

**May 08, 2013**

**IOWA UTILITIES BOARD**

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

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In the Matter of	Docket No. FCU-2013-0006
The Complaints of Helen Adolphson and Charlotte Skallerup	(C-2013-0006 and C-2013-0011)

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**JOINDER IN STAFF REQUEST FOR FORMAL PROCEEDING**

Pursuant to Iowa Code § 476.3, the Office of Consumer Advocate (OCA), Iowa Department of Justice, joins the staff request for a formal proceeding regarding the above rural call completion complaints. In support of the request, OCA states:

1. On January 17 and 19, 2013, sisters Helen Adolphson of Red Oak and Charlotte Skallerup of Glenwood submitted complaints that phone calls were not completing to their elderly mother in Emerson. Their mother reports no difficulty placing outgoing calls. Emerson (population 438) is nine miles west of Red Oak and twenty-one miles east of Glenwood.<sup>1</sup>

2. Adolphson alleged the calls sometimes go through fine. At times, however, she hears ringing and ringing, but her mother hears nothing. Other times, Adolphson hears one or two rings, followed by a busy signal or a drop. Still other times, the connection is so poor that she and her mother cannot hear one another.

3. Skallerup also reports the calls sometimes go through without difficulty. Other times, “it rings once or twice and then goes dead.” Still other times, “it may ring

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<sup>1</sup>Population figure is from 2010 census.

sounding fine for the first couple of rings and then the ring sounds garbled and if mother tries to answer we cannot hear or understand each other.” Skallerup stated she has hung up and tried as many as 8-10 times and after numerous tries the call may go through. She says she can tell immediately if the ring sounds clear and if the call is going to be proper.

4. On January 17 and 24, 2013, staff requested responsive information from CenturyLink.

5. On March 21, 2013, CenturyLink responded. According to the responses, CenturyLink opened a trouble ticket. Calls records were searched for calls that corresponded with the date and time information provided by Adolphson and Skallerup. Not all of the calls were found, but testing was able to continue with the calls that were found, apparently three in number. The technician determined that the routing was the source of the problem for the three calls.

6. According to the responses, CenturyLink had used an underlying carrier, Intermetro Communications, Inc. The CenturyLink technician removed Intermetro as an intrastate routing option to the NPA/NXX local exchange of the destination number in Emerson. CenturyLink also opened a trouble ticket with Intermetro. According to the responses, following the routing change, CenturyLink verified with Adolphson and Skallerup that the calls were completing correctly.

7. On March 22, 2013, staff requested responsive information from Intermetro.

8. On April 17, 2013, Intermetro responded. According to the response, Intermetro handed the calls to another provider after CenturyLink handed them to Intermetro. According to the response, CenturyLink had identified an “intermittent”

problem and opened two trouble tickets with Intermetro. Intermetro then “researched the matter, identified the provider with the intermittent problem, and permanently removed that provider from delivering calls to Iowa on behalf of Intermetro.” According to the response, Intermetro in conjunction with CenturyLink later verified with Adolphson and Skallerup that the calls were completing correctly.

9. On April 19, 2013, staff asked InterMetro to provide the name, address and contract information for the underlying provider used by Intermetro.

10. On April 22, 2013, Intermetro responded:

InterMetro treats its vendor information as CONFIDENTIAL and PROPRIETARY . . . . InterMetro is obligated by a confidentiality clause in its Master Services Agreement with the vendor at issue: “. . . The Parties understand and agree that the terms and conditions of this Agreement . . . are Confidential Information . . . . A violation or threatened violation by either Party or its agents of this Section will entitle the other Party to seek an injunction or restraining order.” InterMetro will have to notify its vendor of your request before we can provide it because of this contract. It would help resolve the matter quickly if you could advise us that the IUB would treat this information as confidential and proprietary and the proper procedure for submitting this information as such.

11. On April 29, 2013, staff issued proposed resolutions. The proposed resolutions stated:

Call completion issues have been increasing in frequency in complaints filed with the Board. This complaint describes that many of Ms. Adolphson’s [Skallerup’s] calls to her mother are not completing. The increased call completion problems could point to failures due to the use of least cost routers for call completion. Many rural carriers believe that call completion problems begin with least cost routers, and routing is handled by such intermediate or underlying providers. In this case InterMetro states a confidentiality clause in its contract with its underlying carrier prevents InterMetro from disclosing the identity of that carrier. InterMetro has not yet provided the vendor’s information. Further investigation is appropriate in this case for examination of the call completion issues, including the roles and responsibilities of the various carriers regarding the call failures alleged in this complaint. Initiating a

formal proceeding would create a docket in which InterMetro could file a request for confidential treatment of the identity of its underlying carrier, allowing the investigation to proceed. Staff will recommend that the Board initiate a formal proceeding on its own motion.

