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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter Of: )  
 )  
The Complaint of Mary Ann Morgan )  
vs. First Communications for Unfair )  
and Unjust Billing Practices. )  
\_\_\_\_\_ )

Case No. 11-0331-TP-CSS

ANSWER OF FIRST COMMUNICATIONS, LLC

NOW COMES the respondent, First Communications, LLC (the "Respondent"), by and through its attorneys, and submits its Answer in the form of a general denial of all allegations contained within the Complaint. This general denial is submitted only after Respondent has made reasonable attempts to decipher the content of the Complaint, much of which is illegible and incoherent. For these reasons, as well as those set forth in the Respondent's Motion to Dismiss, filed concurrently herewith, Respondent intends in good faith to deny all allegations set forth in the Complaint and, therefore, submits this general denial in accordance with Section 4901-9-01(D) of the Ohio Administrative Code.

In addition to the general denial set forth herein, Respondent states that this Commission is without subject matter jurisdiction over some or all of the allegations comprising the Complaint herein and further states that the Complainant has failed to set forth reasonable grounds for said Complaint. The foregoing defenses are also relied upon by Respondent in support of its Motion to Dismiss, filed concurrently herewith.

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Respectfully submitted:



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing Answer of First Communications, LLC has been served this 14<sup>th</sup> day of February, 2011, via ordinary, First Class U.S. Mail, postage prepaid, upon the following party:

Mary Ann Morgan  
3319 Somia Drive  
Parma, OH 44134



David A. Ferris (0059804)