

May 08, 2013

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

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

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.¹

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

¹Population 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
Telephone: (515) 725-7200
E-Mail: IowaOCA@oca.iowa.gov
E-Mail: Craig.Graziano@oca.iowa.gov

OFFICE OF CONSUMER ADVOCATE

Copies sent electronically to:
Helen Adolphson
helenadolphson@wildblue.net

Diana Ornelas, CenturyLink
diana.ornelas@CenturyLink.com

Charlotte Skallerup
gc.skallerup@yahoo.com

Judith A. Endejan, Attorney for Intermetro Communications, Inc.
jendejan@grahamdunn.com

Ganpat-Puffett, Tara [IUB]

From: Ganpat-Puffett, Tara [IUB]
Sent: Monday, April 29, 2013 8:35 AM
To: helenadolphson@wildblue.net
Cc: Diana Ornelas (Diana.Ornelas@CenturyLink.com); jendejan@grahamdunn.com; Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)
Subject: C-2013-0006 (Complaint)
Attachments: C-2013-0006-InterMetro Response.pdf; C-2013-0006-Staff Request.pdf; C-2013-0006-InterMetro Response to Request.pdf; C-2013-0006-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



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

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

April 29, 2013
File No. C-2013-0006
PROPOSED RESOLUTION

Ms. Helen Adolphson
1099 230th Street
Emerson, IA 51533

Dear Ms. Adolphson:

On January 17, 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 February 7, and 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. Adolphson, 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 to troubleshoot numerous times and they are unable to find any problems with your mother's phone service. You noted the problems you have when you called your mother's number include:

- The phone rings but when you checked with your mother later she reported that the phone did not ring at her house.
- The phone rings once or twice, then you hear a busy tone.
- Calls are dropped.
- The call goes through, but the connection is so poor you can't hear each other.
- Sometimes the call goes through fine.

You stated this is extremely troubling since your mother is 97 years old and when you can't reach her by phone you drive to her home to ensure her welfare. You stated your sister (Charlotte Skallerup) and you have spoken with Interstate Communications and you are both reaching out to the IUB, hoping this problem can be resolved.

CenturyLink's Response:

In its response of February 7, 2013, CenturyLink stated in this case you are its customer and it conducted tests calls and found the calls completed without experiencing any of the trouble you indicated.

On March 21, 2013, CenturyLink provided an updated response. CenturyLink stated a trouble report ticket was opened by a CenturyLink technician for your telephone number (TN) [REDACTED] and [REDACTED] your sister, Ms. Skallerup). 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 [REDACTED] NPA/NXX local exchange, and a trouble report ticket was opened with InterMetro. [REDACTED] 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. Adolphson'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 the various carriers have 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's 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. Adolphson, 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]

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 | www.grahamdunn.com

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

Ganpat-Puffett, Tara [IUB]

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

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

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**. 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.

Pier 70
2801 Alaskan Way ~ Suite 300
Seattle WA 98121-1128
Tel 206.624.8300
Fax 206.340.9599
www.grahamdunn.com

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

Judith A. Endejan

JAE/dtd

cc: C. Fogel
C. Rice

Ganpat-Puffett, Tara [IUB]

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]

From: Ganpat-Puffett, Tara [IUB]
Sent: Friday, March 22, 2013 8:47 AM
To: 'Chris.fogel@intermetro.net'
Cc: helenadolphson@wildblue.net; Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov); Diana Ornelas (Diana.Ornelas@CenturyLink.com)
Subject: C-2013-0006 (Complaint)
Attachments: C-2013-0006-Initial-Intermetro.pdf; C-2013-0006-CenturyLink Additional Response.pdf; C-2013-0006-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
Complaint Line Toll Free: 1-877-565-4450
Complaint Line Local: 725-7321
E-Mail: tara.ganpat-puffett@iub.iowa.gov



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

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-2013-0006

Dear Mr. Fogel:

We have received the enclosed complaint from Helen Adolphson regarding calls that are not completing to her mother's telephone number [REDACTED]. Ms. Adolphson's telephone number is [REDACTED].

In accordance with Iowa Code § 476, "Public Utility Regulation," InterMetro Communications (InterMmetro), 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. Adolphson 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: Ms. Helen Adolphson, 1099 230th Street, Emerson, IA 51533
Office of Consumer Advocate, 1375 E. Court Ave., RM 63, Des Moines, IA 50319-0063

Ganpat-Puffett, Tara [IUB]

From: Ornelas, Diana L <Diana.Ornelas@CenturyLink.com>
Sent: Thursday, March 21, 2013 8:21 AM
To: Ganpat-Puffett, Tara [IUB]; 'helenadolphson@wildblue.net'
Cc: Finnegan, Karen [OCA]
Subject: RE: C-2013-0006 (Complaint)

March 21, 2013

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

Re: File: C-2013-0006
Helen Adolphson

REDACTED

Dear Ms. Ganpat-Puffett:

CenturyLink has completed investigating the complaint filed by Ms. Helen Adolphson 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 Helen 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: Helen Adolphson
1099 230th St.
Emerson, IA 51533

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

From: Ganpat-Puffett, Tara [IUB] [<mailto:Tara.Ganpat-puffett@iub.iowa.gov>]
Sent: Thursday, January 17, 2013 1:50 PM
To: helenadolphson@wildblue.net; Ornelas, Diana
Cc: Finnegan, Karen [OCA]
Subject: C-2013-0006 (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

Ganpat-Puffett, Tara [IUB]

From: Ganpat-Puffett, Tara [IUB]
Sent: Wednesday, March 06, 2013 4:01 PM
To: 'Ornelas, Diana'
Cc: Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov); helenadolphson@wildblue.net
Subject: RE: C-2013-0006, Helen Adolphson, REDACTED

