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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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OTC DAIHEN, INC.,

Complainant,

v.

FRONTIER NORTH, INC.,

Respondent.

**PUCO**

Case No. 11-0549-TP-CSS

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**REPLY OF OTC DAIHEN, INC. TO MOTION TO DISMISS OF MCI  
COMMUNICATIONS, INC. d/b/a VERIZON BUSINESS SERVICES**

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By Entry dated March 11, 2011, the Public Utilities Commission of Ohio ("Commission") ordered that MCI Communications Services, Inc. d/b/a Verizon Business Services ("MCI"), should be joined as a party to this proceeding and file an Answer to OTC Daihen's Complaint. On March 31, 2011, MCI filed both an Answer and a Motion to Dismiss the Complaint as against MCI, and to dismiss MCI as a party to this proceeding.

The Memorandum in Support of MCI's Motion to Dismiss contains no legal arguments to which OTC Daihen may reply. Rather, the Memorandum contains only MCI's factual contentions that MCI never billed or provided services to OTC Daihen. (MCI Mem. at 2.) MCI contends that, based on the circuit number referenced in OTC Daihen's invoice, Verizon Advanced Data, Inc. is the party that billed and provided services to OTC Daihen. (MCI Mem. at 4.) MCI further contends that the Verizon Advanced Data, Inc. circuit was transferred to Frontier North, Inc. as a result of the 2010

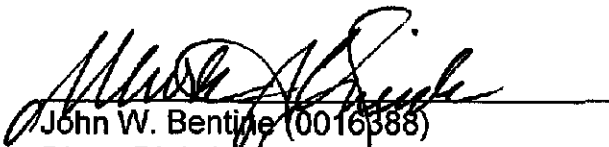
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transfer of ownership of Verizon North, Inc. from Verizon Communications, Inc. to Frontier North Communications Corporation. (Id.)

Frontier North disputes this assertion of ownership, asserting that "Verizon Business is a separate legal entity from Frontier and provided separate services and separate billing to OTC." (Frontier North Answer at 2.) In its March 11, 2011 Entry, the Commission stated that it was seeking "clarity regarding which entity with the Verizon name was providing and billing OTC for internet and DS1 Service." (Entry ¶ 3.) OTC Daihen seeks that same clarity. OTC Daihen requests that the Commission order Frontier North to identify the exact party responsible for billing and providing the "Verizon Business" services to OTC Daihen, so that the appropriate party may be joined in this matter.

OTC Daihen would accept the dismissal of MCI as a party in this matter on the condition that Frontier North can identify any additional proper parties who should be joined in this proceeding rather than a general denial that Frontier North is responsible. If MCI is correct that Frontier North owns the circuit related to OTC Daihen's service, in which case no additional parties are necessary, OTC Daihen would accept dismissal of MCI as a party to this matter without the joinder of additional parties.

Respectfully submitted,

  
John W. Bentine (0016388)  
Direct Dial: 614.334.6121  
Email: jbentine@cwslaw.com  
Mark S. Yurick (0039176)  
Counsel of Record  
Direct Dial: 614.334.7197  
Email: myurick@cwslaw.com

Jason H. Beehler (0085377)  
Direct Dial: 614.334.6122  
Email: jbeehler@cwsllaw.com  
Chester Willcox & Saxbe, LLP  
65 E. State Street, Suite 1000  
Columbus, OH 43215  
Telephone: 614.221.4000  
Facsimile: 614.221.4012  
***Attorneys for OTC Daihen, Inc.***

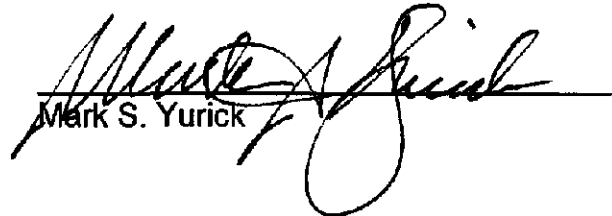
## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing *Reply of OTC Daihen, Inc. to Motion to Dismiss of MCI Communications, Inc. d/b/a Verizon Business Services* was served, via regular U.S. mail, postage prepaid, this 15<sup>th</sup> day of April, 2011, upon the following:

Kevin Saville  
Associate General Counsel  
Frontier Communications Corporation  
2378 Wilshire Boulevard  
Mound, MN 55364  
Email: Kevin.Saville@FTR.com

Barth E. Royer  
Bell & Royer Co., LPA  
33 South Grant Avenue  
Columbus, OH 43215-3927  
Email: BarthRoyer@aol.com

Carolyn S. Flahive  
Thomson Hine LLP  
41 South High Street, Suite 1700  
Columbus, OH 43215  
Email: Carolyn.Flahive@ThompsonHine.com

  
Mark S. Yurick