BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

Robert P. Madison International, Inc.	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 13-1135-TP-CSS
	)	
The Ohio Bell Telephone Company d/b/a AT&T Ohio,	)	
	)	
Respondent.	)	

AT&T OHIO'S ANSWER

AT&T Ohio[1], for its Answer to the Complaint filed against it, states as follows:

1. AT&T Ohio admits the allegations of paragraphs 1 and 2 of the Complaint.

2. AT&T Ohio lacks knowledge sufficient to admit or deny the allegations of paragraph 3 of the Complaint.

3. AT&T Ohio admits the allegations of paragraphs 4 through 8 of the Complaint.

4. AT&T Ohio lacks knowledge sufficient to admit or deny the allegations of paragraphs 9 through 14 of the Complaint.

5. AT&T Ohio admits the allegation of paragraph 15 of the Complaint.

[1] The Ohio Bell Telephone Company is a public utility in Ohio and provides certain Commission-regulated services in Ohio. The Ohio Bell Telephone Company uses the name AT&T Ohio, which is used in this Answer.

6. AT&T Ohio lacks knowledge sufficient to admit or deny the allegations of paragraphs 16 - 19 of the Complaint.

7. As to paragraph 20 of the Complaint, AT&T Ohio incorporates its answers to paragraphs 1 – 19 of the Complaint.

8. AT&T Ohio denies the allegations of paragraphs 21 through 25 of the Complaint.

9. As to paragraph 26 of the Complaint, AT&T Ohio incorporates its answers to paragraphs 1 – 25 of the Complaint.

10. AT&T Ohio denies the allegations of paragraphs 27 through 30 of the Complaint.

11. As to paragraph 31 of the Complaint, AT&T Ohio incorporates its answers to paragraphs 1 – 30 of the Complaint.

12. AT&T Ohio denies the allegations of paragraphs 32 through 34 of the Complaint.

13. 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.

Affirmative Defense

14. The Complaint fails to state reasonable grounds or otherwise state a cause of action against AT&T Ohio for which relief can be granted.

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

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Its Attorney

13-1135.answer

Certificate of Service

I hereby certify that a copy of the foregoing has been served this 28th day of May, 2013 by e-mail on the party shown below.

/s/ Jon F. Kelly
Jon F. Kelly

Robert P. Madison International, Inc.

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