# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Complaint Against Totah	)		
Communications, Inc. by Joseph A. LaFon.	)	Docket No.	23-TTHT-028-COM

## ANSWER TO COMPLAINT

Totah Communications, Inc., by and through its attorneys Thomas E. Gleason, Jr. and Mark Doty, for its answer to the complaint filed herein submits the following factual history prepared by Mark M. Gailey, President and General Manager of Totah Communications, Inc.:

#### **BACKGROUND:**

Original establishment of Local service is dated 1-17-2017.
Original Telephone number 620-289-4355
Verizon via Syniverse 2-5-2019 as requested by Carla LaFon
Service re-established with Totah on 3-22-2019 under phone number 620-289-4321

First trouble ticket dated 10-25-2018 for telephone number 620-289-4355. Trouble was cleared to cable trouble. Issues in a pedestal.

Trouble tickets regarding not being able to receive calls. There were 5 tickets created. They are listed in order of origination and summarized below.

8-30-2019 Customer called and said can't be called.

8-11-2020 Customer called in with billing questions and changed their banking information. Called back later reporting can't be called.

10-19-2020 Customer called and said can't be called.

12-2-2021 Customer called and said can't be called. When they use their cordless phone, nothing works.

1-19-2022 Customer called and said can't be called. This ticket was left open so that technicians could work with customer on possible solutions.

6-23-2022 Customer called to disconnect service.

## **NARRATIVE:**

Trouble ticket on 8-30-2019 was cleared to defective line card in remote.

Trouble ticket on 8-11-2020 was cleared to test OK at CO.

Trouble ticket on 10-20-2020 was cleared to Line Card in Remote.

Trouble ticket on 12-20-2021 was cleared to inside wire.

Trouble ticket on 1-19-2022 was left open so that we could continue to contact the customer and try to work through his problem. There was no trouble found on 1-19-2022.

Of note, Totah does not monitor individual customer lines unless asked to do so or they agree for us to keep a log of incoming and outgoing calls. Mr. LaFon agreed for Totah to put his line on CLI in our switch so that we could keep a record of incoming calls. There are 25 pages on calling information attached that are calling records to Mr. LaFon's telephone number. These start on 1/24/2022 and end on 6-23-2022. Also attached are copies of a picture of the answering machine Totah provided to Mr. LaFon to record days and dates calls may have come into Mr. LaFon and he or his wife may have not heard the telephone ring. To date, this device has not been returned. Mr. LaFon already provided photos of the telephones Totah provided to him for use as his other telephones were causing issues on his line.

As Totah has no knowledge of when calls come into an individual customer, it is difficult at best for us to track down any issues that may arise in calls not being delivered. As has become standard practice within the communications industry, many companies rely upon least cost routing when delivering calls outside of their network another company's network. In many instances, these calls never make it to the end offices. Also of note, wireless companies don't always have the signal from the device originating the call to reach their MITSO and then route the call to be delivered to the end office. There have been many instances where these companies are providing ring back tone where the call is not going anywhere.

We were never afforded the information as to which provider was supposed to be delivering the calls to our office and therefore could not determine if it was a wireless company or a company using least cost routing. We were simply told that the customer could not receive calls.

As stated earlier, the trouble ticket from 1-19-2022 was left open so that testing and troubleshooting with the customer could be accomplished and records could be kept by Totah Communications, Inc. in our trouble reporting system. A copy of that trouble ticket has been provided as well. It was summarized in the initial complaint inquiry that was provided to Sherri Eisenbarth on 6-24-2022. It is also summarized here.

December of 2021, a Totah technician was dispatched to customer residence for a trouble report of inability to receive calls. Technician repaired and replaced the service wire in the house. He also left a telephone with customer as there was a very old rotary phone being used along with a cordless telephone. One of the phones in Mr. LaFon's photos is that phone. The other 2 telephones and the answering machine were also provided to Mr. LaFon on subsequent trouble tickets.

On 1-19-2022, the customer called in to report that they are not receiving their phone calls. They can call out, but when people call back the phone doesn't ring. It was communicated to the customer that he would need to keep a log from the people telling him that they had tried to call, but there was no answer. He was asked to keep the name, date, time, and telephone number trying to call him. This would help us in trying to figure out if there was a network issue within Totah's network or outside our network. There was noise and someone else in the background.

2-15-2022, Customer reported that they were still having issues. We had switched their line card to see that may have been a problem. Customer reported that had not fixed his issue. Several calls show up on our CLI report as being delivered to the customer. It is also noted that there are calls originating within the customer's residence to the number of the residence.

