

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

**FILED WITH
Executive Secretary
July 03, 2014
IOWA UTILITIES BOARD**

IN RE

COMPLAINT OF CAROLYN FRAHM

DOCKET NO. FCU-2013-0007

MOTION TO COMPEL DISCOVERY (VERIZON)

For the reasons stated in this motion, the Office of Consumer Advocate (OCA) seeks an order compelling proper responses by MCI Communications Services, Inc. d/b/a Verizon Business Services (Verizon) to OCA discovery requests nos. 5 through 12 and 14 through 19 by a date certain in the near future. Copies of requests nos. 5-12 and 14-19, and the objections to nos. 5-12, are attached. OCA has received no responses or objections to nos. 14-19.¹ In support of the motion, OCA states:

Data requests nos. 5-12

1. Data requests nos. 5-12 were served on Verizon on December 16, 2013. They seek information regarding the removal of underlying or intermediate carriers from the routing of calls to Iowa destinations following a consumer complaint (no. 5), performance standards that Verizon may impose on underlying or intermediate carriers (no. 6), sanctions Verizon can impose or has imposed on intermediate carriers for failure to meet those standards (nos. 7 and 8), inquiries from or responses to the FCC regarding call completion issues relevant to Iowa (no. 9), and statistics Verizon may have regarding its call completion rate in Iowa (no. 12). These data requests also seek Verizon's perspective or understanding on two issues: whether the use of Internet protocol

¹Data requests nos. 14-19 sought follow-up information to the response to request no. 3, which is also attached.

technology has an effect on whether a call goes through (no. 10), and whether an underlying or intermediate carrier is able to avoid paying terminating or other charges from the terminating local exchange carrier or from Iowa Network Services (no. 11).

2. On February 28, 2014, citing the presiding officer's order regarding Verizon's motion for clarification, Verizon objected to each of these requests. These objections are included in the attachment.

3. By correspondence dated May 6, 2014, OCA sought to resolve the dispute without the involvement of the Board or presiding officer. A copy of the correspondence is attached. OCA has received no response to the correspondence.

4. As explained in greater detail in OCA's resistance to Verizon's motion to dismiss, the earlier orders in this docket reject Verizon's argument regarding the nature and scope of its obligation to assist in addressing the rural call completion problem. The docketing order observes that the responses previously received from the companies during the informal complaint proceedings did not fully explain how any changes made to the call path worked to prevent call failures. The order expressly states that further investigation would allow the Board to better understand what works to prevent call completion problems from occurring in the first place. The order on clarification observes that these problems are of particular concern to the Board and that finding solutions in this particular case should be considered in the larger context of the recurrent difficulties observed by state and federal authorities alike. The order states that useful sources of information for appropriate corrective and preventive actions may include telephone carriers whose customers have not experienced call completion problems or those who have found and implemented effective corrective solutions. The order states

that being a party to this case does not necessarily mean that the party did something wrong. The order states that correcting and preventing these problems will require cooperation and creativity. The order reiterates that Verizon's participation may be needed in understanding what worked in this case. The most recent order on prehearing conference states that the purpose of the cases is to understand the causes of the problems, what was done to fix the problems in these particular cases, why the corrections solved the problems, and what the long-term solutions to the problem are – and for the companies to implement long-term solutions so Iowa customers do not continue to experience call completion issues as they have in the past.

5. As the facts of this case attest, input from Verizon may well be an essential part of the solution. When Windstream effected a solution to the call completion problems of which Ms. Frahm had been complaining, it looked to Verizon.

6. The information requested in data requests nos. 5-12 will help the Board understand what works to prevent call completion problems in the first place. Verizon may have effective standards for intermediate carriers or an effective means for removing or sanctioning underlying or intermediate carriers who fail to meet standards. It may well have information regarding particular underlying or intermediate carriers who have failed repeatedly to complete calls to rural Iowa destinations. Correspondence between the FCC and Verizon on the subject of rural call completion could well elucidate effective ways of preventing rural call completion problems. It could well suggest new avenues for cooperation and creativity. Statistics on call completion rates may well help identify sound solutions. If and to the extent Verizon has an understanding of the role played by IP technology and the role played by terminating charges, that, too, could prove helpful

in forging solutions. The information requested is therefore both relevant to the subject matter of these proceedings and reasonably calculated to lead to the discovery of admissible evidence. See Iowa R. Civ. P. 1.503(1).

