

GARY R. GUELKER (Bar No. 8474)  
JANET I. JENSON (Bar No. 4226)  
**JENSON & GUELKER, LLC**  
747 East South Temple Street, Suite 130  
Salt Lake City, Utah 84102  
Telephone: (801) 579-0800  
Facsimile: (801) 579-0801  
*Attorneys for Petitioners*

**BEFORE THE UTAH PUBLIC SERVICE COMMISSION**

---

In the Matter of the Petition of All	)	
American Telephone Co., Inc. For a <i>Nunc</i>	)	Docket No. 08-2469-01
<i>Pro Tunc</i> Amendment of Its Certificate of	)	
Authority to Operate as a Competitive	)	<u>All American's Response to the Division's</u>
Local Exchange Carrier Within the State of	)	<u>Motion to Compel</u>
Utah	)	
	)	

---

All American Telephone Co., Inc. ("All American"), by and through its counsel, hereby responds to the Division's Motion to Compel as follows. With respect to the Division's data requests, All American states that it has now responded to the requests and served its responses on all parties via e-mail on December 21, 2009. With respect to Qwest's data requests, undersigned counsel states that he did not receive such requests when they were originally made and only received a copy of the requests on Thursday, December 17, 2009. All American is working on the responses to these requests and will provide such responses in a timely manner.

Dated this 21<sup>st</sup> day of December, 2009.

**JENSON & GUELKER, LLC**

By: \_\_\_\_\_

GARY R. GUELKER

Attorneys for Petitioner

## CERTIFICATE OF SERVICE

I hereby certify that on this 21<sup>st</sup> day of November 2009, the foregoing All American's Response to the Division's Motion to Compel was sent by electronic mail and mailed by U.S. Mail, postage prepaid:

Michael L. Ginsberg  
Assistant Attorney General  
160 East 300 South 5<sup>th</sup> Floor  
Heber Wells Building  
Salt Lake City, UT 84111  
[mginsberg@utah.gov](mailto:mginsberg@utah.gov)

Paul Proctor  
Assistant Attorney General  
160 East 300 South 5<sup>th</sup> Floor  
Heber Wells Building  
Salt Lake City, UT 84111  
[pproctor@utah.gov](mailto:pproctor@utah.gov)

Alan L. Smith  
Attorney for Beehive Telephone  
1492 East Kensington Avenue  
Salt Lake City, UT 84105  
[Alanakaed@aol.com](mailto:Alanakaed@aol.com)

Stephen F. Mecham  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, UT 84133  
[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)

Roger Moffitt  
645 East Plumb Lane, B132  
P.O. Box 11010  
Reno, NV 89502  
[roger.moffitt@att.com](mailto:roger.moffitt@att.com)

George Baker Thomson, Jr.  
Qwest Corporation  
1801 California St., 10<sup>th</sup> Flr.  
Denver, CO 80202  
[george.thomson@qwest.com](mailto:george.thomson@qwest.com)