

UAW LEGAL SERVICES PLANS

UAW-GM UAW-Ford UAW-DaimlerChrysler
1939 Goldsmith Lane, Suite 117, Louisville, KY 40218
Phone: (502) 456-4222 Fax: (502) 458-3457

RECEIVED

DEC 21 2006

December 19, 2006

PUBLIC SERVICE
COMMISSION

Beth O'Donnell
Executive Director
Public Service Commission
211 Sowers Blvd
P O Box 615
Frankfort KY 40602

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

*RE: Kenneth Schiess and Louanne Schiess v. Insight Phone
Case No. 2006-00401*

To Whom It May Concern:

Please find enclosed the original and six copies of Response of Complainants to Commission Staff's First Data Request in the above-referenced matter I would appreciate your office filing this document of record with the Public Service Commission.

If you have any questions or require any additional information, please to not hesitate to contact me.

Thank you for your assistance and cooperation in this matter.

Sincerely,



Theodore Walton
Attorney at Law

Enclosure
cc: Kenneth R. Schiess

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

KENNETH SCHIESS AND)
LOUANN SCHIESS)
COMPLAINANTS)

v.)

INSIGHT PHONE OF)
KENTUCKY LLC)
DEFENDANT)

CASE NO. 2006-00401

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PUBLIC SERVICE
COMMISSION

**RESPONSE OF COMPLAINANTS TO
COMMISSION STAFF'S FIRST DATA REQUEST**

Come the Complainants, Kenneth Schiess and Louann Schiess, and for their responses to Commission Staff's First Data Request, state as follows:

1. During the time period in which the international calls in question were allegedly dialed, did any individuals have access to the phone on which the calls were billed? If yes, state the names of the individuals and their relationship to you, if any.

RESPONSE: During the time period in question no one except Kenneth Schiess and Louann Schiess had access to the telephone.

2. Is there a computer in the household?
- a. If yes, is the computer connected to the phone network?
 - b. Is the computer used for connecting to the Internet?
 - c. Have you experienced any unusual behavior of the computer (for example, viruses, unwanted Web page pop-ups, etc.)?

RESPONSE: There is a computer in our home. It was connected to insight phone network. The computer is used sometimes to connect to the Internet. There is no unusual behavior of this computer. Nor more spam than usual, no pop ups, no viruses were noticed.

3. Provide copies of the billing statements that contain the disputed calls.

RESPONSE: attached

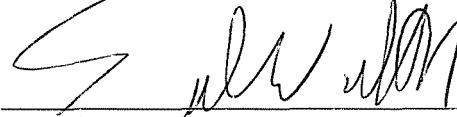
4. What is the total amount of refund or credit that you are seeking?

RESPONSE: \$95.16

5. Have you paid the amount in dispute?

RESPONSE: We have not paid this amount as we dispute it.

Respectfully Submitted:

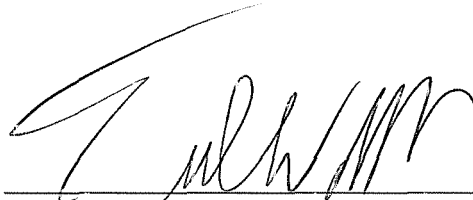


Theodore Walton
UAW-FORD LEGAL SERVICES PLAN
1939 Goldsmith Lane Suite 117
Louisville KY 40218-2006
(502) 456-4222

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served by depositing same with the United States Postal Service, first-class, postage prepaid this 19th day of December, 2006 to:

Laurence Zielke
Janice M. Theriot
Pedley, Zielke, Gordinier & Pence
2000 Meidinger Tower
Louisville, Ky 40202



THEODORE WALTON



WWW.INSIGHT.COM

ACCOUNT #: 10250351958-02 DUE DATE: 05/30/06

BALANCE DUE: \$214.64

Billing Date: May 10, 2006
Service Address: 1812 Millgate Rd. Louisville KY 40223-1047

Page 1 of 5

YOUR ACCOUNT SUMMARY

Questions about Your Statement?
Call Customer Service:
(502)357-4400

Previous Activity

Previous Balance	63.15
Payment Received 04/20/06 - Thank You	63.15 CR
Balance as of 05/09/06	\$0.00

NEW CHARGES

Cable Services	40.00
High Speed Internet Services	20.00
Insight! Phone Local Service	24.55
Insight! Phone Long Distance Service	110.23
SUBTOTAL NEW CHARGES	\$194.78

Taxes and Fees \$19.86

TOTAL BALANCE DUE **\$214.64**

Patricia

Thank you for paying your bill promptly.

