

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

N.E.O. Urology Associates, Inc. )  
 )  
Complainant, ) Case No. 07-1002-TP-CSS  
 )  
v. )  
 )  
AT&T Ohio, )  
 )  
Respondent. )

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ANSWER OF AT&T OHIO

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Now comes AT&T Ohio, Respondent herein, and for its Answer to the Complaint filed by N.E.O. Urology Associates, Inc. ("N.E.O.") states as follows:

1. AT&T Ohio admits the allegations set forth in paragraphs 1 and 2.
2. AT&T Ohio admits the allegation in paragraph 3 that N.E.O.'s long distance rates increased. AT&T Ohio does not have enough information to admit or deny the remaining allegations set forth in paragraph 3.
3. AT&T Ohio admits that N.E.O. has a customer service representative assigned to the account. AT&T denies the allegations in paragraph 4 that the representative did not address the complainant's concerns. AT&T Ohio does not have enough information to admit or deny the remaining allegations set forth in paragraph 4.

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4. AT&T Ohio admits the allegations set forth in paragraph 5.
5. AT&T Ohio does not have enough information to admit or deny the allegations set forth in paragraph 6.
6. AT&T Ohio does not have enough information to admit or deny the allegations in paragraph 7. AT&T Ohio avers that the complainant authorized the disconnection of lines in July 2007.
7. AT&T Ohio admits that the complainant's service was temporarily down with the implementation of PRI service. AT&T Ohio does not have enough information to admit or deny the remaining allegations set forth in paragraph 8.
8. AT&T Ohio admits that ordering and billing problems did take place. AT&T Ohio denies the remainder of the specific allegations in paragraph 9.
9. AT&T Ohio admits that long distance charges have been re-rated and, thereafter, properly assessed.
10. AT&T Ohio denies any other allegations of N.E.O. not expressly admitted.

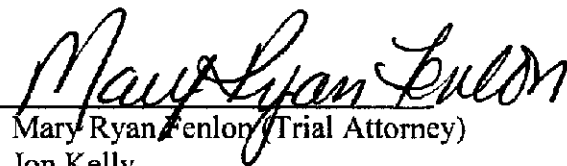
11. AT&T Ohio avers that it has breached no legal duty owing N.E.O. and that its service and practices at all relevant times have been in full accordance with all applicable provisions of law and accepted standards within the telephone industry.
12. The Complaint fails to state reasonable grounds for proceeding to hearing as required by §4905.26, Revised Code.
13. The Complainant is a corporation and, therefore, must be represented by an attorney-at-law admitted to practice in Ohio. In a separate filing AT&T Ohio has filed a Motion to Dismiss this complaint

Wherefore, having fully answered, Respondent requests that the Complaint be dismissed.

Respectfully submitted,

AT&T Ohio

By: \_\_\_\_\_



Mary Ryan Fenlon (Trial Attorney)

Jon Kelly

AT&T

150 East Gay Street, Rm. 4A

Columbus, Ohio 43215

(614) 223-3302

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on October 1,  
2007 by first class mail, postage prepaid, on the following party:

Neo Urology Associates, Inc.  
602 Parmalee Avenue, Suite 300  
Youngstown, OH 44510

  
Mary Ryan Fenlon