

FILE

10

BAILEY CAVALIERI LLC

ATTORNEYS AT LAW

RECEIVED-DOCKETING DIV

One Columbus 10 West Broad Street, Suite 2100 Columbus, Ohio 42315-3422
telephone 614.221.3155 facsimile 614.221.0479
www.baileycavalieri.com
direct dial: 614.229.3278
email: William.Adams@BaileyCavalieri.com

2008 APR 11 PM 4: 59

PUCO

April 11, 2008

VIA HAND DELIVERY

Ms. Renee Jenkins
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, OH 43215-3793

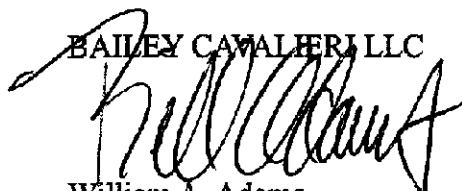
Re: *In the Matter of Windstream Western Reserve, Inc.'s Application For Out-of-Service Grace Period Under Minimum Telephone Service Standards., Case No. 08-258-TP-WVR*

Dear Ms. Jenkins:

Enclosed herewith are the original and eight (8) copies of Supplemental Documentation to be filed in the above-noted matter on behalf of Windstream Western Reserve, Inc. Please time-stamp the two (2) additional copies of this document and return them with our courier.

Thank you for your attention to this matter.

Very truly yours,

BAILEY CAVALIERI LLC

William A. Adams

WAA/sg

Enclosure

#553407v1
11228.03320

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician JS Date Processed 4-14-08

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Windstream Western Reserve,)
Inc.'s Application For Out-of-Service Grace Period)
Under Minimum Telephone Service Standards)

Case No. 08-258-TP-WVR

SUPPLEMENTAL DOCUMENTATION

Windstream Western Reserve, Inc. ("Windstream") filed an Application on March 14, 2008, seeking an additional forty-eight hour grace period to clear out-of-service trouble reports as a result of the recent severe ice and snow storms in Ashtabula and Lake Counties from March 4 through March 9, 2008. At the time the Application was filed, Windstream did not have all of the documentation sufficient to support the request. Pursuant to Rule 4901:1-5-08(D)(3), Windstream submits this supplemental documentation.

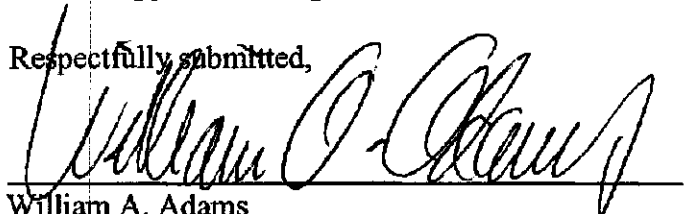
As set forth in the Application, Ashtabula and Lake County officials declared a state of emergency. The documentation of the state of emergency is attached as Exhibit A. In addition, the following chart shows each of the exchanges subject to the Application, the number of open out-of-service reports over 72 hours during the requested grace period, and the number of open out-of-service reports over 72 hours for the same time period for the prior three years:

Open Trouble Tickets over 72 hours				
Exchange	2008	2007	2006	2005
Ashtabula	111	0	0	0
Austinburg	1	0	0	0
Dorset	4	0	0	0
Kingsville	3	0	0	0
Pierpont	0	0	0	0
Geneva	3	1	0	0
Madison	1	0	0	0
Perry	0	0	0	0
Rockcreek	3	0	0	0
Trumbull	1	0	0	0
Total	127	1	0	0

Because only the Ashtabula Exchange had over ten open trouble reports, Windstream hereby withdraws the additional grace period request for all the other exchanges as required by Rule 4901:1-5-08(D)(2). The Ashtabula Exchange satisfies both of the alternative requirements for a state of emergency and a greater than 300% increase over the prior three-year average in accordance with Rules 4901:1-5-08(D)(1)(a) or (b).

WHEREFORE, Windstream requests that its Application be granted as modified herein.

Respectfully submitted,



William A. Adams
Counsel of Record
BAILEY CAVALIERI LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215-3422
(614) 229-3278 (telephone)
(614) 221-0479 (fax)
William.Adams@baileycavalieri.com
Attorneys for Windstream Western Reserve, Inc.

WATCHING 6
LIVE GAMES...

360
EMBRACE YOUR FANHOOD.

at&t

WKYC.COM

Report the Facts

NEWSWEATHERVIDEOSPORTSLIFECONTACT US

Search: All

Go

Find what you need
with our New Search!


