

SUBPOENA DUCES TECUM
Order to Produce Documents



THE STATE OF MISSOURI.

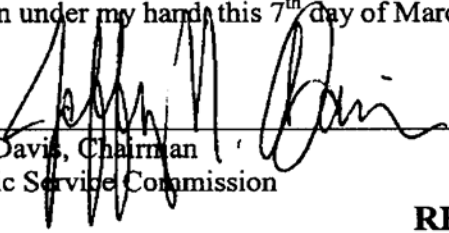
Case No. TO-2005-0237

To Local Exchange Company, LLC
Registered Agent Brydon, Swearngen & England
312 E. Capitol Avenue
Jefferson City MO 65102

You are hereby commanded to appear before The Public Service Commission of the State of Missouri at 9:00 a.m. on the 6th day of April 2005, at the Commission's offices located on the 4th floor of the Governor Office Building, 200 Madison Street, Jefferson City, Missouri with the following:

The items listed on ATTACHMENT A.

Given under my hand this 7th day of March 2005,

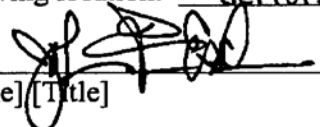

Jeff Davis, Chairman
Public Service Commission

RETURN

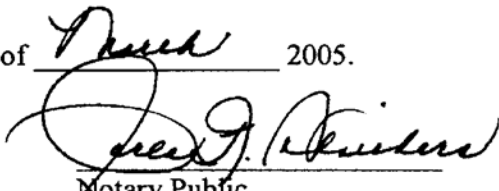
I HEREBY CERTIFY that I served this subpoena by:

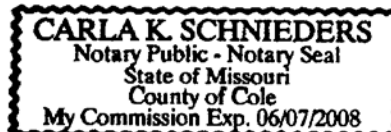
- ☒ delivering a copy to the person named above.
☐ reading a copy to the person named above.

at 3:10 pm (time) on the 7 day of March 2005, at the
following location: Jefferson City,, in the State of Missouri.


[Name]/[Title]

Subscribed and sworn to before me this 7th day of March 2005.


Notary Public



ATTACHMENT A

1. For each Local Exchange Company, LLC employee that performed any work, directly or indirectly, for Cass County Telephone Company, LP or New Florence Telephone Company from January 1, 2003 to present:

- a. For each position held by the employee since January 1, 2003, documents describing each such position—job description, job duties, etc.—and documents showing the dates each such position was held by the employee.
- b. Documents showing the employee's qualifications, including education and work experience.
- c. For each job performance evaluation of the employee since January 1, 2003, all documentation of that job performance evaluation.
- d. Each time sheet or time report made by the employee since January 1, 2003.
- e. Each employment agreement between the employee and Local Exchange Company, LLC that was in effect at any time since January 1, 2003.
- f. For each LEC, LLC employee charge for services made since January 1, 2003, each document that supports the charge.
- g. Each document that shows any other employer of the employee.
- i. For each Local Exchange Company, LLC employee also employed by another employer, each document identifying that employer.
 - a. For each employer identified, including Local Exchange Company, LLC, each document showing the relationship of that employer to:
 - i. Local Exchange Company, LLC
 - ii. Kenneth Matzdorff
 - iii. Rebecca Matzdorff
 - iv. Cass County Telephone, LP
 - v. New Florence Telephone Company
 - vi. Overland Data Center
 - vii. Haug Construction Company
 - viii. LEC Long Distance, Inc.
 - ix. Pegasus Communications, Inc.

- x. Videonet, LLC
- xi. USP&C, Inc.
- xii. Telecom Operator Services, Inc.

