

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILLIAM WAYNE WHITWORTH	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO. 2005-00385
	)	
VERIZON WIRELESS	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST DATA REQUEST  
TO VERIZON WIRELESS AND WILLIAM WAYNE WHITWORTH

Pursuant to 807 KAR 5:001, Commission Staff requests that Verizon Wireless and William Wayne Whitworth file the original and 5 copies of the following information on or before November 30, 2005, with a copy to each party of record. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

To Verizon Wireless

1. Describe the relationship between Verizon Wireless and Diversified Consultants Incorporated ("DCI").

a. Explain in detail how customer accounts are "referred" to DCI and how the transactions pertaining to customer accounts are handled.

b. Clarify whether the responsibility for the collection of the debt, upon referral, is permanently assumed by DCI or assigned only on a temporary basis.

2. Provide an affidavit from each individual employed by DCI who either spoke with, or was otherwise in contact with, William Wayne Whitworth. The affidavits should completely describe the content of any conversations or information exchanged between Mr. Whitworth and DCI pertaining to his account(s) with Verizon Wireless.

3. Provide all information exchanged between Verizon Wireless and DCI regarding the account(s) of Mr. Whitworth. For example, provide evidence of the notice of payment from DCI to Verizon Wireless that accompanied Mr. Whitworth's payment in the amount of \$250.53 received on or about January 14, 2005.

To William Wayne Whitworth

1. Provide any documentation that shows the "settlement offer" was accepted by DCI as payment in full of your account.



Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: November 10, 2005

cc: Parties of Record