7. As indicated in the attached correspondence dated May 6, 2014, OCA has offered to discuss any concerns Verizon may have that these eight requests, or some of them, may be burdensome. Verizon, however, has declined to respond at all, electing instead to rely on a blanket unsupported claim of burdensomeness. Some burden is to be expected and is necessary in furtherance of the Board's and the OCA's legitimate inquiry and the public interest. See *State ex rel. Miller v. Publishers Clearing House, Inc.*, 633 N.W.2d 732, 738-39 (Iowa 2001). Verizon has the burden of making a "specific" showing that providing the requested information would "threaten to unduly disrupt or seriously hinder normal operations of [its] business." *Id.* That burden is not easily met where, as here, the agency inquiry is pursuant to a lawful purpose and the requested documents are relevant to that purpose. *Id.* Verizon's blanket unsupported claims do not meet this burden.

Data requests nos. 14-19

8. Data requests nos. 14-19 were served on Verizon on May 6, 2014. All of these data requests seek follow-up information regarding Verizon's response to data request no. 3 (attached).

9. Responses to these data requests were originally due on May 13, 2014. At Verizon's request, OCA extended the time for response to June 12, 2014. No responses to these data requests have been received.

10. By correspondence dated June 17, 2014, OCA sought to resolve the dispute without the involvement of the Board or presiding officer. A copy of the correspondence is attached. OCA has received no response to the correspondence.

WHEREFORE, OCA moves for an order compelling proper responses to OCA discovery requests nos. 5-12 and 14-19 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
Des Moines, IA 50319-0063
Telephone: (515) 725-7200
E-Mail: IowaOCA@oca.iowa.gov
E-Mail: Craig.Graziano@oca.iowa.gov

OFFICE OF CONSUMER ADVOCATE

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

3. Please describe the complete routing of calls from Frahm's phone number to the Mediapolis number provided in her complaint, immediately after Windstream began using Verizon as underlying carrier. Please include in your response the identity of each underlying or intermediate carrier known to Verizon.

VERIZON'S RESPONSE (2/28/14): Due to Windstream's use of non-standard resale order flow, coupled with the passage of time, Verizon does not have access to the requested information.

It is impossible for Verizon to pinpoint precisely when Windstream began using Verizon as an underlying carrier because Windstream, as both the local exchange carrier ("LEC") and long distance reseller to Ms. Frahm, did not follow standard order flow in ordering resale service from Verizon. The standard process is as follows: (1) the long distance reseller (here, Windstream) submits an order to Verizon to add an ANI to the reseller's account; (2) on behalf of the reseller, Verizon submits an order to the LEC serving that ANI to switch the resold long distance service to Verizon's network; (3) the LEC performs the switch and sends a confirmation or rejection back to Verizon; and (4) Verizon then notifies the reseller of the LEC's confirmation or rejection. In this instance, because Windstream was both Ms. Frahm's LEC and long distance reseller, it bypassed step (3), making it impossible for Verizon to pinpoint the specific date on which the change to Verizon as underlying carrier occurred. Verizon knows only that the change had been completed by March 3, 2013, as Verizon received a 6000 TSCI (a type of transaction code) from Windstream that reflected call routing over Verizon's network on that date. (In its April 24, 2013 response to Board Staff's request for information relating to Ms. Frahm's informal complaint, Verizon originally mistakenly identified the 6000 TSCI as a duplicate service order request, but it was not a duplicate. That error in Verizon's initial response is irrelevant to the issues identified by Ms. Frahm or the other facts in this case.)

Moreover, because the time period at issue is approximately eleven months ago, records of actual call routing paths are no longer unavailable. Verizon would only be able to identify a theoretical primary route and a sequence of theoretical alternate routes (which are established in case of unavailability or lack of sufficient capacity on the primary route at the time of a particular call) in place at the time, but cannot identify the call routing *actually* used for any particular call at the time.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

5. Has Verizon ever taken action removing an underlying or intermediate carrier from the routing of calls to Iowa destinations following a consumer complaint? If so, please provide the date of each of such action, the identity of the underlying or intermediate carrier, the affected destination or destinations, and the reason for removal. If the carrier was subsequently restored to the routing, please state the date of restoration and the reason for restoration.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing practices in Iowa following a consumer complaint (and Verizon was not the subject of the consumer complaint here).

