

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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Ernst Enterprises, Inc.)
)
Complainant,)
)
v.) Case No. 07-1061-TP-CSS
)
ITS Communications and AT&T,)
)
Respondents.)

ANSWER OF AT&T OHIO AND AT&T COMMUNICATIONS OF OHIO, INC.

AT&T Ohio¹ and AT&T Communications of Ohio, Inc., for their Answer to the Complaint filed against them, state as follows:

1. AT&T Ohio and AT&T Communications of Ohio, Inc. provide wholesale service to Respondent ITS Communications, which is, in turn, resold by ITS to the Complainant.
2. The service in question is jointly-provided private line service that is provisioned by four underlying carriers: AT&T Ohio, AT&T Communications of Ohio, Inc., United Telephone Company of Ohio d/b/a Embarq, and Cincinnati Bell Telephone Company, LLC.
3. AT&T Ohio and AT&T Communications of Ohio, Inc. admit that trouble has been reported on the service at issue, but aver that they have responded reasonably to the trouble

¹ The Ohio Bell Telephone Company uses the name AT&T Ohio.

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reports and continue to do so as trouble is reported.

4. AT&T Ohio and AT&T Communications of Ohio, Inc. deny any allegation of the Complaint not specifically admitted.

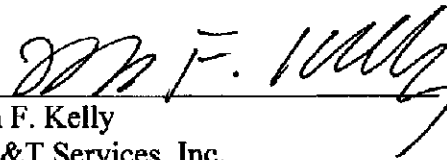
5. AT&T Ohio and AT&T Communications of Ohio, Inc say that they have breached no legal duty owing Complainant and that their service and practices at all relevant times have been in full accordance with all applicable provisions of law and accepted standards within the telephone industry.

WHEREFORE, having fully answered, Respondents AT&T Ohio and AT&T Communications of Ohio, Inc. respectfully pray that this Complaint be dismissed.

Respectfully submitted,

AT&T Ohio and AT&T Communications of
Ohio, Inc.

By:


Jon F. Kelly
AT&T Services, Inc.
150 E. Gay St., Room 4-A
Columbus, Ohio 43215

(614) 223-7928

Their Attorney

CERTIFICATE OF SERVICE


I hereby certify that a copy of the foregoing was served on October 16,
2007 by first class mail, postage prepaid, on the following parties:

Ernst Enterprises, Inc.

Robert Wehmeier
Chief Financial Officer
Ernst Enterprises, Inc.
3361 Successful Way
Dayton, OH 45414

ITS Communications

ITS Communications
Fritz Byam, Chief Operating Officer
4079 Park East Court
Grand Rapids, MI 49546



Jon F. Kelly