

BEFORE RECEIVED-DOCKETING DIV THE PUBLIC UTILITIES COMMISSION OF OHIO 2004 OCT 25 PM 4: 16

Internet Acce	of the Complaint of ess Providers and nications, Inc.,	PUCO	
	Complainant) Case No. 01-1741-TP-CSS	
v.) Case No. 02-669-TP-CSS	
SBC Ohio,)	
	Respondent.)	

MOTION FOR ORDER TO WITHDRAW OR STAY COLLECTION ACTION AND REQUEST FOR EXPEDITED RULING

Now comes complainant, Internet Access Providers and Data Communications, Inc. (IAP) and hereby moves for an Order from the Commission instructing SBC Ohio (SBC) to withdraw or, in the alternative, stay the collection action filed by SBC in the Common Pleas Court of Clark County on October 18, 2004, Case No. 04-CV-1184 while this case is pending. The rates and charges that SBC is seeking to collect through that complaint are at issue in these combined cases, and therefore the Commission has jurisdiction over those issues. A memorandum in support of this motion is attached hereto and incorporated by reference herein. IAP seeks an expedited ruling on this motion because the Commission should act on this motion before a responsive pleading is due in the Common Pleas Court case. Counsel for IAP has not had an opportunity to discuss the expedited ruling with counsel for SBC.

> This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business __ Date Processed CN Technician __

Respectfully submitted,

Jud th B. Sanders

Bell, Royer & Sanders Co., LPA 33 South Grant Avenue

Columbus, Ohio 43215

(614) 228-0704

(614) 228-0201 (FAX)

ATTORNEYS FOR INTERNET ACCESS PROVIDERS AND DATA COMMUNICATIONS, INC.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of)
Internet Access Providers and)
Data Communications, Inc.,)
)
Complainant) Case No. 01-1741-TP-CSS
)
v.) Case No. 02-669-TP-CSS
)
SBC Ohio,)
)
Respondent,)

MEMORANDUM IN SUPPORT OF
MOTION FOR ORDER
TO WITHDRAW OR STAY
COLLECTION ACTION
AND REQUEST FOR EXPEDITED RULING

In the amended complaints filed in these combined cases on July 22, 2004, IAP described numerous failures by SBC to correctly install and maintain its services and facilities, causing IAP not only to incur, *inter alia*, substantial damage to its business, but also to order additional services from SBC that would not have been necessary had SBC provided adequate service in the first place. SBC also charged IAP for lines that were unusable, despite specific requests by IAP for billing adjustments that were never given. Furthermore, as described in Case No. 01-1741-TP-CSS, SBC continued to bill IAP for services that were supposed to have been discontinued, due to the fact that SBC's numerous service problems caused IAP to completely withdraw from a line of business (see amended complaint, ¶11). As described in ¶ 12 of the amended complaint in that case, from year-end 2000 to July, 2001, SBC made no attempt to resolve the billing and

service issues repeatedly raised by IAP, and the sole contacts with SBC were "unrelenting attempts to collect amount from IAP DataCom for service that was non-existent, had been cancelled, or was totally inadequate". IAP sought similar adjustments for the ATDS-E and PRI service failures described in the amended complaint in Case No. 02-669-TP-CSS (see ¶17 and 18).

By filing the original complaints in these cases, IAP has disputed the validity of the bills for services rendered by SBC. Nonetheless, on October 18, 2004, SBC filed a collection action with the Common Pleas Court in Clark County (see attachment). The amounts that SBC is seeking to collect are those that are in dispute as part of these pending complaints. Because IAP has raised issues of service inadequacy and other matters that are within the exclusive jurisdiction of the Commission, the common pleas court lacks jurisdiction to render a decision as to any amounts validly owed by IAP. Alternatively, even if it could be argued that the amounts being sought for collection are based in contract law, it is waste of time and resources for these proceedings to go forward simultaneously with a collections action involving the same services and amounts in dispute.