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
Complaint Line Toll Free: 1-877-565-4450
Complaint Line Local: 725-7321
E-Mail: tara.ganpat-puffett@iub.iowa.gov

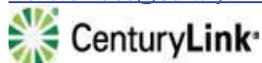
From: Ornelas, Diana [<mailto:Diana.Ornelas@CenturyLink.com>]
Sent: Wednesday, March 06, 2013 3:28 PM
To: Ganpat-Puffett, Tara [IUB]
Subject: C-2013-0006, Helen Adolphson, REDACTED

Dear Ms. Ganpat-Puffett:

CenturyLink is continuing to work on Ms. Adolphson's call completion issue and would like an extension for two weeks until March 20, 2013, 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



Ganpat-Puffett, Tara [IUB]

From: Ornelas, Diana <Diana.Ornelas@CenturyLink.com>
Sent: Thursday, February 07, 2013 9:47 AM
To: Ganpat-Puffett, Tara [IUB]; Finnegan, Karen [OCA]
Subject: C-2013-0006, Helen Adolphson, REDACTED

January 6, 2013

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

Re: File: c-2013-0006
Helen Adolphson, REDACTED

Dear Ms. Ganpat-Puffett:

This complaint was filed by Helen Adolphson (TN REDACTED), a CenturyLink customer, regarding problems she has calling her mother (TN REDACTED) who is a customer of Interstate Communications.

Given the lack of call detail information in the complaint, CenturyLink contacted our customer requesting test calls. Additionally, CenturyLink had our customer's line and cable checked, as well as the central office connections, and the equipment tested fine. CenturyLink made test calls, and those went through correctly, without experiencing any of the indicated trouble the customer reported. Our customer then reported that the problem had not persisted in the last several days. CenturyLink informed Ms. Adolphson if the problem reoccurs to contact me and we will do another investigation.

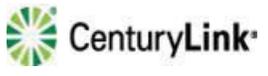
If you have any additional questions concerning this issue, I can be reached at 877-440-8959.

Sincerely,

Diana Ornelas
Executive/Regulatory Escalation Analyst
Customer Advocacy Group
CenturyLink

cc: Helen Adolphson
1099 230th St.
Emerson, IA 51533

Office of Consumer Advocate



Hard copy mailed to customer

Ganpat-Puffett, Tara [IUB]

From: Ganpat-Puffett, Tara [IUB]
Sent: Thursday, January 17, 2013 2:50 PM
To: 'helenadolphson@wildblue.net'; Diana Ornelas (Diana.Ornelas@CenturyLink.com)
Cc: Finnegan, Karen [OCA] (Karen.Finnegan@oca.iowa.gov)
Subject: C-2013-0006 (Complaint)
Attachments: C-2013-0006-Complaint.pdf; C-2013-0006-Initial Customer.pdf; C-2013-0006-Initial-CL.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



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

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

January 17, 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-2013-0006

Dear Ms. Ornelas:

We have received the enclosed complaint from Helen Adolphson regarding calls that are not completing to her mother's telephone number [REDACTED] Adolphson's telephone number 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 6, 2013. Copies of your response must also be provided Ms. Adolphson 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: Ms. Helen Adolphson, 1099 230th Street, Emerson, IA 51533
Office of Consumer Advocate, 1375 E. Court Ave., RM 63, Des Moines, IA 50319-0063



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

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

January 17, 2013

Ms. Helen Adolphson
1099 230th Street
Emerson, IA 51533

Re: Iowa Utilities Board File No. C-2013-0006

Dear Ms. Adolphson:

We have received your complaint regarding calls that are not completing to you mother's telephone number [REDACTED]. Ms. Adolphson's telephone number 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). The company 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 6, 2013. The company is also required to provide you and the Office of Consumer Advocate with a copy of the response.

As soon as we receive the company response, IUB staff will review your complaint, the response, 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: Qwest Corporation d/b/a/ CenturyLink QC, 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: **1/17/2013**

Analyst

Date Received: **1/17/2013**

Tara Ganpat-Puffett

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

Company Name #2

Company Name #3

First Name **Helen**

Last Name **Adolphson**

Customer Business Name

Service Street Address **1099 230th St**

City **Emerson**

State **IA**

Zip **51533-**

Mailing Address (If Different)

helenadolphson@wildblue.net

- 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]

From: Helen Adolphson <helenadolphson@wildblue.net>
Sent: Thursday, January 17, 2013 7:48 AM
To: IUB Customer [IUB]
Subject: Complaint issue

To whom it may concern at the Iowa Utility Board:

For the past several months I have had problems calling my mother in Emerson, IA. She is provided service by Interstate Communications and they have been called numerous times to troubleshoot her phones and have said they can not reproduce the issues and their systems are functioning correctly. They recommended we reach out to you as this may be a case of the rural call completion issues seen by others in the state.

My phone service is out of Red Oak, IA and my home phone number is [REDACTED] through Century Link. My long distance service is also through them and the carrier is C7.

When I call her home phone number ([REDACTED]) I don't always get the same response. Sometimes the call goes through fine. Other times it just rings and rings - though when I check with her later it didn't actually ring at her house. Other times it rings once or twice, then a busy signal comes on, or the call drops. There are times when the call goes through but the connection is so poor we can't hear each other.

This is extremely troubling as Mom is 97 years old and when we can't reach her by phone we drive to her home to ensure her welfare. My sister and I have spoken with Interstate Communications and we are both reaching out to the IUB, hoping this problem can be resolved.

Please let me know if there is further information that would be helpful to you, and thank you for looking into this matter.

Helen Adolphson