12. OCA concurs with staff that there is a “reasonable ground for investigation,” within the meaning of Iowa Code § 476.3. The problems reported by Adolphson and Skallerup are occurring with more than sufficient frequency, and to more than a sufficient number of rural telecommunications consumers, to justify investigation.

13. OCA concurs with staff that investigation is needed regarding the roles and responsibilities being played by the several carriers, including the as yet unidentified carrier which, according to Intermetro, was causing the problem and was permanently removed from delivering calls to Iowa on behalf of Intermetro.

14. Investigation is needed regarding the nature of the problem. Although changing the routing on calls to particular destinations alleviates the problems for those who have complained, it not does prevent like problems from occurring at other locations or even from recurring at a later time at the same locations. What is needed is an understanding of the cause of the problem and tools with which to prevent the problem *before* it occurs.

15. OCA concurs with staff that initiating a formal proceeding would give InterMetro an opportunity to request confidential treatment regarding the identity of its underlying carrier, should Intermetro elect to do so. Such a docket would also give other parties an opportunity to resist such a request if made.

16. As Adolphson and Skallerup observe, the failure of calls to complete vitally affects the health, safety and welfare of Iowans. There appears to be a consensus among those who have studied the problem that its source often lies with the underlying

carriers or “least cost routers.” Yet with isolated exceptions, no one outside the industry has until recently appeared to know even who these carriers are.

17. It is not clear why the identity of these underlying carriers would be proprietary or why parties to a contract could agree to shield their identity from public knowledge, especially when the routing of calls on the public network has failed. Public awareness of the failures, including enforcement activity against those responsible when needed, may be an essential part of the solution.

18. An investigation will materially contribute to solving the problem, because carriers will know they are being watched, with a view toward enforcement when needed.

WHEREFORE, OCA concurs with staff that the Board should initiate a formal proceeding on the Adolphson and Skallerup complaints.

Respectfully submitted,

Mark R. Schuling  
Consumer Advocate

/s/ Craig F. Graziano

Craig F. Graziano  
Attorney

1375 East Court Avenue  
Des Moines, IA 50319-0063  
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OFFICE OF CONSUMER ADVOCATE

Copies sent electronically to:  
Helen Adolphson  
[helenadolphson@wildblue.net](mailto:helenadolphson@wildblue.net)

Diana Ornelas, CenturyLink  
[diana.ornelas@CenturyLink.com](mailto:diana.ornelas@CenturyLink.com)

Charlotte Skallerup  
[gc.skallerup@yahoo.com](mailto:gc.skallerup@yahoo.com)

Judith A. Endejan, Attorney for Intermetro Communications, Inc.  
[jendejan@grahamdunn.com](mailto:jendejan@grahamdunn.com)

## **Ganpat-Puffett, Tara [IUB]**

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Monday, April 29, 2013 8:36 AM  
**To:** Glenn & Charlotte Skallerup (gc.skallerup@yahoo.com)  
**Cc:** Diana Ornelas (Diana.Ornelas@CenturyLink.com); jendejan@grahamdunn.com; Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)  
**Subject:** C-2013-0011 (Complaint)  
**Attachments:** C-2013-0011-InterMetro-Response.pdf; C-2013-0011-Staff Request.pdf; C-2013-0011-InterMetro-Response to Request.pdf; C-2013-0011-PR.pdf

See attached.

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317  
Complaint Line Toll Free: 1-877-565-4450  
Complaint Line Local: 725-7321  
E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)



GOVERNOR TERRY E. BRANSTAD  
LT. GOVERNOR KIM REYNOLDS

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ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

April 29, 2013  
File No. C-2013-0011  
PROPOSED RESOLUTION

Ms. Charlotte Skallerup  
22012 Goode Ave.  
Glenwood, IA 51534

Dear Ms. Skallerup:

On January 22, 2013, the Iowa Utilities Board (IUB or Board) received your complaint regarding rural call completion issues. Staff received responses from Qwest Corporation d/b/a CenturyLink QC (CenturyLink) on March 21, 2013, and InterMetro Communications, Inc. (InterMetro) on April 19, 2013.

CenturyLink forwarded a copy of its response to you and the Office of Consumer Advocate (OCA). Staff is attaching InterMetro's response for you and the OCA's records. Below is the summary of your complaint, CenturyLink and InterMetro's responses, and the IUB staff findings:

Complaint:

Ms. Skallerup, your complaint states for the past several months you have had problems calling your mother, Mrs. Faye Wookey, in Emerson, Iowa. You stated your telephone provider is CenturyLink and your telephone number is **REDACTED**. Your mother's telephone provider is Interstate Communications and her telephone number is **REDACTED**. Your complaint states you have called Interstate Communications and they have come to your mother's house and tested numerous times and can't find any problems. You stated you live 30 miles away from your mother and need to check on her often. In your complaint, you stated you have been told to have your phone checked, but you don't believe that is the problem since this is also an issue for your sister. You noted your sister's phone number is **REDACTED** and she lives in Red Oak, Iowa. You also noted your sister and you have no problems calling other people long distance. In addition your mother does not recall having problems calling long distance from her phone. You further stated you have experienced the following trouble calling your mother:

- The phone rings on your end and no one answers and when you checked with your mother you are told the phone never rang at her house.
- The phone rings once or twice, then it goes dead.

