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CHIEF CLERK'S OFFICE

JAMES Paul Miller,
Claimant,

Vs.

CONSOLIDATED COMMUNICATIONS
ENTERPRISE SERVICES, INC. d/b/a
CONSOLIDATED COMMUNICATIONS
NETWORK SERVICES d/b/a
CONSOLIDATED COMMUNICATIONS
PUBLIC SERVICES,
Respondent.

Case No. 12-0107

Complaint as to Service
in LINCOLN, Illinois.

FORMAL HEARING REQUESTED

FORMAL COMPLAINT

NOW COMES the Claimant, JAMES PAUL MILLER pro se, and
for his Formal Complaint against the Respondent, CONSOLIDATED
COMMUNICATIONS PUBLIC SERVICES, INC., a telecommunications company,
states as follows:

NATURE

This Formal Complaint arises from the failure of the Respondent
to comply with its obligations under the Public Utilities Act, the
CONSOLIDATED COMMUNICATIONS PUBLIC SERVICES, INC. ("CCPS") Illinois
Commerce Commission ("ICC") Tariff No. 3, and the CONTRACT FOR SUPPLIES
AND/OR SERVICES between the Respondent and the Illinois Department
of Central Management Services ("CMS"), CMS Contract No. TCVS 0302
("contract"), which is made part of CCPS Tariff at § 2.1 and § 2.12;

JURISDICTION

The ICC has exclusive jurisdiction over Claimant's claims since
Respondent is a Public Utility as defined by the Public Utilities
Act. Jurisdiction is conferred by 220 ILCS 5/9-252;

PARTIES

Claimant is a resident of the State of Illinois who is currently committed to the custody of the Illinois Department of Corrections ("IDOC") and his address of record for this matter is:

JAMES Paul Miller #A-92410
LOGAN Correctional CENTER
P.O. Box 1000
LINCOLN, ILLINOIS 62656;

Respondent is a telecommunications company and a public utility whose primary place of business is:

Consolidated Communications Public Services, Inc.
Steven L. Childers, Chief Financial Officer
121 South Seventeenth Street.
Mattoon, IL 61938;

STATEMENT OF FACTS

AROUND MARCH 15th 2008 AND November 1st 2008 PLAINTIFFS
Pre-Paid telephone calls placed on defendant CCP's equipment
were terminated early more than 20 times after PLAINTIFFS account
had been debited the correct charge, due to defective and
improperly maintained telephone equipment.

Also between the same time plaintiff notified all defendants
in writing of the trouble with offenders telephones and even spoke
personally with defendant's CCP's COUNCIL about the problems

but Nothing was done to remedy them.

~~AROUND~~

AROUND December 1st 2010 to January 1st 2012 Plaintiff's prepaid telephone calls placed on the Defendant's CCPS's equipment were terminated early no less 30 times after Plaintiff's account had been debited the connect charge due to defective and improperly maintained ~~the~~ telephone equipment.

Defendant IDOC failed to report defendant CCPS's frequent equipment issues and failure to make timely repairs as required by CCPS's contract with CMS

[CMS contract No. TCVS 0302] to Defendant CMS and

IDOC Administration as required by IDOC Administrative Directive governing the monitoring of contracts.

VIOLATIONS

The Respondent is in violation of Tariff No. 3 at but not limited to: §§ 2.1, 2.2.4, 2.12, 2.13, 3.1, and 3.3.2;

The Respondent is in violation of its contract with CMS at but not limited to: §§ 3.1, 3.2, 3.7, 3.9, 3.13.1, 3.13.2, 4.1.2, 4.1.3, 4.1.5, 4.3.10, 4.4.1, 4.4.8, 4.6.4, 4.6.4.2, 4.6.4.3, and 4.6.4.5 as well as §§ 13 and 15 of the Standart Terms and Conditions chapter;

RELIEF SOUGHT

WHEREFORE Claimant prays that this Commission order the Respondent to correct the violations cited herein and award costs.

Respectfully submitted,

Jan Paul Mills

VERIFICATION

STATE OF ILLINOIS)
) ss
COUNTY OF LOGAN)

I the undersigned, after first being duly sworn, do hereby certify that the contents of the foregoing are true and accurate to the best of my knowledge.

Jan Paul Mills

Subscribed and sworn before me on this the 23 day of JANUARY, 2012.

K. Brinton

Notary Public
