

RECEIVED-DOCKETING DIV

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FILE**MEMORANDUM**

To: PUCO Docketing Division

From: OPEX Communications, Inc.

PUCO

Date: July 21, 2008

Re: Case No. 08-0813 TP-CSS

Enclosed please find the original and nine (9) copies of OPEX Communications, Inc.'s Answer to the Complaint filed by Stand Energy Corporation in the above-referenced complaint.

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.
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-BUCKEYING DIV

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PUCO

In the Matter of the Complaint of:)

Stand Energy Corporation)

1077 Celestial Street, Suite 110)

Cincinnati, Ohio 45202-1629)

Complainant)

v.)

OPEX Communications, Inc.)

707 Wilshire Blvd.)

12th Floor)

Los Angeles, CA 90017)

Respondent)

Case No. 08-0813 TP-CSS

Answer

OPEX Communications, Inc. (hereinafter "Respondent"), an approved telecommunications provider in Ohio, by and through its undersigned counsel, files the following Answer to Stand Energy Corporation's Complaint against Respondent filed on June 30, 2008 (the "Complaint").

General Denial

1. Respondent generally denies each and every allegation contained in the Complaint.

Affirmative Defenses

Respondent states the following FACTS as separate affirmative defenses to Complainant's Complaint:

1. On or about July 9, 2008, the Complaint was served upon Respondent via U.S. Mail, postage prepaid.

Answer of OPEX Communications, Inc. to Stand Energy Corporation's Complaint


2. After receiving service of process of the Complaint, Respondent's Corporate Counsel attempted on at least three occasions to contact Complainant's General Counsel in order to resolve the Complaint informally by proposing a credit to Complainant's account for the full outstanding balance of Sixty Two Dollars and Forty One Cents (\$62.41).
3. All of Respondent's attempts to contact Complainant were unfruitful as Complainant's General Counsel refused to discuss or even agree to speak with Respondent's Corporate Counsel.
4. Nevertheless, Respondent issued the credit in the amount of Sixty Two Dollars and Forty One Cents (\$62.41) in full satisfaction of the outstanding balance on Complainant's account with Respondent in order to resolve the Complaint, and no further bills will be issued to Complainant by Respondent.
5. It is Respondent's position before the Public Utilities Commission of Ohio (the "Commission") that the Complaint has been fully satisfied by Respondent's issuance of credit to Complainant.
6. Pursuant to OAC 4901: 9-01(F), Complainant has twenty days to file a written response agreeing or disagreeing with Respondent's assertion that the Complaint has been fully satisfied, and if no response is filed, the Commission may presume that satisfaction has occurred and dismiss the Complaint.

WHEREFORE, Respondent requests the following relief:

a. An Order be issued dismissing the Complaint in the event Complainant does not file a written response to Respondent's assertion that the Complaint has been fully satisfied pursuant to OAC 4901: 9-01(F) within twenty days of the filing of this Answer.

Respectfully Submitted,

OPEX COMMUNICATIONS, INC.


By: 
Nathaniel Law, Esq.
Its Corporate Counsel
CA State Bar # 254425
707 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90017
(213) 995-9700 (Phone)
(213) 995-9710 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Affidavit was served upon the following parties of record via Federal Express on July 21, 2008.

PUCO Docketing Division
13th Floor
180 East Broad Street
Columbus, OH 43215-3793

Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629


Nathaniel Law