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August 22, 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 the Amendment of the Minimum Telephone Service Standards
As Set Forth in Chapter 4901:1-5 of the Ohio Administrative Code*
Case Nos.: 00-1265-TP-ORD and 05-1102-TP-ORD

Dear Ms. Jenkins:

Enclosed herewith are the original and seven (7) copies of the comments of Windstream Ohio, Inc. and Windstream Western Reserve, Inc. to the Commission's July 31, 2008 Entry for filing in the above-captioned matter. Please file stamp the two (2) additional copies of the Comments 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

cc(w/enclosure): Per the Attached Service List

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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of the)	
Minimum Telephone Service Standards)	Case No. 00-1265-TP-ORD
As Set Forth in Chapter 4901:1-5 of the)	Case No. 05-1102-TP-ORD
Ohio Administrative Code)	

**COMMENTS OF WINDSTREAM OHIO, INC. AND WINDSTREAM WESTERN
RESERVE, INC. TO THE COMMISSION'S JULY 31, 2008 ENTRY**

Windstream Ohio, Inc. and Windstream Western Reserve, Inc. (collectively, "Windstream") hereby submit these Comments on the proposed changes to Ohio Administrative Code § 4901:1-5-10 ("Rule 10") pursuant to the Commission's July 31, 2008 Entry. Windstream supports the proposed changes to Rule 10 for the reasons set forth in these Comments and also concurs in the Comments of Ohio Telecom Association ("OTA") filed this date.

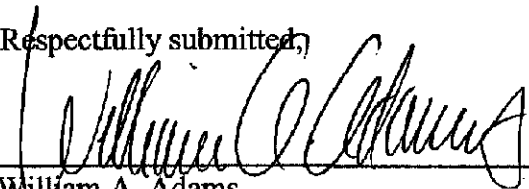
The proposed Rule 10 is the result of OTA's permanent blanket waiver filing of March 20, 2008, which Windstream supported at that time. The IT system changes that would have been required in order to separate basic local exchange service from other bundled services in the disconnection process and billing systems would require significant IT hours and additional costs to implement. The additional requirement to separate the primary access line from additional access lines added further complexity and costs to the required changes. While the Commission's May 14, 2008 Entry in this case removed the requirement to separate the primary access line, the requirement to separate the basic access line from all other regulated services was maintained.

Windstream previously met with the Commission Staff to address these issues. While eliminating the requirement to separate the primary access line was a significant improvement,

Windstream still faced costs to make the other requisite system changes. These unnecessary costs would benefit only a very small number of customers.

Windstream strongly supports the revisions to Rule 10 proposed in the Commission's July 31, 2008 Entry for the reasons set forth in these Comments and the OTA Comments and urges the Commission to approve the changes. The proposed Rule 10 changes place Windstream on a level playing field with its competitors regarding disconnection practices.

Respectfully submitted,



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Counsel of Record

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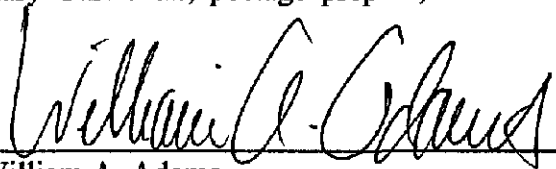
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Attorneys for Windstream Ohio, Inc. and
Windstream Western Reserve, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon all parties on the attached service list, by ordinary U.S. Mail, postage prepaid, this 22nd day of August, 2008.



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