

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

James Anderson)	
)	
Complainant)	
)	
v.)	Case No. 18-0301-TP-CSS
)	
Frontier Communications, Inc.,)	
)	
Respondent.)	

**ANSWER AND AFFIRMATIVE DEFENSES
OF FRONTIER COMMUNICATIONS**

Frontier Communications, Inc. (“Frontier”), appearing specially, and through its counsel, answers the February 20, 2018 Complaint (“Complaint”) of James Anderson (“Complainant”) and raises its affirmative defenses thereto as follows:

GENERAL DEFENSE

Frontier has examined its records and billing statements and Frontier finds that the charges were valid with no evidence of erroneous billing.

A. ANSWER

Page 1 of the Complaint

1. In response to the allegations contained in the first unnumbered page titled “Formal Complaint Form,” Frontier denies that it had done anything unethical or illegal and denies that it has provided substandard service, or charged improper billings. Further responding, Frontier lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies all other allegations in the first unnumbered page.

Page 2 of the Complaint

2. In response to the statements and allegations on Page 1 of 2 as marked by Mr. Anderson, Frontier acknowledges that Mr. Anderson has filed complaints with the Public Utilities Commissions of Ohio (PUCO). Frontier further admits that Mr. Anderson filed a formal complaint in Case No. 14-1299-TP-CSS which was dismissed by the PUCO after both parties reached a Confidential Settlement Agreement. Frontier specifically denies that it had done anything unethical or illegal and denies that it has provided substandard service, or charged improper billings. The remaining allegations contained on Page 1 are either personal in nature, lacking in detail, such as dates, names, or supporting documentation; therefore, Frontier lacks sufficient knowledge or information to form a belief as to the truth of allegations and denies all remaining allegations.

Page 3 of the Complaint

3. In response to the statements and allegations on Page 2 of 2 as marked by Mr. Anderson, Frontier admits that Mr. Anderson's service for account number 7409456410.2 was permanently disconnected due to nonpayment on August 18, 2017. At the time of disconnection in August 2017, the last payment received was nine months prior for \$15.96 posted on November 23, 2016 although originally due November 21, 2016. Frontier further admits this account was referred for collection activities with a balance of \$182.11. Frontier has no record of any additional payments made between November 23, 2016 through March 9, 2018; therefore, the balance remains \$182.11. Frontier specifically denies that it had done anything unethical or illegal and denies that it has provided substandard service, or charged improper billings. The remaining allegations contained on Page 2 are either personal in nature, lacking in details such as

dates, names, or supporting documentation and subsequently overly broad; therefore, Frontier lacks sufficient knowledge or information to form a belief as to the truth of allegations and denies all remaining allegations.

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4. In response to the fourth unnumbered page, Frontier denies that it sent the attached letter and therefore denies any intended allegations that may be directed at Frontier. Responding further, the November 12, 2017 letter speaks for itself.

5. Frontier denies all allegations not expressly admitted herein.

B. AFFIRMATIVE DEFENSE

1. The Complaint fails to allege any violation of any rule(s), regulation(s) or law(s) that would constitute a violation of any sort, or any unlawful action, and thus, the Complaint should be dismissed.

2. Complainant's allegations regarding internet service is not within the Commission's jurisdiction, as that service is not regulated.

3. 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.

By: /s/ Michele L. Noble
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer and Affirmative Defenses of Frontier Communications was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, on March 12, 2018.

James Anderson
147 E. College Street
Scio, Ohio 43988

Complainant

/s/ Michele L. Noble

Michele L. Noble

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in

Case No(s). 18-0301-TP-CSS

Summary: Answer electronically filed by Michele L Noble on behalf of Frontier North Inc.