

ILLINOIS COMMERCE COMMISSION

STAFF DATA REQUESTS JH-1.01 through JH-1.15

Company Or Entity: **Midwestern Telecommunications Incorporated d/b/a/ M.T.I.**

Regarding: **Docket 10-0524**

**Midwestern Telecommunications Incorporated d/b/a M.T.I.:
Application for Designation as an Eligible Telecommunications
Carrier for Purposes Of Receiving Federal Universal Service Support
Pursuant to Section 214(e)(2) of the Telecommunications Act of 1996.**

Date Submitted: **October 25, 2010**

Staff of the Illinois Commerce Commission (“Staff”) hereby submits Staff Data Requests JH-1.01 through JH-1.15 to Midwestern Telecommunications Incorporated d/b/a/ M.T.I. (the “Applicant” or “MTI”). Responses should be delivered as soon as feasible (“Response Due Date”), in accordance with the instructions set forth below.

DEFINITIONS AND INSTRUCTIONS

1. “Relate to” or “refer to” shall mean, in addition to their customary and usual meaning, to reflect on, to pertain to, support, evidence, constitute, or mention.
2. “And” as well as “or” are to be construed either disjunctively or conjunctively so as to bring within the scope of this request any matters that might be construed outside its scope.
3. The terms “document” or “documents” are intended to be comprehensive, including without limitation any kind of written or graphic material, whether typed, handwritten, printed, computer-generated, or matter of any kind from which information can be derived, however produced, reproduced or stored on paper, cards, machines, tapes, film, electronic facsimile, disks, computer tapes, printouts, computer programs or computer storage devices or any other medium, of any nature whatsoever, including all originals, copies and drafts.
4. When asked to “identify” a person, provide that person's name, job title and last known business address.
5. All documents requested herein are all those in the custody of, possession of, or control of the Company or its experts, consultants, agents, employees or representatives (including attorneys), or to which the Company or its experts, consultants, agents, employees or representatives (including attorneys) have access.

6. If any of the information requested in a data request cannot be furnished, please indicate what information is not being provided and the reason that it cannot be provided.
7. If the Company asserts any privilege as to any documents responsive to this request, it shall identify the author(s) of the document, the addressee(s), the recipients(s) of copies, the date of the document, the nature of the document (e.g., letter, memorandum, handwritten notes), the length of the document, the document's current location, and the specific reason(s) why the Company contends that the document is privileged or otherwise protected from discovery.
8. The response to each data request question should begin on a new page. As part of each response, please identify the data request question to which the response is made by typing it at the top of the page. In addition, each response should identify the name, job title and telephone number of the person or persons responsible for providing the information requested for each data request question. If any person so identified is not a witness in this proceeding, the response shall also identify the witness or witnesses who will be responsible for the answering of cross-examination questions pertaining to both the request and the response.
9. Documents provided as part of a response should be attached to the sheet containing the response. Each page of all documents provided in response to any data request question should be clearly marked with the data request question number, unless stapled together, in which case only the first page need be marked.
10. Please provide individual responses as they become available. If, in your responses to a data request, you make reference to written testimony or affidavits filed in this docket, please include page numbers and line numbers where the information sought by Staff in each question can be found.
11. Electronic responses rather than paper responses are preferred. If data is provided in response to a particular request, such data should be provided in an electronic format that allows data manipulation (i.e., spreadsheet -- preferably Microsoft Excel - or database -- preferably Microsoft Access -- not .pdf). If a portion of a response needs to be provided in paper, please provide the entire response in paper and also provide electronically the portion that is able to be provided electronically. Responses shall be provided on or before the Response Due Date as follows:

Electronic responses shall be provided to the following persons:

Nicole Sara
Illinois Commerce Commission
nsara@icc.illinois.gov

Jeff Hoagg
Illinois Commerce Commission
jhoagg@icc.illinois.gov

14. Due to the requirements regarding ex parte communications in the State Officials and Employees Ethics Act, 5 ILCS 430/5-50, please serve your responses to these data requests to all parties on the Service List for this Docket. Do not serve the Administrative Law Judge.

