

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

AT&T CORP.)	
)	
Complainant,)	
)	
v.)	Case No. 16-1104-TP-CSS
)	
TSC COMMUNICATIONS, INC.)	
)	
Respondent.)	

ANSWER TO COUNTERCLAIM

AT&T Corp. by its attorneys, alleges as follows in response to the counterclaim of Respondent TSC Communications, Inc. ("TSCCI"):

First Defense

1. AT&T Corp. admits the allegations of counterclaim paragraph 1
2. AT&T Corp. denies the allegations of counterclaim paragraph 2.
3. AT&T Corp. denies the allegations of counterclaim paragraph 3.

Second Defense

4. TSCCI has failed to set forth reasonable grounds for the counterclaim.

Third Defense

5. TSCCI's counterclaim is barred in whole or in part by the applicable statute of limitations, laches, and the like.

Fourth Defense

6. TSCCI's rates were and are unlawful and violate orders and rules of the Commission and the FCC.

July 13, 2016

Respectfully submitted,

AT&T Corp.

By: /s/ Mark R. Ortlieb
Mark R. Ortlieb (94118)
AT&T Services, Inc.
225 West Randolph, Floor 25D
Chicago, IL 60606
(312) 727-6705
mo2753@att.com

OF COUNSEL:
Dennis G. Friedman
Mayer Brown LLP
71 S. Wacker Drive
Chicago, IL 60606
Telephone: (312) 782-0600
Facsimile: (312) 701-7711
dfriedman@mayerbrown.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served this 13th day of July 2016 by
U.S. Mail and/or electronic transmission on the party shown below.

 /s/ Mark R. Ortlieb
Mark R. Ortlieb

L. Douglas Jennings
Attorney Examiner
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43231
doug.jennings@puco.ohio.gov

William A. Adams
BAILEY CAVALIERI LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215-3422
William.Adams@baileycavalieri.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/13/2016 3:27:21 PM

in

Case No(s). 16-1104-TP-CSS

Summary: Answer Answer to Counterclaim electronically filed by Mr. Mark R Ortlieb on behalf of AT&T Entities and AT&T Ohio and Ohio Bell Telephone Company and AT&T Corp.