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August 22, 2017

VIA EMAIL AND ECFS

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Rosemary McEnery, Esq.
A.J. DeLaurentis, Esq.
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *AT&T Corp. v. Iowa Network Services, Inc.*
FCC Docket No. 17-56
Bureau ID No. EB-17-MD-001

Dear Counsel:

Counsel for Iowa Network Services, Inc. d/b/a Aureon Network Services (“Aureon”) are writing to report to the FCC the late discovery of additional materials responsive to AT&T Interrogatory No. 5 regarding backup materials relied upon for Aureon’s tariff filings. In the course of Aureon’s counsel making inquiries to Aureon’s outside accountants regarding accounting issues in this case, William Warriner of Moss Adams & Associates uncovered three additional spreadsheets used to support Aureon’s tariff filings. Jeff Schill, Aureon’s Senior Vice President of Corporate Finance, had previously certified that all backup materials had been produced to AT&T. However, Mr. Schill was not aware of these spreadsheets as two of them were prepared under the supervision of his predecessor, and he relied on Mr. Warinner to conduct a thorough search of Moss Adams’s records for supporting materials to produce to AT&T. At the time that Mr. Schill made the certification, it was believed that all supporting tariff materials had been discovered and produced to AT&T.

Mr. Warinner did not realize that he had the additional spreadsheets in his possession until the evening of August 22, 2017, and Aureon’s counsel received those spreadsheets at approximately 5:45 p.m. Upon realizing that those spreadsheets had not been produced to AT&T, the undersigned counsel for Aureon called AT&T’s counsel, Mr. Jim Bendernagel, at approximately 6:00 p.m. to inform him of the discovery of the spreadsheets, and that they would be produced on August 23, 2017. Aureon will be producing PDF and native copies of the spreadsheets to AT&T tomorrow.

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Aureon takes its discovery obligations in this case seriously, and reported the late-discovered materials to AT&T's counsel promptly after Aureon's counsel realized that the documents had not been produced. Aureon will not oppose AT&T's request, if any, to file a sur-reply addressing the information in the subject spreadsheets.

We realize that there are tight deadlines in this proceeding, and apologize for the inconvenience that this late discovery may cause. Should there be any questions with respect to this matter, please feel free to contact the undersigned.

Respectfully submitted,



James U. Troup
Tony S. Lee

cc: Michael J. Hunseder, Counsel for AT&T
James F. Bendernagel, Jr, Counsel for AT&T
Christopher Killion, FCC
Adam Suppes, FCC
Sandra Gray-Fields, FCC