

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Review of Ohio :
Administrative Code Chapter 4901:1-6, : **CASE NO. 14-1554-TP-ORD**
Telephone Company Procedures and :
Standards :

**REPLY COMMENT
OF THE
OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to the January 7, 2015 Entry, the Ohio Cable Telecommunications Association (the "Association" or the "OCTA") submits these Reply Comments. The OCTA, a trade association of cable telecommunication operators located throughout Ohio, appreciates the opportunity to provide input into these proposed rule revisions.

As noted in its Initial Comments, some of the Association's members offer, or may in the future offer, telephone service using a switched network, offer or may offer telephone service through internet protocol-enabled services or broadband or utilize the services or facilities of incumbent local exchange carriers (ILECs) or competitive local exchange carriers (CLECs) in offering these services for transport and termination. Some of the OCTA members utilize pole attachment and conduit occupancy services offered by ILECs. Therefore, the Association, on behalf of its members, submitted Initial Comments in this proceeding and now offers this Reply Comment.

Rule 4901:1-6-26 – Abandonment

The Initial Comments of the AT&T Entities¹ raise concerns with the Staff's failure to recommend revising subsection (I) of Rule 4901:1-6-26 which provides that no telephone

¹ The AT&T Entities include The Ohio Bell Telephone Company, AT&T Corp., Teleport Communications America LLC, New Cingular Wireless PCS LLC and Cricket Communications, Inc.

company may discontinue services to a LEC that has filed an application to abandon service prior to the Commission ruling on the application. The AT&T Entities are unclear regarding the specific recommendation to resolve its issues with this rule.

The OCTA understands the concern that an ILEC could be required to provide services even if the LEC is not paying. The solution to this concern is not the deletion of Rule 4901:1-6-26(I) in its entirety, but rather revising Rule 4901:1-6-26(I) as follows:

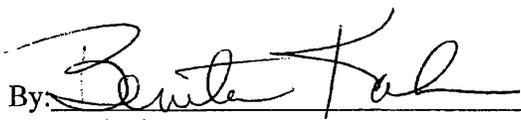
- (I) Except in the case of disconnection for non-payment, No telephone company may discontinue services provided to a local exchange carrier (LEC) that has filed an application to abandon service prior to the commission ruling on such application to abandon service.

The OCTA has no further Reply Comments regarding the Staff's suggested revisions to Chapter 4901:1-6 and the Initial Comments filed in this docket.

II. Conclusion

The OCTA understands and appreciates the time and effort the Commission staff has put into reviewing Chapter 4901:6 and the proposed revisions to the existing rules. It also appreciates the opportunity to provide input into the staff proposed rule revisions. The OCTA asks the Commission to revise suggested rule revisions as specifically recommended in the OCTA Initial and Reply Comments.

Respectfully submitted,

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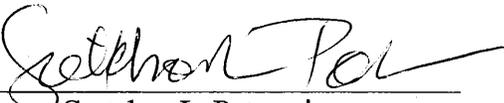
Attorneys for the Ohio Cable Telecommunications
 Association

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service of the Docket card who have electronically subscribed to the case (those individuals are marked with an asterisk below). In addition, I certify that a copy of the foregoing Reply Comments of the Ohio Cable Telecommunications Association has been served via electronic mail on March 6, 2015 to the following:

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Summary: Reply Comments electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association