6-13-06
Mudlo

1875
773
9766

Have some SUMMER FUN on Insight!
Join us at the Louisville Bats for any Tuesday home game (except 7/4) this season and receive \$2.00 off each Field Reserved Seat ticket (up to 6 tickets) when you present your Insight bill. Visit www.batsbaseball.com for a complete schedule.
Present your Insight bill for any Louisville Fire Arena game this season and receive BUY ONE, GET ONE FREE tickets (up to two free tickets). Visit www.louisvillefirefootball.com for a complete schedule.

Insight Phone is pleased to be your telecommunications provider. Call us at 502-357-4400 to ask about our great rates for an additional phone line or to learn more about our many calling features like Additional Lines, Voice Mail Services, Two Feature Packages and Multiple Feature Packages.

GOOD NEWS FOR CUSTOMERS

continued

(Details on following pages)

also write CT to femme wait



WWW.INSIGHT-COM.COM

ACCOUNT #: 10250351958-02

DUE DATE: 05/30/06

BALANCE DUE: \$214.64

502-357-4400

Page 3 of 5

6-21-06 call
Chad cuz late

YOUR ACCOUNT DETAIL

Custom Calling Features

05/16-06/15

Voice Mail 1.05
Call Waiting ID 0.00

SUBTOTAL \$1.05

Your Insight Phone Feature Package Includes

05/16-06/15

alice

Multi Feature Package 4.00
Anonymous Call Rejection 0.00
Caller ID 0.00
Call Waiting 0.00
Call Forward - Remote Access 0.00
Call Forward - Selective 0.00
Call Forwarding Variable 0.00
Call Return 0.00
Call Screening 0.00
Distinctive Ring 0.00
Repeat Dialing 0.00
Speed Dial 30 0.00
Three Way Calling 0.00

SUBTOTAL \$4.00

TOTAL INSIGHT PHONE SERVICE \$24.55

Hitchhiker
5/19/06
miss
recall

overheard a discussion
of Insight employees
who forgot to
put me on
hold.
Darius
357
4400

Makisa 5/15/06
w/ back 24/48 hrs.
no call

Insight Phone Long Distance Service

For (502)425-4966

Long Distance Charges

05/16-06/15 180 Minute Block of Time \$11.95

SUBTOTAL \$11.95

Insight Phone Direct Dialed Calls - Netherlands

05/08 Insight Phone Direct Dialed Calls \$98.28

Date	Number called	Where	Time	Rate	Type	Min	Amt
04/13	116.32008011	NLD CELL	9:44PM	econ	direct	6	9.36
04/14	116.32008011	NLD CELL	10:17PM	econ	direct	4	6.24
04/15	116.32008011	NLD CELL	1:08PM	econ	direct	3	4.08
04/15	116.32008011	NLD CELL	5:14PM	std	direct	1	1.56
04/15	116.32008011	NLD CELL	5:10PM	std	direct	1	1.56



ACCOUNT #: 10250351958-02

DUE DATE: 05/30/06

BALANCE DUE: \$214.64

YOUR ACCOUNT DETAIL

Date	Account No.	Service	Time	Rate	Category	Duration	Amount
04/17	31632008011 0	NLD CELL	8:58PM	econ	direct	7	10.92
04/18	31632008011 0	NLD CELL	1:38PM	std	direct	3	4.68
04/19	31632008011 0	NLD CELL	9:42PM	econ	direct	11	17.16
04/19	31632008011 0	NLD CELL	10:39PM	econ	direct	2	3.12
04/19	31632008011 0	NLD CELL	10:41PM	econ	direct	1	1.56
04/19	31632008011 0	NLD CELL	10:42PM	econ	direct	1	1.56
04/21	31632008011 0	NLD CELL	8:15AM	std	direct	8	12.48
04/22	31632008011 0	NLD CELL	2:33PM	std	direct	4	6.24
04/23	31632008011 0	NLD CELL	3:34AM	std	direct	8	12.48
04/23	31632008011 0	NLD CELL	5:37PM	std	direct	1	1.56
04/23	31632008011 0	NLD CELL	5:38PM	std	direct	1	1.56
04/23	31632008011 0	NLD CELL	5:39PM	std	direct	1	1.56

SUBTOTAL98.28

TOTAL INSIGHT LONG DISTANCE SERVICE\$110.23

Your Selected Service Providers

Telephone No.	Service	Provider
(502) 425-4966	Long Distance	INSIGHT PHONE
(502) 425-4966	Local Toll	INSIGHT PHONE

Your local carrier is Insight Phone for all lines listed above. Please confirm your selected Ca to ensure no unauthorized changes have been made. Thank you for choosing Insight Phone.