STAFF DATA REQUESTS JH-1.01 through JH-1.15

- JH-1.01 Please describe and specify in detail how the lease of equipment from Reunion Communications, Inc. meets the requirements of a capital lease. Please include MTI's definition of a capital lease, any specific criteria that must be satisfied to meet this definition and all details regarding how any such criteria have been met.
- JH-1.02 Please provide true and correct copies of all advertising and publicity materials, and any other pertinent proof of the advertising and publicity practices (required pursuant to Code Part 757.110(a) for Linkup programs), employed by MTI for each quarter of calendar year 2009 and year 2010 to present.
- JH-1.03 Please provide a true and correct copy of MTI's wireline tariff sheet or sheets, in effect as of the date of filing MTI's instant petition (August 30, 2010), providing for full or partial waiver of subscriber installation charges and for customer deferred payment arrangements.
- JH-1.04 Please provide true and correct copies of each quarterly report filed with the Commission pursuant to Code Part 757.120 (b) for calendar year 2009 and year 2010 (to present).
- JH-1.05 Please provide true and correct copies and/or samples of all bill inserts and any other materials submitted to customers (or otherwise used to convey to customers from January 2009 to present) that they may voluntarily contribute to the Illinois Universal Telephone Service Assistance Program.
- JH-1.06 Please provide true and correct copies or samples (customer name redacted if and where necessary and/or appropriate) for each applicable year of annual bill inserts provided to customers pursuant to Code Part 757.220(a).
- JH-1.07 Please provide true and correct copies or examples (and any other pertinent evidence) of publicity materials employed or distributed pursuant to Code Part 757.220(b) for each quarter of year 2009 and year 2010 to present.
- JH-1.08 Please provide true and correct copies or examples (and any other pertinent evidence) of publicity materials employed or distributed pursuant to Code Part 757.410(a) for each quarter of year 2009 and year 2010 to present.

- JH-1.09 Please provide true and correct copies of written notifications provided pursuant to Code Part 757.410(a)(3).
- JH-1.10 Does MTI own a network call controller that routes DA traffic to a specific directory assistance provider? If so, please provide documentation and verification of MTI's purchase of such equipment. Such documentation should show, at minimum, the date of purchase, vendor, make, model and type of equipment, identity of seller, and purchase price of this equipment.
- JH-1.11 Please provide a true and correct copy of MTI's wireline tariff sheet or sheets, filed pursuant to Code Part 757.420, in effect as of the date of filing of MTI's instant petition (August 30, 2010),.
- JH-1.12 Please provide a detailed summary and description, for each year since MTI's initial designation as an Illinois ETC, of all annual customer eligibility verification procedures utilized by MTI as required by Code Part 757.430(b)(1).
- JH-1.13 Please provide the number of customers, for each year since MTI's initial designation as an Illinois ETC, found ineligible to continue receiving Lifeline assistance as a result of MTI's continuing eligibility verification programs or procedures.
- JH-1.14 Please provide a true and correct copy of each and every form application for Lifeline / Link-up assistance prepared and circulated by MTI since its initial designation as an Illinois ETC.
- JH-1.15 Please provide a true and correct copy of each and every form Letter of Agency prepared and circulated by MTI since its initial designation as an Illinois ETC.

