

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Complaint of** )  
**J&D Home Improvement** )  
 )  
**Complainant,** )  
 )  
**v.** )  
 )  
**United Telephone Company of Ohio** )  
**dba CenturyLink** )  
 )  
**Respondent.** )

**Case No. 14-0525-TP-CSS**

**ANSWER OF RESPONDENT**  
**UNITED TELEPHONE COMPANY OF OHIO DBA CENTURYLINK**

United Telephone Company of Ohio dba CenturyLink (“CenturyLink”), by its attorneys,  
answers the complaint of J & D Home Improvement (“J&D”) as follows.

1. CenturyLink admits that J&D is a current customer of CenturyLink and that it has  
been a customer for several years.

2. CenturyLink admits that J&D changed its phone systems from CenturyLink and  
Miltel to a VOIP phone system with 8x8 in August 2012. CenturyLink admits that it became  
aware at some point in time that J&D had made the change in phone systems and that J&D  
ported numbers over to the new 8x8 system. CenturyLink presently lacks knowledge or  
information sufficient to form a belief as to when it became aware of the change in phone  
systems. CenturyLink admits that J&D upgraded its internet capabilities with CenturyLink in  
early 2013.

3. CenturyLink denies knowing that J&D and/or J&D’s contractors had  
disconnected two PRI connections provided by CenturyLink. CenturyLink admits that it  
continued to charge for the two PRI connections until notified by J&D in December 2013 that

the two PRI connections had been disconnected. CenturyLink admits that the charges for the two PRI connections amounted to approximately \$22,284.64 over 16 months. CenturyLink presently lacks knowledge or information sufficient to form a belief as to whether J&D used the two PRI connections during the time period from August 2012 until December 2013, when it notified CenturyLink that the two PRI connections had been disconnected. CenturyLink admits that J&D paid for the two PRI connections until it notified CenturyLink that the two PRI connections had been disconnected.

4. CenturyLink admits that it stopped billing for the two PRI connections when notified by J&D in December 2013. CenturyLink admits that Mr. Jack Witt of J&D has had discussions with Ms. Jamie Fry at CenturyLink and has asked for a credit for the two PRI connections from the time J&D and/or its contractor disconnected them until December 2013. CenturyLink admits that it has not been willing to agree to the credit J&D has requested without evidence that J&D notified CenturyLink to disconnect the two PRI connections in August 2012.

5. CenturyLink admits that J&D changed phone systems but presently lacks knowledge or information sufficient to form a belief as to whether J&D knew what PRIs were in August 2012 or what J&D assumed concerning its account with CenturyLink at that time.

6. CenturyLink denies each allegation in the Complaint not specifically admitted as true.

7. The remaining allegations in the Complaint request relief and do not require an answer. CenturyLink affirmatively states that Complainant is not entitled to the relief it is seeking.

### **FIRST AFFIRMATIVE DEFENSE**

8. The Complaint fails to state reasonable grounds for a complaint against CenturyLink as required by R.C. 4905.26.

### **SECOND AFFIRMATIVE DEFENSE**

9. The Complaint is barred by the doctrine of laches.

### **RESERVATION OF DEFENSES**

10. CenturyLink reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, CenturyLink prays that the Complaint be dismissed with prejudice.

Respectfully submitted,

/s/ Christen M. Blend

Christen M. Blend (Counsel of Record)  
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Date: April 21, 2014

*Counsel for United Telephone Company of  
Ohio dba CenturyLink*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served by regular mail  
on this 21st day of April, 2014, upon the Complainant at the following address:

Jack M. Witt  
J & D Home Improvement  
13659 E. Main St.  
Reynoldsburg, Ohio 43068

/s/ Christen M. Blend

Christen M. Blend

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**Case No(s). 14-0525-TP-CSS**

Summary: Answer of Respondent United Telephone Company of Ohio dba CenturyLink electronically filed by Ms. Christen M. Blend on behalf of United Telephone Company of Ohio dba CenturyLink