

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Carol Anne Lake,	:	
	:	
Complainant	:	
	:	Case No. 15-2088-TP-CSS
	:	
vs.	:	
	:	
	:	
Frontier Communications, Inc.,	:	
	:	
Respondent.	:	

**ANSWER AND AFFIRMATIVE DEFENSES OF
FRONTIER COMMUNICATIONS, INC.**

Frontier Communications, Inc. (“Frontier”), appearing specially, and through its counsel, answers the December 16, 2015 Complaint (“Complaint”) of Carol Anne Lake (“Complainant”) and raises its affirmative defenses thereto as follows:

A. ANSWER

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1. In response to the first unnumbered paragraph, Frontier lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations.
2. In response to the second unnumbered paragraph, Frontier admits that the total due from Complainant’s first bill was \$174.09. Frontier denies the remaining allegations.
3. In response to the third unnumbered paragraph, Frontier denies the allegations.
4. In response to the fourth unnumbered paragraph, Frontier denies the allegations.
5. In response to the fifth unnumbered paragraph, Frontier denies the allegations.

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6. In response to the sixth unnumbered paragraph, Frontier denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

7. In response to the seventh unnumbered paragraph, Frontier denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

8. In response to the eighth unnumbered paragraph, Frontier denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

9. In response to the ninth unnumbered paragraph, Frontier denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

10. In response to the tenth unnumbered paragraph, Frontier denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

11. In response to the eleventh unnumbered paragraph, Frontier allegations denies all allegations directed at it, and denies for lack of lacks knowledge upon which to form a belief as

to the truth of the facts alleged and therefore denies the allegations relating to Ms. Lake's subjective beliefs or actions.

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12. In response to the twelfth unnumbered paragraph, Frontier admits only that it worked with a PUCO representative regarding Complainant's invoices on or around November 2015. At that time, Frontier credited a cancellation fee and back-dated a disconnect date, resulting in credits. Further responding, Frontier admits that Complainant's December 2015 invoice was \$226.84. Frontier denies all further allegations not expressly admitted.

13. In response to the thirteenth unnumbered paragraph, Frontier admits only that Complainant's December 2015 invoice was \$226.84, and denies all further allegations.

14. In response to the fourteenth unnumbered paragraph, Frontier denies all allegations directed at it, and further states that Complainant's invoices have been fully credited.

15. Frontier denies all allegations not expressly admitted herein.

B. AFFIRMATIVE DEFENSE


1. Payment and satisfaction. Frontier has fully credited Complainant's account, and therefore, the Complaint should be dismissed.

2. Frontier reserves the right to raise additional affirmative defenses or to withdraw any of the foregoing affirmative defenses as may become necessary during the investigation and discovery of this matter.

WHEREFORE, Frontier requests that the Complaint be dismissed with prejudice.

Respectfully submitted,

FRONTIER COMMUNICATIONS, INC.



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Counsel for Frontier Communications, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer and Affirmative Defenses of Frontier Communications, Inc., was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, January 5, 2016:

Carol Anne Lake
4497 E. Peachton Drive
Port Clinton, Ohio 43452



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in

Case No(s). 15-2088-TP-CSS

Summary: Answer and Affirmative Defenses of Frontier Communications, Inc. electronically filed by Michele L Noble on behalf of Frontier Communications, Inc.