PAUL H. PROCTOR (#2657) Assistant Attorney General Utah Office of Consumer Services MARK L. SHURTLEFF (#4666) Attorney General 160 East 300 South P.O. Box 140857 Salt Lake City, Utah 84114-0857 Telephone (801) 366-0552

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consideration of the Rescission, Alteration or Amendment of the Certificate of Authority of All American Telephone Co., Inc. to Operate as a Competitive Local Exchange Carrier Within the State of Utah Docket No. 08-2469-01

UTAH OFFICE OF CONSUMER SERVICES' DATA REQUESTS TO ALL AMERICAN TELEPHONE CO.

The Utah Office of Consumer Services requests that All American respond to the following data requests by providing responses to:

Cheryl Murray
Utah Office of Consumer Services
160 East 300 South, Suite 200
PO Box 146782
Salt Lake City, UT 84114-6782
Telephone (801) 530-6480
cmurray@utah.gov

And

Paul H. Proctor Assistant Attorney General 160 East 300 South, 5<sup>th</sup> Floor P.O. Box 140857 Salt Lake City, Utah 84114-0857

## Telephone (801) 366-0552 pproctor@utah.gov

- 1. For each data request, please identify by name, business address and affiliation with All American, each person who participated in preparing the response and each person who may testify concerning the matters contained in each response or document produced.
- 2. State the per-minute billed rate or rates if they varied, for the number of billed minutes "Total Company" and "Utah Operations" reported in "Messages and Minutes Usage" in All American's 2008 Annual Report to the Utah Public Service Commission.
- 3. Provide a copy of each monthly bill All American submitted to Beehive as described in Paragraph 6.4 of the June 2007 Utah Interconnection and Reciprocal Compensation Agreement by and between Beehive Telephone Company, Inc. and All American Telephone Co., Inc.
- 4. Provide a copy of the December 11, 2003 Memo, from Chuck McCown, General Manager, Beehive Tel. Co., to All Parties Attending the Meeting at the PUC on Dec. 10.
- 5. Provide a copy of the May 23, 2005 e-mail written by Chuck McCown, pertaining to All American and Beehive number pooling, a LERG change and Beehive acting as a service bureau for billing and collections for All American. It is believed that this e-mail was addressed to CHR Solutions.

6. Provide all documents relating to All American's business relationship with

Joy Enterprises, Inc.

7. Describe all Joy Enterprises, Inc. customer premises equipment co-located

with or connected to All American's switches in Garrison, Utah.

8. Provide a copy of All American Telephone Company, Inc. Tariff F.C.C.

No. 2 (April 21, 2008).

9. In its response to DPU Data Request 1.21, All American stated its intent to

file its 2007 Annual Report by the end of August 2008. Please provide a copy of

this report. If it has not been filed, please explain why it has not been filed and

provide a copy of all drafts, work-papers and other documents that have been

prepared or compiled in anticipation of preparing and filing the 2007 Annual

Report.

10. In the counterclaim All American filed against Sprint Communications in

Case No. 2:08-CV-00380, in the Utah Federal District Court, All American

alleged that it provided services under tariffs filed with the FCC and with the Utah

Public Service Commission. Please provide a copy of each of these tariffs.

Dated this 11<sup>th</sup> day of February 2010.

Paul H. Proctor

Assistant Attorney General

**Utah Office of Consumer Services** 

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing data requests was served upon the following by electronic mail sent February 11, 2010:

Michael Ginsberg
Patricia Schmid
ASSISTANT ATTORNEYS GENERAL
Division of Public Utilities
Heber M. Wells Building, 5<sup>th</sup> Floor
160 East 300 South
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mailto:pschmid@utah.gov

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Paul H. Proctor Assistant Attorney General