

Statement of Qualifications

HELEN E. GOLDING

Helen E. Golding has worked for over thirty-five years in the field of utility regulation and public policy. As Vice President at Economics and Technology, Inc. (ETI) from 1994 to 2011, Ms. Golding had a wide-ranging practice that involved traditional regulatory issues (such as rate setting, rate design, universal service, affiliate transactions, and quality of service), mergers and acquisitions, antitrust, and a host of issues arising from competition, deregulation, and the evolution of new technologies and the Internet. She is currently an independent consultant. In addition to work in state and federal regulatory proceedings in the US, Ms. Golding has also provided consulting services to AT&T Canada and MTS Allstream in proceedings before the Canadian Radio-television and Telecommunications Commission. Ms. Golding has served as an expert witness for the Pennsylvania Attorney General (representing the Department of Revenue), and for the City of Newton, Massachusetts.

Much of Ms. Golding's work in recent years has focused on industry structure and the effects of competition and evolving technologies, including work on behalf of consumer advocates on legislative and regulatory initiatives related to the deployment of new technologies, deregulation, and the preservation of safe, reliable, and affordable service for all consumers. She has a broad understanding of the issues confronting regulators and stakeholders, having analyzed these issues from the diverse (although frequently overlapping) perspectives of residential consumers, small/medium/large business customers, and competitive providers. Ms. Golding has also worked with state and local taxing authorities in matters involving state taxation of telecommunications and information services.

Although most of Ms. Golding's work has involved the telecommunications industry, similar issues arise in other industries where changes in market structure and regulation create new challenges for consumer protection. Thus, Ms. Golding recently assisted Connecticut's Office of Consumer Counsel to analyze the practices of competitive retail electric suppliers and their consequences for consumers.

As Assistant General Counsel of the Massachusetts Department of Public Utilities from November 1988 to September 1992 (including an interval as Acting General Counsel), Ms. Golding managed a staff of hearing officers who conducted adjudicatory and rulemaking proceedings for all regulated utilities. Her position required case management and policy coordination with the Department's numerous technical divisions (organized by industry sector: telecommunications, electric, gas, water, and transportation). Ms. Golding also served as the DPU's chief legal advisor on matters that spanned the Department's broad utility jurisdiction. In addition to overseeing numerous rate cases for all utilities, these proceedings included the tariffing of new services, design of conservation and load management programs, incentive and competitive rates, licensing, financing, siting and utility management practices.

Immediately prior to joining ETI, Ms. Golding was in the Regulatory Practice Group at Rubin and Rudman, a mid-sized Boston law firm, where she specialized in communications, energy, and municipal law, for clients that included communications and cable companies, municipal electric companies, independent power producers, and public authorities.

Prior to becoming Assistant General Counsel at the DPU, Ms. Golding was Regulatory Counsel and Manager of Telecommunications Public Policy for Honeywell, Inc., providing legal and strategic planning advice concerning rate and regulatory developments affecting the company as a large user of telecommunications service and as a computer manufacturer. In that position, she also provided counsel on tariff and regulatory matters to the company's alarm and customer premises equipment businesses.

Ms. Golding also worked at the Federal Communications Commission, as a General Attorney in the Common Carrier Bureau, Tariff Division, where she was responsible for tariff review and rulemaking proceedings for domestic and international telecommunications services. After interning with the Department of Public Utilities during her final year of law school, Ms. Golding joined the Department's new Telecommunications Division as a Telecommunications Specialist. Among her responsibilities were matters pertaining to the Department's regulation of radio common carriers and coordination with the CATV Commission on rates, terms, and conditions for pole attachments.

Ms. Golding is a graduate of Boston University School of Law (J.D., 1977 and Bryn Mawr College (A.B. *cum laude*, 1974).

Publications of Helen E. Golding

The BCM [Benchmark Cost Model] Debate, A Further Discussion, (with Dr. Lee L. Selwyn and Susan M. Baldwin). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, May 1996.

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Report on the Southern New England Telephone Company (SNET), (with Patricia D. Kravtin, et al.), prepared for Cablevision Systems Corporation, July 1997.

The "Connecticut Experience" with Telecommunications Competition: A Case in Getting it Wrong, (with Lee L. Selwyn and Susan M. Gately), February 1998.

Affidavit of Susan M. Baldwin and Helen Golding, submitted on behalf of Consumer Groups in FCC Docket CC 98-141, SBC-Ameritech Merger Proceeding, October 15, 1998.

Affidavit of Susan M. Baldwin and Helen Golding, submitted on behalf of Consumer Groups in FCC Docket CC 98-184, Bell Atlantic-GTE Merger Proceeding, December 18, 1998.

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Market-based Solutions for Realigning Spectrum Use in the 800 MHz Band, (with Lee L. Selwyn), June 2003.

Competition in Access Markets: Reality or Illusion, (with Lee L. Selwyn and Susan M. Gately) prepared for the Ad Hoc Telecommunications Committee, August 2004.

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Avoiding the Missteps Made South of the Border: Learning from the US Experience in Competitive Telecommunications Policy (with Lee L. Selwyn), prepared for MTS Allstream Inc., August 2006.

Special Access Overpricing and the US Economy: How Unchecked RBOC Market Power is Costing US Jobs and Impairing US Competitiveness, with Lee L. Selwyn, Susan M. Gately, and Colin B. Weir, prepared for the AdHoc Telecommunications Users Committee, August 2007.

“The Comcast Decision and the Case for Reclassification and Re-regulation of Broadband Internet Access as a Title II Telecommunications Service,” (with Lee L. Selwyn), *Icarus* (Communications & Digital Technology Industries Committee, American Bar Association Section of Antitrust Law), Fall 2010.

A New Era in ILEC Transfers: Safeguarding Wireline Telecom Service, National Regulatory Research Institute, December 2010.

“Revisiting the Regulatory Status of Broadband Internet Access: A Policy Framework for Net Neutrality and an Open Competitive Internet,” (with Lee L. Selwyn), *Federal Communications Law Journal*, vol. 63, no. 1, December 2010.

Market Definition in Antitrust: Theory and Case Studies, Chapter 10, “Network Industry Markets: Telecommunications,” (with Lee L. Selwyn), ABA Section of Antitrust Law, 2012.

Telecom Antitrust Handbook, Second Edition, ABA Section of Antitrust Law, 2013 (contributor).