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

6. Please describe any performance requirements, metrics or standards that Verizon imposes on underlying or intermediate carriers.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing practices or business arrangements with other carriers.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

7. Please describe any sanctions that Verizon can impose on underlying or intermediate carriers for failure to meet performance requirements, metrics or standards.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing practices or business arrangements with other carriers.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

8. Has Verizon imposed a sanction on an underlying or intermediate carrier for failure to meet performance requirements, metrics or standards based in whole or part on calls or faxes placed to or from Iowa? If so, please identify each such carrier, the sanction and the date the sanction was imposed.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing practices or business arrangements with other carriers.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

9. Please state whether, from and after January 1, 2011, the Federal Communications Commission has made inquiry of Verizon regarding (i) possible call completion failure, post dial delay, poor transmission quality or misidentification of calling party on any calls or faxes placed to or from Iowa, (ii) general statistical information, either limited to Iowa or including Iowa, regarding the call completion problem, or (iii) relations with underlying or intermediate carriers, including their removal from routes or their sanctioning for failure to meet performance requirements. If so, please produce the Commissions' inquiries, Verizon's responses, and any follow-up communications. Communications not pertinent to calls to or from Iowa may be omitted.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this request because the Iowa Utilities Board has no jurisdiction over interstate long distance calls subject to the Federal Communications Commission's jurisdiction. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing or call completion practices.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

10. Does Verizon have any information that would assist the Iowa Utilities Board in understanding whether the use of IP switching technology at some point in a call path may have an effect on whether a call goes through to its intended destination? If so, please provide.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about the effects of the use of IP switching technology.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

11. Does Verizon have an understanding as to whether an underlying or intermediate carrier, if subtended a call from Verizon, is able to avoid paying terminating or other charges from the terminating LEC or from Iowa Network Services? If so, what is that understanding?

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing practices or intercarrier compensation matters pertaining to other carriers.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : December 16, 2013
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

12. Please produce any statistics maintained by Verizon, from and after January 1, 2011, regarding its call completion rates in Iowa, including any breakdown by geographic location or NPA NXX.

VERIZON'S RESPONSE (2/28/14): Verizon objects to this request as overbroad, unduly burdensome, harassing, an improper attempt to convert an individual complaint case against Windstream into a generic call routing investigation, and not reasonably calculated to lead to the discovery of admissible evidence. The Administrative Law Judge's August 16, 2013 "Order Regarding Verizon's Motion for Clarification" found that Verizon was not the cause of Ms. Frahm's call completion problems, but the solution, and that Verizon's participation in this case is therefore limited to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved Ms. Frahm's call completion problems. Verizon is not subject to generalized discovery about its call routing or call completion practices.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

14. Is the standard resale order flow referenced in Verizon's response to data request no. 3 reduced to writing? If so, please produce a copy and indicate where precisely in the document this information can be found. Was this information communicated to Windstream? If so, when, by whom and to whom, and by what means? Please produce all supporting documentation.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

15. Did Windstream, pursuant to step 1 of the standard resale order flow referenced in Verizon's response to date request no. 3, submit an order to Verizon to add Ms. Frahm's ANI to its reseller account? Did Verizon, on behalf of Windstream as reseller, pursuant to step 2 of the standard resale order flow referenced in response to data request no. 3, submit an order to Windstream as LEC to switch the resold long distance service to Verizon's network? Please produce all supporting documentation.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

16. Verizon's response to data request no 3 states that Verizon, in its April 24, 2013 response to Board staff, originally mistakenly identified the 6000 TSCI on April 24, 2013 as a duplicate service order request. Is it accurate to infer from this statement that MCI did not receive an electronic order from Windstream to add Ms. Frahm's telephone number to Windstream's reseller account on February 8, 2013, as also stated in the April 24, 2013 response? Did MCI receive something else from Windstream on February 8, 2013? If so, what? Please explain what TSCI 6000 means.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

17. Please produce any documentation of communications between Windstream and Verizon regarding the movement of Ms. Frahm's telephone number to Windstream's network, including but not limited any orders, requests or correspondence.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

18. What is the theoretical primary route and the sequence of theoretical alternate routes, as referenced in Verizon's response to data request no. 3, in place for calls from Ms. Frahm's phone number to the number she was trying to reach in Mediapolis as of March 7, 2013? What is the theoretical primary route and the sequence of theoretical alternates route in place for the same calls as of the date of your response to this data request?

