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2014 APR 16 AM 11:39

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April 9, 2014

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APR 14 2014

INVESTIGATION AND AUDIT DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO

14-0594-TP-CSS

Johnston H. Means
Raymond A. Bichimer
John C. Burkholder
Robert T. Baker
Robert G. Stafford
Retired

Public Utilities Commission of Ohio
Attn: IAD
180 E. Broad Street
Columbus, Ohio 43215-3793

Re: Complaint Against AT&T filed on behalf of Lake Local School District
Board of Education, Account Nos. 330-877-4275 811 & 330-R02-1668 419

Dear Sir or Madam:

Our firm represents the Lake Local School District Board of Education (the "Board of Education") located in Uniontown, Ohio. We have been asked to file a Complaint against AT&T based on disputed amounts for telephone service.

The Board of Education initially disputed specific charges with AT&T on April 9, 2013. The Board of Education identified significant, unexplained and inaccurate amounts billed relating to both of the above-referenced accounts. The dispute continued unaddressed and unresolved through August 19, 2013, at which point the Board of Education delivered a formal "Notice of Disputed Charges" letter to AT&T. (See 8/16/2013 Letter, attached as Exhibit A.) Because the issues remained unaddressed and unresolved, the Board of Education subsequently delivered a "Reminder of Disputed Charges" letter on March 7, 2014. (See 3/7/2014 Letter, attached as Exhibit B.) Both letters were sent via certified mail.

Despite repeated efforts by the Board, there has been minimal response and no action by AT&T to date. The Board of Education is willing to pay any accurate charges to bring the accounts up-to-date, but requests the disputed amounts to be resolved as soon as possible in order to avoid carrying an unnecessary liability into the next fiscal year. In addition, AT&T's inaction on this issue may well jeopardize any E-Rate Reimbursement that may be available to the Board. Therefore, please consider this a formal Complaint against AT&T.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Su Date Processed APR 16 2014

April 9, 2014

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If you should have any questions or need additional information, please do not hesitate to contact us.

Sincerely,

MEANS, BICHIMER, BURKHOLDER & BAKER CO., L.P.A.

A handwritten signature in black ink, appearing to read "Nicole Donovsky", with a stylized flourish at the end.

Nicole M. Donovsky

ndonovsky@mbbblaw.com

NMD:vjr

Enclosures

cc: AT&T, 45 Erieview Plaza, Floor 13, Cleveland, OH 44114

AT&T Corp., Attn: Master Agreement Support Team, One AT&T Way,
Bedminster, NJ, 07921-0757

Mary Jo Slick, Esq., General Counsel, Stark Co. Educational Service Center (via Email)

Nicole Nichols, Treasurer, Lake Local School District



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MEANS, BICHIMER, BURKHOLDER & BAKER
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2014 APR 16 AM 11:39

PUCO August 19, 2013

Johnston H. Means
Raymond A. Bichimer
John C. Burkholder
Robert T. Baker
Robert G. Stafford
Retired

Certified & Regular Mail

AT&T
45 Erieview Plaza, Floor 13
Cleveland, OH 44114

Certified & Regular Mail and E-mail

AT&T Corp.
Attn: Master Agreement Support Team
One AT&T Way
Bedminster, NJ 07921-0757
mast@att.com

Re: **NOTICE OF DISPUTED CHARGES**
Lake Local School District
Account Nos. 330-877-4275 811 and 330-R02-1668 419

Dear Sir/Madam:

Please consider this letter a NOTICE OF DISPUTED CHARGES by the Lake Local School District under paragraph 4.5 of the Master Agreement between AT&T Corp. (AT&T) and the Lake Local School District Board of Education (the "Customer"), executed by the Customer on March 20, 2012 (the "Master Agreement") with respect to the referenced Account Numbers.

Account No. 330-877-4275 811

According to the Monthly Statements issued to the Customer dated January 19, 2013 and February 19, 2013, the charges for Account No. 330-277-4275 811 were \$3,345.76 and \$3,342.45, respectively. Then, unexpectedly, the March 19, 2013 Monthly Statement increased dramatically. Not only did the Monthly Charge increase from \$2,709.00 to \$4,231.40, but the Customer was charged for a host of "Additions and Changes to Service," totaling \$2,033.14, that were neither requested nor authorized by the Customer. The Monthly Statements for April 19, 2013, May 19, 2013 and June 19, 2013 reflect the higher Monthly Charge of \$4,231.40, as well. However, these Monthly Statements also reflect an unexplained increase in the charges for 330 R01-7810 from \$224.00, as reflected on the Monthly Statement dated March 19, 2013, to \$1,542.00 as reflected on the Monthly Statements dated April 19, 2013, May 19, 2013 and June 19, 2013. This is essentially a 100% increase in the cost of services. The most recent invoice received, dated July 19, 2013, reflects Monthly Charges of \$4,583.40 (another unexplained increase) and an unexplained, reduced charge for 330 R01-7810 to \$240.00.