In Weiler v. Ohio Bell Telephone Company, 1997 Ohio App. LEXIS 819 (2d Appellate District, Montgomery County), the Common Pleas Court of Montgomery County dismissed an filed against Ohio Bell (now SBC) on the grounds that the court lacked subject matter jurisdiction over the issues in dispute because the allegations of the complaint were "essentially bottomed upon acts or a practice 'affecting or relating to any service furnished by said public utility, or in connection with such service. R.C. 4905.26". (see attached decision). The Ohio Supreme Court has repeated this finding on

several recent occasions. In *State ex. Rel. Cleveland Electric Illuminating Company v. Cuyahoga County Common Pleas Court*, 88 Ohio St. 3d. 447 (2000), stating:

The Commission has exclusive jurisdiction over various matters involving public utilities, such as rates and charges, classifications and service, effectively denying to all Ohio courts (except this court) any jurisdiction over such matters. R.C. 4905.26 specifically establishes the commission's exclusive jurisdiction over such matters, which 'in any respect' are alleged to be unjust, unreasonable, unjustly discriminatory, unjustly preferential, or in violation of law..."

(88 Ohio St. 3d 450)

The same language was used again by the Ohio Supreme Court in a later case,

State ex. Rel. Cleveland Electric Illuminating Company v. Cuyahoga County Common

Pleas Court, 97 Ohio St. 3d 69, 776 N.E. 2d 92 (2002), wherein the court concluded that:

Therefore, 'the jurisdiction specifically conferred by statute upon the Public Utilities Commission over public utilities of the state...is so complete, comprehensive and adequate as to warrant the conclusion that it is likewise exclusive.' State ex.rel. N. Ohio Tel.Co. v. Winter (1970), 23 Ohio St. 2d 6, 9, 52 Ohio Op. 2d 29, 260 N.E. 2d 827, quoting State ex.rel. Ohio Bell Tel. Co. v. Cuyahoga Cty Court of Common Pleas (1934), 128 Ohio St. 553, 557, 1 Ohio Op. 99, 192 N.E. 787, 40 Ohio L. Rep. 651; see, also Kazmaier Supermarket, Inc. v. Toledo Edison Co. (1991), 61 Ohio St. 3d 147, 152, 573 N.E. 2d. 655.

(776 N.E.2d 96-97)

SBC is aware of this well-founded legal principle, and appears to have filed the action in Clark county simply to cause IAP, a small family-run business, to incur additional legal expenses. The Commission should not tolerate such a practice, and should order SBC to immediately withdraw the complaint in common pleas cout or to voluntarily stay it pending the outcome of these proceedings. Furthermore, the Commission should consider this motion on an expedited basis, pursuant to Rule 4901-1-12(c), so that SBC will be ordered to withdraw or stay the Common Pleas court case before a responsive pleading is due in that case.

Respectfully submitted,

Judith B. Sanders

Bell, Royer & Sanders Co., LPA 33 South Grant Avenue Columbus, Ohio 43215 (614) 228-0704

FAX (614) 228-0201

ATTORNEYS FOR INTERNET ACCESS PROVIDERS AND DATA COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Motion on the parties listed below, via U. S. mail, first-class postage prepaid, this 25^{th} day of October, 2004.

Judith B. Sanders

Daniel R. Conway Andrew C. Emerson Porter Wright Morris & Arthur, LLP 41 South High Street Columbus, Ohio 43215

Jon F. Kelly SBC Ohio 150 E. Gay St. Room 4-A Columbus, Ohio 43215

IN THE COURT OF COMMON PLEAS OF CLARK COUNTY, OHIO

THE OHIO BELL TELEPHONE COMPANY

45 Erieview Plaza

Suite 1411

Cleveland, Ohio 44114

'04-CV 1184

PLAINTIFF,

Case No.

V

Judge

INTERNET ACCESS PROVIDERS AND DATA COMMUNICATIONS, INC.
4 West Main Street, Suite 903
National City Bank Building

National City Bank Building Springfield, Ohio 45502

COMPLAINT

DEFENDANT.

COMPLAINT

This is a civil action for legal and equitable relief against Internet Access Providers and Data Communications, Inc., for failure to pay on open accounts, unjust enrichment, and breach of contract.

Parties

- Plaintiff, SBC Ohio¹ ("Plaintiff"), is duly qualified to conduct business in the
 State of Ohio, with its principal place of business as 45 Erieview Plaza, Suite 1411, Cleveland,
 Ohio 44114.
- Defendant, Internet Access Providers and Data Communications, Inc.
 ("Defendant"), is a Nevada corporation with offices in Springfield and Urbana, Ohio as listed in the caption.

