, and reverse auctions. (July 12, 2010.)

**California Public Utilities Commission (On Behalf of TURN)**

Order Instituting Rulemaking into the Review of the California High Cost Fund B Program. (Auctions for Universal Service Funding. With Regina Costa and Christine Mailloux. November 9, 2007.)

Federal Communications Commission (On Behalf of Consumer Federation of America, Consumers Union, Free Press, US PIRG).

In the Matter of Broadband Industry Practices. WC Docket No. 07-52. (Supporting documents attached to Comments. June 15, 2007.)

**Federal Communications Commission (On Behalf of Consumer Federation of America, Consumers Union, Free Press, US PIRG).**

In the Matter of AT&T Inc. and BellSouth Corporation Applications for Approval of Transfer Of Control, WC Docket No. 06-74. (June 6, 2006.) With Mark Cooper.

**Federal Communications Commission (On Behalf of National Association of Utility Consumer Advocates)**

In the Matter of Federal-State Joint Board on Universal Service, CC Docket 96-45. Affidavit addressing application of forward-looking economic cost methodology to rural ILECs with 100,000 or more access lines. (December 14, 2004.)

**Indiana Utility Regulatory Commission (On behalf of the Indiana Consumer Counselor)**

A Comprehensive Approach to Local Exchange Competition in Indiana (October, 1995).

**Indiana Utility Regulatory Commission (On behalf of the Indiana Consumer Counselor)**

Comments of the Office of the Office of Utility Consumer Counselor to the Telecommunications Regulatory Flexibility Committee (1993).

**New York Public Service Commission (On behalf of Independent Telephone Companies [NYNEX and Rochester excluded])**

Proceeding on Motion of the Commission to Examine Issues Related to the Continued Provision of Universal Service and to Develop a Regulatory Framework for the Transition to Competition in the Local Exchange Market: "Comments on Compensation Arrangements Related to Module 2" (April, 1995).

**Maine Public Service Commission (On behalf of Independent Telephone Companies [NYNEX excluded])**

Inquiry Into the Provision of Competitive Telecommunications Services (Chapter 280), Docket 94-114: "Reply Comments to the Preliminary Proposal for a Revision and Restructuring of the Access Charge Provision of Chapter 280" (June, 1995).

## **Federal Communications Commission (On behalf of the Indiana Consumer Counselor)**

Comments of the Indiana Office of Utility Consumer Counselor on the Ameritech Customers First Plan (1993).

Reply Comments of the Indiana Office of Utility Consumer Counselor on the Ameritech Customers First Plan (1993).

### **Civil Litigation**

Jason Bond and David Lear, individually and as class representatives of those similarly situated v. Veolia Water North America Operating Services, Inc.; Veolia Water North America Operating service, LLC; and Veolia Water Indianapolis, LLC. In the Marion County, Indiana, Superior Court. Analysis and litigation support. 2008; United States District Court, Southern District of Indiana, Indianapolis Division, Affidavit, June 16, 2008.

Baxter Air, Inc., and for all others similarly situated, Plaintiffs, v. NOS Communications, Inc., NOSVA Limited Partnership, Affinity Network, Inc., Robert A. Lichtenstein, and Joseph T. Kopyy, Defendants. In the Superior Court of the State of Washington in and for the County of King. Declaration, July 2007.

Brooke Randolph and John Girad, et al, Plaintiffs, v. AT&T Wireless Services Inc., et al. Superior Court of the State of California in and for the County of Alameda, Unlimited Jurisdiction. Declaration, February 12, 2007. Reply Declaration, April 25, 2007. Declaration, March 4, 2009.

Christopher W. Hesse, Plaintiff v. Sprint Spectrum L.P., Defendant. Nathaniel Olson, Plaintiff v. Sprint Spectrum L.P., et al v. Sprint Spectrum L.P. et al. United States District Court Western District of Washington at Seattle. Declaration, April 30, 2007.

Dawn M. Black, et al, Plaintiffs, v. Indiana Bell Telephone Company, Inc. d/b/a Ameriech Indiana. State of Indiana, Marion County Superior Court. Analysis and litigation support. 2006-2007.

Robert Young, et al, Plaintiffs, v. United Telephone of Indiana, Inc. *d/b/a* Sprint. State of Indiana, Marion County Superior Court. Analysis and litigation support. 2003-2004.

Mark Webber, et al, Plaintiffs, v. Indiana Bell Telephone Company, Inc. d/b/a Ameriech Indiana. State of Indiana, Marion County Superior Court. Analysis and litigation support. 2003-2004.