- At times the phone may ring, sounding fine for the first couple of rings, and then the ring sounds garbled and if your mother tries to answer, you cannot hear or understand each other.
- Calls are dropped.
- You have tried as calling as many as 8 to 10 times before the call may go through.
- You asked your mother how many times the phone rang before she answered and she has indicated she probably answered on the first or second ring.
- The call goes through, but the connection is so poor you can't hear each other.
- Sometimes the call goes through fine.

You stated the long distance service is unreliable and is a concern since you have to drive 30 miles to make certain your mother is doing okay. You are also concerned your mother had a lifeline alert through the Red Oak, Iowa hospital and you questioned if it works properly if her phone does not always work. You noted you have had the lifeline alert company replace the phone, but they do not think it is their problem.

#### CenturyLink's Response:

On March 21, 2013, CenturyLink provided a response. CenturyLink stated a trouble report ticket was opened by a CenturyLink technician for your telephone number (TN) **REDACTED** and **REDACTED** (your sister, Ms. Adolphson). The call records for those TNs were searched for calls that corresponded with the date and time information supplied by you. CenturyLink stated not all of the calls were found, but testing was able to continue with the calls that were found. CenturyLink stated its technician determined that the routing was the source of the problem for the three calls. An underlying carrier, InterMetro, was used to route the calls. InterMetro was removed by the CenturyLink's technician as an intrastate routing option to the 712 824 NPA/NXX local exchange, and a trouble report ticket was opened with InterMetro. According to CenturyLink, the technician contacted you at TN **REDACTED** and verified with you that calls are now completing without trouble to the Called TN.

CenturyLink stated the following is its standard investigation process for these types of complaints:

- Where there is an issue with the performance of a CenturyLink customer's long distance service, and the customer contacts CenturyLink, CenturyLink opens a trouble report ticket, the issue is identified and documented, and troubleshooting takes place.
- If the issue is related to routing, the route path is reviewed and may be changed and tested for efficacy to allow the customer's traffic to properly flow.
- If an underlying carrier is involved in the problem, it is removed from the path (NPA/NXX), and a trouble report ticket is opened with the underlying carrier. That carrier must conduct a root cause analysis, address the issue to resolution, take corrective action, test its fix, notify CenturyLink, and test with CenturyLink before CenturyLink will re-instate it to be used for processing calls, and close the trouble report ticket.

- The original customer issue is worked, its resolution tested and confirmed, and it is closed with the customer.

CenturyLink explained the following is how the call traffic is routed to rural telephone companies. Long distance traffic is routed based on the dialed digits.

- The route is designated based on the Local Exchange Routing Guide (LERG) information related to the local exchange of the called TN (for ported numbers, the local routing number is used). Traffic that originates and terminates within a state has designated routing options. These are designated based on business and traffic needs. Traffic that goes between states has designated routing options as well, which are also based on business and traffic needs.

#### InterMetro's Response:

On April 19, 2013, InterMetro responded to your complaint and states that CenturyLink passed the call to InterMetro and InterMetro in turn handed the call to another provider to then complete the call directly in Iowa. InterMetro stated CenturyLink had independently identified an intermittent problem in this area and had submitted two trouble tickets to InterMetro.

InterMetro stated it promptly researched the matter, identified the provider with the intermittent problem, and permanently removed that provider from delivering calls to Iowa on behalf of InterMetro. Additionally, InterMetro stated it verified with CenturyLink that the call completion issue was fully resolved and InterMetro closed out the two trouble tickets. InterMetro summarized that the intermittent problem was resolved and permanently eliminated.

#### Staff Findings:

Based on staff review, the testing performed by CenturyLink indicated the problem was with InterMetro, CenturyLink's underlying carrier. Staff finds once CenturyLink removed InterMetro from the routing and performed test calls, the calls completed without issue. Staff notes that InterMetro stated the calls were handed off to another provider, but InterMetro has not provided the name of its underlying carrier.

Iowa Code Section 476.3 provides, "If the board determines the public utility's response is inadequate and there appears to be any reasonable ground for investigating the complaint, the board shall promptly initiate a formal proceeding."

