

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
vs)	
Illinois Bell Telephone Company)	Docket 06-0027
)	
Investigation of specified tariffs declaring certain)	
services to be competitive telecommunications services)	

**RESPONSE OF AT&T ILLINOIS TO ATTORNEY GENERAL’S MOTION TO
EXCLUDE E9-1-1 AND IBT WHOLESALE DATA FROM THE RECORD**

Illinois Bell Telephone Company (“AT&T Illinois” or the “Company”) hereby responds to the “Motion To Exclude E9-1-1 And IBT Wholesale Data From The Record” filed on March 28, 2006. In its Motion, the Attorney General (“AG”) requests that the Commission “strike all testimony and exhibits of [AT&T Illinois] that includes or relies on the E9-1-1 data base or [AT&T Illinois’] wholesale records, and not base any decision upon that data.” Motion at 6. Specifically, the AG seeks to exclude Schedules WKW-5 and WKW-9, sponsored by W. Karl. Wardin in his Direct Testimony.¹ In support of its Motion, the AG argues that the E9-1-1 database is not “accurate” and that use of the E9-1-1 database and AT&T Illinois’ wholesale records to develop estimates of the number and location of residential access lines served by competitive local exchange services (“CLECs”) is prohibited by Sections 222(b) and 222(g) of the federal Telecommunications Act of 1996 (the “1996 Act”).

The AG’s motion is without merit and should be rejected for several reasons. First, CLEC line information derived from the E9-1-1 database and AT&T Illinois’ databases is highly relevant to the issue of whether the residential basic local exchange service at issue in this case is

¹ Schedules WKW-5 and WKW-9 were revised. In this response, AT&T Illinois will refer to the schedules as WKW-5 Revised and WKW-9 Revised.

“competitive” within the meaning of Section 13-502 of the Illinois Public Utilities Act. The AG’s assertions regarding the “accuracy” of the E9-1-1 data are unfounded and, in any event, raise a factual dispute that must be resolved on the basis of the full record. Those assertions do not support a decision by the Commission to simply ignore relevant evidence.

Second, all CLECs in Illinois, the only entities that would have standing to complain about the use of their confidential data, were notified in advance of AT&T Illinois’ intention to use such data in this proceeding on a confidential basis and had a full opportunity to object. None did.

Third, the AG’s interpretation of Sections 222(b) and 222(g) of the 1996 Act is incorrect, as evidenced by the fact that the Federal Commerce Commission (“FCC”) (the agency charged with enforcing Section 222), the United States Department of Justice (“DOJ”) and numerous state commissions (including this one) have consistently allowed and relied on the use of the E9-1-1 database and ILEC wholesale records as sources of information regarding access lines served by CLECs in regulatory proceedings such as this one.

Fourth, AT&T Illinois’ submission of the evidence that the AG seeks to strike was necessary to comply with the Order initiating the proceeding, which required AT&T Illinois to “provide any and all evidence supporting a detailed analysis” of the factors supporting the competitive classification of services at issue in this case.

I. THE TESTIMONY AND EXHIBITS THAT THE AG SEEKS TO STRIKE ARE HIGHLY RELEVANT TO THE ISSUES IN THIS PROCEEDING

The evidence which the AG seeks to strike is directly relevant to the question of whether AT&T Illinois’ residential basic local exchange service in the Chicago LATA meets the definition of “competitive” under Section 13-502 of the Illinois Public Utilities Act. Specifically, the evidence consists of information regarding (i) the number of CLECs which

provide residential local exchange service in competition with AT&T Illinois in the Chicago LATA; (ii) the number and geographic locations of the residential access lines served by those CLECs in the Chicago LATA; (iii) the overall percentage of residential access lines served by CLECs in the Chicago LATA; and (iv) the methods by which residential access lines are provisioned by CLECs (e.g., via CLEC-owned facilities, UNEs provided by AT&T Illinois and/or other service platforms). To develop this information on a current basis, AT&T Illinois was required to use sources of information available to it. There were two such sources. First, AT&T Illinois used its wholesale records to determine the number of lines served by CLECs using the UNE platform (“UNE-P”), resale and local wholesale complete (“LWC”), a commercially negotiated replacement for UNE-P. Second, AT&T Illinois used the E9-1-1 database to determine the number of lines served by CLECs through the use of their own switches. AT&T Ill. Ex. 1.0 at 17-18. The information contained in Schedules WKW-5 Revised and WKW-9 Revised was based on E9-1-1 and wholesale data as of September 30, 2005, the end of the most recent quarter for which data was available both at the time the tariffs classifying the residential services competitive were filed and at the time that AT&T Illinois prepared its direct testimony and exhibits.

