

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0002
<b>Company Name</b>	Delta Phones, Inc.
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	08/26/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Delta customers receiving service under EZ-Talk with frozen lines
<b>Description</b>	Information regarding Delta customers with EZ-Talk OCNs with line freezes.
<b>Due Date</b>	09/03/2003

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Delta Phones, Inc. office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Delta Phones, Inc. and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**

**Appendix A**

**Data Request for Delta Phones, Inc.**  
**Case No. TC-2004-0064**

**Please provide copies of the letters of authorization, or other means of confirmation, under which the following customer accounts were transferred to EZ-Talk Communications.**

[illegible]

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0003
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Names and numbers of customers for which Delta was allegedly billed after disconnect order issued.

<b>Description</b>	Please provide the names and telephone numbers of those Delta customers, relevant to this case, for which SWBT allegedly continued to bill Delta after Delta placed its order to disconnect. Please indicate how Delta became aware of the problem, when, and what steps it took to resolve the issue.
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<b>Due Date</b>	09/25/2003
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<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0004
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Disconnect orders
<b>Description</b>	Please provide the dates the disconnect orders in (from DR No. 1) were placed. Please provide a copies of the disconnect requests. If a copies of the disconnect order are not available, please explain how the disconnect orders were issued to SWBT and provide supporting evidence showing SWBT confirmed receipt of the disconnect orders.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0005
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Please provide copies of bills on which claims for non-Delta customers are made.
<b>Description</b>	Please provide copies of the SWBT bills on which Delta claims it was invoiced for non-Delta customers. Did Delta, Delta's parent company or another subsidiary of Delta's parent company ever provide service to these customers? If so, indicate when.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0006
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Names and numbers of Delta customers for which Delta received bills for resale and UNE-P services.

<b>Description</b>	Please provide the Delta customer names and telephone numbers for which SWBT invoiced Delta for both resale and UNE-P services. Please indicate how Delta became aware that SWBT was billing Delta both resale and UNE-P charges for the same customer line in the same time period, when, and what steps it took to resolve the issue. Please provide supporting documentation including copies of invoices.
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<b>Due Date</b>	09/25/2003
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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0007
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Why is Delta due discounts stemming from the Ameritech Merger.

<b>Description</b>	Please explain why Delta is due discounts stemming from the Ameritech Merger. Please provide references to the appropriate sections of the SBC/Ameritech Merger Agreement outlining the terms of the expected discounts. Please provide numerical documentation indicating how Delta arrived at the discount's monetary figure.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0008
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Identify services for which Delta has been overcharged by SWBT.
<b>Description</b>	Please identify all services for which Delta has been overcharged by SWBT. Please identify the amount billed, the amount that should have been billed according to Delta's records (and supporting documentation indicating why this amount is correct), the dates of the over billing, and any and all documentation supporting the above.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0009
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Identify specific customers approached by SWBT technical personnel to resubscribe to SWBT.
<b>Description</b>	With respect to paragraphs forty-three (43) and forty-four (44) of Delta's Complaint Of Delta Phones, Inc. Against Southwestern Bell Telephone, L.P., please provide the names of those Delta customers who have been approached by SWBT technicians to return to SWBT and the dates of the contacts.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0010
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	
<b>Description</b>	Please explain, under your interconnection agreement, why SWBT's demand for deposits and escrowed funds is inappropriate. Please include appropriate cites to interconnection agreement in your response.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0011
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	NA
<b>Description</b>	What systems does Delta utilize to receive and analyze CABS data? Why is the current SWBT format unsuitable or harmful?
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0012
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	NA
<b>Description</b>	If SWBT does not provide billing records electronically, how does SWBT provide its billing records to Delta? Have any other formats ever been used by SWBT and Delta? If so, why were the formats changed?
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0013
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Missed Installation dates
<b>Description</b>	Please provide the number, not percentage, of times SWBT missed the three-day installation interval. For the past twenty-four months, please list by telephone number as related to this case, the date of each installation request and the due date that SWBT was expected to have dial tone to the end user that was missed
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

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**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0014
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	NA
<b>Description</b>	Relating to this case, please indicate the number of times that SWBT indicated that it could not provide a UNE-P line. For each request, please provide SWBT's explanation for declining the request. Please provide supporting documentation of both Delta's request for UNE-P service and SWBT's denial of such service.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0015
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Please identify the outstanding balance for all disputed bill amounts.
 <b>Description</b>	 Please identify the outstanding balance for all disputed bill amounts.
<b>Due Date</b>	09/25/2003

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TC-2004-0064 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Delta Phones, Inc.-CLEC(Telephone) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Delta Phones, Inc.-CLEC(Telephone) and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0016
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	NA
<b>Description</b>	Please identify the outstanding balance for all non-disputed bill amounts.
<b>Due Date</b>	09/25/2003

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<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**



**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0017
<b>Company Name</b>	Delta Phones, Inc.-CLEC(Telephone)
<b>Case/Tracking No.</b>	TC-2004-0064
<b>Date Requested</b>	09/05/2003
<b>Issue</b>	Telephone Specific - Other Telephone Specific Issues
<b>Requested From</b>	Mark Comley
<b>Requested By</b>	Walter Cecil
<b>Brief Description</b>	Were any Delta customers transferred to any other Delta affiliate companies?
<b>Description</b>	Were any Delta customers transferred to any other Delta affiliate companies? If so, please identify the new provider, end-user's telephone number, date of the request to migrate the customer, the date the migration was effected
<b>Due Date</b>	09/25/2003

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If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Delta Phones, Inc.-CLEC(Telephone) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Delta Phones, Inc.-CLEC(Telephone) and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security</b>	Public
<b>Rationale</b>	NA

**With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.**