¹ SBC Ohio is a registered trade name of The Ohio Bell Telephone Company.

 At all times relevant to this litigation, Plaintiff provided services to Defendant in the State of Ohio under contract and on an open account.

Facts Common To All Counts

- 4. Plaintiff incorporates Paragraphs 1 through 3 above as if fully rewritten herein.
- 5. Plaintiff and Defendant entered into an agreement for Plaintiff to provide services to Defendant in exchange for Defendant paying Plaintiff the tariff rate for these services. A copy of SBC Ohio's retail service tariff, which is on file with the Public Utilities Commission of Ohio (PUCO), is too voluminous to attach to this Complaint. It is available to Defendant and the public at the PUCO's web site

(http://www.puco.ohio.gov/puco/docketing/tariffs.cfm?industry=LEC#LEC).

- 6. Plaintiff began providing services to Defendant (1) on or about September 1998 with regard to account number 937-342-5700, (2) on or about October 1998 with regard to account number 937-390-8700, (3) on or about October 1998 with regard to account number 937-R91-0141, (4) on or about October 1999 with regard to account number 937-390-7000, (5) on or about February 2001 with regard to account number 937-r14-1323, and (6) on or about April 2001 with regard to account number 614-r12-0127. Plaintiff provided these services to Defendant on six open accounts. True copies of the recorded accounts, showing Defendant's name as the party charged, the beginning balance, the listed items representing charges, debits, and credits, and summarizations that permit calculation of the accounts claimed to be due are attached hereto as Exhibits A through F.
- Plaintiff fully performed its obligations to Defendant with respect to these
 accounts.

Count I Action on Account (Account 937-342-5700)

- 8. Plaintiff incorporates Paragraphs 1 through 7 above as if fully restated herein.
- Defendant had an open account (Account number 937-342-5700) with Plaintiff for services furnished by Plaintiff at Defendant's request.
- 10. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$46,132.45 according to the account attached hereto as Exhibit A.
- Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$46,132.45, interest, and costs.

Count II Action on Account (Account 937-390-8700)

- 12. Plaintiff incorporates Paragraphs 1 through 11 above as if fully restated herein.
- 13. Defendant had an open account (Account number 937-390-8700) with Plaintiff for services furnished by Plaintiff at Defendant's request.
- 14. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$1,360.23 according to the account attached hereto as Exhibit B.
- 15. Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$1,360.23, interest, and costs.

Count III Action on Account (Account 937-R91-0141)

- 16. Plaintiff incorporates Paragraphs 1 through 15 above as if fully restated herein.
- 17. Defendant had an open account (Account number 937-R91-0141) with Plaintiff for services furnished by Plaintiff at Defendant's request.

- 18. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$1,936.90 according to the account attached hereto as Exhibit C.
- 19. Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$1,936.90, interest, and costs.

Count IV Action on Account (Account 937-390-7000)

- 20. Plaintiff incorporates Paragraphs 1 through 19 above as if fully restated herein.
- Defendant had an open account (Account number 937-390-7000) with Plaintiff for services furnished by Plaintiff at Defendant's request.
- 22. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$249.87 according to the account attached hereto as Exhibit D.
- 23. Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$249.87, interest, and costs.

Count V Action on Account (Account 937-r14-1323)

- 24. Plaintiff incorporates Paragraphs 1 through 23 above as if fully restated herein.
- Defendant had an open account (Account number 937-r14-1323) with Plaintiff for services furnished by Plaintiff at Defendant's request.
- 26. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$97,364.03 according to the account attached hereto as Exhibit E.

27. Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$97,364.03, interest, and costs.

Count VI Action on Account (Account 614-R12-0127)

- 28. Plaintiff incorporates Paragraphs 1 through 27 above as if fully restated herein.
- 29. Defendant had an open account (Account number 614-R12-0127) with Plaintiff for services furnished by Plaintiff at Defendant's request.
- 30. Plaintiff provided all services requested by Defendant, but Defendant refused and failed to pay Plaintiff on its open account. Therefore, Defendant is in breach of the open account and owes Plaintiff \$8,551.39 according to the account attached hereto as Exhibit F.
- 31. Due to Defendant's breach of this open account, Plaintiff demands judgment against Defendant for the sum of \$8,551.39, interest, and costs.