The information contained in Schedules WKW-5 Revised and WKW-9 Revised shows, *inter alia*, that (i) there are 75 carriers providing basic local exchange service to residential customers in the Chicago LATA; (ii) on average, there are 29 CLECs providing residential local exchange service in each of AT&T Illinois’ exchanges within the Chicago LATA; (iii) in 108 of the 118 exchanges, 10 or more carriers provide residential local exchange service; and (iv) the fewest number of CLECs in any given exchange is 4. The evidence also shows that CLECs serve 17% of the residential access lines in the Chicago LATA. AT&T Ill. Ex. 1.0 at 16, 20-21,

26-27. This information is directly relevant to the factors that the Commission is required to consider in determining whether residential service of the type provided by AT&T Illinois, or its functional equivalent, is “reasonably available from more than one provider” for the purposes of Section 13-502, including “the number, size and geographic distribution of other providers of the service.” 220 ILCS 5/13-502(b). The information contained in Schedules WKW-5 Revised and WKW-9 Revised regarding the number of lines served by facilities-based carriers which own their own switches and/or loop facilities and the numbers of CLEC lines served via UNE-P, LWC and resale is also relevant to a consideration of the “extent to which other telecommunications carriers must rely on the service of another telecommunications carrier to provide telecommunications service.” 220 ILCS 5/13-502(c).²

The Commission Staff agrees that the information regarding CLEC lines obtained from the E9-1-1 database and AT&T Illinois’ wholesale records is relevant to the determination of whether AT&T Illinois’ residential services are competitive. In response to Staff Data Request JZ 2.01, AT&T Illinois updated Schedules WKW-5 Revised and WKW-9 Revised for data available on December 31, 2005. Staff witness Dr. Zolnierek used that data in his analysis of the platforms used by CLECs to provide local exchange services in the Chicago LATA and the extent to which CLECs using those platforms have been effective in providing residential local exchange service at rates, terms and conditions comparable to those of the services provided by AT&T Illinois. Staff Ex. 2.0 at 26-53.³

² The AG argues that AT&T Illinois could have relied on other information regarding CLEC competition, including “FCC and ICC competition reports, CLEC marketing information, tariff information and its own assessment of its market share and number of lines.” Motion at 6. Up-to-date FCC and ICC competition reports were not, however, available to AT&T Illinois. Moreover, the fact that the sources of information referred to by the AG are available, and in fact are relied on to some extent by AT&T Illinois in support of its position in this case, does not justify excluding relevant E9-1-1 and wholesale data which provide evidence of CLEC competition which is comprehensive and current.

³ The updated data provided by AT&T Illinois in response to Staff Data Request JZ 2.01 is included in Schedules WKW-R1 and WKW-R2, sponsored by Mr. Wardin in his rebuttal testimony. AT&T Ill. Ex. 1.1 Revised.

In contexts other than its Motion to Exclude, the AG also has relied on and acknowledged the relevance of CLEC line information obtained from the E9-1-1 database and wholesale records. On March 29, 2005, the day after the AG filed its Motion to Exclude, the AG filed a “Motion For Release Of Aggregate Information To The Public Record” (“Motion for Release”). In the Motion for Release, the AG requested that this Commission “release to the public” record aggregate information regarding CLEC-provisioned lines contained in the direct testimony of Dr. Zolnierek and the direct and rebuttal testimonies of Dr. Selwyn, as identified in Exhibit A to the Motion to Release. The sources of most of the aggregate information that the AG seeks to release to the public, as identified in Exhibit A, was AT&T Illinois’ response to Staff Data Request JZ 2.01. As discussed, the sources of the information provided in response to that data request were the E9-1-1 database and AT&T Illinois’ wholesale records. In support of its request to release this information to the public record, the AG asserts, in part, that “[t]his information is essential to the Commission’s, the parties’ and the public’s ability to have a complete discussion on the merits of the tariffs under consideration in this docket.” Motion for Release at ¶ 18.⁴

The AG asserts that the “E9-1-1 database is not an accurate source for determining the number of residential lines served by non-IBT carriers.” Motion at ¶¶ 17, 18. The evidence presented by AT&T Illinois, however, demonstrates that the E9-1-1 database is, in fact, a “accurate source” for determining the number of residential lines served using CLEC-owned facilities in the Chicago LATA. AT&T Ill. Ex. 1.0 Rev. at 19; AT&T Ill. Ex. 1.1 Rev. at 7-15, 23-30. Because the E9-1-1 database is “derived from data compiled for emergency purposes” (Motion, ¶ 19), extreme accuracy in compiling the data is required, and it is in the interest of

⁴ As discussed in its response to AG’s Motion to Release, AT&T Illinois is not at liberty to consent on behalf of CLECs to the public disclosure of their confidential data.

