

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

Aggressive Insurance)	
)	Case No. 07-1039-TP-CSS
Complainant,)	
)	
v.)	
)	
AT&T Ohio,)	
)	
Respondent.)	

ANSWER OF AT&T OHIO

Now comes AT&T Ohio, Respondent herein, and for its Answer to the Complaint filed by Aggressive Insurance states as follows:

1. AT&T Ohio admits that Aggressive Insurance is a customer.
2. AT&T Ohio avers that a disconnect notice was sent to Aggressive Insurance based on its standard practices and procedures.
3. AT&T Ohio admits that Aggressive Insurance paid a deposit on July 20, 2007 and made additional payments in August and September in the said amounts.
4. AT&T Ohio admits that it has denied Aggressive Insurance reimbursement of the deposit paid in July.

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5. AT&T Ohio avers that it is the Company's policy to keep a deposit until the customer has a perfect payment history for 12 straight months.
6. AT&T Ohio denies any other allegations of Aggressive Insurance not expressly admitted.
7. AT&T Ohio avers that it has breached no legal duty owing Aggressive Insurance 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.
8. The Complaint fails to state reasonable grounds for proceeding to hearing as required by §4905.26, Revised Code.

Wherefore, having fully answered, Respondent requests that the Complaint be dismissed.

Respectfully submitted,

AT&T Ohio

By: 

Mary Ryan Fenlon (Trial Attorney)

Jon Kelly

AT&T

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Columbus, Ohio 43215

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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on October 9,
2007 by first class mail, postage prepaid, on the following parties:

Aggressive Insurance
P.O. Box 1414
Coshocton, OH 43812


Mary Ryan Fenlon