## BAILEY CAVALIERI LLC

file

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December 4, 2009

Ms. Renee Jenkins
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 11<sup>th</sup> Floor
Columbus, OH 43215-3793

Re:

In the Matter of the Complaint of Sharon R. Cedeño v. AT&T Ohio and Windstream Ohio, Inc., PUCO Case No. 09-1063-TP-CSS

Dear Ms. Jenkins:

Enclosed herewith for filing in the above matter are the original and ten (10) copies of the Answer of Respondent Windstream Ohio, Inc. to the Complaint of Sharon Cedeño. Please file stamp and return the two (2) additional copies of the Answer with our courier.

Thank you for your attention to this matter.

Very truly yours,

BATLEY CAVALIERI LLO

William A. Adams

WAA:sg

Enclosure

cc(w/enclosure):

Ms. Sharon R. Cedeño

16635 Downey Glen Trail Auburn Township, OH 44023

Mary Kay Fenlon, Esq.

AT&T Ohio

150 East Gay Street, Room 4A

Columbus, OH 43215

PUCO

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## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Sharon R. Cedeno,	)
Complainant,	)
v.	) Case No. 09-1063-TP-CSS
AT&T Ohio and Windstream Ohio, Inc.,	
Respondents.	<u> </u>

## ANSWER OF RESPONDENT WINDSTREAM OHIO, INC. TO THE COMPLAINT OF SHARON CEDEÑO

Now comes Respondent Windstream Ohio, Inc. ("Windstream") and for its Answer to the Complaint states as follows:

- 1. Windstream either denies or denies for lack of knowledge all allegations of the Complaint.
- 2. Windstream has breached no legal duty owing Complainant and its service and practices at all relevant times have been in full compliance with all applicable provisions of law and accepted standards within the telephone industry.
- 3. The Complaint fails to state reasonable grounds for proceeding to hearing as required by Ohio Revised Code § 4905.26.

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WHEREFORE, Windstream respectfully requests that the Commission dismiss the Complaint and grant all other necessary and proper relief to which Windstream is entitled.

Respectfully Submitted,

William A. Adams, Counsel of Record

**BAILEY CAVALIERI LLC** 

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Attorneys for Respondent Windstream Ohio, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served by regular U.S. Mail, postage prepaid, this 4<sup>th</sup> day of December, 2009, upon:

Mary Kay Fenlon, Esq. AT&T Ohio 150 East Gay Street, Room 4A Columbus, OH 43215

Sharon R. Cedeño 16635 Downey Glen Trail Auburn Township, OH 44023

William A. Adams, Counsel of Record