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CHIEF CLERK'S OFFICE

Case No. 12-0127

Complaint as to Service
in Lincoln, Illinois.

FORMAL HEARING REQUESTED

Johnny Flores,
Claimant,

Vs.

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

Respondent.

FORMAL COMPLAINT

NOW COMES the Claimant, Johnny Flores 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:

Johnny Flores
IDOC Reg. B-16168
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

WHEREAS claimant has exhausted institutional remedies - filed grievance regarding 3-5 weeks to have phone list approved.

WHEREAS claimant communicated these concerns to security staff assigned to Intel c/o Stratton c/o Woods who assured claimant that delay was not on their behalf.

WHEREAS claimant has encountered confrontational situations with other inmates due to default of contract and facility not having required amount of phones per inmate, as specified within contract.

WHEREAS on several occasion phones have not been functioning and have remained out of service for several weeks before being repaired.

WHEREAS on site technician "Morriscey himself stipulated, that there is NO ON SITE technician, that there is one technician for several facilities..

WHEREAS there are many inmates that have filed grievances regarding these issues at the institutional level with no success in having them resolved.

WHEREAS The phones have cut-off during time of being used.

WHEREAS without the Commissions involvement these matters may never be resolved.

WHEREAS for all of the forclosed information this commission finds merit to protect this claimant ?

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,

[Handwritten Signature]

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.

[Handwritten Signature]

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



[Handwritten Signature]
_____ Notary Public