BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of)
Lonnie R. Stephen,)
Complainant,	
)
V.) Case No. 18-0335-TP-CSS
)
Windstream Ohio, Inc.,)
)
Respondent.)

ANSWER OF RESPONDENT WINDSTREAM OHIO, INC. TO THE COMPLAINT OF LONNIE R. STEPHEN

Now comes Respondent Windstream Ohio, Inc. ("Windstream"), and for its Answer to the Complaint states as follows:

- 1. Windstream denies or denies for lack of knowledge all allegations of the Complaint.
- 2. Windstream has breached no legal duty owing Complainant and its service and practices at all relevant times have been in full compliance with all applicable provisions of law and accepted standards within the telephone industry.
- 3. The Complaint fails to state reasonable grounds for proceeding to hearing as required by Ohio Revised Code § 4927.21.

WHEREFORE, Windstream respectfully requests that the Commission dismiss the Complaint and grant all other necessary and proper relief to which Windstream is entitled.

Respectfully Submitted,

/s/William A. Adams

William A. Adams, Counsel of Record BAILEY CAVALIERI LLC 10 West Broad Street, Suite 2100 Columbus, OH 43215-3422 (614) 229-3278 (telephone) (614) 221-0479 (fax) wadams@baileycav.com Attorneys for Respondent Windstream Ohio, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served by regular U.S. Mail, postage prepaid, this 16th day of March, 2018, upon:

Lonnie R. Stephen 6444 Cubbison Road Cumberland, OH 43732

<u>/s/William A. Adams</u>

William A. Adams, Counsel of Record

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in

Case No(s). 18-0335-TP-CSS

Summary: Answer of Respondent Windstream Ohio, Inc. to the Complaint of Lonnie R. Stephen electronically filed by Mr. William A. Adams on behalf of Windstream Ohio, Inc.