EXHIBIT

A

AT&T Notice of Disputed Charges
August 19, 2013
Page 2

Account No. 330-R02-1668 419

The Customer has experienced a similar phenomenon with Account No. 330-R02-1668 419. The Monthly Statements for January 1, 2013 and February 1, 2013 totaled \$1,618.01 and \$1,682.88, respectively. The March 1, 2013 Monthly Statement reflects changes to services that were neither requested nor authorized by the Customer, resulting in a "Total of Current Charges" in the amount of \$8,163.11. This total is comprised mostly of a \$4,977.00 Monthly Charge which was increased from the previous Monthly Charge of \$1,220.70. The unexplained increase appears on the April 1, 2013 Monthly Statement as well. However, the Monthly Charge reflected on the May 1, 2013, June 1, 2013, July 1, 2013 and August 1, 2013 Monthly Statements is stated as \$5,275.00, reflecting another unexplained increase.

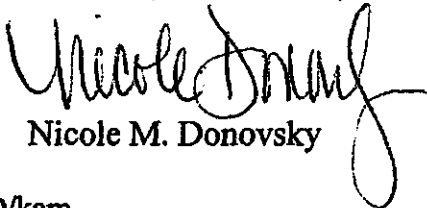
These issues were immediately brought to the attention of two AT&T representatives on April 9, 2013. This initial inquiry was followed by several additional communications to AT&T representatives with no explanation or adjustment being provided to date. Most recently, and before resorting to engaging legal counsel, the Customer made one final attempt to resolve the issues relating to these accounts. While being promised a response, no response or explanation was provided. Just today, the Customer has received disconnection notices for both accounts, despite aggressively seeking an explanation for the charges.

This lack of responsiveness from AT&T representatives is frustrating and unsatisfactory to the Customer. Not only was the Customer unable to resolve these accounts at the end of the fiscal year ending June 30, 2013, the unresolved issues jeopardizes the Customer's ability to submit the charges for E-Rate Reimbursement.

Please direct this matter to the appropriate individual, with authority and knowledge to explain the disputed charges and to resolve this matter as expeditiously as possible.

Sincerely,

MEANS, BICHIMER, BURKHOLDER & BAKER CO., L.P.A.


Nicole M. Donovsky

NMD/kam
cc: Nicole Nichols, Treasurer (via email)



MEANS, BICHIMER, BURKHOLDER & BAKER
Co., L.P.A.

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March 7, 2014

Johnston H. Means
Raymond A. Bichimer
John C. Burkholder
Robert T. Baker
Robert G. Stafford
Retired

Certified & Regular Mail

AT&T
45 Erieview Plaza, Floor 13
Cleveland, OH 44114

Certified & Regular Mail and E-mail

AT&T Corp.
Attn: Master Agreement Support Team
One AT&T Way
Bedminster, NJ 07921-0757
mast@att.com

Re: **REMINDER NOTICE OF DISPUTED CHARGES**
Lake Local School District
Account Nos. 330-877-4275 811 and 330-R02-1668 419

Dear Sir/Madam:

Our firm represents the Lake Local School District Board of Education. The District initially communicated with AT&T on April 9, 2013 about significant, unexplained and inaccurate charges to the above-referenced accounts. The issue continues, unresolved, and on August 19, 2013, we provided formal NOTICE OF DISPUTED CHARGES. The District continues to dispute the recurring charges on those accounts.

To date, despite the District's efforts to communicate and resolve the dispute, and their willingness to pay accurate charges to bring their accounts current, there has been minimal response by AT&T. The District wants to get this dispute resolved. Given the significant balance on these accounts, the passing of one fiscal year-end for the District, the approaching of the next fiscal year-end, and the risk of jeopardizing the Districts' E-Rate Reimbursement, we are requesting an immediate and substantive response. In the event that AT&T does not provide an appropriate response by March 17, 2014, the District feels it has no other choice but to file a Complaint with the Public Utilities Commission of Ohio.

Please direct this matter to the appropriate individual, with authority and knowledge to explain the disputed charges and to resolve this matter as expeditiously as possible.

Sincerely,

MEANS, BICHIMER, BURKHOLDER & BAKER CO., L.P.A.

Nicole M. Donovan

cc: Nicole Nichols, Treasurer (via Email)
Jeff Wendorf, Superintendent (via Email)
Mary Jo Slick, Esq. (via Email)

