

MEMORANDUM

TO: Richard Wheeler, Esq.
One Communications
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FROM: Robbin Russell
Public Utilities Commission of Ohio
Telecommunications Division
Robbin.russell@puc.state.oh.us

RE: In the matter of the Application of CTC Communications Corporation d/b/a One Communications to Provide Resold Local Exchange and Inter-exchange Telecommunications Services
Case No. 09-0698-TP-ACE; 90-6388-TP-TRF

In the Matter of the Application of Conversant Communications Resale L.L.C. d/b/a One Communications to Provide Resold Local Exchange and Inter-exchange Telecommunications Services
Case No. 09-0699-TP-ACE; 90-XXXX-TP-TRF

Application Revisions – 1st Data Request

DATE: August 21, 2009

DUE: August 25, 2009

After careful review of the CTC Communications Corporation d/b/a One Communications and Conversant Communications Resale L.L.C. d/b/a One Communications applications several issues need to be addressed before approval can be completed. The issues addressed below just pertain to the application in general, additional tariff revision will follow. The application issues are as follows:

Application:

1. CTC Communications Corporation d/b/a One Communications ("CTC") filed to abandon its CLEC certification in Case No. 08-1216-TP-ABN (November 24, 2008), why is the company now asking to be certified as a CLEC again?

CTC is requesting to be certified again for two primary business reasons. First, since the merger that created One Communications ("ONE"), the company has worked to integrate the various the back-end operational, financial and customer service systems. In order to accomplish this back-end consolidation, which will result in significant efficiencies and cost-savings, ONE needs to have a seamless regulatory footprint; as such, where our legacy companies are not certificated, we are filling in the gaps. ONE has recently received CLEC certifications in Illinois, Michigan, Wisconsin, Indiana, Vermont and Washington, DC.; the Company have applications pending in Maryland, Virginia, and Delaware.

Secondly, at the time it abandoned its prior CLEC certification in Case No. 08-1216-TP-ABN, CTC had no customers in Ohio, and did not intend to solicit any. Since that time, circumstances and market factors have changed. As a result, the business decision has been made for CTC to solicit local customers in Ohio.

2. One Communications Corporation, the parent company of the CTC Communications Corporation d/b/a One Communications and Conversant Communications Resale L.L.C. d/b/a One Communications, already has a subsidiary, Choice One Communications of Ohio, Inc. d/b/a One Communications (Choice-One), that currently has CLEC certification in Ohio (Case No. 99-724-TP-ACE; 90-9082-TP-TRF). The two pending certification applications are proposing to offer the same or similar services in the same service area as Choice-One. Please explain the rationale for having three companies in the same service that are offering the same or similar services.

Since the merger that created One Communications ("ONE"), the company has worked to integrate the various the back-end operational, financial and customer service systems. In order to accomplish this back-end consolidation, which will result in significant efficiencies and cost-savings, ONE needs to have a seamless regulatory footprint; as such, where our legacy companies are not certificated, we are filling in the gaps. ONE has recently received CLEC certifications in Delaware, Illinois, Indiana, Maryland, Michigan, Vermont, Virginia, Washington, DC and Wisconsin.

3. Exhibit G – The Applicant does not have to offer service to a residential customer that wishes to purchase service. This rule only applies to Incumbent Local Exchange Carriers (ILEC) and not Competitive Local Exchange Carriers (CLEC).

As such, if the Applicant only intends to initially offer service to business customers, please revise these applications to reflect that intent.

See Attachment # 1 revised Exhibit G provided as a separate attachment sent via email (previously provided, but provided again for convenience of staff).

4. Exhibit I – Please provide a Certificate of Good Standing for Conversant Communications Resale L.L.C. d/b/a One Communications.

As per email communication of August 25, 2009 this was provided with the initial application. It may be found at page 125 of the PDF version of the Conversant application.

5. Exhibit V – If the Applicant intends to offer residential service please provide a copy of the “Welcome Letter” that is sent to the residential customer after service is ordered. Or, if offering residential service via contract please provide a copy of the contract. (Sample Welcome Letter attached).

This is Not Applicable. Applicant does not intend to offer residential service as per revised Exhibit G (previously provided, but provided again for convenience of staff).

6. Exhibit V, Sample Bill – Please revise the bill to comply with the following:
 - a) Must provide call detail for long distance; ***See Attachment # 2 – Sample Bill with Call Detail***
 - b) Add the following Ohio Consumers’ Counsel information to page 2 “For Ohio Client Only” if offering residential service: “Residential customers may also contact the Ohio Consumers’ Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or www.pickocc.org.” ***Not Applicable; Applicant(s) will not be offering residential service.***

October 28, 2009

7. Exhibit V, Disconnection Notice – Please revise the disconnection notice to comply with the following: **See Attachment # 3 – Disconnection Notice**
- a) Please add a statement that payments to an unauthorized payment agent may result in the untimely or improper crediting of the customer's account; and
 - b) Add the following information to the "YOU HAVE THE RIGHT TO DISPUTE YOUR BILL" section: "If your dispute is not resolved after you called your telephone company residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov. Residential customers may also contact the Ohio Consumers' Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or www.pickocc.org."

When you file your corrections please make certain that the "Issued Date" in the lower left corner of each tariff sheet reflects that date on which you file the corrections. I must reject your filing if you fail to do this.

This case is scheduled to go automatic on September 6, 2009; therefore it is important to return these revisions as soon as possible to avoid suspension.

If you have any questions, feel free to call me at (614) 466-0401 or email me at the above address.

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 09-0699-TP-ACE

Summary: Response Response of Conversent Communications Resale L.L.C. dba One Communications to Application Revisions - 1st Data Request for a Certificate of Public Convenience and Necessity (CPCN) electronically filed by Mr. Richard H Wheeler on behalf of Conversent Communications Resale L.L.C. dba One Communications