Count VII Unjust Enrichment

- 32. Plaintiff incorporates Paragraphs 1 through 31 above as if fully restated herein.
- 33. Defendant requested that Plaintiff provide the services reflected in Exhibits A through F.
 - 34. Plaintiff expected to be compensated by Defendant for the services so provided.
- 35. Defendant knew or should have known that Plaintiff expected payment equal to the tariff rate, on file with the Public Utilities Commission of Ohio, for the services provided.
- 36. Defendant received the benefits of the said services, but has failed and refused to pay for the value, as determined by the tariff rates, of the benefits received.
- 37. Due to its failure to pay for the services, Defendant has been unjustly enriched in the amount of \$155,594.87.

Count VIII Breach of Contract

- 38. Plaintiff incorporates Paragraphs 1 through 37 above as if fully restated herein.
- 39. Plaintiff and Defendant entered into a contract for services as depicted in the accounts described above. A copy of Plaintiff's retail tariff is not attached to this complaint because Defendant has access to it and it is too voluminous to attach hereto. As noted in paragraph 5, Plaintiff's retail tariff is available on the Public Utilities Commission of Ohio's web site (http://www.puco.ohio.gov/puco/docketing/tariffs.cfm?industry=LEC#LEC).
 - 40. Plaintiff at all times performed its obligations under the contract.
- 41. Defendant breached said contract by refusing and failing to pay Plaintiff for the services it rendered under the contract.
- 42. As a result of said breach by Defendant, Plaintiff sustained damages in the amount of \$155,594.87.

WHEREFORE, on all Counts, Plaintiff, SBC Ohio, demands judgment against

Defendant, Internet Access Providers and Data Communications, Inc., in the amount of

\$155,594.87, plus interest, costs, including reasonable attorney's fees, and all other relief to
which Plaintiff is entitled in law or in equity.

Brian L. Buzby (0023124)

Andrew C. Emerson (0071994) Porter Wright Morris & Arthur LLP

41 South High Street

Columbus, Ohio 43215-6194

614-227-2270 (voice)

614-227-2100 (facsimile)

Attorneys for Plaintiff SBC Ohio

PRECIPE FOR SERVICE

To: Clerk of Courts

You are instructed to make express mail service of the Summons together with a copy of the Complaint on the defendant at the addresses below in accordance with Civil Rule 4.1(A) of the Ohio Rules of Civil Procedure.

Andrew C. Emerson Attorney for Plaintiff

INTERNET ACCESS PROVIDERS AND DATA COMMUNICATIONS, INC. 4 West Main Street, Suite 903 National City Bank Building Springfield, Ohio 45502

Also Serve:

INTERNET ACCESS PROVIDERS AND DATA COMMUNICATIONS, INC. 202 Scioto Street, Suite 5 Urbana, Ohio 43078