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE
DATA REQUEST**

DATE : May 6, 2014
DOCKET NO. : FCU-2013-0007
COMPANY : Verizon

19. Please explain Verizon's record retention policies with respect to the actual routes of calls placed on Verizon's network from and to points within Iowa. Are these policies reduced to writing? If so, please produce.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

Graziano, Craig [OCA]

From: Graziano, Craig [OCA]
Sent: Tuesday, May 06, 2014 2:03 PM
To: Dublinske, Bret
Subject: FCU-2013-0007. Carolyn Frahm.

Bret,

Thank you, and the same to Verizon, for the discovery responses provided February 28, 2014. We appreciate the cooperation. We will be sending a few follow-up discovery requests.

The purpose of this message is to attempt to resolve a discovery issue.

Data request nos. 5-12 seek information regarding the removal of underlying or intermediate carriers from the routing of calls to Iowa destinations following a consumer complaint, performance standards that Verizon may impose on underlying or intermediate carriers, any sanctions Verizon can impose or has imposed on intermediate carriers for failure to meet those standards, inquiries from or responses to the FCC regarding call completion issues relevant to Iowa, and any statistics Verizon may have regarding its call completion rate in Iowa. These data requests also seek Verizon's perspective or understanding on two issues: whether the use of IP technology has an effect on whether a call goes through, and whether an underlying or intermediate carrier is able to avoid paying terminating or other charges from the terminating LEC or from INS. Verizon objects to each of these requests citing the administrative law judge's order regarding Verizon's motion for clarification dated August 6, 2014. Verizon claims the order found that Verizon was the solution to, not the cause of, Ms. Frahm's call completion problems. Verizon further claims that the order limited its participation in the case to its knowledge of the change in Ms. Frahm's call routing from Windstream's prior provider to Verizon and why that change resolved her call completion problems.

While it continues to appear that Verizon was the solution to, and not the source of, the problem, we respectfully disagree with Verizon's contention that the requested discovery is objectionable. On the contrary, we think that both the docketing order dated July 15, 2013, and the order on clarification provide ample basis for the requested discovery. The Board's docketing order observes that the responses previously received from the companies did not fully explain, among other things, how any changes made to the call path worked to prevent call failures. The docketing order expressly states that further investigation would allow the Board to better understand what works to prevent call completion problems from occurring in the first place. The order on clarification observes that these problems are of particular concern to the Board and that finding solutions in this particular case should be considered in a larger context. The order states that useful sources of information for appropriate corrective and preventive actions may include telephone carriers whose customers have not experienced call completion problems or those who have found and implemented effective corrective solutions. The order states that being a party to this case does not necessarily mean that the party did something wrong. The order states that correcting and preventing these problems will require cooperation and creativity. The order reiterates that Verizon's participation may be needed in understanding what worked in this case.

The information requested in data requests nos. 5-12 could well help the Board understand what works to prevent call completion problems in the first place. Verizon may have effective standards for intermediate carriers or an effective means for removing or sanctioning underlying or intermediate carriers who fail to meet standards. Correspondence between the FCC and Verizon could well elucidate effective ways of preventing problems. It could well suggest new avenues for cooperation and creativity. If and to the extent Verizon has an understanding of the role played by IP technology and the role played by terminating charges, that, too, could prove helpful in forging solutions.

We accordingly request that Verizon reconsider its objection to data requests nos. 5-12 and provide responses. We will work with you if any of the requested information is voluminous. Thank you.

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

Graziano, Craig [OCA]

From: Graziano, Craig [OCA]
Sent: Monday, June 16, 2014 10:38 AM
To: Bret A. Dublinske (Bret_Dublinske@gshllp.com)
Subject: Iowa Utilities Board Docket No. FCU-2013-0007. In re Complaint of Carolyn Frahm.

Dear Mr. Dublinske,

The purpose of this letter is to attempt to resolve a discovery dispute without the need for the involvement of the Board or the presiding officer.

Data requests nos. 14-19 were served upon Verizon on May 6, 2014. Responses were originally due May 13, 2014. In response to your request, the time for response was extended to June 12, 2014.

Responses have not been received. Please provide responses or before June 27, 2014. Thank you.

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