#### Staff Recommendations:

Call completion issues have been increasing in frequency in complaints filed with the Board. This complaint describes that many of Ms. Skallerup's calls to her mother are not completing. The increased call completion problems could point to failures due to the use of least cost routers for call completion. Many rural carriers believe that call completion problems begin with least cost routers, and routing is handled by such

intermediate or underlying providers. In this case InterMetro states a confidentiality clause in its contract with its underlying carrier prevents InterMetro from disclosing the identity of that carrier. InterMetro has not yet provided the vendor's information. Further investigation is appropriate in this case for examination of the call completion issues, including the roles and responsibilities of the various carriers regarding the call failures alleged in this complaint. Initiating a formal proceeding would create a docket in which InterMetro could file a request for confidential treatment of the identity of its underlying carrier, allowing the investigation to proceed. Staff will recommend that the Board initiate a formal proceeding on its own motion.

If anyone disagrees with staff proposed resolution you have 14 days to submit your response. To do so, please send a copy of your response to our office, CenturyLink, InterMetro, and the Office of Consumer Advocate. Please refer to the C-file number listed at the top of this letter.

Ms. Skallerup, thank you for taking time to bring this matter to our attention. If we may be of assistance in the future, please do not hesitate to contact us. Our toll-free number is 877-565-4450.

Sincerely,

/s/

Tara Ganpat-Puffett  
Utility Analyst II  
Customer Services

cc: CenturyLink, 930 15th St, 11th Floor, Denver, CO 80202  
InterMetro, Judith A. Endejan, Attorney, Graham & Dunn PC, Pier 70, 2801  
Alaskan Way, Suite 300, Seattle, WA 98121-1128  
Office of Consumer Advocate, 1375 E. Court Avenue, RM 63, Des Moines, Iowa  
50319-0069

## Ganpat-Puffett, Tara [IUB]

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**From:** Endejan, Judith A. <JEndejan@GrahamDunn.com>  
**Sent:** Monday, April 22, 2013 4:45 PM  
**To:** Ganpat-Puffett, Tara [IUB]  
**Cc:** Finnegan, Karen [OCA]  
**Subject:** RE: C-2013-0006 and C-2013-0011

Dear Ms. Ganpat-Puffett, InterMetro treats its vendor information as CONFIDENTIAL and PROPRIETARY... InterMetro is obligated by a confidentiality clause in its Master Services Agreement with the vendor at issue: "... The Parties understand and agree that the terms and conditions of this Agreement... are Confidential Information... A violation or threatened violation by either Party or its agents of this Section will entitle the other Party to seek an injunction or restraining order." InterMetro will have to notify its vendor of your request before we can provide it because of this contract. It would help resolve the matter quickly if you could advise us that the IUB would treat this information as confidential and proprietary and the proper procedure for submitting this information as such. regards, Judy Endejan

**Judith A. Endejan, Attorney** | **Graham & Dunn PC**

Pier 70 | 2801 Alaskan Way - Suite 300 | Seattle, WA 98121-1128

206.340-9694 (o) | 206.799-4843 (c) | 206.340.9599 (f) | [jendejan@grahamdunn.com](mailto:jendejan@grahamdunn.com) | [www.grahamdunn.com](http://www.grahamdunn.com)

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**From:** Ganpat-Puffett, Tara [IUB] [<mailto:Tara.Ganpat-puffett@iub.iowa.gov>]

**Sent:** Friday, April 19, 2013 1:08 PM

**To:** Endejan, Judith A.

**Cc:** Finnegan, Karen [OCA]

**Subject:** C-2013-0006 and C-2013-0011

**Importance:** High

Dear Ms. Endejan:

Please provide the name and address of the underlying provider used by InterMetro (pertaining to these calls), as well as the company contact person's name, email and telephone number. Staff asks that you provide this information by April 23, 2013.

I appreciate your attention to this matter.

Sincerely,

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317

Complaint Line Toll Free: 1-877-565-4450

Complaint Line Local: 725-7321

E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)

## **Ganpat-Puffett, Tara [IUB]**

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Friday, April 19, 2013 3:08 PM  
**To:** 'jendejan@grahamdunn.com'  
**Cc:** Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)  
**Subject:** C-2013-0006 and C-2013-0011  
**Attachments:** C-2013-0006-InterMetro Response.pdf

**Importance:** High

Dear Ms. Endejan:

Please provide the name and address of the underlying provider used by InterMetro (pertaining to these calls), as well as the company contact person's name, email and telephone number. Staff asks that you provide this information by April 23, 2013.

I appreciate your attention to this matter.

Sincerely,

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

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JUDITH A. ENDEJAN  
206.340.9694  
jendejan@grahamdunn.com

April 17, 2013

Ms. Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
Office of Consumer Advocate  
1375 East Court Avenue, Room 63  
Des Moines, Iowa 50319-0063

**FILED WITH**  
Executive Secretary

APR 19 2013

**IOWA UTILITIES BOARD**

**Re: Iowa Utilities Board File Nos. C-2013-0006; C-2013-0011**

Dear Ms. Ganpat-Puffett:

We represent InterMetro Communications, Inc., who received two complaints in the above-entitled dockets from the Iowa Utilities Board. These were filed by Ms. Helen Adolphson and Ms. Charlotte Skallerup regarding their inability to complete calls to their mother at **REDACTED** **REDACTED**. For the telephone numbers in question, CenturyLink passed the call to InterMetro and InterMetro in turn handed the call to another provider to then complete the call directly in Iowa.