ILECs and CLECs alike to ensure that the data is accurately maintained. AT&T Ill. Ex. 1.0 Rev. at 19. Indeed, as discussed below, the FCC and the DOJ have consistently relied on E9-1-1 listings to estimate facilities-based CLEC lines in merger proceedings and Section 271 proceedings. *Id.*; AT&T Ill. Ex. 1.1 Rev. at 28-29. Moreover, the evidence presented by AT&T Illinois demonstrates that the CLEC line counts obtained from the E9-1-1 database and AT&T Illinois' wholesale records are, if anything, conservative based on a proper analysis of the line counts produced by CLEC responses to the Staff information requests in Docket 06-0028. *Id.* at 7-15. Staff witness Zolnierrek agreed that E9-1-1 listings produce a "reasonable estimate" of line counts. Staff Ex. 5.0 at 6-7.

Accordingly, there is no basis to exclude E9-1-1 data from the record based on the AG's mere allegation that such data is "not accurate." The accuracy of the E9-1-1 database and its reliability for use in determining CLEC line counts and market shares is an issue of disputed fact that must be based upon the entire record. It is not appropriate to "resolve" that issue by excluding relevant evidence from the record.

II. FEDERAL LAW DOES NOT PRECLUDE THE USE OF E9-1-1 AND WHOLESALE RECORDS DATA IN THIS PROCEEDING

A. THE AG HAS MISINTERPRETED SECTION 222(g) OF THE 1996 ACT

The AG argues that federal law "prohibits" the use of data from the E9-1-1 database to develop estimates of CLEC line counts and market shares. In support of this assertion, the AG argues that, under Section 222(g) of the federal Telecommunications Act of 1986 (the "1986 Act"), E9-1-1 information may be used "solely for purposes of delivering or assisting in the delivery of emergency services." 47 U.S.C. § 222(g). Motion at 6. This argument is based on a fundamental misreading of Section 222(g). That section governs the use of "information described in subsection (h)(3)(A)" of Section 222. The information described in Section

222(h)(3)(A) is “subscriber list information,” defined as information “identifying the listed names of subscribers of a carrier and such subscribers’ telephone numbers, addresses, or primary advertising classifications . . .” 47 U.S.C. § 222(h)(3)(A). AT&T Illinois has not included any such “subscriber list information” in its evidence. Rather, the information from the E9-1-1 database used by AT&T Illinois is limited to information regarding the numbers of types and locations of CLEC lines. Section 222(g) has no applicability to such information.

B. THE AG HAS NO STANDING TO OBJECT TO AT&T ILLINOIS’ USE OF CONFIDENTIAL CLEC DATA

Section 222(g), entitled “Confidentiality of Carrier information,” provides that

[a] telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose and shall not use such information for its own marketing efforts.

47 U.S.C. § 222(b). AT&T Illinois has not used any of the CLEC information obtained from the E9-1-1 database and wholesale records “for its own marketing efforts.” The AG nonetheless argues that AT&T Illinois’ use of this CLEC information in this proceeding violates Section 222(b).

The AG has no standing under Section 222(b) to object to AT&T Illinois’ use of confidential CLEC data in this proceeding. The purpose of Section 222(b) is to protect the rights of carriers which provide confidential information to another carrier. Thus, it is only the CLECs, not the AG, which could possibly be aggrieved by the improper use of confidential CLEC data in violation of Section 222(b). Prior to filing its direct testimony, however, AT&T Illinois sent an Accessible Letter to all CLECs in Illinois notifying them of AT&T Illinois’ intention to disclose CLEC proprietary data, including data from AT&T Illinois’ wholesale records, in this docket on

a confidential basis subject to the terms of a proprietary agreement.⁵ By that notice, all CLECs were given an opportunity to object to such disclosure.⁶ To date, AT&T Illinois has received no objection from any CLEC, including the two CLECs (Data Net and TruComm) who intervened in this proceeding.⁷

C. THE FCC, DOJ AND STATE COMMISSION HAVE CONSISTENTLY ALLOWED USE OF E9-1-1 AND WHOLESALE RECORDS DATA IN REGULATORY PROCEEDINGS SUCH AS THIS ONE

