

FILE



Crown Castle Fiber  
196 Van Buren Street  
Suite 250  
Herndon, VA 20170

July 22, 2020

90-6429 TP-TRF

Brian Benjamin  
Public Utilities Commission of Ohio  
Business Resources – Finance and Services  
180 East Broad Street  
Columbus, OH 43215

RE: Ohio Telephone Relay Services Reporting Form (“TRS”)  
Docket 90-6429

Dear Mr. Benjamin:

Crown Castle Fiber LLC (“CCF”) respectfully informs the Public Utilities Commission of Ohio, (“PUCO”) that based on 4901:1-6-36 ORC and 47 U.S.C. § 225, Crown Castle Fiber LLC is not required to file TRS because Crown Castle Fiber LLC does not provide services that are competitive with or functionally equivalent to voice-grade or telephone voice transmission services.

Therefore, it is CCF’s understanding that it is exempt from filing the Annual Telephone Relay Services Reporting Form. Please see email attached dated March 28, 2019 from you confirming CCF is exempt from filing the TRS Reporting Form.

In light of the foregoing, CCF respectfully requests the PUCO accept this one-time letter in lieu of the Annual Telephone Relay Services Reporting Form.

For questions related to this letter, please contact the undersigned. Thank you.

Very truly yours,

Fernanda Hilb Biehl  
Mgr. Regulatory Affairs  
E: [Fernanda.Biehl@crowncastle.com](mailto:Fernanda.Biehl@crowncastle.com)  
T: (703) 434-8533  
cc: [anna.sanyal@puco.oh.gov](mailto:anna.sanyal@puco.oh.gov)

Attachment

2020 AUG 26 AM 11:17  
PUCO

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
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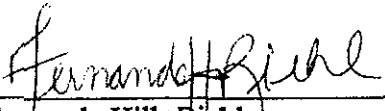
The pathway to possible.  
[Fiber.CrownCastle.com](http://Fiber.CrownCastle.com)



## DECLARATION/ATTESTATION

I, Fernanda Hilb Biehl, Mgr. Regulatory Affairs, of Crown Castle Fiber LLC, to the best of my knowledge and belief, declare and attest to the following statements:

1. CCF does not provide services that are competitive with or functionally equivalent to voice grade pursuant to 4901:1-6-36 ORC;
2. CCF does not provide telephone voice transmission services pursuant to 47 U.S.C. § 225; and CCF is not required to provide telecommunications services because CCF does not provide the services covered by 4901:1-6-36 ORC and 47 U.S.C. § 225

  
\_\_\_\_\_  
Fernanda Hilb Biehl  
Mgr. Regulatory Affairs

Date: July 10, 2020



**From:** [Brian.Benjamin@puco.ohio.gov](mailto:Brian.Benjamin@puco.ohio.gov) <[Brian.Benjamin@puco.ohio.gov](mailto:Brian.Benjamin@puco.ohio.gov)>

**Sent:** Thursday, March 28, 2019 9:13 AM

**To:** McClinton, Carla <[Carla.McClinton@crowncastle.com](mailto:Carla.McClinton@crowncastle.com)>

**Cc:** Biehl, Fernanda <[Fernanda.Biehl@crowncastle.com](mailto:Fernanda.Biehl@crowncastle.com)>

**Subject:** Crown Castle Fiber TRS

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I'm writing to confirm that the requirement to file a 2018 TRS Report was fulfilled this year via the letter received. IT has been instructed to cancel the filing in the system.

Thank you,

**Brian Benjamin**

Public Utilities Commission of Ohio

Business Resources

Finance and Services - Financial Manager

(614) 387-1511

[www.PUCO.ohio.gov](http://www.PUCO.ohio.gov)



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