EXHIBIT C

Revised Lifeline/Linkup Certification Forms

IQ TELECOM

Application for Life-Line & Link-Up Assistance Home Telephone Service

PLEASE READ CAREFULLY AND FILL OUT COMPLETELY

I hereby certify that I participate in a minimum of one of the following programs

- Medicaid** **Federal Public Housing** **National School Lunch Program's Free Lunch**
- Food Stamps** **Supplemental Security Income (SSI)** **Low Income Home Energy Assistance Program (LIHEAP)**
- Temporary Assistance to Family Needs (TANF)**

Packages

Deluxe Package
Unlimited local + 250 Minutes Toll & Long Distance
Call Waiting & Caller ID with Name
\$43.49 plus taxes and fees*

Agent : _____

Local Package
Unlimited local only
Call Waiting & Caller ID with Name
\$45.47 plus taxes and fees*

Applicant's Name: _____ (First) _____ (Last) Public Aid# /SS# _____

Service Address: _____

FLOOR: _____ **APT:** _____ **HOUSE:** _____

City: _____ State: _____ Zip: _____

Email: _____ Contact Number: (_____) _____

- I **certify** that I do not currently have Lifeline service and no other resident at my residential address participates in the Lifeline program
- I certify that I did not received Link Up assistance at the above address. *(Note: You may not receive Link Up assistance more than once at the same principal residence. You may receive Lifeline assistance only.)*
- I hereby authorize IQ Telecom, Inc. or it's duly appointed representative to access any records relating to me and my family, that are in any state or federal database to verify my eligibility for the Lifeline/Linkup programs.
- I authorize representatives of the above programs to discuss with and/or provide copies if requested by the company, to verify my participation in the above selected programs for purpose of verifying my eligibility for Life-Line or Link-Up Telephone service.
- I will notify my telecommunications provider if and when I am not longer participating in at least one of the above-designated programs.
- I affirm that I am over eighteen years of age, I am head of the household and that I am not claimed as a dependant on another's person federal or state income tax return. I agree to notify IQ Telecom if I have a change of address.
- I acknowledge and certify under penalty of perjury, that I have read the information in this application and that the information contained is true and correct.

Applicant's Signature: _____ **Date:** _____
(Sign Here)

Avoid Unnecessary Delays

- Call IQTEL Communications, Inc. 5 days after faxing this form to obtain your telephone number and due date.
- Questions? 708-385-8600 FAX 708-489-6480**

EXHIBIT D

Revised Annual Verification Form

Lifeline & Link-up Annual Certification & Verification Form

Each year, **IQ Telecom** is required by State and Federal law to randomly select customers to participate in the annual verification & certification process. You have been randomly selected and must re-certify and provide proof of your continued participation in one of the following eligible lifeline & linkup programs. This authorization is only for the purposes of verifying your continued participation in these programs and will not be used for any other purpose.

I _____ hereby certify that I participate in at least one of the following programs: **(PLEASE CHECK ONE)**

- | | |
|--|--|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8)
<input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP)
<input type="checkbox"/> Temporary Assistance for Needy Families ("TANF")
<input type="checkbox"/> The National School Lunch Program's Free Lunch Program | <input type="checkbox"/> Supplemental Security Income ("SSI")
<input type="checkbox"/> Medicaid
<input type="checkbox"/> Food Stamps |
|--|--|

I certify, under penalty of perjury:

- That I am a current recipient of the above program(s) and will notify my local telephone company when I am no longer participating in any of the above-designated program(s). I give permission to the duly authorized official(s) administering the above programs to provide to IQT Telephone (the company) my participation status in any of the above program(s). I give this permission on the condition that the information in this form and any information about my participation in the above programs provided by officials be maintained by the company as confidential customer account information.
- I am not listed as a dependent on another person's tax return (unless over the age of 60).
- The address listed is my primary residence, not a second home or business.

Name: _____

Street Address (PO Boxes are mailing addresses): _____

Mailing Address (if different than street address): _____

City: _____ State: _____ Zip Code: _____

Home Telephone Number: _____ Or Can Be Reached At: _____

Applicant's Signature: _____ Date: _____

FAX THIS COMPLETED FORM TO 708-489-6480 OR EMAIL TO IQTELECOM@AOL.COM

For Office Use Only:

Date Received:	
Agent ID:	
Date Verified:	

EXHIBIT E

Sample Invoice

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Yolanda Gamble
15439 DORCHESTER Avenue (AV)
Apartment 2
DOLTON, IL 60419