CHANNEL 3 WEATHER PLUS BULLETIN: A WINTER STORM WATCH IS ACTIVE FOR ASHLAND, CRAWFORD, CUYAHOGA, ERIE, GEAUGA, HOLMES, HURON, LAKE, LORAIN, MEDINA, OTTAWA, RICHLAND, SANDUSKY, SENECA, SUMMIT AND WAYNE UNTIL SATURDAY AT 7:00 PM. THE FORECAST IS ALWAYS AVAILABLE ON WEATHER PLUS AND WKYC.COM

Homepage >> News >>

Ashtabula County Sheriff's Department issues state of emergency

Michael O'Mara
Marc Magill
Created: 3/5/2008 12:32:47 PM
Updated: 3/5/2008 8:15:58 PM

Video
Play
Video



Most popular stories

1. Ohio Primary: Click to

http://www.wkyc.com/news/news_article.aspx?storyid=84506&provider=gnews

3/6/2008



results

2. Winter Weather Advis
Click for radar



3. Ohio Primary: Clinton
Texas; Click fo



Most popular video

1. BREAKING NEWS: D
crumbling after
main break.



2. BREAKING NEWS: D
crumbling after
main break.



3. BREAKING NEWS: D
crumbling after
main break.



ASHTABULA COUNTY -- Ashtabula County Sheriff Billy Johnson says the county is in a state of emergency.

Fifty thousand people are currently without electricity and heat after Tuesday night's ice storm, according to a spokesperson from the Sheriff's Office.

Much of the county is basically at a stand still from the after effects of last night's snow storm and it will take a few days to get back to normal. There is a lot of ice and many wires and trees are down.

Ads by Google

People are advised not to be on the roads if they don't have to travel. If there is an emergency, they should call their local police, fire, EMS or sheriff's departments.

The damage is reportedly widespread.

Conneaut, Geneva and some of the other smaller towns are using all of their emergency personnel and will probably ask state and federal authorities for reimbursement.

Shelters are being opened on a case by case basis. Not many residents, however, have asked for that service yet.

Across the city of Ashtabula, the sound of chain saws echoed from neighborhood to neighborhood. The heavy coating of ice too much for thousands of tree limbs.

For some residents with homes encased in ice, the most reassuring sound was the drone of a nearby generator providing light and heat.

Carla Hague said that at the height of the storm, "you couldn't see out, but you could hear everything hitting the house. And you just wondered what kind of damage was done. We could hear the crunching and the falling limbs".

On E. 16th street, one of the utility poles is dangerously close to snapping as it leans across the road. The power lines already dragged down by the falling tree limbs.

Resident, Dave Good, looked out his window at the scene and told Channel 3's Mike O'Mara, "we're just sitting and waiting. I don't have a plan. Get all the kids under the blankets near the kerosene heaters and keep warm".

Chris Loveland took his family out for lunch for a meal and some warmth. They lost power about 10:30 last night.

Said Loveland, "and the lights and heat were still out when we woke up this morning. I think the thermostat said 49 degrees in the house".

Because of the widespread power failure, many residents used open flames for light and heat. Fire officials believe that a burning candle may have sparked an apartment fire. The blaze claimed one life. Six other residents were rescued.

Leppo Rent Equipment

Rent Low Cost Landscaping
& Tools 4 All Spring F

[www.leppos](http://www.leppos.com)

As the cleanup continues, utility crews have an exhausting list of emergencies to cope with all across the county.

Repair crew member, Mameka Parns, said "this is terrible, just terrible. I've never seen anything like it ever".

© 2008 WKYC-TV

Story tools

- E-mail This Article
- Printable Version
- Submit your news photo
- Upload video and pictures to wkyc.com

Search

Search

Weather

- Local radar | Animation
- 5-day forecast | Live weather video
- iAlert school closings

You a Wellness Champion?

AKRON GENERAL



Ashtabula County Sheriff's Department issues state of emergency

Registry Cleaner Download
Free, Safe Registry Scan, Winner
of Fix PC Errors. Improve Speed
Now!
www.NetCom3.com

Top 5 Spyware Removers
Compare and Download the 5 Top
Spyware Removers 100% Free.
www.SpywareRemoverComparisonsMins.com

Speed Up Windows XP
Fix PC, Remove Errors. Clean
System Complete Scan. Takes 6
mins.
www.ErrorSmart.com

Remove all Spyware - Free
Fix Your PC. You Can Detect And
Remove All Adware And Spyware
www.AntiSpyware.com

Ads by Google

Up to a foot could fall; salt supplies dwindle

MICHAEL SCOTT
MICHAEL SANGIACOMO
AND SARAH HOLLANDER
Plain Dealer Reporters

Strike three...we're out.

Almost out of salt, mostly out of school snow days and pretty much out of luck lately when it comes to dodging snowstorms.

