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BEFORE THE ARIZONA CORPORATION

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COMMISSIONERS

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AZ CORP COMMISSION
DOCKET CONTROL

GEORGE BIEN-WILLNER, for)
GLENDALE & 27TH)
INVESTMENTS,)
LLC)

DOCKET NO. T-01051B-10-0200

COMPLAINANT,

COMPLAINANT'S DISCOVERY
INTERROGATORIES AND REQUEST FOR
PRODUCTION TO
RESPONDENT QWEST CORPORATION

V.

QWEST CORPORATION,

RESPONDENT.

TO: QWEST CORPORATION

Under authority of Rules and Regulations of the Commission, you are hereby requested to answer the following interrogatories in writing under oath and produce the following documentation within seven (7) days of this request:

DISCOVERY INTERROGATORIES

1. Whom did Qwest inform at the Arizona Corporation Commission that Qwest would not agree to participate in the "informal hearing process" in accordance with Arizona R14-2-510, and why did Qwest refuse to participate in this specific process?

Arizona Corporation Commission

DOCKETED

MAR 3 2011

DOCKETED BY

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2. In accordance with Arizona State Legislation No. 40-361, has Qwest complied with the legislative requirements concerning all account billings by Quest to George Bien-Williner during the period of January 2004 through December 31, 2005.

3. Please identify the responsible party for the Telephone No. 602-273-4326 in 2005.

4. Please identify the responsible party for the Telephone No. 602-275-4990 in 2005.

5. Please identify the responsible party for the Telephone No. 602-273-0321 in 2005.

6. On February 5, 2010, please describe the purpose of the Qwest refund in the amount of \$810.89.

1 7. How many Commercial customer-billing disputes did Qwest receive for
2 telephone services during the calendar years 2008, 2009 and 2010?
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6 8. How many Commercial customer complaints were submitted to the
7 Arizona Corporation Commission by the customer for a third party resolution of the
8 contested billing during the calendar years 2008, 2009 and 2010?
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14 9. How many individual business category Arizona Corporation Commission
15 complaints for improper billing's has Qwest resolved through the Arizona Corporation
16 Commission during the calendar periods of 2008 through January 2011?
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21 10. Who was the Qwest account manager assigned responsibility for the Qwest
22 account services provided to Glendale & 27th Investments, LLC during the transition of
23 ownership in 2004 and 2005 calendar years?
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11. During the years 2004 through 2011 how many customer billing disputes have been resolved with Qwest through the Arizona Corporation Commission Informal and Formal Hearing process?

12. Please explain why Complainant's accounts was billed for the government account/telephone # 602-273-4326 (is referenced as that certain Chantel Scheen memo dated Tuesday, September 14, 2004).

13. What authority did Jim Holstrom have as the "Account Manager" of this account under the direction of Elaine Hinchcliffe, Senior Account Executive?

14. How many Qwest credits have been issued for the subject Qwest/ Glendale & 27th Investments, LLC account by date commencing March 2005 through February 23, 2011, for what amount, and why were they issued?

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15. What was the intended purpose of multiple communications between Account Manager Jim Holstrom and George Bien-Willner during the period including February 2004 through 2005, also provide a description of any results of these communications.

16. How many times has Jim Holstrom met with Qwest customer George Bien-Willner; please specify where, when, for what specific issues and the outcome of each meetings?

17. How many times has the Qwest Account Manager, Jim Holstrom been to the Sterling International Hotel (former Howard Johnson) at 124 S. 24th Street, Phoenix Arizona 85034?