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EXHIBIT A

																											937 390-8700 705	Account #	
3/28/2001	2/28/2001	1/28/2001	12/28/2000	11/28/2000	10/28/2000	9/28/2000	8/28/2000	7/28/2000	6/28/2000			3/28/2000	2/28/2000	1/28/2000		11/28/1999	9/28/1999	8/28/1999	7/28/1999	6/28/1999	5/28/1999	4/28/1999	3/28/1999	2/28/1999	1/28/1999	12/28/1998	æ	Bill Date N	
	\$ 76.56	\$ 76.56	-		•	\$ 76.56	•	-		\$ 69.84			\$ 70.80	\$ 60.96	\$ 60.96	\$ 60,96			\$ 287.28	\$ 287.28	\$ 287.28	\$ 287.28	\$ 287.28	\$ 287.28	\$ 287.28	\$ 285.60	285.60	Monthly Svc	
\$ (45.84)							\$ 12.77				S (0.86)		\$ 18.70			\$ 54.96		\$(2,688.29) \$							\$ 1.5		69	0000	
34) \$ (1	€ 9	€9 €9	₩	ю 69	€9 N	69 69	(A	6A N	\$	₩	Ø	49	69	₩	\$	49		$\overline{}$	\$	64 00	69 00	49	\$	œ •	1 \$ 8.66	69 00	69	Taxes	
.38)	.30	.30	30	2.30	2.30	2.30	.68	.10	.10	.10	.07	12	2.69	83	1.83	3,48		65)	8.62	62	8.62	8.62	62	62	66	57	-		Surch
																												Local Calls	
																												Local Calls Toll Dir Chgs	
	\$ 19.63	\$ 18.18	\$ 16.74	\$ 15.33	\$ 13.94	\$ 12.57	\$ 11.02	\$ 9.80	\$ 8.59	\$ 7.40	\$ 6.24	\$ (2.41)	\$ 3.74	\$ 2.76	\$ 1.79			\$ 22.58	\$ 17.87	\$ 13.24	\$ 8.67	\$ 4.17	\$ 4.37	\$ 4,46	\$ (15.34)	\$ 15.34		gs LPC	
\$ 1,407.45	\$ 1,308.96	\$ 1,211.92	\$ 1,116.32	\$ 1,022.13	\$ 929.33	\$ 837.90	\$ 734.87	\$ 653.13	\$ 572.60	\$ 493.26	\$ 415.97	\$ 345.46	\$ 249.53	\$ 183.98	\$ 119.40		\$ (1,222.91)	\$ 1,523.45	\$ 1,209.68	\$ 900.54	\$ 595.97	\$ 600.63	\$ 597.81	\$ 297.45	\$ 1,332.36	\$ 1,022.85		Prev Bal	
																	_					\$ 304.7	\$ 297.4		\$ 696.12			Payments	
																	\$ 1,222.91					w	on		2 \$. 620.90			Adjustments	
\$ 1,360.23	\$ 1,407.45	\$ 1,308.96	\$ 1,211.92	5 1,116.32	\$ 1,022.13	\$ 929.33	\$ 837.90	\$ 734.87	\$ 653.13	\$ 572.60	\$ 493.26	\$ 415.97	\$ 345,46	\$ 249.53	\$ 183.98	\$ 119.40	ده	\$ (1,222.91)	\$ 1,523.45	\$ 1,209.68	\$ 900.54	\$ 595.97	\$ 600.63	\$ 597,81		\$ 1,332,36	\$ 1,022.85	Total	

