BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of: )

)

MILLERSVILLE CONSTRUCTION,

)

Complainant, )

)

v. ) Case No. 14-0366-TP-CSS

)

FRONTIER COMMUNICATIONS )

)

Respondent. )

**MOTION FOR LEAVE TO FILE ANSWER, *INSTANTER*,  
OF FRONTIER NORTH INC.**

Frontier North Inc., incorrectly identified as Frontier Communications on the Complaint (“Frontier”), by and through its attorneys, respectfully moves for leave to file, *instanter,* its Answer and Affirmative Defenses, attached as Exhibit “A” to this Motion. In support of its Motion, Frontier states that it did not have actual knowledge or receipt of Millersville Construction’s Complaint until March 26, 2014. For reasons unknown at this time, Frontier did not receive a copy of the Complaint through the United States mail, but only noticed the Complaint when searching for a different matter on the Commission’s website. Granting of this Motion will not serve to prejudice the Complainant or create undue delay.

WHEREFORE, Frontier respectfully requests that the Commission grant Frontier’s Motion and accept the Answer and Affirmative Defenses, attached as Exhibit A, for filing in the above-captioned case and treat it as timely filed.

Respectfully submitted,

FRONTIER NORTH INC.

By: /s/ Michele L. Noble

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Its Attorney

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon all parties listed below, by U.S. mail, this 28th day of March, 2014.

Millersville Construction

925 County Road 72

Helena, Ohio 43435

/s/ Michele Noble

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