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Exhibit B  
Motion for Order  
Compelling  
Discovery

-BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH-  
STATE OF UTAH

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In the Matter of the Application of	)	
Uintah Basin Telecommunications	)	<u>DOCKET NO, 04-053-03</u>
Association, Inc., and UBET Telecom,	)	
Inc., for an Order of the Commission	)	
Approving the Combination, Merger	)	
and Consolidation of UBET Telecom,	)	
Inc., and Uintah Basin	)	<u>DATA REQUEST</u>
Telecommunications Association, Inc.	)	
	)	
	)	
	)	

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Proceeding Time Period

Expiration Date:

January 17, 2005

The Commission has 20 days after filing a request for reconsideration to respond Pursuant to Utah Code Ann. “63-46b-12 and 54-7-15.

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Pursuant to Rule 34 of the Utah Rules of Civil Procedure, intervener requests applicant to produce the documents specified below. This request is for paper copies which the intervener will pick up at the plaintiff's general counsel Vernal, Utah office of Clark B. Allred or at the applicant's office at 211 East 200 North, Roosevelt, Utah. Electronic records that are not in paper form should be sent to intervener's email address: [brenthansencpa@yahoo.com](mailto:brenthansencpa@yahoo.com)

I would like to pick up these items on or before Saturday, January 7<sup>th</sup>. I will call midweek to determine your progress and set up time and place for delivery to take place.

#### DOCUMENT REQUESTS

REQUEST NO. 1 Please produce all audited financial statements that have been completed for the last three years. Specifically for years ending in 2002, 2003 and 2004. This request is for each of the individual operations of UBTA where separate audited financial statements exist for the regulated and non-regulated businesses owned by UBTA. Specifically: Uintah Basin Telecommunications Association, Inc., UBET Telecom, Inc., Uintah Basin Electronic Telecommunications, and Uintah Basin Long Distance, Inc.. I want statements that show the financial information of the individual companies as well as the combined operations of UBTA.

REQUEST NO. 2: Please produce unaudited yearly financial statements for all of the four companies identified in request no. 1 above that did not have an audited financial statement. For example, if Uintah Basin Long Distance, Inc. did not have any audited financial statements prepared for the years 2002 through 2004, then you would provide the company prepared financial statements. This request is not for you to provide both the audited and unaudited financial statements for the same company for the same year. It is to get the the unaudited statements where audited statements do not exist. The result of requests no. 1 and 2 is that you should provide four (one for each company) or five (combined or consolidated) financial statements for each year requested to the extent that the statements have been completed for that year. For example: it is not likely that statements for December 31, 2004 year-end would be available.

REQUEST NO. 3: Please produce a complete copy of the minutes of the UBTA member meeting on April 29, 2004 where the members approved the merger plan. These minutes should include the member voting information—the issue voted on and number of votes for and number against.

REQUEST NO. 4: Please produce a copy of the minutes for UBTA where the board of directors declared and identified the total amount of patronage dividend that were paid to UBTA members during the years 2001, 2002, 2003, and 2004.

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REQUEST NO. 5: Please produce the formula and examples of how the amount of patronage dividend is determined for the different types of UBTA members.

(Calculations that show how older accounts get a higher percentage than newer accounts. How larger accounts get a higher percentage than smaller accounts.)

It is assumed that these examples were provided as part of the discovery since the regulators would have wanted to know how the dividends would be distributed to the different types of members (old, new, low usage, high usage, etc.).

REQUEST NO. 6: Please produce copy of the bylaws and articles of incorporation of UBTA and UBET (the two regulated companies). I want the bylaws and articles just before the merger was approved by the members on April 29, 2004. I, also, want a copy of any proposed or approved changes to the articles of incorporation and bylaws after April 29, 2004.

REQUEST NO. 7: Please produce any and all written or electronic communications that took place on November 11, 12 , 13, 14, and 15 between the (applicant and/or his attorneys) and (anyone associated with the Public Service Commission, the Division of Public Utilities, and the Committee of Consumer Services.) This includes any papers that changed hands during any meetings or by mail on those five days

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REQUEST NO. 8: Please produce a copy of the purchase contract or some other papers that show how much UBET paid QWest Communications on April 6, 2001 for the UBET exchanges. I am interested in knowing what the total purchase price was. So whatever document(s) you have that specify this amount is all that I am requesting. I do not need to know the financing arrangements, etc.

REQUEST NO. 9: Please produce a salary and per diem schedule for the UBTA board members. I am not asking what was paid to John Doe. What I am asking for is how much a board member is paid per year or meeting and how much per diem they are given for travel expenses. You should have a handout or something in your minutes that you provide to new board members.

Dated this 2<sup>nd</sup> day of January 2005

By \_\_\_\_\_

Brent Hansen

Intervener (representing self)

254 North 100 East (physical)

P O Box 263 (mail)

Vernal, Utah 84078

Docket No. 04-053-03--Data Request—01/02/05—Exhibit B

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Data Request was served by email by me this 2<sup>nd</sup> day of January, 2005 to:

Stanley K. Stoll  
Blackburn & Stoll, LC  
Email: [sstoll@blackburn-stoll.com](mailto:sstoll@blackburn-stoll.com)

Bruce Todd  
General Manager  
Uintah Basin Telecommunications Association, Inc.  
UBET Telecom, Inc.  
Email: [brucet@ubtanet.com](mailto:brucet@ubtanet.com)

Clark B. Allred  
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Brent Hansen