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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO AUG 20 1996

DOCKETING DIVISION  
Public Utilities Commission of Ohio

James P. Woodman, )  
Complainant ) Case No. 96-751-TP-CSS  
v. )  
Ameritech Ohio, )  
Respondent. )

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ANSWER OF AMERITECH OHIO

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Ameritech Ohio, for its Answer to the Complaint filed against it, states as follows:

FIRST DEFENSE

1. Ameritech Ohio denies the allegations contained in the complaint except those allegations expressly admitted herein. Ameritech Ohio further denies that it has failed to provide any required notice or that it has violated its tariff or any statute, rule or regulation in connection with any customer notice, service or rates charged to any of the entities named in the complaint.

SECOND DEFENSE

2. Further answering, Ameritech Ohio asserts that Complainant is not a proper party to the complaint and has no standing, interest or right to bring the complaint. Moreover, Complainant is not an attorney licensed to practice law in Ohio and cannot bring this action on behalf of WeShare, Inc. and the trustees of WeShare, Inc. named in the complaint.

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THIRD DEFENSE

3. Further answering, Ameritech Ohio says that the Commission lacks jurisdiction to order billing refunds or to award any other form of damages to Complainant or the individuals named in the complaint.

FOURTH DEFENSE

4. Further answering, Ameritech Ohio says that it has breached no legal duty owing Complainant or the entities named in the complaint and that its service and practices at all relevant times have been in full accordance with all applicable provisions of law and accepted standards within the telephone industry.

FIFTH DEFENSE

5. Further answering, Ameritech Ohio says that the complaint fails to state reasonable grounds for proceeding to hearing as required by the provisions of Ohio Revised Code Section 4905.26.

SIXTH DEFENSE

6. Further answering, Ameritech Ohio says that the Commission lacks jurisdiction to entertain "citizen, taxpayer or informed donor" actions.

WHEREFORE, having fully answered, Respondent Ameritech  
Ohio respectfully prays that the complaint be dismissed.

Respectfully submitted,

AMERITECH OHIO

By: Michael T. Mulcahy  
Michael T. Mulcahy *MTM*

45 Erieview Plaza, Room 1400  
Cleveland, OH 44114  
(216) 822-3437  
Its Attorney

CERTIFICATE OF SERVICE

A copy of the foregoing Answer of Ameritech Ohio has been served on James P. Woodman, 1675 Woodward Avenue #1, Lakewood, OH 44107 by regular U.S. mail, postage prepaid, this 20th day of August, 1996.

*Michael T. Mulcahy* *JP*  
Michael T. Mulcahy