

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

City of Alliance,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 13-2107-TP-CSS
	)	
The Ohio Bell Telephone Company d/b/a AT&T Ohio,	)	
	)	
Respondent.	)	

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AT&T OHIO'S ANSWER

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AT&T Ohio<sup>1</sup>, for its Answer to the Complaint filed against it, states as follows:

1. AT&T Ohio admits that it provided certain circuits, including the circuit at issue in this case, to the Complainant pursuant to its tariff and/or Guidebook.
  
2. AT&T Ohio avers that the Complainant's "internal memo indicating that this circuit was disconnected in April of 2009" is not the equivalent of an order placed with AT&T Ohio to effectuate that disconnection.
  
3. AT&T Ohio avers that it did not receive an order in 2009, or until the recent disconnection in 2013, to disconnect the circuit in question.

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<sup>1</sup> The Complainant named "AT&T" as the Respondent. The Ohio Bell Telephone Company is a public utility in Ohio and provides certain Commission-regulated services in Ohio, including the services at issue in this complaint. The Ohio Bell Telephone Company uses the name AT&T Ohio, which is used in this Answer.

4. AT&T Ohio lacks knowledge sufficient to admit or deny the other allegations of the Complaint.

5. 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

6. 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                      
Jon F. Kelly  
AT&T Services, Inc.  
150 E. Gay St., Room 4-A  
Columbus, Ohio 43215

(614) 223-7928

Its Attorney

Certificate of Service

I hereby certify that a copy of the foregoing has been served this 12<sup>th</sup> day of November, 2013 on the party shown below by U. S. Mail, postage prepaid.

/s/ Jon F. Kelly

Jon F. Kelly

City of Alliance

Kevin G. Knowles  
Alliance City Auditor  
504 E. Main St.  
Alliance, Ohio 44601

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**11/12/2013 9:20:22 AM**

**in**

**Case No(s). 13-2107-TP-CSS**

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