EXHIBIT

B

		1,936.90	€9		\$ 3,325.91						(3.35)	ټ •۶	(1,38			
		3,325.91	*		\$ 2,750.64	40.98	G			\$ 31.38	1.29				69	
		2,750.64	€9		\$ 2,183.96	32.48	69			\$ 31.33	1.29	(A)		01.58	69	
		2,183.96	€9		\$ 1,624.90	24.09	69			\$ 31.33	.31 12	69			69	
		1,624.90	69		\$ 1,075,26	15.85	69			\$ 30.93	1.28	69		01.58	€9	
		1,075.26	69			7.73	69			\$ 30.93	.28	₩		01.58	(A	
Bill Date Monthly Src COCAC Taxes Surcharges Local Callis Toll Dir Chgs LPC Prey Bal Payments Adjustments Toll Taxes Toll Taxes Surcharges Local Callis Toll Dir Chgs LPC Prey Bal Payments Toll Taxes Toll Toll Taxes Toll Taxes Toll Taxes Toll Toll Toll		2,186.98	- 649		5 1,629.03	24.21	40			\$ 30.93	1.27	ت ھ	60.04		ia 	
		1,629.03	€9		\$ 1,079.25	15.97	49			\$ 30.93	1.28	G4		01.60	€9	
		1,079.25	69	\$ 1,120.70	1,657.83	7.84	64			\$ 30.93	1.29	co.			69	
		1,657.83	67		\$ 1,104.31	16.39	€			\$ 30.98	1.37	69	3.50		€	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1012.5 1128/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.012.05 \$ 1.28/1998 \$ 586.94 \$ 0.13 \$ 14.71 \$ 28.18 \$ 2.315.3 \$ 1.28/1999 \$ 586.94 \$ 0.13 \$ 14.71 \$ 28.18 \$ 28.18 \$ 2.317.3 \$ 1.826.55 \$ 2.317.3 \$		1.104.31	G	\$ 2,190.20	\$ 2,754.59	8.29	49			\$ 29.58	1.21	(A		00.84	(/)	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Prev Bal Payments Adjustments Intal 1128/1998 \$ 586.00 \$ 403.08 \$ 14.70 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.666.91 \$ 1.666.91 \$ 1.666.91 \$ 1.02.05 \$ 1.666.91 <td< td=""><th></th><td>2,754.59</td><td>s</td><td></td><td>5 2,190.20</td><td>32.76</td><td>ç</td><td></td><td></td><td>\$ 29.58</td><td><u>.</u>;</td><td>(A</td><td></td><td>00.84</td><td>69</td><td></td></td<>		2,754.59	s		5 2,190.20	32.76	ç			\$ 29.58	<u>.</u> ;	(A		00.84	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Prev Bal Payments Adjustments Total 11/28/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.665.91 <		2,190.20	69		1,634.16	24.41	47			\$ 29.58	1.21	(4		00.84	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Prev Bal Payments Adjustments Total 1128/1998 \$ 586.80 \$ 403.08 \$ 14.70 \$ 28.18 \$ 1.012.05 \$ 2.012.05 \$ 1.012.05 \$ 1.012.05 \$ 2.012.05 \$ 1.012.05 \$ 1.012.05 \$ 2.012.05 \$ 2.012.05 \$ 2.012.05 \$ 1.012.05 \$ 2.012.05 \$ 2.012.05 \$ 2.012.05 \$		1,634.16	_G A		1,086.34	16.19	₩			\$ 29.58	1.21	s		00.84	49	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments Total 1128/1998 \$ 586.00 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.012.05 \$ 1.012.05 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 2.311.73 \$ 1.020.5 \$ 1.324.54 \$ 2.311.73 \$ 1.020.5 \$ 1.333.8		1,086.34	69	\$ 1,100.90	1,647.52	8,09	⊌ 9			\$ 29.58	1.21	(1)		00.84	H	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Prev Bal Payments Adjustments Total 11/28/1998 \$ 586.80 \$ 403.08 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.020.5 <t< td=""><th></th><td>1,647.52</td><td>€9</td><td>\$ 529.88</td><td>1.630.78</td><td>16.43</td><td>€A</td><td></td><td></td><td>\$ 28.18</td><td>1.17</td><td>49</td><td></td><td>00.84</td><td>₩</td><td></td></t<>		1,647.52	€9	\$ 529.88	1.630.78	16.43	€A			\$ 28.18	1.17	49		00.84	₩	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Frev Bal Payments Adjustments Total 1128/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.012.05 \$ 2.012.05 \$ 2.018.05 \$ 1.012.05 \$ 2.018.05 \$ 1.012.05 \$ 2.018.05 \$ 1.012.05 \$ 2.018.05 \$ 2.017.05 \$ 2.018.05 \$ 2.017.05 \$ 2.017.05 \$ 2.018.05 \$		1,630.78	49		1,084.38	16.21	eπ			\$ 28.18	1.17	€		00.84	67	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1.1728/1998 \$ 586.80 \$ 403.08 \$ 27.17 \$ 28.18 \$ 1.012.05 \$ 1.		1,084.38	¢ o	\$ 530.38	1,076.74	8.14	€6			\$ 28.18	1.16	<i>⊕</i>	(0.30		€9	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 11/28/1998 \$ 586.80 \$ 403.08 \$ 27.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.228/1998 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.228/1999 \$ 586.94 \$ 0.13 \$ 14.71 \$ 28.18 \$ 2.311.73 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 2.318 \$ 2.311.73 \$ 1.324.54 \$ 6.28.96 \$ 1.324.54		1,076.74	G	\$ 530.33	1,068,67	8.04	ь			\$ 28.18	. <u>.