

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Pay                   :  
Tel Communications, Inc. for a Waiver of            : Case No. 18-0917-TP-WVR  
Section 4901:1-6-22 of the Ohio                   :  
Administrative Code                                   :

---

**PAY TEL COMMUNICATIONS, INC'S MOTION FOR EXTENSION OF TIME TO  
COMPLY WITH  
SECTION 4901:1-6-22 OF THE OHIO ADMINISTRATIVE CODE**

---

NOW COMES Pay Tel Communications, Inc. ("Pay Tel"), pursuant to Ohio Administrative Code ("O.A.C.") §4901-1-12 and §4901-1-13, and file this Motion requesting that the Public Utilities Commission of Ohio ("PUCO" or "Commission") GRANT a thirty (30) day extension of time in order to allow Pay Tel to comply with the changes made to O.A.C. 4901:1-6-22. A memorandum in support of this Motion is attached hereto.

Respectfully Submitted,

/s/ Justin M. Dortch

Justin M. Dortch (0090048)

Richard R. Parsons (0082270)

Michael D. Dortch (0043897)

KRAVITZ, BROWN, & DORTCH, LLC

65 East State Street, Suite 200

Columbus, Ohio 43215

Phone (614) 464-2000

Fax: (614) 464-2002

E-mail: [jdortch@kravitzllc.com](mailto:jdortch@kravitzllc.com)

[mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)

[rparsons@kravitzllc.com](mailto:rparsons@kravitzllc.com)

Attorneys for Applicant

PAY TEL COMMUNICATIONS, INC

## **Memorandum In Support**

### **I. MATERIAL FACTS**

On September 5, 2014, the Public Utilities Commission of Ohio (“Commission” or “PUCO”) opened Case No. 14-1554-TP-ORD. The purpose of Case No. 14-1554-TP-ORD was to review Telephone Company Procedures and Standards under O.A.C. §4901:1-6 (“TP-ORD Case”). The TP-ORD Case amended Ohio Administrative Code (“O.A.C.”) §4901:1-6-22. O.A.C. §4901:1-6-22 regulates Inmate Operator services (“IOS”). Pay Tel Communications, Inc. (“Pay Tel”) provides IOS in the state of Ohio. Pay Tel did not receive notice that the TP-ORD Case had been filed.

On May 14, 2018, the Joint Committee of Agency Rule Review (JCARR”) approved the proposed changes to O.A.C. §4901:1-6-22. On May 17, 2018, Pay Tel became aware of the rule changes to O.A.C. §4901:1-6-22 via a regulatory briefing (“Briefing”) it received from its consultants, Inteserra Consulting Group, Inc.

On May 23, 2018, Pay Tel filed its Application for Waiver of Section 4901:1-6-22 of the Ohio Administrative Code in Case No. 18-0917.TP-WVR (“Application”). In its Application, Pay Tel notified this Commission that it intended to comply with the changes made to O.A.C. §4901:1-6-22. However, it believed that it believe good cause existed to allow Pay Tel additional time in order to meet the new requirements of O.A.C. §4901:1-6-22. Therefore, Pay Tel Application sought an additional forty-five (45) days in which to review the new requirements and to comply with these new requirements.

### **II. LAW & ARGUMENT**

O.A.C. §4901-1-12 and §4901-1-13 allow for an extension of time to be granted to a party if good cause can be shown for why such an extension of time should be granted. Pay Tel

has good cause to request an extension of the Waiver requested in its Application. Specifically, Pay Tel wants to ensure that it is in compliance with all of the changes made to O.A.C. §4901:1-6-22. Pay Tel has been working diligently, since it filed its Application, to become compliant with O.A.C. §4901:1-6-22. In fact, Pay Tel has been able to successfully set its new rates under O.A.C. §4901:1-6-22. However, Pay Tel is still working to complete the changes necessary to its tariff, voice prompts, and branding that are required by the changes to O.A.C. §4901:1-6-22. These changes will be made during the requested extension. Pay Tel will notify this Commission when these changes have been completed.

### **III. CONCLUSION**

For the reasons stated, Pay Tel respectfully request that this Commission GRANT its Motion and permit Pay Tel an additional thirty (30) days to come into compliance with the changes made to O.A.C. §4901:1-6-22.

Respectfully Submitted,

/s/ Justin M. Dortch

Justin M. Dortch (0090048)

Richard R. Parsons (0082270)

Michael D. Dortch (0043897)

KRAVITZ, BROWN, & DORTCH, LLC

65 East State Street, Suite 200

Columbus, Ohio 43215

Phone (614) 464-2000

Fax: (614) 464-2002

E-mail: [jdortch@kravitzllc.com](mailto:jdortch@kravitzllc.com)

[mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)

[rparsons@kravitzllc.com](mailto:rparsons@kravitzllc.com)

Attorneys for Applicant

PAY TEL COMMUNICATIONS, INC

## **CERTIFICATE OF SERVICE**

I hereby certify that the PUCO's e-filing system will serve notice of this filing upon all parties and the Staff of the Public Utilities Commission of Ohio.

/s/ Justin M. Dortch

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/9/2018 4:26:58 PM**

**in**

**Case No(s). 18-0917-TP-WVR**

Summary: Motion Pay Tel's Motion for an Extension of Time electronically filed by Mr. Justin M Dortch on behalf of Pay Tel Communications, Inc