For these particular numbers, CenturyLink had independently identified an intermittent problem in this area and had submitted two trouble tickets to InterMetro.

InterMetro promptly researched the matter, identified the provider with the intermittent problem, and permanently removed that provider from delivering calls to Iowa on behalf of InterMetro.

Thereafter, InterMetro coordinated with a CenturyLink technician to verify with the complainants that the call completion problem was fully resolved, at which point InterMetro closed out the two trouble tickets submitted by CenturyLink.

In sum, it appears that the two complaints were resolved and the intermittent problem permanently eliminated. InterMetro regrets any inconvenience it may have caused to Ms. Adolphson and Ms. Skallerup. InterMetro appreciates their efforts to bring service problems to InterMetro's attention.

Iowa Utilities Board  
April 17, 2013  
Page 2

Please let me know if you need any additional information or assistance. Thank you.

Very truly yours,

GRAHAM & DUNN PC

REDACTED

REDACTED

Judith A. Endejan

JAE/dtd

cc: C. Fogel  
C. Rice

## **Ganpat-Puffett, Tara [IUB]**

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**From:** Whetstone, Jane [IUB]  
**Sent:** Tuesday, April 16, 2013 12:05 PM  
**To:** Ganpat-Puffett, Tara [IUB]  
**Subject:** C-2013-0011 and C-2013-0006 extension for response

**Judy Endejan with Graham & Dunn (REDACTED) called on behalf of InterMetro. Ms. Endejan just received a copy of your letters and would like an extension until April 26, 2013 to respond. I granted the extension.**

**Jane**

Jane Whetstone  
Iowa Utilities Board  
Customer Service Coordinator  
1375 E Court Avenue  
Des Moines, IA 50319  
515-725-7358

## **Ganpat-Puffett, Tara [IUB]**

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Friday, March 22, 2013 8:50 AM  
**To:** Chris.fogel@intermetro.net  
**Cc:** Glenn & Charlotte Skallerup (gc.skallerup@yahoo.com); Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov); Diana Ornelas (Diana.Ornelas@CenturyLink.com)  
**Subject:** C-2013-0011 (Complaint)  
**Attachments:** C-2013-0011-Initial-Intermetro.pdf; C-2013-0011-Complaint.pdf; C-2013-0011-CenturyLink Response.pdf

See attached.

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317  
Complaint Line Toll Free: 1-877-565-4450  
Complaint Line Local: 725-7321  
E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)



GOVERNOR TERRY E. BRANSTAD  
LT. GOVERNOR KIM REYNOLDS

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ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

March 22, 2013

Mr. Chris Fogel  
InterMetro Communications  
2685 Park Center Dr.  
Simi Valley, CA 93065

Re: Iowa Utilities Board File No. C-2013-0011

Dear Mr. Fogel:

We have received the enclosed complaint from Charlotte Skallerup regarding calls that are not completing. The telephone number involved is **REDACTED**.

In accordance with Iowa Code § 476, "Public Utility Regulation," InterMetro Communications (InterMetro), is required to investigate the complaint and to provide a written response to the Iowa Utilities Board staff no later than April 11, 2013. Copies of your response must also be provided Ms. Skallerup and to the Office of Consumer Advocate.

As soon as we receive your response, Iowa Utilities Board (IUB) staff will review the complaint, your response, and any other relevant information including laws, rules, and tariffs. Staff may also request additional information from the utility or the customer to complete this review. Once all of the information has been gathered and reviewed, staff will issue a letter of proposed resolution specifically addressing those issues within the Board's jurisdiction.

Any party in this proceeding will have 14 days from the date of the letter of proposed resolution to request a formal proceeding. This process will be explained in the proposed resolution letter.

Thank you for your prompt attention to this matter.

Sincerely,

/s/  
Tara Ganpat-Puffett  
Utility Analyst II  
Customer Service

Enc.

cc: Charlotte Skallerup, 22012 Goode Ave., Glenwood, IA 51534  
Office of Consumer Advocate, 1375 E. Court Ave., RM 63, Des Moines, IA 50319-0063

## Ganpat-Puffett, Tara [IUB]

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**From:** Ornelas, Diana L <Diana.Ornelas@CenturyLink.com>  
**Sent:** Thursday, March 21, 2013 10:25 AM  
**To:** Ganpat-Puffett, Tara [IUB]; 'Glenn & Charlotte Skallerup'  
**Cc:** Finnegan, Karen [OCA]  
**Subject:** RE: C-2013-0011 (Complaint)

March 21, 2013

Ms. Tara Ganpat-Puffett  
Iowa Utilities Board  
1375 E. Court Avenue, Room 69  
Des Moines, Iowa 50319

Re: File: C-2013-0011  
Charlotte Skallerup,

Dear Ms. Ganpat-Puffett:

CenturyLink has completed investigating the complaint filed by Ms. Charlotte Skallerup regarding problems she encountered when calling her mother.

