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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of Certain)
Rules of the Ohio Administrative Code to)
Implement Section 4911.021, Revised Code)

Case No. 11-4910-AU-ORD

COMMENTS OF THE OHIO TELECOM ASSOCIATION

THE OHIO TELECOM ASSOCIATION (“OTA”), for and on behalf of its members, hereby submits its Comments in this matter. The OTA Comments address the proposed Staff changes to Ohio Administrative Code (O.A.C.) 4901:1-6-12 and 4901:1-6-17, which affect its members. The OTA Comments briefly address two matters – the timing of the implementation of the Staff - proposed contact language changes for the Public Utilities Commission of Ohio (“PUCO”) and the Ohio Consumers’ Counsel (“OCC”); and the placement of the OCC information on bills and disconnect notices.

As to the first issue, as has been the case in previous proceedings involving modification of language incorporated into customer bills and disconnect notices, members seek assurance that sufficient time for implementing such billing system changes will be provided if a mandatory effective date is ordered. Few companies use existing paper stock for billing and disconnection notices – but billing changes themselves may require system changes needing approximately 60-90 days to implement.

On the second issue, OTA recommends that the proposed rule be clarified to allow some flexibility in the placement of the reference to the OCC on residential bills and disconnection notices. Section 4927.17 Ohio Revised Code (“O.R.C.”) imposes the requirement to include contact information for the OCC on residential customer bills and disconnection notices. The Staff proposal does satisfy the noticing requirement, as the OCC no longer maintains a call

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center, but, may represent residential consumers in proceedings before the PUCO. OTA's Comment on this issue focuses only on the placement of such information on customer bills and disconnection notices. To avoid confusion and prevent customer frustration, companies should have the discretion to determine where the OCC information is placed on residential bills and disconnection notices. The Commission's Entry states that, "any consumer complaint that requires call center intervention with the utility to resolve should be handled by the PUCO's call center." Placing the OCC's information too closely to the Commission's contact information has the potential to cause confusion and frustration for customers seeking call center complaint resolution from the Office of the Consumers' Counsel.

Respectfully submitted,

OHIO TELECOM ASSOCIATION

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Summary: Comments of the Ohio Telecom Association electronically filed by Scott E. Elisar on behalf of Ohio Telecom Association