

telephone numbers of all lines used and in service by independent payphone providers, including Complainants, as of the end of each calendar quarter since the third quarter of 1992. Complainants intend to use these ANI lists to determine the amount of EUCL charges that defendants unlawfully assessed. Complainants can use the LEC ANI lists to obtain the ANIs subscribed to by each complainant and thus obtain information on the amount of EUCL charges assessed by defendants on Complainants.

The LEC ANI lists are submitted by the LECs to the National Payphone Clearinghouse, the long-distance industry's only payphone clearinghouse. The National Payphone Clearinghouse then aggregates all of the LEC ANI lists and reconciles them to the ANI lists provided to it by the payphone providers. The National Payphone Clearinghouse then communicates to the long-distance companies the ANIs on which they must pay dialaround compensation.

Complainants are currently attempting to obtain the LEC ANI lists from the National Payphone Clearinghouse on a voluntary basis. However, Complainants seek a subpoena so that they may obtain the lists in the event that the National Payphone Clearinghouse and Complainants fail to reach agreement.

In light of the importance of the LEC ANI lists to this proceeding, a subpoena should be issued.¹

Dated: August 3, 2001

Respectfully submitted,

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¹ Although Section 1.338 of the Commissions rules requires parties requesting a subpoena to submit a subpoena form, Complainants' attempts to obtain a form were unsuccessful. Complainants first attempted to obtain a form from the Secretary's Office but were directed to the Commission's reference room. Complainants immediately went to the reference room only to find that it had closed at 4 PM. Complainants' attempts to obtain the form from the Commission's web site were also unsuccessful as such form is not made available to the public electronically. Complainants will obtain and file the form on Monday.

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2001, a copy of the foregoing Complainants' Request for a Subpoena was served by hand-delivery, facsimile, and/or first-class mail, postage prepaid, as indicated below, on the following parties:

By Hand-Delivery:

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