Following CenturyLink's standard process for long distance call completion inquiries, the baseline information supplied by the Task Force, along with information for CenturyLink's customer, were provided by CenturyLink's Policy Director to CenturyLink's Network Operations group for investigation. A trouble report ticket was opened by a CenturyLink technician for CenturyLink's customer at TN [REDACTED] (Ms. Adolphson), and [REDACTED] (Ms. Slallerup). The call records for those TNs were searched for calls that corresponded with the date and time information supplied by CenturyLink's customer. Not all of the calls were found, however, testing was able to continue with the calls found. The technician determined that the routing was the source of the problem for the three calls. An underlying carrier, Intermetro, was used to route the calls. Intermetro was removed by the technician as an intrastate routing option to the [REDACTED] NPA/NXX local exchange, and a trouble report ticket was opened with Intermetro. The technician contacted CenturyLink's customer at TN [REDACTED] and verified with Charlotte that calls are completing fine to the Called TN.

### CENTURYLINK'S STANDARD INVESTIGATION PROCESS:

- Where there is an issue with the performance of a CenturyLink customer's long distance service, and the customer contacts CenturyLink, CenturyLink opens a trouble report ticket, the issue is identified and documented, and troubleshooting takes place.
- If the issue is related to routing, the route path is reviewed and may be changed and tested for efficacy to allow the customer's traffic to properly flow.
- If an underlying carrier is involved in the problem, it is removed from the path (NPA/NXX) and a trouble report ticket is opened with the underlying carrier. That carrier must conduct a root cause analysis, address the issue to

resolution, take corrective action, test its fix, notify CenturyLink, and test with CenturyLink before CenturyLink will re-instate it to be used for processing calls and close the trouble report ticket.

- The original customer issue is worked, its resolution tested and confirmed, and it is closed with the customer.

#### HOW TRAFFIC IS ROUTED TO RURAL TELEPHONE COMPANIES

- Long distance traffic is routed based on the dialed digits. The route is designated based on the Local Exchange Routing Guide (LERG) information related to the local exchange of the called TN (for ported numbers, the local routing number is used). Traffic that originates and terminates within a state has designated routing options. These are designated based on business and traffic needs. Traffic that goes between states has designated routing options as well, which are also based on business and traffic needs.

If you have any additional questions concerning this issue, I can be reached at 877-440-8959.

Sincerely,  
Diana Ornelas  
Executive/Regulatory Escalation Analyst  
Customer Advocacy Group  
CenturyLink

cc: Charlotte Skallerup  
22102 Goode Ave.  
Glenwood, IA 51534

Office of Consumer Advocate  
1375 E. Court Avenue, Room 63  
Des Moines, Iowa 50319

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**From:** Ganpat-Puffett, Tara [IUB] [<mailto:Tara.Ganpat-puffett@iub.iowa.gov>]  
**Sent:** Thursday, January 24, 2013 7:26 AM  
**To:** Glenn & Charlotte Skallerup; Ornelas, Diana  
**Cc:** Finnegan, Karen [OCA]  
**Subject:** C-2013-0011 (Complaint)

See attached.

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317  
Complaint Line Toll Free: 1-877-565-4450  
Complaint Line Local: 725-7321  
E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)

## Ganpat-Puffett, Tara [IUB]

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Wednesday, March 06, 2013 4:00 PM  
**To:** 'Ornelas, Diana'  
**Cc:** Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov); Glenn & Charlotte Skallerup (gc.skallerup@yahoo.com)  
**Subject:** RE: C-2013-0011, Charlotte Skallerup,

I will allow the additional time for a reply due March 20, 2013.

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317  
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Complaint Line Local: 725-7321  
E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)

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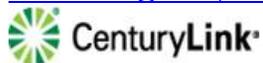
**From:** Ornelas, Diana [<mailto:Diana.Ornelas@CenturyLink.com>]  
**Sent:** Wednesday, March 06, 2013 3:25 PM  
**To:** Ganpat-Puffett, Tara [IUB]  
**Subject:** C-2013-0011, Charlotte Skallerup, .

Dear Ms. Ganpat-Puffett:

CenturyLink has been investigating this issue for Ms. Skallerup and would like an extension for two-weeks to complete the investigation.

