

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

Neil Lichtman d/b/a Columbus Window,

Complainant,

v.

AT&T Ohio,

Respondent.

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Case No. 13-0227-TP-CSS

AT&T OHIO'S ANSWER

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

1. AT&T Ohio provides certain services to the Complainant.
2. AT&T Ohio admits that it created two accounts for the Complainant's service, but avers that it did so in the ordinary course of its business arising out of Complainant's bankruptcy.
3. AT&T Ohio denies for lack of knowledge the allegations of the Complaint referring to the Complainant's interactions with the PUCO Staff.

¹ The Ohio Bell Telephone Company is a public utility in Ohio and provides certain Commission-regulated services and other non-regulated services. The Complainant used the name "AT&T" in his complaint. The Ohio Bell Telephone Company uses the name AT&T Ohio, which is used in this Answer.

4. AT&T Ohio avers that it has reviewed the Complainant's billing, including the process and the results of the "bill separation" which took place as a result of Complainant's bankruptcy, and that the calculations and bills are correct.

5. AT&T Ohio avers that it has attempted to communicate with the Complainant on a number of occasions with no success.

6. AT&T Ohio denies any allegation of the Complaint which is not specifically admitted.

7. AT&T Ohio avers 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.

8. AT&T Ohio avers that the Complaint has failed to properly register and/or maintain the fictitious name ("d/b/a Columbus Window") with the Ohio Secretary of State.

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