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**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 <b>UTAH OFFICE OF CONSUMER SERVICES' DATA REQUESTS TO ALL AMERICAN TELEPHONE CO.</b>
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The Utah Office of Consumer Services requests that All American respond to the following discovery 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](mailto:cmurray@utah.gov)

And

Paul H. Proctor  
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Telephone (801) 366-0552  
[pproctor@utah.gov](mailto: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. Provide an unredacted copy of any contract, agreement or understanding, or any document memorializing or referencing the same, that provides for shared terminating access revenues among any of the following at any time between January 1994 and December 2009: All American Telephone Co. [All American], Joy Enterprises Inc. [JEI] and Beehive Telephone Company, Inc. [Beehive] or any affiliate of Beehive.
3. Prior to or at the time it entered into an interconnection agreement with Beehive, did All American disclose to Beehive that in All American's February 20, 2007 Amended Application, All American excluded exchanges with less than 5000 access lines that are served by incumbent telephone corporations with fewer than 30,000 access lines in the state, described by All American as the "standard rural carve-out"?
4. Provide a copy of any Annual Report filed by All American as required by Exhibit B to the March 7, 2007 Report and Order in Docket No. 06-2469-01. If an Annual Report was not filed, please provide a detailed explanation of the reasons it was not filed.

5. For All American's Utah operations and for each of the years 2006, 2007, 2008 and 2009, state the amount of end-user terminating access services billed to each of the following INX carriers: Qwest, AT&T, and Sprint.
6. For All American's Utah operations and for each of the years 2006, 2007, 2008 and 2009, state the amount of end-user terminating access services paid to All American by each of the following INX carriers: Qwest, AT&T, and Sprint.
7. In the action filed March 6, 2007 in the United State District Court Southern District of New York, All American v. AT&T, Case 1:07-cv-00861, All American alleged that on or about May 1, 2006, AT&T ceased paying for the access services it took from All American and that as of the date of the Complaint, AT&T had failed to pay approximately \$2,025,470.80. Were any of the unpaid access charges for services provided by All American's Utah operations?
8. Did All American in April 2006, submit to AT&T invoices for switched access services provided to AT&T from All American's Utah operations? If such invoices were submitted, provide a copy of the invoices.
9. In All American v. AT&T, cited in Data Request 7, does All American claim any damages are owed as a result of AT&T not paying for end-user terminating access services provided by All American's Utah operations? If so, state the amount of unpaid access charges and other damages claimed?
10. For each of the years 2006, 2007, 2008 and 2009, state the amount of marketing fees for termination traffic paid by All American to JEL.

11. Does All American charge JEI for use of All American's switch located in Garrison, Utah?
12. Is JEI's intelligent voice response system co-located with All American's switch in Garrison, Utah?
13. When was the Tacqua 7000 switch owned by All American first installed in Garrison, Utah?
14. When was JEI's intelligent voice response system first installed in Garrison, Utah?
15. Other than the intelligent voice response system co-located with All American's switch in Garrison, Utah, does JEI have any other physical presence, or own or operate any other premises, in Garrison?
16. At any time since 1994, has JEI been authorized to do business in Utah?
17. Describe the end-user access services All American provides to JEI in the Garrison, Utah exchange.
18. Has All American filed Utah corporate franchise and income tax returns for any tax year or period? If so, provide a copy of the return.
19. Please provide a copy of all documents, faxes, e-mails, correspondence, memoranda, reports, or other written or electronic document, related to or referring to All American that are authored or produced by CHR Solutions. In particular, provide a copy of all such documents produced by All American or CHR Solutions in All American v. AT&T, Case No. 07-cv-861, including but not limited to a copy of the August 17, 2006 e-mail from David Goodale to CHR

Solutions, and a copy of communications between February 2008 and May 2008,  
by David Goodale or CHR Solutions pertaining to All American's Tariff FCC No.  
1 and/or Tariff FCC No. 2.

Dated this 9<sup>th</sup> day of February, 2010.

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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 9, 2010:

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Patricia Schmid  
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