

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of	)	
Bizcorp, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 18-1123-TP-CSS
	)	
Windstream,	)	
	)	
Respondent.	)	

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**ANSWER OF RESPONDENT WINDSTREAM TO THE COMPLAINT OF  
COMPLAINANT BIZCORP, LLC**

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Now comes Respondent Windstream ("Windstream"), and for its Answer to the Complaint of Complainant Bizcorp, LLC, ("Bizcorp") states as follows:

First Defense

1. Windstream admits that Bizcorp was its customer and properly disconnected service effective November 20, 2016. Bizcorp has failed to pay Windstream for amounts due through the disconnection date. Windstream denies or denies for lack of knowledge all remaining allegations of the Complaint.

Second Defense

2. The Public Utilities Commission of Ohio ("Commission") lacks subject matter jurisdiction over some or all of the services in the Complaint pursuant to Ohio Revised Code § 4905.02.

Third Defense

3. Bizcorp has failed to set forth reasonable grounds for the Complaint.

Fourth Defense

4. Windstream has breached no legal duty owing to Bizcorp and its services and practices at all relevant times have been in full accordance with the applicable provisions of law and accepted standards within the telephone industry.

Fifth Defense

5. Windstream reserves the right to raise further defenses based upon the results of further investigation and discovery.

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

Respectfully submitted,

/s/ William A. Adams

William A. Adams, Counsel of Record

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*Attorneys for Respondent Windstream*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing *Answer of Respondent Windstream* was served this 2<sup>nd</sup> day of August, 2018, by regular U.S. Mail upon Complainant as follows:

Bizcorp, LLC  
c/o John Chaffin, President  
1335 Dublin Road, Suite 118-A  
Columbus, OH 43215

/s/ William A. Adams  
William A. Adams, Counsel of Record

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

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**Case No(s). 18-1123-TP-CSS**

Summary: Answer of Respondent Windstream to the Complaint of Complainant Bizcorp, LLC  
electronically filed by Mr. William A. Adams on behalf of Windstream