

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

**FILED WITH**  
**Executive Secretary**  
**July 3, 2014**  
**IOWA UTILITIES BOARD**

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IN RE

COMPLAINT OF CAROLYN FRAHM

DOCKET NO. FCU-2013-0007

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**MOTION TO ADD PARTY (AIRUS)**

For the reasons stated in this motion, the Office of Consumer Advocate (OCA) seeks an order adding Airus, Inc. (Airus), f/k/a IntelPeer, Inc., as a party to this case.

1. Based on discovery responses received by OCA on February 28, 2013, OCA believes that Airus served as the underlying carrier on the failed calls that Ms. Frahm attempted to place to the number she was trying to reach in Mediapolis, as alleged in her complaint. See Order Regarding Fourth Hearing Conference (March 8, 2014), p. 3 (noting that OCA intended to seek discovery from Airus).

2. OCA further believes that Airus, if it did serve as the underlying carrier on these calls, may have relevant information regarding the routing on the calls, may have interconnected with other carriers in the routing on the calls, may have opened trouble tickets on the calls, may possess information regarding the cause of the failures, and may have an explanation and documentation of efforts that may have been taken by Airus or others to address the alleged failures.

3. For these reasons, OCA believes Airus is a necessary party to these proceedings pursuant to Iowa R. Civ. P. 1.234.

WHEREFORE, OCA moves that Airus be made a party to these proceedings.

Respectfully submitted,

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Consumer Advocate

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