Insight Phone is a trade name of the Insight Communications subsidiary authorized to provide Insig Phone Service in your state.

One Time Charges

Cable Installation and Repair Charges

04/26 High Signal0.00

TOTAL ONE TIME CHARGES\$0.00

Taxes and Fees

Cable Services

FCC Regulatory Fee\$0.06

Multichannel Video Excise Tax\$1.20

SUBTOTAL\$1.26

Let
Abbott - Fraud
574-7043

7-5-06 See pg
3
John
McNeehan
pub Ser

Insight Phone 574-4663
82-10P Fern

July 2, 2006

Kenneth Schiess
1812 MILLGATE RD
LOUISVILLE KY 40223-1047

Sheet of Service
06-006571

RE: Response to Bill Dispute Regarding your Insight Phone service
Account #: 351958-02 Telephone Number: 502 425 4966

Dear Mr. Schiess,

Thank you for bringing your billing concern to our attention. We appreciate your continued loyalty and make it our goal to keep you satisfied as an Insight customer. We take billing discrepancies very seriously and our Insight Phone Fraud Investigations group thoroughly researches each situation to be sure that the final assessment is correct.

It was brought to our attention that you were disputing seventeen (17) international long distance calls to the Netherlands that appeared on your bill statement dated May 10, 2006. These calls are detailed below from this statement:

Apr 13 09:44P NLD CELL, 32 008-0110	Apr 19 10:41P NLD CELL, 32 008-0110
Apr 14 10:17P NLD CELL, 32 008-0110	Apr 19 10:42P NLD CELL, 32 008-0110
Apr 15 05:08P NLD CELL, 32 008-0110	Apr 21 08:15A NLD CELL, 32 008-0110
Apr 15 05:14P NLD CELL, 32 008-0110	Apr 22 02:33P NLD CELL, 32 008-0110
Apr 15 05:16P NLD CELL, 32 008-0110	Apr 23 08:34A NLD CELL, 32 008-0110
Apr 17 08:58P NLD CELL, 32 008-0110	Apr 23 05:37P NLD CELL, 32 008-0110
Apr 18 01:38P NLD CELL, 32 008-0110	Apr 23 05:38P NLD CELL, 32 008-0110
Apr 19 09:42P NLD CELL, 32 008-0110	Apr 23 05:39P NLD CELL, 32 008-0110
Apr 19 10:39P NLD CELL, 32 008-0110	

Our investigators are able to determine the point of origin of phone calls by looking at detailed customer call records. Regrettably, our call records confirm that the above calls were, in fact, made from your Insight Phone number, and were billed correctly. Please also keep in mind that you are responsible for calls made from your home, even if made by friends or neighbors without your consent.

We recognize that you may not agree with the results of our investigation and apologize for any frustration you may have experienced. However, we hope you understand that this closes our investigation and our initial involvement in the dispute process. If you still feel that these calls were incorrectly billed, we'd like to suggest two possible steps you may take to continue your investigation:

- 1) If you believe that you are a victim of fraud, please contact your local law enforcement agency. For your information, we have enclosed details about a common Internet scam. We will gladly cooperate with any law enforcement investigation.
- 2) You may also contact your state's regulatory authority that oversees telephone service. We have provided contact information in the attached documents under the category heading "Right To Dispute Your Bill". Please be assured that we will cooperate fully with any investigation that the regulatory authority would like to pursue on your behalf.

PLEASE NOTE: Whether or not you are planning on pursuing the dispute, it is important that you pay your Insight bill in full at this time to maintain your account in good standing. Regulations require that we inform you when our dispute investigations are closed, and, after that point, you become responsible for the charges pending further investigation by an external agency

In an effort to help you protect your account, we have also included information on Call Blocking/Restriction options available through Insight Phone. Please look these over carefully. If you feel that any of the Blocking or Restriction options might help to prevent a situation such as this in the future, please call us at the Insight Customer Care Center to apply them to your account. We'd be happy to help you and, best of all, these features are FREE.

Again, we thank you for your inquiry and for choosing Insight Phone

Sincerely,

Marian Wright

Marian Wright
Legal Demands & Fraud Investigations Manager
Insight Phone

RIGHT TO DISPUTE YOUR BILL

If for any reason you believe your telephone bill is wrong, you may call or write an Insight Phone representative and explain the amount you believe to be in error and the reason you believe there has been an error. If, when you receive the decision of the Insight Phone representative you still consider the bill wrong or are not satisfied, you have the right to appeal to your state regulatory authority by calling the appropriate number listed below.

