

Frank Darr

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June 29, 2020

Ms. Tanowa Troupe
Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Case No. 20-1139-TP-WVR; letter of support for waiver request from Ohio Telecom Association

Dear Madame Secretary:

The Public Utilities Commission of Ohio (Commission) is currently considering a request by AT&T Ohio for a waiver of Rule 4901:1-6-15(B) of the Ohio Administrative Code to make available upon request a printed telephone directory. The Ohio Telecom Association (OTA) supports the waiver request.

OTA is a statewide trade association that promotes the common interests of telecommunications companies serving and employing Ohioans. The OTA currently represents 41 telecommunications providers, two wireless providers, and over 100 associate member companies that supply goods and services to the telecommunications industry. In total, the OTA member companies employ more than 16,000 Ohioans.

Ohio law does not mandate the provision of a printed directory to customers receiving basic local exchange service. Although R.C. 4927.01(A)(1) defines basic local exchange service to include “[p]rovision of a telephone directory,” it does not mandate the form. Instead, the directory may be provided in any reasonable format. The Commission, however, has by rule required that a printed directory be made available upon request. Because the requirement for the provision of a printed directory on request is not statutorily mandated, the Commission may waive the rule for good cause. Rule 4901:1-6-02(E).

It is understood that customers need access to directory information to realize the benefits of basic local exchange and bundled telecommunications services. To meet that need, many electronic versions of directories have emerged and replaced printed directories. As a result, the demand for a printed directory is such that the costs associated with making one available on request may no longer be justified.

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As shown by the application in this case, new forms may make the printed directory obsolete and cost prohibitive. Accordingly, OTA supports the request for waiver filed by AT&T Ohio.

Sincerely,

/s/ Frank P. Darr

Frank P. Darr
General Counsel
Ohio Telecom Association

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Summary: Correspondence Letter in support of waiver application of AT&T Ohio electronically filed by Frank P. Darr on behalf of Ohio Telecom Association