18. What specific telephone account numbers were assigned to Glendale & 27th Investments, LLC by Qwest at the time of the transfer of ownership from Howard Johnson in February/March 2005 to George Bien-Willner (DBA) Glendale & 27th

1 Investments, LLC, and what were the specific departments and or use within the Hotel
2 that these numbers were assigned?
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6 19. Who is the owner of Qwest as of February 24, 2011; who is the President or
7 other Chief Executive Officer?
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11 20. Who was the Qwest Account Manager for the Glendale & 27th Investments,
12 LLC accounts, including the account in dispute prior to February 24, 2011.
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16 21. Who is the current Qwest Account Manager of the Glendale & 27th
17 Investments, LLC as of February 24, 2011.
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21 22. Who is the Qwest Account Manager as of February 24, 2011 for the
22 Glendale & 27th Investments, LLC account in dispute?
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27. Please provide all handwritten recorded notes, logs, electronic communications, and documented records of Qwest's personnel communications with Sterling International/Glendale & 27th Investments, LLC and/or George Bien-Willner for any billing period which includes January 1, 2006 through February 28, 2011.

28. Please provide a list of all involved employees of Qwest (2004 through 2005) who have any knowledge of the customer service issues, billing disputes, customer service recordings, telephone billing discussions, account change orders and all written communication concerning Glendale & 27th Investments, LLC/George Bien-Willner regarding Qwest accounts identified as; 602-275-4990, 602,269-2626, 602-220-0044, 602-220-0174, 602-244-8221, 602-224-8221, 602-273-4326, 602-233-2602 and 602-273-0327. With regard to each employee, please provide the employee's full name, title class position during the period including January 2004 through December 31, 2005, the scope of each employee's individual responsibilities and authority. A list of employees for which this information is requested includes, but is not limited to, Chantel Scheen, Jim Holstrom, Elaine Hinchcliffe, Tod Collins, Richard C. Notebaert, Max Iwaniec, Annette Kreger, Tom Carlson and Beth Johnson.

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29. With regard to Arizona Administrative Code Title 14, Ch.2 R-14-508- H, regarding (Billing & Collection), there having been a change of responsibility or occupancy in 2004, please provide supporting documentation of the arrangements, terms and conditions of the Howard Johnson/Qwest's acceptable agreement achieved prior to the new subscriber accepting billing responsibility for the Qwest telephone numbers of Howard Johnson, 124 S. 24th Street, Phoenix, Arizona 85034 in 2004.

30. Please provide a copy of the CTX21 contract on 602-244-8221 applicable in 2003, 2004, and 2005.

31. Please provide copies of all logs, tapes, disc's, and all written & verbal communications, and recordings of all Qwest telephone business communications transacted in Qwest's billing department between Qwest management, employees, agents, and Qwest representatives (to include their individual names) employed during the period of February 2004 through January 2005.

1 32. Please provide the official outcome of the George Bien-Willner/Qwest
2 billing complaints with all written responses, notes and phone/fax logs entries to the
3 specific correspondence billing and customer service issues raised by George Bien-
4 Willner's correspondence to Qwest dated September 28, 2004.
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8 33. Please provide the results of the George Bien-Willner Qwest billing
9 complaints with all written responses, notes and phone/ fax logs entries to the specific
10 correspondence billing and customer service issues raised by George Bien-Willner's
11 correspondence to Qwest dated May10, 2005 (sent to Qwest via facsimile to 602-604-
12 7982 and 303-896-85150).
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17 34. Please provide a complete itemized review (with a detailed explanation of
18 each line item category) billed by Qwest to the Glendale & 27th Investments, LLC for the
19 calendar billing months of February 2005, March 2005, April 2005, May 2005 and June
20 2005.
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35. Please provide a complete list of credits, which have been issued to Glendale & 27th Investments, LLC commencing in March 2005 through 2006 with an explanation as to why Qwest issued the credit.

DATED ___ day of March 2011.

George Bien-Willner
Glendale & 27th Investments LLC
3641 North 39th Avenue
Phoenix, Arizona 85004

ORIGINAL mailed this
___ day of March, 2011 to:

Norman G. Curtright, Corporate Counsel
Qwest Corporation
20 East Thomas Road-16th Floor
Phoenix, Arizona 85012