Kentucky Public Service Commission
730 Schenkel Lane
PO BOX 615
Frankfort, KY 40602

John Deakana
7-5-06

1-800-772-4636 or 502-564-3940 (press 1 when you hear the recording)
Business hours: Monday through Friday, 8:00 AM – 5:00 PM

Hearing/Speech impaired:
1-800-648-6056 (TDD only)
1-800-648-6057 (voice only)

You may also fax correspondences to: 502-564-1582

Your telephone service will not be shut off for failure to pay the portion of your bill you are disputing while Insight Phone conducts research into your dispute. Insight Phone will notify you upon closure of this dispute research. Please call Insight Phone at the number provided on your bill to make payment arrangements.

RIGHT TO TELEPHONE SERVICE DURING SERIOUS ILLNESS AND PERSONAL EMERGENCY

If you or anyone living in your home is SERIOUSLY ILL and you can demonstrate that continued access to the telephone is required due to that illness and that you are unable to pay your bill, please call or have your physician call our Credit Management Center immediately.

We will continue or restore your telephone service during such illness for a period up to 30 days. In order to have service continued or restored, you must have a registered physician certify, in writing to us within 7 calendar days, that such an illness exists. If the SERIOUS ILLNESS continues beyond 30 days, service may be continued for an additional 30 days upon receipt of a second certificate from your physician. If the SERIOUS ILLNESS continues beyond this additional 30 days, service may be continued for a final 30-day period upon receipt of a third certificate from your physician.

If you can demonstrate that there is a PERSONAL EMERGENCY that endangers the health or safety of someone in your household and you require continued access to telephone service and are unable to pay your bill, we will continue your telephone service for a period not to exceed 30 days. You must inform Insight in writing of the reason why you are unable to pay your bill and the nature of the emergency. Insight has the right to contest before the state regulatory authority the validity of any PERSONAL EMERGENCY notification we may receive.

Before the end of any extension period granted because of SERIOUS ILLNESS or PERSONAL EMERGENCY, you must either pay your past due bills in full or enter into a payment arrangement satisfactory to you and Insight. You may appeal any refusal by Insight to furnish service where a SERIOUS ILLNESS or PERSONAL EMERGENCY exists by contacting your state regulatory authority as directed above.

How can this be legal?

We didn't do anything.

INTERNET SCAM ALERT: "DUMPING"

Please be aware of an Internet scam called "dumping" that can cause unexpected long distance and premium rate call charges to appear on your telephone bill. The following information may help you determine if your call charges are the result of this Internet practice.

What is dumping?

Certain Internet sites can disconnect your modem from your local Internet Service Provider (sometimes without your knowledge) and cause the modem to re-dial and connect directly to an overseas number. These calls may be charged at premium rates and will automatically appear on your telephone bill. These calls are your responsibility.

"Dumping" software is like a computer virus that is downloaded (by clicking on a link) onto an individual's PC from certain Internet sites. This software then effectively controls your dial-up modem, disconnecting it and connecting it directly to another number. Please note, the software may be automatically downloaded onto your computer even if your screen content remains unchanged.

Tips to minimize the chance of recurrence:

Keep your modem speakers on at all times so you can monitor all connection activity.

Be wary when accessing unfamiliar web sites, particularly if you are asked to download specific software or special viewing programs. Most of these sites have a small disclaimer either on the web site or in the service agreement that you are required to agree to when accessing the site or downloading the software. They may be buried several clicks away in pages of small print. Don't click "OK" unless you know exactly what you're agreeing to.

Please visit the Federal Trade Commission's website: www.ftc.gov for additional tips.

CALL BLOCKING/RESTRICTION FEATURES WITH INSIGHT PHONE

You may also subscribe to one or more of the call blocking options available with your Insight Phone service. These include:

- International Call Blocking – restricts the connection of international calls dialed from your telephone line
- Toll Restriction – restricts the connection of domestic long distance calls dialed from your telephone line. This can include 0 Plus, 1 Plus and Dial-Around (Casual User) calls for Local and Long Distance Toll.
- Third Number Blocking – restricts third parties from charging your account for calls made from another number
- Collect Call Blocking – restricts your service from accepting charges for calls made to you from another number

Please contact Insight at the Customer Care number listed on your bill to apply any Call Blocking/Restriction features to your account.