3-9-2022, Customer reported that they are still having issues. They had gone back to using the old phones. We requested that they only use the phones that we had provided so as to eliminate the old phones as the problem causer. Tried to contact the customer, but there was no response.

4-4-2022, Customer called to report trouble. Tried to call the customer at 9:04 a.m., but did not get an answer. The switch recorded on CLI that the call was delivered, but not answered at the residence. Sent a field technician to the residence. Field technician received a test call from our office in Ochelata at the NID. A hum was heard on the line this time. Field technician checked the cable pair. Another telephone was left for use in the bedroom along with the test phone in the dining room.

5-2-2022, Customer called to report they are still having the issue of not receiving calls. We have not been able to duplicate the trouble. Our test calls get delivered from within our network and from cellphones being used by Totah Technicians.

5-4-2022, Customer was moved to a new cable pair in efforts to remedy his problem. His NID was also thoroughly rehabbed. Ground rods were added to pedestals in efforts to remedy the situation. An electric pole was found to be missing about 2 ft. of its ground wire. This was repaired as well. That removed the noise from the customer line. In general, a hum on the line caused by grounding issues do not stop calls from being delivered to a customer. Grounding issues in general cause noise on the line.

6-1-2022, Customer called to provide updates as to calls missed on 5-31-2022. The number he provided was his sister's. CLI showed she called at 8:56 am. This was not the time he provided that he said she called with no answer. CLI also showed that she called at 12:24 pm and at 4:03 pm. According to Mr. LaFon, he did not receive any of those calls. Customer did not have an answering machine to show if the calls made it to

his residence or not. Customer also had gone back to using his old phones and a phone a phone that someone had given to him because they didn't want it anymore. We ordered an answering machine and we will be installed once it comes in to try to log if calls are making it to the residence or not. A copy of the Amazon bill is attached along with a picture of the answering machine.

6-23-2022, Customer called again to report calls not being delivered to his residence. His report was that his sister who lives in Bartlesville had tried to call him. CLI log shows several calls made to his home. Customer stated that he was not home, so he didn't know if the calls came through. Customer was asked if the answering machine had picked up any calls. Customer stated that the answering machine was removed by his wife as she believed it was a spying device. It was communicated that the machine was important for us to see if calls were being delivered and the phone wasn't heard. Customer got mad and stated that he wanted to disconnect his service and that he was going to make a complaint to the Kansas Corporation Commission. Customer was advised that he was certainly within his rights to do so. Customer was then transferred to a CSR to complete a Disconnect order. Order was issued and customer service was turned off on 9-23-2022

As was stated in the email (attached) dated 6-24-2022 to Sherri Eisenbarth of the KCC, I believe that Totah went to great lengths to try to find an issue within our network that would have caused calls not to be delivered to this customer. As is shown by our CLI reports attached (and more can be produced if necessary) calls were being delivered. All of the test calls made by Totah Technicians within and outside of our network rang through to the customer. Also of note, Mr. LaFon's official complaint states that he is requesting a refund for 4 years of service, but would settle for 2 years. He generated 1 trouble ticket in the third quarter of 2019, 2 tickets in 2020 (one in third quarter and one in fourth quarter), 1 ticket in the fourth quarter of 2021, and his last ticket that was kept open in January of 2022. I do not see anything that would warrant a refund for 4 years of service. One of those tickets was due to defective house wire and instruments on the customer side of the NID which were repaired at no cost pursuant to the customer's inside wire maintenance contract. That trouble is outside of the KCC jurisdiction.

To date, we have found nothing that would have caused calls not to be delivered to Mr. LaFon. Also of note, if it were a problem in our network, it would stand to reason that it would affect more than one customer. To date, we have not had an ongoing report of call delivery problems from other customers.

Again, this lends itself to the issue being with a wireless provider or another company that is supposed to deliver calls to our office.

WHEREFORE Totah Communications, Inc. respectfully requests the Commission find that it has committed no violations of the law with respect to the matters set forth in the complaint filed herein.

Respectfully submitted,

Mark Doty #14526

Thomas E. Gleason, Jr. #07741

GLEASON & DOTY, CHARTERED

P.O. Box 490

Ottawa, KS 66067

(785) 242-3775

# **VERIFICATION**

Mark M. Gailey , President and G.M.