Account: 306171	
Invoice Number:	563874
Invoice Date:	02/09/2010
Invoice Due:	02/23/2010
Billing Telephone:	(708) 8415429
Previous Balance:	\$0.00
Previous Payment:	\$0.00
Current Charges:	\$59.99
Total Amount Due:	\$159.50

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(708) 8415429	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Linda Wade
5255 S hermitage Avenue (AV)
Floor 2
CHICAGO, IL 60609

Account: 320436	
Invoice Number:	596433
Invoice Date:	05/18/2010
Invoice Due:	06/01/2010
Billing Telephone:	(773) 7789522
Previous Balance:	\$20.07
Previous Payment:	\$79.02
Current Charges:	\$59.99
Total Amount Due:	\$1.04

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(773) 7789522	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Sheila Johnson
731 E 50TH Place
Apartment 3B
CHICAGO, IL 60615

Account: 338165	
Invoice Number:	603208
Invoice Date:	06/08/2010
Invoice Due:	06/22/2010
Billing Telephone:	(773) 2859332
Previous Balance:	\$0.00
Previous Payment:	\$138.70
Current Charges:	\$59.99
Total Amount Due:	\$0.00

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(773) 2859332	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Patricia Beard
20 S waller Avenue (AV)
Floor 2
CHICAGO, IL 60644

Account: 343311	
Invoice Number:	565300
Invoice Date:	02/12/2010
Invoice Due:	02/26/2010
Billing Telephone:	(773) 2871638
Previous Balance:	\$-33.81
Previous Payment:	\$0.00
Current Charges:	\$59.99
Total Amount Due:	\$26.18

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(773) 2871638	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Olivero Chalma
1965 GROVE
Blue Island, IL 60406

Account: 356488	
Invoice Number:	562210
Invoice Date:	01/30/2010
Invoice Due:	02/13/2010
Billing Telephone:	(708) 3961338
Previous Balance:	\$0.00
Previous Payment:	\$0.00
Current Charges:	\$59.99
Total Amount Due:	\$59.99

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(708) 3961338	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
 3221 W. Burr Oak Ave
 Blue Island, IL 60406
 708-385-8600

Gayle Shemerdiak
 13750 MARY Drive
 Orland Park, IL 60462

Account: 358040	
Invoice Number:	583130
Invoice Date:	04/01/2010
Invoice Due:	04/15/2010
Billing Telephone:	(708) 2266074
Previous Balance:	\$0.00
Previous Payment:	\$0.00
Current Charges:	\$59.99
Total Amount Due:	\$59.99

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(708) 2266074	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

Carolyn Polk
4018 W MONROE
Floor 1
Chicago, IL 60624

Account: 377839	
Invoice Number:	657394
Invoice Date:	09/01/2010
Invoice Due:	09/15/2010
Billing Telephone:	(773) 2650885
Previous Balance:	\$0.00
Previous Payment:	\$59.99
Current Charges:	\$59.99
Total Amount Due:	\$0.00

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(773) 2650885	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

IQ Telecom, Inc
3221 W. Burr Oak Ave
Blue Island, IL 60406
708-385-8600

GREGORY GORMAN
9821 S MASON AVE
OAK LAWN, IL 60453

Account: 298227	
Invoice Number:	657720
Invoice Date:	09/01/2010
Invoice Due:	09/15/2010
Billing Telephone:	(708) 4235316
Previous Balance:	\$0.00
Previous Payment:	\$0.00
Current Charges:	\$59.99
Total Amount Due:	\$59.99

Recurring and One-Time Charges			
Telephone	Billing Date	Description	Price
(708) 4235316	-	Connection Fee	\$59.99
Total Recurring and One-Time Charges			\$59.99

EXHIBIT F

1st
Month
Free

mymti.com
877-567-3722



HOME PHONE SERVICE

Activated
Free

1st
Month
Free

mymti.com
877-567-3722

