

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

Hi TecMetal Group, Inc.,)	
)	
Complainant,)	
)	
v.)	Case No. 09-377-TP-CSS
)	
AT&T Ohio,)	
)	
Respondent.)	

AT&T OHIO'S ANSWER

AT&T Ohio¹, for its Answer to the Complaint filed against it, states as follows:

1. AT&T Ohio admits that it provides business telephone service to the Complainant.

2. AT&T Ohio admits that the Complainant placed an order for new services to upgrade its existing services and that the services were installed. AT&T Ohio denies that the new services did not work, and avers that the Complainant did not take the necessary steps to test and turn-up the services at its locations. AT&T Ohio avers that the customary notices were sent to the Complainant advising it that the upgraded services were ready to test and turn-up.

¹ Complainant named "AT&T" as the Respondent. The Ohio Bell Telephone Company is a public utility in Ohio and provided the services at issue here. The Ohio Bell Telephone Company uses the name AT&T Ohio, which is used in this answer.

3. AT&T Ohio admits that efforts were undertaken to resolve the Complainant's issues. AT&T Ohio avers that it was willing to work with the Complainant to resolve its issues, and did so, but that the Complainant abandoned those efforts.

4. AT&T Ohio avers that substantial amounts are past due on the Complainant's accounts for services that were installed and available for the Complainant's use.

5. AT&T Ohio denies any allegation of the Complaint not specifically admitted.

6. AT&T Ohio says that it has breached no legal duty owed to the 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.

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

Respectfully submitted,

AT&T Ohio

By: /s/ Jon F. Kelly

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

(614) 223-7928

Its Attorney

09-377.answer

Certificate of Service

I hereby certify that a copy of the foregoing has been served this 18th day of May, 2009 by first class mail, postage prepaid, on the parties shown below.

/s/ Jon F. Kelly

Jon F. Kelly

Hi TecMetal Group, Inc.

Michael Deans
System Administrator
Hi TecMetal Group, Inc.
1101 East 55th St.
Cleveland, OH 44103

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/18/2009 11:50:26 AM

in

Case No(s). 09-0377-TP-CSS

Summary: Answer electronically filed by Jon F Kelly on behalf of AT&T Ohio