Neither Section 222(g) nor Section 222(g) has even been interpreted as precluding the use of CLEC proprietary data obtained from the E9-1-1 database or an ILEC's wholesale records in regulatory proceedings such as this one. To the contrary, the Federal Commerce Commission ("FCC") (which is responsible for enforcing the provisions of the 1996 Act, including Section 222) and the United States Department of Justice ("DOJ") (which is responsible for enforcing federal law generally) have both consistently *accepted* and *relied* on the use of E9-1-1 and wholesale data provided by ILECs to make determinations of CLEC line counts and market shares in merger review and Section 271 proceedings.⁸ For example, in its November 17, 2005 Order approving the merger of AT&T Corp. and SBC Communications, Inc., the FCC performed an analysis of SBC's and AT&T's shares of the retail mass market. For purposes of that analysis, the FCC expressly used "residential resold lines, residential UNE-P lines [and] non-SBC residential E9-1-1 listings" in developing an estimate of the "total residential local access lines." *SBC Communications, Inc. and AT&T Corp. Application for Approval of Transfer of*

⁵ The Accessible Letter is attached as Exhibit 1.

⁶ This is the same method that AT&T Illinois and its ILEC affiliates in other states have consistently used to provide notice to CLECs of the intent to use confidential CLEC data in Section 271 and other proceedings for the purpose of estimating CLEC line counts and market shares.

⁷ Indeed, Data Net's witness, Mr. Gillan, cites information obtained from the E9-1-1 database and AT&T Illinois' wholesale records in his testimony. Data Net Ex. 3.0 at 4-13.

⁸ In fact, the CLEC information AT&T Illinois is required to include on the FCC's Form 477 comes from AT&T Illinois' wholesale records. Data Net Cross Exam. Exs. 1 and 2.

Control, WC Docket No. 05-65, *Memorandum Opinion and Order*, ¶ 102, n. 308 (rel. Nov. 17, 2005).

The FCC and the DOJ have consistently relied on E9-1-1 and ILEC wholesale data to estimate numbers of CLEC-served access lines and CLEC market shares in Section 271 proceedings. AT&T Ill. Ex. 1.0 Rev. at 19; AT&T Ill. Ex. 1.1 Rev. at 28-29. In a Section 271 proceeding involving Qwest, for example, the FCC approved Qwest's use of E9-1-1 data and the number of UNE-P lines it provides as sources for calculations of the number of CLEC lines, stating that "[t]hese methodologies have been used in previous Section 271 applications that have been approved by the Commission." *In re: Application by Qwest Communications International, Inc. for Authorization to Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming*, WC 02-314, *Memorandum Opinion and Order*, FCC 02-332 at ¶ 32 (Dec. 23, 2002). Other examples include the following:

- Evaluation of the U.S. Department of Justice, *In re: Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region InterLATA Services in Arkansas and Missouri*, FCC CC Docket No. 01-194 (Sept. 24, 2001), at 4, n.8;
- Evaluation of the U.S. Department of Justice, *In re: Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, FCC CC Docket No. 00-217 (Dec. 4, 2000), at 5, n.11 & 8, n.25;
- Evaluation of the U.S. Department of Justice, *In re: Application by New York Telephone Company (d/b/a Bell Atlantic - New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in New York*, FCC CC Docket No. 99-295 (Nov. 1, 1999), at 9;
- Evaluation of the U.S. Department of Justice, *In re: Application by Verizon New England, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company*

(d/b/a Verizon Enterprise Solutions), and Verizon Global Networks Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts, FCC CC Docket No. 01-9 (Feb. 21, 2001), at 4; and

- Evaluation of the U.S. Department of Justice, *In re: Application by Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Pennsylvania, FCC CC Docket No. 01-138 (July 26, 2001), at 4.*

AT&T Ill. Ex. 1.1 Rev. at 28-29.

Numerous state commission, including this Commission, have also allowed the use of E9-1-1 and wholesale records data to develop estimates of CLEC line counts and market shares. For example, in Docket 01-0662, the Commission’s investigation concerning AT&T Illinois’ compliance with Section 271 of the 1996 Act, AT&T Illinois used information from the 911 database and its wholesale records to make an estimate of the number of CLEC lines in Illinois for purposes of demonstrating that it had satisfied eligibility requirements of Section 271(c)(1)(A) (“Track A”). *Illinois Commerce Commission On Its Own Motion, Investigation Concerning Illinois Bell Telephone Company’s Compliance With Section 271 of the Telecommunications Act of 1996, Docket 01-0662, Order on Investigation, ¶¶ 69, 70 (May 13, 2003) (the “Illinois 271 Order”).*⁹

