

THE BISON JACOBSON FIRM LLC

A LEGAL PROFESSIONAL ASSOCIATION

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CINCINNATI, OHIO 45206

FILE

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May 4, 2011

Ms. Betty McCauley, Secretary
Public Utilities Commission of Ohio
180 East Broad Street
11th Floor
Columbus, Ohio 43215

PUCO

2011 MAY -4 PM 1:17

RECEIVED-DOCKETING DIV

Re: Case No: 11-2767-TP-CSS
Request for Assistance to Prevent Termination

Dear Ms. McCauley:

Pursuant to Rule 4901-9-01 (E) of the Ohio Administrative Code, I am writing to request the Commission to provide assistance to prevent the termination of service to Nationwide Biweekly Administration, Inc. during the pendency of the above complaint.

Since the filing of the complaint on Friday, April 29, 2011, the undersigned, as counsel for Nationwide Biweekly Administration, Inc., has been working diligently and directly with counsel for Velocity, Nationwide's telephone carrier, attempting to understand the legal and factual basis for the unexpected April 6th charge of over \$133,000.00 for services that normally range from seven to eight thousand dollars per month. My efforts continued on Monday and Tuesday, May 2nd and 3rd with email and telephone communication with Velocity's attorney.

Despite this good faith progress on the issues involved in the dispute between the parties, at 7:20 P. M. last night, Velocity send via e-mail the letter enclosed, again threatening service termination, effective at noon on Thursday, May 5, 2011. See attached letter dated May 3, 2011. This letter was unexpected and was directly from Velocity to the undersigned.

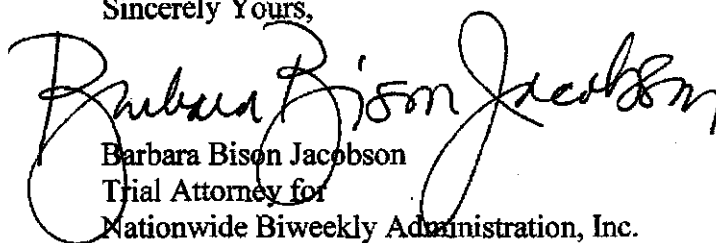
Nationwide is in the financial services industry and services over 70,000 customers, using the telecommunications currently provided by Velocity. See Complaint at paragraph 1. Both Nationwide and its customers would suffer severe hardship and substantial economic and legal consequences if telecommunication service is terminated. While Nationwide had requested Velocity to transfer its service to another carrier (prior to the April 6th bill), Velocity has refused to authorize such transfer. Therefore, if Velocity terminates telecommunications service to it, Nationwide would be unable to fulfill its responsibilities to its customers, which would cause irreparable injury to all involved.

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 DR Date Processed 5-4-11

For all these reasons, we respectfully request that the Commission issue a ruling to prevent the termination of telecommunication service by Velocity during the pendency of the complaint. Nationwide will agree to pay during the pendency of the complaint all amounts to the utility that are not in dispute.

Thank you very much.

Sincerely Yours,



Barbara Bison Jacobson
Trial Attorney for
Nationwide Biweekly Administration, Inc.

Enclosure:

cc: Jeff Jones, Esq.,
Paul Duffy, Esq.
Lance J. M. Steinhart, Esq.



May 3rd, 2011
The Bison Jacobson Firm LLC
2199 Victory Parkway
Cincinnati, Ohio 45206
Attention: Barbara Bison Jacobson

Barbara Bison Jacobson,

This letter is in regard to NBA (Nationwide Biweekly Administration).

After several attempts to collect on your client's unpaid balance, we are again, demanding payment.

To avoid service interruption:

By noon on Thursday, as a good faith payment towards your client's past due balance, please have your client wire \$25,000.00 to Velocity (wiring instructions below).

Your client's current invoice (he will receive this week) needs to be paid by May 25th, 2011.

Wiring Instructions:

Velocity, The Greatest Phone Company Ever, Inc.
PNC Bank
7015 Spring Meadows West Drive
Holland, Ohio 43528
419.865.6874 office
419.865.0872 fax

ABA#: 041000124
Account#: 4228374102

William "Chip" Werner
Vice President-Operations
Velocity
The Greatest Phone Company Ever, Inc.
(P) 419-868-9986
(C) 419-356-5164
chip@velocity.org
www.velocity.org