Thank you,  
Diana

Diana Ornelas  
Executive Regulatory Escalations Analyst  
Customer Advocacy Group  
CenturyLink  
930 15th Street  
Denver, CO 80202  
Direct: (303) 664-7034  
Fax: (800) 939-0599  
[Diana.Ornelas@CenturyLink.com](mailto:Diana.Ornelas@CenturyLink.com)



## Ganpat-Puffett, Tara [IUB]

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Tuesday, February 12, 2013 12:06 PM  
**To:** 'Ornelas, Diana'  
**Cc:** Glenn & Charlotte Skallerup (gc.skallerup@yahoo.com); Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)  
**Subject:** RE: C-2013-0011 (Complaint)

I will grant the additional two weeks –reply due on February 26, 2013.

Tara

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

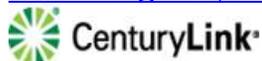
Phone Direct: 515-725-7317  
Complaint Line Toll Free: 1-877-565-4450  
Complaint Line Local: 725-7321  
E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)

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**From:** Ornelas, Diana [<mailto:Diana.Ornelas@CenturyLink.com>]  
**Sent:** Tuesday, February 12, 2013 11:49 AM  
**To:** Ganpat-Puffett, Tara [IUB]  
**Subject:** RE: C-2013-0011 (Complaint)

Hi Tara,  
CenturyLink is asking for a two-week extension on this complaint for February 26, 2013 to gather more data.  
Thank you,  
Diana

Diana Ornelas  
Executive Regulatory Escalations Analyst  
Customer Advocacy Group  
CenturyLink  
930 15th Street  
Denver, CO 80202  
Direct: (303) 664-7034  
Fax: (800) 939-0599  
[Diana.Ornelas@CenturyLink.com](mailto:Diana.Ornelas@CenturyLink.com)



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**From:** Ganpat-Puffett, Tara [IUB] [<mailto:Tara.Ganpat-puffett@iub.iowa.gov>]  
**Sent:** Thursday, January 24, 2013 7:26 AM  
**To:** Glenn & Charlotte Skallerup; Ornelas, Diana

**Cc:** Finnegan, Karen [OCA]

**Subject:** C-2013-0011 (Complaint)

See attached.

Tara Ganpat-Puffett

Utility Analyst II

Iowa Utilities Board

1375 E Court, Room 69

Des Moines, IA 50319

Phone Direct: 515-725-7317

Complaint Line Toll Free: 1-877-565-4450

Complaint Line Local: 725-7321

E-Mail: [tara.ganpat-puffett@iub.iowa.gov](mailto:tara.ganpat-puffett@iub.iowa.gov)

## **Ganpat-Puffett, Tara [IUB]**

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**From:** Ganpat-Puffett, Tara [IUB]  
**Sent:** Thursday, January 24, 2013 8:26 AM  
**To:** 'Glenn & Charlotte Skallerup'; Diana Ornelas (Diana.Ornelas@CenturyLink.com)  
**Cc:** Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)  
**Subject:** C-2013-0011 (Complaint)  
**Attachments:** C-2013-0011-Initial Customer.pdf; C-2013-0011-Initial-CL.pdf; C-2013-0011-Complaint.pdf

See attached.

Tara Ganpat-Puffett  
Utility Analyst II  
Iowa Utilities Board  
1375 E Court, Room 69  
Des Moines, IA 50319

Phone Direct: 515-725-7317  
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GOVERNOR TERRY E. BRANSTAD  
LT. GOVERNOR KIM REYNOLDS

ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

January 24, 2013

Ms. Diana Ornelas  
Customer Advocacy Group  
Qwest Corporation d/b/a/ CenturyLink QC  
930 15th St, 11th Floor  
Denver, CO 80202

Re: Iowa Utilities Board File No. C-2013-0011

Dear Ms. Ornelas:

We have received the enclosed complaint from Charlotte Skallerup regarding calls that are not completing. The telephone number involved is **REDACTED**.

In accordance with Iowa Code § 476, "Public Utility Regulation," Qwest Corporation d/b/a/ CenturyLink QC (CenturyLink), is required to investigate the complaint and to provide a written response to the Iowa Utilities Board staff no later than February 13, 2013. Copies of your response must also be provided to Ms. Skallerup and to the Office of Consumer Advocate.

As soon as we receive your response, Iowa Utilities Board (IUB) staff will review the complaint, your response, and any other relevant information including laws, rules, and tariffs. Staff may also request additional information from the utility or the customer to complete this review. Once all of the information has been gathered and reviewed, staff will issue a letter of proposed resolution specifically addressing those issues within the Board's jurisdiction.

Any party in this proceeding will have 14 days from the date of the letter of proposed resolution to request a formal proceeding. This process will be explained in the proposed resolution letter.

Thank you for your prompt attention to this matter.