More recently, in proceedings, such as this one, to determine the competitive status of local telecommunications services, the Oklahoma, Wisconsin and Michigan commissions all relied on data regarding CLEC-served residential lines for which ILECs used their wholesale records and the E9-1-1 database as sources. *Application of Southwestern Bell Telephone, LP., d/b/a SBC Oklahoma, For The Classification of Intrastate Retail Telecommunications Services*

⁹ The parties to Docket 01-0662 included the AG as well as several CLECs. While certain of the CLECs in that proceeding took issue with the reliability of the E9-1-1 data, no party, including the AG and the CLECs, argued that AT&T Illinois’ use of the E9-1-1 and wholesale data in that case violated Section 222 of the 1996 Act or any other provision of federal law.

as Basket 4 Services Pursuant to OAC 165:55-5-66(4), Cause No. PUO-200500042, *Order No. 508813* at 10-11 (July 28, 2005); *Petition of SBC Wisconsin for Suspension of Wisconsin Statute sec. 196.196(1) with Regard to Basic Local Exchange Service*, Docket 6720-TI-196, *Order* (Wis. PSC) (Nov. 23, 2005); *In the Matter of SBC Michigan's Request for Classification of Business Local Exchange Service as Competitive Pursuant to Section 208 of the Michigan Telecommunications Act*, Case Nos. U-14232 and U-14324, *Order* at 7 (Mich. PSC) (Aug. 4, 2005); AT&T Ill. Ex. 1.1 Rev. at 29.

III. AT&T ILLINOIS' SUBMISSION OF THE EVIDENCE AG SEEKS TO EXCLUDE WAS NECESSARY TO COMPLY WITH THE ORDER INITIATING THIS DOCKET

AT&T Illinois' presentation of evidence derived from its wholesale records and the E9-1-1 database was not only consistent with the practice that has been consistently allowed and approved by this Commission, other state commissions, the FCC and the DOJ in numerous past proceedings, it was also necessary to comply with the January 11, 2006 Order initiating this proceeding. In that Order, AT&T Illinois was directed by the Commission to provide "any and all data and evidence supporting a detailed analysis" of factors supporting the competitive classification of the services at issue in this case, including "the number, size and geographic distribution of other providers of the service" and "the availability of functionally equivalent services in the geographic area." *Order*, Docket 06-0027, App. B, p. 1 (January 11, 2006). The E9-1-1 database and AT&T Illinois' wholesale records were the best sources available to AT&T Illinois of "data and evidence supporting a detailed analysis" of these factors.

The AG argues that it was not "necessary" to "offer" information from the E9-1-1 database in light of the Commission's request to CLECs for line count data in Docket 06-0028. Motion at ¶ 20. The Order in Docket 06-0028, however, was issued on the same date as the

order initiating this docket. Obviously, therefore, the information provided by CLECs in response to the Commission's request in Docket 06-0028 was not available to AT&T Illinois to comply with the Order in Docket 06-0027. Furthermore, the Order in Docket 06-0028 did not apply to all CLECs providing residential service in the Chicago LATA, as the AG suggests. Moreover, the evidence shows that the information provided to Staff by CLECs who were subject to the Order in Docket 06-0028 was not in all respects complete. AT&T Ill. Ex. 1.1 Rev. at 9-11. Accordingly, even if the CLEC responses had been available to AT&T Illinois, full compliance with the directive to provide "*any and all* data and evidence supporting a *detailed* analysis" of the factors supporting the competitive classification required AT&T Illinois to provide the information available to it from the E9-1-1 database and its wholesale records.

IV. CONCLUSION

For all the reasons discussed herein, the AG's "Motion To Exclude E9-1-1 and Wholesale Data From the Record" should be denied.

Respectfully submitted,

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VERIFICATION

I, W. Karl Wardin, on oath, state that I am Executive Director-Local Competition for AT&T Illinois, that I have reviewed the foregoing **RESPONSE OF AT&T ILLINOIS TO ATTORNEY GENERAL'S MOTION TO EXCLUDE E9-1-1 AND IBT WHOLESALE DATA FROM THE RECORD**, and that, to the best of my knowledge, information and belief, the statements contained therein are true and correct.



W. Karl Wardin

Subscribed and sworn to before
me this 5 day of April, 2006



Notary Public, State of Illinois



CERTIFICATE OF SERVICE

I, Karl B. Anderson, an attorney, certify that a copy of the foregoing **RESPONSE OF AT&T ILLINOIS TO ATTORNEY GENERAL'S MOTION TO EXCLUDE E9-1-1 AND IBT WHOLESALE DATA FROM THE RECORD** was served on the following parties by U.S. Mail and/or electronic transmission on April 5, 2006.

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