2. For the period January 1, 2003 to present, the following documents:
 - a. Each Local Exchange Company, LLC cost allocation manual that was used to develop charges to any third party entity.
 - b. Each document prepared by a Local Exchange Company, LLC employee using Cass County Telephone Company, LP or New Florence Telephone Company letterhead.
 - c. Each document prepared by a Local Exchange Company, LLC employee using LEC, LLC letterhead for business conducted on behalf of Cass County Telephone Company, LP
 - d. Each document prepared by a Local Exchange Company, LLC employee using LEC, LLC letterhead for business conducted on behalf of New Florence Telephone Company.
 - e. Each document of any policy or procedure in effect relating to the conduct of business with related parties and/or affiliated entities.
 - f. Each document created to comply with any policy or procedure related to the conduct of business with related parties and/or affiliated entities.
 - g. Each document that shows the organization of Local Exchange Company, LLC.
 - h. Each Operating Agreement of Local Exchange Company, LLC.
 - i. Each document identifying ownership of Local Exchange Company, LLC.
 - j. Each bid solicitation for an external auditor for Local Exchange Company, LLC, all responses to each such solicitation, and evaluations of each of those responses.
 - k. Each communication received terminating accounting services to Local Exchange Company, LLC.
3. For the period January 1, 1996 to present, the following documents:
 - a. Each audited financial statement of Local Exchange Company, LLC.

- b. Each document that shows any company, partnership or any other entity that, at any time from 1996 to present, has had a direct or indirect business relationship with Kenneth Matzdorff, Rebecca Matzdorff and/or Robert Williams and that has done business with, or for, Local Exchange Company, LLC.
 - i. For each such entity, each document that shows the work performed, the amounts paid by Local Exchange Company, LLC to the entity, and the requests for proposals, bids, responses to bids, evaluations of bids, contracts and any other documentation associated with the work performed for Local Exchange Company, LLC.
- c. Each document showing Local Exchange Company, LLC's bidding procedures.
- d. Each document showing the percentages and amounts of LEC, LLC's costs allocated to Cass County Telephone, LP
 - i. For each time allocation is made, each document describing the basis and/or methodology used to allocate the costs.
- e. Each document showing the data functions Overland Data Center provided to Local Exchange Company, LLC.
 - i. For each data function that Overland Data Center provided to Local Exchange Company, LLC, each document showing how Overland Data Center became the provider, including bid solicitations, responses and evaluations, if applicable.
 - ii. For each data function that Overland Data Center provided to Local Exchange Company, LLC, each contract, memorandum of understanding or other document showing the agreement between Overland Data Center and Local Exchange Company, LLC or Cass County Telephone Company, LP
 - iii. For each data function that Overland Data Center provided to Local Exchange Company, LLC, each invoice from Overland Data Center paid by or on behalf of Cass County Telephone Company, LP or Local Exchange Company, LLC.
 - a. For each such invoice, each document showing whether the invoice cost was allocated to Cass County Telephone Company, LP or New Florence Telephone Company and, if so, each document that shows the rationale relied upon for the allocation to Cass County Telephone Company, LP or New Florence Telephone Company.

- f. Each document showing each business relationship between USP&C and Local Exchange Company, LLC
 - i. For each business relationship listed, provide each document showing how USP&C and Local Exchange Company entered into the relationship, including bid solicitations, responses and evaluations, if applicable
 - ii. For each business relationship listed, provide each contract, memorandum of understanding or other document showing the agreement between USP&C and Local Exchange Company, LLC
 - iii. For each business relationship listed, provide each invoice from USP&C paid by or on behalf of Local Exchange Company, LLC.
- g. Each document showing Local Exchange Company, LLC's business plans, including, but not limited to, minutes of meetings of the decisionmakers for Local Exchange Company, LLC
- h. Each document of Local Exchange Company, LLC's internal accounting practices.
- i. Each document of Local Exchange Company, LLC's purchasing processes.
- j. Each document of Local Exchange Company, LLC's procedures for purchasing or selling goods or services to or from affiliates.
- k. Each document showing the address of and individual(s) associated with Qualitel, Inc.
- l. Each document showing the address of and individual(s) associated with Cohen Partnership, L.P.
- m. Each Local Exchange Company, LLC federal income tax return.
- n. Each Local Exchange Company, LLC state income tax return.