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# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

EADS FENCE COMPAN	ΙΥ,	)
	Complainant	)
V.		) Case No. 99-157-TP-CSS
AMERITECH		)
	Respondent	) ) )

## ANSWER OF AMERITECH OHIO

Now comes Respondent The Ohio Bell Telephone Company, doing business as "Ameritech Ohio," and for its answer states as follows:

#### First Defense

- 1. It admits the allegations of paragraph 1 of the Complaint.
- 2. It denies the allegations of paragraph 2 of the Complaint.
- 3. It admits the allegations of paragraph 3 of the Complaint.
- 4. It admits that, effective February, 1998, the Complainant ordered remote call forwarding from the Dayton area to the Cincinnati area at a monthly charge of \$18.45 and that the Complainant increased its Yellow Pages advertising.

- 5. It admits the allegations of paragraph 5 of the Complaint.
- 6. It admits that the Complainant contacted it on May 18, 1998, and complained that the remote call forwarding was not functioning.
- 7. It admits that the Complainant contacted it on June 4, 1998, and complained that the remote call forwarding was not functioning and that the complainant was receiving no calls from the Dayton area, whereas calls had been received in the past on a collect call basis.
- 8. It admits that the Complainant contacted it on July 30, 1998, to complain that the remote call forwarding was not working and that the remote call forwarding feature was repaired on that date.
- 9. It is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9 of the Complaint.
- 10. It admits that the Complainant ordered, was billed for, and originally paid for the remote call forwarding service, denies that it was negligent, is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 10 of the Complaint as to the injury alleged, and denies that the service provided to the Complainant was unreasonable, unjust, insufficient, unjustly discriminatory, unjustly preferential, or inadequate.

## Second Defense

11. The Complainant's account was credited as required by law.

#### Third Defense

12. The Complaint fails to allege any violation of applicable law.

#### Fourth Defense

13. The Complaint fails to state reasonable grounds for proceeding to hearing as required by Ohio Rev. Code § 4905.26.

WHEREFORE, having fully answered, Respondent prays that the Complaint be dismissed.

Respectfully submitted,

The Ohio Bell Telephone Company

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**CERTIFICATE OF SERVICE** 

A copy hereof was mailed to counsel for the Complainant on the \_\_\_\_\_\_ day of

Monas A. Linton, Jan