### CERTIFICATE OF SERVICE

Mark Doty certifies that a true and correct copy of the foregoing Answer to Complaint was sent via email on \_\_\_\_\_\_ addressed to the following persons:

BRIAN G. FEDOTIN, GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 b.fedotin@kcc.ks.gov

WALKER HENDRIX, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 w.hendrix@kcc.ks.gov

And by First Class Mail to:

JOSEPH A. LAFON 3523 Legionville Lane Independence, KS 67301

Mark Doty

Page 1 of 3 07/22/2022 8:19:12 AM Kelli **TROUBLE TICKET 27425** Network Status Disconnect Network # 620-289-4321 **Account Number 9786** Network Type Telephone **Tech Type** Svc Type Serving Area 289 Plant Area Contact Number 620-779-0058 Pending Serv Order JOE & CARLA LAFON Customer In Date 03/22/2019 JOE & CARLA LAFON Account 06/23/2022 Out Date Network Address 3523 LEGIONVILLE LN Status Q Bus/Res R INDEPENDENCE, KS 67301 -Latitude: 37.083749 Longitude: -95.740519 Reported Trouble 0006 CAN'T BE CALLED 01/19/2022 11:56:24 AM Priority Report Taken By Gillian Inter 07030 Carriers Intra 07030 Assigned To Local Int'I Department Work Group 01/19/2022 2:38:10 PM Employee ADAM

#### **Account Contact Information:**

Name

JOE & CARLA LAFON

Phone Number

(620) 779-0058 (Mobile)

**Email Address** 

Appointment Date Canceled By

#### Description:

Customer is saying they can not receive calls. They can call out but when people call back the phone doesn,t ring. Contact # 6208709299

USP Codes: (\* indicates a bundle element)

Code	Description	Quantity
023	RES-LOCAL ACCESS LINE-RUR	1
110	RES-INTERSTATE TOLL ACCESS	1
203	RES-CALL WAITING	1
225	RES-CALLER ID W/NAME	1
271	RES-UNLISTED NUMBER	1
639	INSIDE WIRE MAINT ONLY TP	1

#### Questions / Answers:

DO YOU HAVE CORDLESS?
HAS SOMEONE BEEN DIGGING?
HAVE CHECHED ALL PHONES?
HAVE CHECKED AT NID?
IS SOMEONE HOME?
WHEN DID THIS START?
WHERE CAN YOU BE REACHED?
WHOSE CALLING?

Plant:

Plant Key:

TROUBLE TICKET 27425 Kelli			07/22/2022 8:19:12 AM Page 2 of 3		
Account Number 9786 Plant Area 289 Contact Number 620-779-00	Network Type Telephone Serving Area	Network # 620-289-4321 Tech Type	Network Status Disconnect Svc Type		
Current:					
Code CUSTOMER HAS DOG CALL	Detail	Code MODEM LINE CONF PROFILE	Detail		
GATE CODE	A9F5/05	SSID 1			
ROUTE & PED FIELD PAIR FIBER #	0056	WIRELESS MODEM KEY 1 SSID 2			
X-CONNECT PAIR		WIRELESS MODEM KEY 2			
HOUSE LOCATION LINE PACK	61-14-07	GATEWAY PHONE #			
ADSL/VDSL		DSL JACK			
DLC CDT		EXTENDER POWER			
DLC RDT	N7-1-1-2	EXTENDER FIELD PAIR			
DLC NAME	JEFFERSON	DLC SYS PAIR			
CDT SYS	10.113.5.134	DSLAM			
IDTL	TYR1 IDE 1 157	DLCNM			
EVC-MAP	LAFON-JOE	UNI			
BLOCK PIN	2	ACT CODE FIBER			
IP ADDRESS		RX PWR			
Customer is saying they can recontact # 6208709299  Add I called and talked with Mr Lafthrough. I have put them on C with day and time. Looks like phone. Scott says they have a 02/15/2022  Lafon has called back in and see several calls on CLI. I have the line to stay off hook and the 03/09/2022  Customer was still having issue that might be the issue. they hod/04/2022  Customer called back in today Monday (today). The call did see if they are home. We will a house. Will also verify they are non my end. Scott is going to look Add Scott is leaving a test phone in hearing the phone ring. Scott status.	fon and asked him to keep a log CLI on 1/19/22 at 2:24pm. Asked e a least call routing issue. I control a corder of a cold rotary phone and a cordless am as as that swapping cards did not be seen a few that looks like the beaus giving other people a busy signames but was using their older phone as the called back in. I will try tham a color of the called back from the called back from the called back in an also verify they are not using the called back in an also verify they are not using the called back from called back from called back from the called back from the called back from the called back from the period from called trouble.	of when the calls are being replayed him to get the callings number all hear noise like someone was phone.  If it is the trouble and they are straight are calling their own number gnal. I will get ahold of scott for the second them just use the photo reach them today  In since 3/9. I called their house at the home. I am having scott older phones again and will have jack.  It says he can hear a loud hum the dining room, to rule out the test calls to them in the next for the says he can them in the next for the says he calls to them in the next for the says he calls to them in the next for the says he calls to them in the next for the says he calls to them in the next for the says he calls to them in the next for the says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to them in the next for the says have a says he calls to the says have a says he calls the says have a says have a says he calls the says have a says have a says he calls the says have a says	ported to him that are not going er and provider if possible along was moving around with another will having the same issues. I can not sure why or if this is causing or some more testing.  One that scott left them to see if the and got no answer at 8:50am go by and check what he can and ave only 1 test jack work in the the possiblity that they are not the ew days to check on the phone		
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Customer Signature			Date		

