

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Commission’s Review of Chapter)
4901:1-6 of the Ohio Administrative Code, Regarding) Case No. 14-1554-TP-ORD
Telephone Company Procedures and Standards.)**

REPLY COMMENTS OF AT&T OHIO

The Ohio Bell Telephone Company (“AT&T Ohio”) hereby submits its reply comments on the Commission’s July 2, 2019 proposal to make additional revisions to Ohio Adm. Code 4901:1-6-02, 4901:1-6-07 and 4901:1-6-21. In these reply comments, AT&T Ohio addresses the initial comments filed by the Ohio Telecom Association (“OTA”), the Ohio Cable Telecommunications Association (“OCTA”), and the Consumer Groups.

Proposed Deletion of Rules 21(F) and (G)

The OTA and the OCTA both support the proposed deletion of Rules 21(F) and (G). OTA, pp. 2-4; OCTA, p. 3. AT&T Ohio supports this position. The Consumer Groups do not oppose the deletion of these provisions, but they suggest other objectionable provisions, addressed below.

Proposed Rule 7(J)

The OTA and the OCTA both support the proposed deletion of Rule 7(J). AT&T Ohio supports this position. The Commission cannot, and should not, impose additional, or different, regulations on the withdrawal of “voice service.”

Proposed Rule 2(C)

Both the OTA and the OCTA recognize the problems associated with the proposed changes to Rule 2(C). OTA, p. 4; OCTA, p. 3. The proposed language exceeds the Commission's authority and should not be adopted.

Additional Proposals of the Consumer Groups

The Consumer Groups propose that a separate mailing be required for the customer notice announcing the prospective withdrawal of basic local exchange service ("BLES"). Consumer Groups, p. 2. This proposal is outside the scope of this phase of the proceeding, which is limited to the edits proposed in the July 2, 2019 Entry. Entry, July 2, 2019, ¶ 6. Substantively, Rule 7 thoroughly addresses all of the various customer notice requirements. The requirements applicable to a withdrawal of BLES should not be revisited here.

The Consumer Groups also propose that the "willing provider" process of Rule 21(E) be applied to the provider of voice service that succeeds the provider of BLES by expanding Rule 7(J). Consumer Groups, p. 3. The three other commenting parties unanimously agree that Rule 7(J) should not be adopted. Here, the Consumer Groups would impose other objectionable COLR-like requirements on the providers of voice service. Consumer Groups, pp. 3-4. These, too, would exceed the Commission's authority under the law.

While the Consumer Groups argue that VoIP should be "treated the same" as BLES in this context (Consumer Groups, p. 4), the General Assembly and the Commission have already made the policy decision to differentiate those two services. If the Consumer Groups' suggestion

is limited to the Commission simply assisting customers of voice service providers in finding another provider, that would not be objectionable.

Conclusion

The Commission should adopt the suggestions of AT&T Ohio, OTA, and OCTA and should reject those made by the Consumer Groups.

Dated: July 26, 2019

Respectfully submitted,

AT&T OHIO

By: /s/ Mark R. Ortlieb

Mark R. Ortlieb (94118)
AT&T Ohio
225 West Randolph Street, Floor 25D
Chicago, IL 60606
312-727-6705
mo2753@att.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of **REPLY COMMENTS OF AT&T OHIO** has been served this 26th day of July 2019, by e-mail and/or U.S. Mail on the parties shown below.

/s/ Mark R. Ortlieb

Mark R. Ortlieb

Jeffrey Jones
Jay Agranoff
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215
Jeffrey.jones@puc.state.oh.us
Jay.agranoff@puc.state.oh.us

Christen M. Blend
American Electric Power Service
Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
cmblend@aep.com

Patrick M. Crotty
Cincinnati Bell Telephone Co.
221 East Fourth Street, Suite 1090
Cincinnati, OH 45202
Patrick.crotty@cinbell.com

Frank Darr
McNees Wallace & Nurick LLC
21 E. State Street, 17th Floor
Columbus, OH 43215
fdarr@mwncmh.com

Terry L. Etter, Bruce J. Weston
Ohio Consumers
65 East State Street, 7th Floor
Columbus, OH 43215
Terry.etter@occ.ohio.gov

William Haas
T-Mobile
2001 Butterfield Road
Downers Grove, IL 60515
william.haas@t-mobile.com

Gretchen L. Petrucci
Michael J. Settineri
Vorys, Sater, Seymour Pease
52 East Gay Street
Columbus, OH 43216
glpetrucci@vorys.com
mjsettineri@vorys.com

Ellis Jacobs
Advocates for Basic Legal Equality
Inc.
130 W. Second St, Ste 700 East
Dayton, OH 45402
ejacobs@ablelaw.org

Peggy Lee
Southeastern Ohio Legal Services
964 East State Street
Athens, OH 45701
plee@oslsa.org

Glenn S. Richards
Voice On The Net Coalition
1200 Seventeenth St., NW
Washington, D.C. 20036
Glenn.richards@pillsburylaw.com

Barth E. Royer
Barth E. Royer, LLC
2740 East Main Street
Bexley, OH 43209
BarthRoyer@aol.com

Kathy L. Buckley
Verizon
4700 MacCorkle Avenue SE, Box 3
Charleston, WV 25304
Kathy.L.Buckley@verizon.com

Michael Walters
Pro Seniors, Inc.
7162 Reading Road, Suite 1150
Cincinnati, OH 45237
mwalters@proseniors.org

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/26/2019 4:06:38 PM

in

Case No(s). 14-1554-TP-ORD

Summary: Reply REPLY COMMENTS OF AT&T OHIO electronically filed by Mr. Mark R Ortlieb on behalf of AT&T Ohio and Ohio Bell Telephone Company