

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Johnnie Graham Jr.,	)	
	)	
Complainant	)	
	)	
v.	)	Case No. 17-2114-TP-CSS
	)	
Frontier Communications, Inc.,	)	
	)	
Respondent.	)	

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**ANSWER AND AFFIRMATIVE DEFENSES  
OF FRONTIER COMMUNICATIONS**

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Frontier Communications, Inc. (“Frontier”), which should be Frontier North, Inc., appearing specially, and through its counsel, answers the October 11, 2017 Complaint (“Complaint”) of J. Graham Jr. (“Complainant”) and raises its affirmative defenses thereto as follows:

**GENERAL DEFENSE**

Frontier has examined its records and billing statements and Frontier finds that the charges were valid with no evidence of erroneous billing.

**A. ANSWER**

1. In response to the first unnumbered paragraph, Frontier denies that it cut Complainant’s telephone line nor charged improper billings. Frontier lacks knowledge upon which to form a belief as to the truth of the facts alleged and therefore denies all other allegations in the first unnumbered paragraph. Frontier denies all other allegations in the first page of the Complaint.
2. In response to the second unnumbered paragraph, Frontier denies all allegations.

3. Frontier denies all allegations not expressly admitted herein.

**B. AFFIRMATIVE DEFENSE**

4. The Complaint fails to allege any violation of any rule(s), regulation(s) or law(s) that would constitute a violation of any sort, or any unlawful action, and thus, the Complaint should be dismissed.

5. Frontier reserves the right to raise additional affirmative defenses or to withdraw any of the foregoing affirmative defenses as may become necessary during the investigation and discovery of this matter.

6. The Complaint fails to comply with OAC 4901:9-01 by not making a statement by which relief can be granted.

7. The account referenced in the Complaint is a business account in name of Church of Miracle ministries. The Complainant is not listed on the account, and he lacks standing to file the Complaint.

**WHEREFORE**, Frontier requests that the Complaint be dismissed with prejudice.

Respectfully submitted,

/s/ Michele L. Noble  
Michele L. Noble (0072756)  
Squire Patton Boggs (US) LLP  
41 S. High Street, Suite 2000  
Columbus, Ohio 43215  
Telephone: (614) 365-2722  
Fax: (614) 365-2799  
Michele.Noble@squirepb.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer and Affirmative Defenses of Frontier Communications was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, on October 27, 2017

Johnnie Graham Jr.  
1417 Swinger Dr.  
Dayton, Ohio 45417

*Complainant*

/s/ Michele L. Noble

Michele L. Noble

**This foregoing document was electronically filed with the Public Utilities**

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**in**

**Case No(s). 17-2114-TP-CSS**

Summary: Answer electronically filed by Michele L Noble on behalf of Frontier North Inc. and Frontier Communications, Inc.