Sincerely,

/s/  
Tara Ganpat-Puffett  
Utility Analyst II  
Customer Service

Enc.

cc: Charlotte Skallerup, 22012 Goode Ave., Glenwood, IA 51534  
Office of Consumer Advocate, 1375 E. Court Ave., RM 63, Des Moines, IA 50319-0063



GOVERNOR TERRY E. BRANSTAD  
LT. GOVERNOR KIM REYNOLDS

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ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

January 24, 2013

Ms. Charlotte Skallerup  
22012 Goode Ave.  
Glenwood, IA 51534

Re: Iowa Utilities Board File No. C-2013-0011

Dear Ms. Skallerup:

We have received your complaint regarding call completion issues. The telephone number involved is **REDACTED**

In accordance with Iowa Code section 476, "Public Utility Regulation," we are forwarding your complaint to Qwest Corporation d/b/a CenturyLink QC (CenturyLink). CenturyLink is required to investigate the complaint and may contact you to identify or resolve any issues. In addition, CenturyLink must provide a written response to the Iowa Utilities Board (IUB) staff no later than February 13, 2013. CenturyLink is also required to provide you and the Office of Consumer Advocate with copies of its response.

As soon as we receive CenturyLink's response, IUB staff will review your complaint, the responses, and any other relevant information including laws, rules, and tariffs. Staff may also request additional information from you, to complete this review. Once all of the information has been gathered and reviewed, staff will issue a proposed resolution letter, specifically addressing those issues within the Board's jurisdiction.

Any party in this proceeding will have 14 days from the date of the letter of proposed resolution to request a formal proceeding with the IUB. This process will be explained in the proposed resolution letter.

Sincerely,

Tara Ganpat-Puffett  
Utility Analyst II  
Customer Service

enc.

cc: CenturyLink, 930 15th St, 11th Floor, Denver, CO 80202  
Office of Consumer Advocate, 1375 E. Court Ave, RM 63, Des Moines, IA 50319-0063

# Correspondence

**C-File**

Today's Date: **1/23/2013**

Analyst

Date Received: **1/22/2013**

**Tara Ganpat-Puffett**

Company Name #1 **Qwest Corporation d/b/a CenturyLink QC**

Company Name #2

Company Name #3

First Name **Charlotte**

Last Name **Skallerup**

Customer Business Name

Service Street Address **22012 Goode Ave.**

City **Glenwood**

State **IA**

Zip **51534-**

Mailing Address (If Different)

**gc.skallerup@yahoo.com**

- Billing
- Cramming
- EAS
- Delayed Install
- Deposit
- Deregulated Services
- Directory Error
- Disconnect
- Info Only
- Comments
- Line Extension
- Meter Reading
- Payment Arrng
- Poor Cust Svc
- Rates/Charges
- Repair
- Slamming
- Service Problem
- Other Call Type If Other >>>

- Local Telephone
- Long Distance Telephone
- Electric
- Gas
- Water
- Cellular
- VOI
- Broadband

Other:

Rural Call Termination

## Whetstone, Jane [IUB]

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**From:** Glenn & Charlotte Skallerup <gc.skallerup@yahoo.com>  
**Sent:** Saturday, January 19, 2013 11:11 AM  
**To:** IUB Customer [IUB]  
**Subject:** telephone service for number

I live in Glenwood, IA and my home telephone number is [REDACTED] through Century Link. My long distance is also through Century link and the carrier is C7. I have an unlimited long distance plan mainly because my mother, Faye Wookey, phone number [REDACTED] is 97 years old and I live 30 miles away and need to check on her often as she lives alone and does not have household help there daily.

Faye Wookey's [REDACTED] is through Interstate Communications and they have come to her home numerous times to try and find why there are problems calling her number. I have been told to have my phone checked-- but that is not the problem since this is also an issue for my sister phone number [REDACTED] who has a Red Oak telephone. My sister and I have no problems calling other people long distance. Faye Wookey does not recall that she has had a problem calling long distance from her phone to other households.

When I try to call it sometimes rings through without difficulty. Other times when I try to call [REDACTED] it rings once or twice and then goes dead. Other times it may ring sounding fine for the first couple of rings and then the ring sounds garbled and if mother tries to answer we cannot hear or understand each other. I have hung up and tried as many as 8-10 times and after numerous tries the call may go through. I can tell immediately if the ring sounds clear and if the call is going to be proper. Sometimes I ask mother how many times it has rung there and not at all until she has answered on probably the first or second ring she has gotten.

This unreliable long distance call to my mother is a concern since I do not like to drive 30 miles to make certain she is doing OK. Mother also has a life line through the Red Oak, IA hospital and I wonder if it works properly if her phone does not always work correctly. I have had lifeline replace that phone so they do not seem to think it is their problem. Any help or answers you can find will be appreciated.

Charlotte Skallerup  
22012 Goode Ave.  
Glenwood, IA 51534  
phone