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		Serving Area	Tech Type		Svc Type
Contact Number	620-779-0	058			
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when using cord Has four jacks a Contact # 62028	nly receives s less phones nd the only o	some calls from a corded phone nothing works. ne that works is in bedroom.  NG // Cause: DETERIORATE	e.		Date Cleared 12/02/2021
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		Wo	ork Performed		
Picked Up By			<i>H</i>		e / Time 01/19/2022 2:38:13 PM
Cleared By	Adam				e / Time 06/23/2022 2:39:08 PM
Followed Up By				lowed Up Date	e/Time
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Customer Signati					Date



#### Final Details for Order #114-3399561-6857003

Order Placed: June 1, 2022

PO number: adam

Amazon.com order number: 114-3399561-6857003

Order Total: \$14.97

Shipped on June 1, 2022

**Items Ordered Price** 

\$14.97 1 of: AT&T (1740WH) Digital AnsweSystem with Time and Day Stamp, White

Sold by: Amazon.com Condition: New

**Shipping Address:** Item(s) Subtotal: \$14.97

Totah Communications, Inc. Shipping & Handling: \$0.00 101 S OCHELATA ST

OCHELATA, OK 74051-5018

**United States** Total before tax: \$14.97

Sales Tax: \$0.00

**Shipping Speed:** \$14.97

FREE Prime Delivery **Total for This Shipment:** 

**Payment information** 

**Payment Method:** Item(s) Subtotal: \$14.97

American Express I Last digits: 5004 Shipping & Handling: \$0.00

Billing address

Total before tax: \$14.97 Totah Communications, Inc.

101 S OCHELATA ST **Estimated Tax:** \$0.00 OCHELATA, OK 74051-5018

**United States** Grand Total: \$14.97

**Credit Card transactions** American Express ending in 5004: June 1, 2022: \$14.97

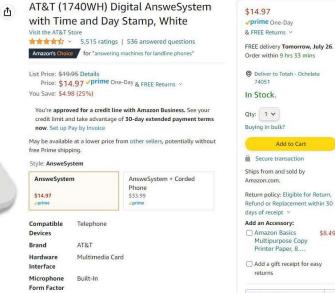
To view the status of your order, return to Order Summary.

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Roll over image to zoom in



✓ See more

Add to List

CLI HAVN MON 08:35:00 24/01/22 CLED DN 620 289 4321 JIP= 620673 CLNG DN 620 762 0716 TG 110 KFN HAVN 02 02 04 24

CLI HAVN MON 11:55:29 24/01/22 CLED DN 620 289 4321 JIP= 918232 CLNG DN 918 332 1157 TG 110 KFN HAVN 02 01 05 21

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CLED DN 620 289 4321

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CLI HAVN WED 16:08:24 02/02/22 CLED DN 620 289 4321 JIP= 620673 CLNG DN 833 567 4094 TG 110 KFN HAVN 02 01 06 20

CLI HAVN WED 16:12:29 02/02/22 CLED DN 620 289 4321 JIP= 918232 CLNG DN 620 251 3861 TG 110 KFN HAVN 02 01 06 21

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CLI HAVN THUR 07:48:05 23/06/22 CLED DN 620 289 4321 JIP= 918504 CLNG DN 620 515 1037 TG 110 KFN HAVN 02 02 04 05

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