</u>	(A)		01.00	 44	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 101205 1128/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.22811998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.22811999 \$ 586.80 \$ 40.70 \$ 28.18 \$ 1.666.91 \$ 1.22811999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 9.41 \$ 1.324.54 \$ 629.96 \$ 1.334.81 \$ 1.32811999 \$ 501.94 \$ (357.00) \$ 14.70 \$ 28.18 \$ 9.41 \$ 1.324.54 \$ 629.96 \$ 1.333.81 \$ 703.99 \$ 512.96 \$ 1.32811999 \$ 501.94 \$ (357.00) \$ 1.20 \$ 28.18 \$ 10.96 \$ 10.96 \$ 10.96 \$ 1.334.64 \$ 1.965.05 \$ 1.32811999 \$ 501.94 \$ 1.20 \$ 28.18 \$ 1.20 \$ 28.18 \$ 10.96 \$ 1.334.64 \$ 1.965.05 \$ 1.324.64 \$ 1.965.05 \$ 1.965		1,068.67	€9		530.33	7.96	₩			\$ 28.18	1.18	₩	0.02	_	- 69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 11/28/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.012.05 \$ 1.022.05 \$ 1.0		530,33	1,355.32		2,992.17	(84.56) \$	(#)			\$ 28.18	1.17	69		96.00	₩	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1012.05 11/28/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.665.91 \$ 1/28/1998 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 2.311.73 \$ 1.28/1999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 9.54 \$ 2.311.73 \$ 1.656.91 \$ 2.311.73 \$ 1.28/1999 \$ 586.94 \$ 14.70 \$ 28.18 \$ 9.54 \$ 2.311.73 \$ 1.625.55 \$ 1.324.54 \$ 3/28/1999 \$ 501.94 \$ (357.00) \$ 1.20 \$ 28.18 \$ 9.41 \$ 1.324.54 \$ 629.96 \$ 1.333.81 \$ 1.20 \$ 28.18 \$ 1.20 \$ 28.18 \$ 1.20 \$ 1.20 \$ 28.18 \$ 1.20 \$		2,992.17	6		5 2,463.71	•				\$ 28.18	1.12	∵	(1.82		6 9	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 101205 1128/1998 \$ 568.50 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.22811998 \$ 588.50 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.666.91 \$ 1.22811999 \$ 588.54 \$ 0.13 \$ 14.70 \$ 28.18 \$ 24.86 \$ 1.656.91 \$ 2.311.73 \$ 1.22811999 \$ 588.54 \$ 14.70 \$ 28.18 \$ 9.41 \$ 1.324.54 \$ 628.96 \$ 1.324.54 \$ 1.324.54 \$ 628.96 \$ 1.333.81 \$ 703.99 \$ 585.94 \$ 1.20 \$ 28.18 \$ 9.41 \$ 1.324.54 \$ 628.96 \$ 1.333.81 \$ 703.99 \$ 501.94 \$ 1.20 \$ 28.18 \$ 1.20 \$ 28.18 \$ 10.96 \$ 5 11.346.4 \$ 1		2,463.71	€9		1,905.05	27.34	4)			\$ 28.18	1.20	69		01.94	G	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1,1729/1998 \$ 586.80 \$ 403.08 \$ 22.17 1/1/28/1998 \$ 586.80 \$ 403.08 \$ 14.70 \$ 28.18 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.656.91 \$ 1.012.05 \$ 1.012.0		1,905.05	₩		1,354.64	19.09	(/)			\$ 28,18	1.20	69		01.94	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1012.05 11/28/1998 \$ 586.80 \$ 403.08 \$ 22.17 11/28/1998 \$ 586.80 \$ 403.08 \$ 22.17 1/28/1999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 14.70 \$ 28.18 1/28/1999 \$ 586.94 \$ 1.333.81		1,354.64	€9		612.36	10.96	es			\$ 28.18	1,20	G		01.94	64	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 1012.05 1128/1998 \$ 586.90 \$ 403.08 \$ 22.17 \$ 12/28/1998 \$ 586.90 \$ 403.08 \$ 22.17 \$ 28.18 \$ 1.518 \$ 1.012.05 \$ 1.666.91 \$ 1.228/1999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 24.86 \$ 1.656.91 \$ 2311.73 \$ 1.228/1999 \$ 586.94 \$ 0.13 \$ 14.70 \$ 28.18 \$ 9.54 \$ 2.311.73 \$ 1.228/1999 \$ 586.94 \$ 14.70 \$ 28.18 \$ 9.54 \$ 2.312.73 \$ 1.324.54 \$ 1.333.81		812.36	€9	\$ 703.99	1,333.81	8.22	67			\$ 28.18	120		(357.00	_	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 101ai 11/28/1998 \$ 586.80 \$ 403.08 \$ 2.71.7 \$ 1.666.91 \$ 1.28/1998 \$ 586.94 \$ 0.13 \$ 14.71 \$ 28.18 \$ 2.818 \$ 2.486 \$ 1.656.91 \$ 2.311.73 \$ 2.311.73 \$ 1.324.54 \$ 1.324.54	,	1.333.61	ம	\$ 629.96	1,324.54	9.41	₩			•	14.70	69		86.94	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Inches LPC Prev Bal Payments Adjustments Total 11/28/1998 586.80 \$ 403.08 \$ 22.17 \$ 102.05 \$ 15.18 \$ 1.012.05 \$ 1.656.91 \$ 1.656.91 \$ 2.311.73 1/28/1999 \$ 586.94 \$ 0.13 \$ 14.71 \$ 28.18 \$ 24.86 \$ 1,656.91 \$ 2.311.73		1,324.54	49	\$ 1,626.55	2,311.73	9.54	(9				14.70	()		86.94	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments 101at 1128/1998 \$ 586.80 \$ 403.08 \$ 22.17 \$ 1,012.05 \$ 12/28/1998 \$ 586.80 \$ 14.70 \$ 28.18 \$ 15.18 \$ 1,012.05 \$ 16.68.91		2,311,73	· 64		1,656.91	24.86	69				14.71		0.13		49	,
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments Total 11/28/1996 \$ 586.80 \$ 403.08 \$ 22.17	E		69		1,012.05	15.18 \$	(P			-	14.70			86.80	69	
Bill Date Monthly Svc OC&C Taxes Surcharges Local Calls Toll Dir Chgs LPC Prev Bal Payments Adjustments Total	X		49								22.17	())	403.08	B6.80 \$	8	937 R91-0141 910
	HI		djustments	Payments &	Prev Bal	LBC.		Toll Dir	Local Calls	Surcharges		-4	0220	y Svc		Account #
	n															

