

**FILE**

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV  
2007 JUL 17 PM 3:47  
PUCO

In the Matter of the Complaint of  
AmTote International, Inc.

Complainant,

v.

AT&T Ohio,

Respondent.

Case No. 07-754-TP-CSS

---

ANSWER OF AT&T OHIO

---

AT&T Ohio<sup>1</sup>, for its Answer to the Complaint, states as follows:

1. AT&T Ohio provides certain retail telephone services directly to the Complainant and also provides certain wholesale services to other carriers, who in turn provide retail services to the Complainant.

2. AT&T Ohio's policy is to not provide trouble tickets or repair information to the end-users of its wholesale customers, but rather to provide that information to its wholesale customers, where appropriate.

3. AT&T Ohio has certain equipment on the Complainants' premises that is used by

---

<sup>1</sup> The Ohio Bell Telephone Company now uses the name AT&T Ohio. The Respondent understands the Complainant's reference to "Ameritech" to mean that Company.

**This is to certify that the images appearing are an  
accurate and complete reproduction of a case file  
document delivered in the regular course of business.**  
Technician SM Date Processed 7/17/07

other carriers to provide retail service to the Complainant.

4. Consistent with its policy described above, AT&T Ohio has declined to provide trouble ticket or repair information on the equipment used by the other carriers to provide service to the Complainant.

5. AT&T Ohio denies, for lack of knowledge sufficient to form a belief, the Complainant's allegations that a fault in AT&T Ohio's equipment interrupted all of the Complainant's services or impacted its ability to conduct its business.

6. AT&T Ohio denies any other allegation of the Complaint not expressly admitted.

7. AT&T Ohio says that it has breached no legal duty owing Complainant and that its service and practices at all relevant times have been in full accordance with all applicable provisions of law and accepted standards within the telephone industry.

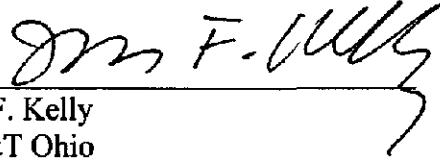
8. AT&T Ohio says that the Complaint fails to state reasonable grounds for proceeding to hearing against AT&T Ohio as required by the provisions of Ohio Revised Code § 4905.26.

WHEREFORE, having fully answered, Respondent AT&T Ohio respectfully prays that this Complaint be dismissed.

Respectfully submitted,

AT&T Ohio

By:

A handwritten signature in black ink, appearing to read "Jon F. Kelly", written over a horizontal line.

Jon F. Kelly  
AT&T Ohio  
150 E. Gay St., Room 4-A  
Columbus, Ohio 43215

(614) 223-7928

Its Attorney

07-754.answer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on July 17, 2007

by first class mail, postage prepaid, on the following party:

**AmTote International, Inc.**

Gary Kiehl  
AmTote International, Inc.  
11200 Pepper Road  
Hunt Valley, MD 21031

  
\_\_\_\_\_  
Jon F. Kelly