

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

**FILED WITH
Executive Secretary**

February 03, 2015

IOWA UTILITIES BOARD

IN RE:

COMPLAINTS OF HELEN ADOLPHSON
AND CHARLOTTE SKALLERUP

DOCKET NO. FCU-2013-0006

MOTION TO COMPEL DISCOVERY

The Office of Consumer Advocate (OCA) seeks an order compelling InterMetro, Inc., to respond to OCA data request no. 5 by a date certain in the near future. In support of the motion, OCA states:

1. On September 18, 2014, OCA directed the following data request no. 5 to InterMetro: "Insofar as InterMetro's participation in call routing and call routing is concerned, what are InterMetro's long-term solutions to the call completion problems?"
2. A response was initially due September 25, 2014.
3. No response has been received.
4. As evidenced by the attached correspondence, OCA has made a good faith effort to resolve the issue without the involvement of the presiding officer.
5. Most recently, on January 28, 2015, OCA made a telephone inquiry to counsel for InterMetro and received a response indicating that progress is being made.

WHEREFORE, OCA requests the entry of an order compelling a response to OCA data request no. 5 by a date certain in the near future.

Respectfully submitted,

Mark R. Schuling
Consumer Advocate

/s/ Craig F. Graziano
Craig F. Graziano
Attorney

1375 East Court Avenue
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OFFICE OF CONSUMER ADVOCATE

Graziano, Craig [OCA]

From: Graziano, Craig [OCA]
Sent: Monday, January 12, 2015 11:54 AM
To: Dublinske, Bret
Subject: RE: IUB No. FCU-2013-0006

Bret,

Would you please check on this for me? Thanks.

Craig

Craig F. Graziano, Attorney
Office of Consumer Advocate
Iowa Department of Justice
1375 East Court Avenue, Room 63
Des Moines, Iowa 50319-0063
Telephone (direct): 515-725-7223
Telephone (office): 515-725-7200
Fax: 515-725-7221

From: Graziano, Craig [OCA]
Sent: Wednesday, January 07, 2015 12:12 PM
To: Dublinske, Bret
Subject: FW: IUB No. FCU-2013-0006

Bret,

Just another reminder. Please do what you can to expedite and to be sure that we have within the next couple of days. Thank you.

Craig

From: Graziano, Craig [OCA]
Sent: Monday, December 29, 2014 11:20 AM
To: Dublinske, Bret
Subject: FW: IUB No. FCU-2013-0006

Bret,

In reviewing my checklists, I think we still need an affidavit and a response to DR no. 5 from InterMetro in the above cases. Our reports are due January 16, 2015. We would appreciate receiving no later than the end of next week. Thanks.

Craig F. Graziano, Attorney

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Graziano, Craig [OCA]

From: Graziano, Craig [OCA]
Sent: Friday, January 16, 2015 2:37 PM
To: Dublinske, Bret
Subject: FCU-2013-0006. In re Complaints of Adolphson and Skallerup.

Bret,

We are missing a response to data request no. 5, which was due in early October. We will need a response no later than Monday, January 26. We are also missing an affidavit from InterMetro.

Thanks for any help you may be able to provide.

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