And just maybe out of patience for a winter that keeps coming back for more.

The entire state of Ohio is being battered today by the third late-winter snowstorm to come up out of the South in the last 12 days — and this one might drop more than a foot of snow by Sunday.

In fact, the region is under a blizzard watch until 7 p.m. today, the National

Weather Service said. If that happens, it could be the first true blizzard — a storm with three hours straight of 35 mph winds and quarter-mile visibility — in the last 15 years, weather officials said.

"This is an all-out snow event, unlike the last two, which had the rain and icy rain mixed in," said meteorologist Brian Mitchell of the National Weather Service office at Cleveland Hopkins International Airport. "And with high winds and snow up to a foot, Saturday is probably going to be even worse."

Even worse? That's hard to imagine after Friday's afternoon storm soon turned into a long winter's nightmare — especially for Ashtabula and eastern Lake County.

SEE SNOW 1 B6

POWER

FROM B1

The biggest disaster we ever had

Tuesday's ice storm left 55,000 customers without electricity for nearly three days. Ice-laden tree limbs decorated streets across Ashtabula where power lines dangled dangerously against many buildings and roads.

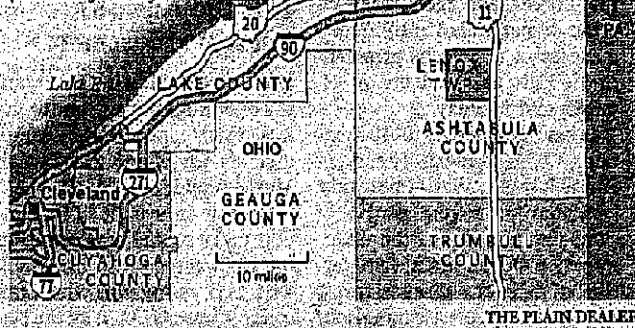
Ashtabula County commissioners declared a state of emergency Wednesday afternoon. That remains in effect today.

"It could get worse because these branches are weak," Ashtabula County Emergency Management spokesman Byron Landolfi said. "More people could lose power."

On Friday, 11,000 residents in Ashtabula and 5,000 in Lake and

Ashtabula still without power

Ashtabula County was slammed Tuesday by one of the worst ice storms to ever hit Ohio. More than 55,000 customers were without power Wednesday and Thursday, and on Friday many residents were still without power. FirstEnergy linemen are trying to restore power by today.



Geauga County were coping with the frustrations of a forced back-to-basics lifestyle with no refrigeration, no heat and no lights.

FirstEnergy Corp. dispatched 350 crews to those areas.

Ashtabula firefighters carried chainsaws on their trucks to cut

through downed trees before they could answer fire calls, the chief said.

Michelle Titus, 33, of North Madison, is a clerk at the Ready Go Food Mart where residents in a near panic were snatching up everything from bleach to beer to prepare for the oncoming storm.

She said the store has been selling 100 pots of coffee daily since the ice storm, far more than usual.

"I am really tied of this," said Titus, who said they called the power company repeatedly only to hear they were on their way.

Ashtabula residents were expressing similar frustrations.

"We waited and waited and waited and still no electricity," said Roy Dixon, who kept warm with a kerosene heater until power returned Thursday.

Bob and Ida Owens of Lenox Township huddled around a generator until their power

kicked on at 5 p.m. Thursday.

"It's the worst ice storm I've seen for quite a few years," said Bob Owens, who is an electrician. "We lost a lot of limbs from our big pine trees."

Owens said the generator was necessary to keep their refrigerator and well water running.

In Conneaut, one of the hardest hit areas, Heather McQueeney had to dodge a giant tree that shattered her windshield.

"We were one of the lucky ones," she said, adding that her power was out for about five hours. She invited neighbors in for hot meals the last two days.

The Red Cross set up sheltering locations Friday night for residents still without power. The locations will remain open today.

In Lake County, the Madison Senior Center served as a shelter for residents seeking a warm place to stay. The shelter closed Friday when power was restored

to most residents.

Madison officials were told most of the township would have power restored by midnight.

Madison District Fire Chief Walt Zilke said his department had rushed to six different homes in the last few days to rescue families overcome by carbon monoxide fumes. On Wednesday, the department rushed 13 family members to the hospital after a power generator and fireplace filled the home with fumes.

In Ashtabula, the Red Cross had fielded more than 1,000 calls for help and sheltered about 300 people at school and at City Hall.

FirstEnergy spokeswoman Tricia Ingraham said crews arrived from Toledo, Pennsylvania, Cleveland and Akron. She said they hope to have all power restored by noon today.

To reach this Plain Dealer reporter: mmartin@pland.com, 216-999-3534