

**OFFICE OF CONSUMER ADVOCATE**

**DIRECT TESTIMONY**

**OF**

**TONY CAMPBELL**

**In Re Rehabilitation Center of Allison, Iowa**

**Docket No. FCU-2012-0019**

**October 30, 2013**

1 **Q: Please state your name.**

2 A: Tony Campbell.

3 **Q: By whom are you employed?**

4 A: Waverly Health Center, Waverly, Iowa.

5 **Q: What is your position?**

6 A: Maintenance mechanic.

7 **Q: Are you aware that the Rehabilitation Center of Allison filed a complaint with**  
8 **the Iowa Utilities Board regarding the failure of calls and faxes, including calls**  
9 **and faxes from the Waverly Health Center and the Shell Rock Clinic, to**  
10 **complete to the Rehabilitation Center of Allison?**

11 A: Yes.

12 **Q: Would you accept my word that the complaint was filed on September 24,**  
13 **2012?**

14 A: Yes.

15 **Q: Do you have an understanding as to whether personnel at the Waverly Health**  
16 **Center and the Shell Rock Clinic, prior to that date, experienced difficulties**  
17 **completing calls and faxes to the Rehabilitation Center of Allison?**

18 A: Yes. We did.

19 **Q: Did you, or to your knowledge did anyone at the Waverly Health Center or the**  
20 **Shell Rock Clinic, keep a log of or track the difficulties?**

21 A: No.

22 **Q: Do you have personal knowledge of the difficulties?**

1 A: Yes. On multiple occasions, I received telephone calls from the Shell Rock Clinic  
2 about faxes that would not go through to the Rehabilitation Center of Allison.  
3 Upon receipt of these calls, I placed test telephone calls to the Rehabilitation Center  
4 of Allison. I would get twenty seconds of silence or nothing at all. I would then  
5 call CenturyLink to report the difficulty.

6 **Q: Do you recall on how many occasions this happened?**

7 A: No. Perhaps between five and ten. Perhaps closer to five.

8 **Q: Do you recall the dates?**

9 A: No.

10 **Q: What phone line were you using when you placed the test calls to the**  
11 **Rehabilitation Center of Allison?**

12 A: Waverly Health Center.

13 **Q: A landline phone at the facility?**

14 A: Yes.

15 **Q: Did you dial directly?**

16 A: Yes.

17 **Q: What did CenturyLink tell you when you called CenturyLink to report the**  
18 **difficulties?**

19 A: They opened a ticket. Within the same working day, sometimes within an hour,  
20 they asked to do test calls. They corrected the problem, usually quickly. The calls  
21 and faxes would work. The only explanation they gave me was “routing issues.”

22 **Q: Is there anything you would like to add?**

23 A: Not at this time.

1 **Q: Does that conclude your testimony?**

2 A: Yes.

STATE OF IOWA                    )  
  ) ss.  
COUNTY OF BREMER            )

I, Tony Campbell, being first duly sworn on oath, depose and state that that I am familiar with the contents of the foregoing testimony and that the foregoing testimony is true and correct to the best of my knowledge and belief.

/s/ Tony Campbell  
Tony Campbell

Subscribed and sworn to before me this 22 day of October, 2013.

/s/ Mary Mihm  
Notary Public

My Commission expires: April 5, 2015