	Account # 937 390-7000 117
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es es es	_
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	Payments
₩	Adju
269.75	Adjustments

324.95 459.24 327.22 325.19 327.17 224.16 227.17 230.23 233.33 233.33 235.30 236.30 245.27 245.28 245.28	otal 184.95

EXHIBIT

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EXHIBIT

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7/10/2003	6/10/2003	5/10/2003	4/10/2003	3/10/2003	2/10/2003	1/10/2003	12/10/2002	11/10/2002	10/10/2002	9/10/2002	8/10/2002	7/10/2002	6/10/2002	5/10/2002	4/10/2002	3/10/2002	2/10/2002	1/10/2002	12/10/2001	11/10/2001	10/10/2001	9/10/2001	8/10/2001	7/10/2001	6/10/2001	5/10/2001	Bin Date	
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8	₩	€A	64)		(A						(A	છ			69			(A	69		69		69			G	o	
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29.22)	18.68	15.18	17.32	17.81	17.82	17.81	17.81	17.81	17.81	17.81	17.61	17.96	17.96	17.96	17.96	17,96	17.96	17.96	17.91	17.97	17.97	17.98	17.54	18.33	18.33	35.66	3×98	
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	\$ 31.75	\$ 22.11	\$ 10.41	\$ (2.17)	\$ 89.74	\$ 77.80	\$ 66.23	\$ 54,74	\$ 43.43	\$ 32.27	\$ 21.38	\$ 10.48	\$ 10.75		\$ 7.44	\$ 19.33	\$ 8.46	\$ 31.41	\$ 20.39	\$ 34.32	\$ 23.23	\$ 12.29	\$ 43.96	\$ 32.52	\$ 21.26		Toll	
€**	₩,	₩	\$ 10.41 \$	•	49	49	€9	69	69	7 \$	69	6 9	60	45	\$ 7.44 \$ 2	₩	↔	eń.	€9	₩	69	69	69	69	69		Toll Dir Chgs LPC	
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\$ 9.777.95	₩,	₩	\$ 709.40	\$ 6,813,26 \$6,813	49	49	€9	69	69	7 \$	69	\$ 2,167.93 \$1,440	60	69	₩	₩	\$ 2,974.59 \$2,226	eń.	\$ 3,123.19 \$ 1,631	₩	69	\$ 3,676.41 \$1,458	\$ 2,930.24	69	69		Toll Dir Chgs LPC	
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