

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

FRONTIER COMMUNICATIONS, INC.'S MOTION FOR A
CONTINUANCE

Frontier Communications, Inc., which should be designated Frontier North, Inc. ("Frontier"), Respondent herein, pursuant to Ohio Admin. Code §4901-1-12, moves for a continuance of the hearing scheduled for April 23, 2018 in the captioned case. Frontier is also filing, contemporaneously, a Motion to Compel related to the discovery it has served on the Complainant March 7, 2018. Frontier requires full and complete responses to that discovery in order to prepare for the hearing.

Complainant's refusal to respond to the Frontier's basic discovery request is preventing the Frontier from being able to prepare to put on its defense at the hearing. As a matter of due process, Frontier is entitled to responses to its discovery before a hearing can be held. The hearing must, therefore, be continued to a mutually agreeable date after the Complainant has fully responded to the discovery requests.

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Respectfully submitted,

A handwritten signature in cursive script, reading "Michele L. Noble". The signature is written in black ink and is positioned above a horizontal line.


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 was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, on April 18th, 2018, as well as certified mail.

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

Complainant



Michele Noble

CASE No 17-214-fp 285

INTERROGATORY NO. 5

Identify all exhibits that you intend to utilize and/or introduce at any hearing in this Formal

Complaint. at 308 Mader Ave, Groceries cut my telephone
ANSWER: line then called over this for myself to
come 308 Mader Ave Church 2016
summer time, when the fire burnt my
telephone lose no one called me three
mont. 2015

INTERROGATORY NO. 6

Identify all lay witnesses that you intent to call at the hearing in this Formal Complaint.

ANSWER:

CASE No 17-2114 TP-CSS

DOCUMENT REQUESTS

Pursuant to Ohio Administrative Code 4901-1-16 to 4901-1-24, please produce the following:

REQUEST FOR PRODUCTION NO. 1

Any and all documents or communications referenced, referred to, or relied upon in your responses to any of the Interrogatories.

RESPONSE:

This is what the Bill suppose
~~43.66~~ 43.66 Inside Wire Maintenance Co
937 835 758. 2012 I had the Bill
3217 Monitor to bring the Bill
down phone were not use that much

REQUEST FOR PRODUCTION NO. 2

Produce all documents that you intend to introduce as evidence in this Formal Complaint.

RESPONSE:

Date of Bill 44.14 - 1-22-16 / 48.12
5-22-16 / 58.09.40 / 22-15-48.00 / 2-22-16
48.15 / 8-22-15 48-28 / 522-16-116-18
3-17-16 48-15 / 2-16-16 4812 / 11-16-15-48.00
REQUEST FOR PRODUCTION NO. 3 7-16-15 47.73 / 6-02-15
47.73

If you do not agree that the attached Exhibit A includes all bills for the Account from March 2015 to February 2018, produce all other bills for the Account in Your possession.

RESPONSE:

1-17-17 41.12
1 22 16 41 12
5-22-15 47.73
1 15-16 48.00
12-22 15 48 00
3-18-18 98.10

Frontier

COMMUNICATIONS

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CHURCH OF MIRACLE MINISTRIES
Your Monthly Invoice

Page 1 of 3

32-18

Account Summary	
New Charges Due Date	6/15/16
Billing Date	5/22/16
Account Number	937-835-3217-031896-5
PIN	7910
Previous Balance	106.91
Payments Received Thru 4/26/16	-48.82
Thank you for your payment!	
Balance Forward	58.09
New Charges	58.09
Total Amount Due	\$116.18

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Pay by Mail

To Contact Us

Chat: Frontier.com Online: Frontier.com/helpcenter
 1.800.921.8102 Email: ContactBusiness@ftr.com



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Account Summary

New Charges Due Date	2/16/16
Billing Date	1/22/16
Account Number	937-835-3217-031896-5
PIN	7910
Previous Balance	48.00
Payments Received Thru 1/06/16	-48.00
Thank you for your payment!	
Balance Forward	.00
New Charges	48.12
Total Amount Due	\$48.12

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Pay by Mail

To Contact Us

Chat: Frontier.com **Online:** Frontier.com/helpcenter
 1.800.921.8102 **Email:** ContactBusiness@ftr.com



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Account Summary

Date Due	11/16/15
Billing Date	10/22/15
Account Number	937-835-3217-031896-5
Amount of Last Bill	50.49
Payments Received Thru 10/05/15	50.49CR
Thank you for your payment!	
Balance Before Current Charges	.00
New Charges	48.00
Total Amount Due	\$48.00

Contacting Us

Your Personal Identification Number is 7910
 Billing Questions www.frontier.com
 Business 1-877-387-3477

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Visit frontiercanhelp.com/tradein or call 877-270-9836

AVAYA
 & Mitel



Unlimited time offer for West Virginia and Ohio customers. Offer expires October 31, 2015. Requires trade-in of old phone system with 10 or more handsets, purchase of new Mitel or Avaya phone system with number of handsets equal to or greater than the number of handsets of phone system being traded in, and purchase of 36-month Smart Maintenance plan. Old phone system must be in acceptable condition as determined in Frontier's sole discretion. Cannot trade in batteries or other hazardous materials. Trade-in allowance is \$5000 for old systems with 25 or more handsets or \$2500 for old systems with 10 to 24 handsets. Other terms and conditions apply. Frontier reserves the right to withdraw this offer at any time. All services marks and trademarks belong to their respective owners and are used with permission. © 2015 Frontier Communications Corporation.



CHURCH OF MIRACLE MINSTRIES

Date of Bill

Account Number

Page 3 of 3

11/22/12

937-835-3217-031896-5

CURRENT BILLING SUMMARY

Local Service from 11/22/12 to 12/21/12

Qty Description

937/835-3217.0

Charge**Basic Charges**

Business Line - Measured
2 Federal Subscriber Line Charge - Bus
Ohio State E911 Surcharge
Access Recovery Charge
Federal Tax
Federal USF Recovery Charge
Total Basic Charges

24.09
7.00
.24
3.00
1.06
1.22
36.61

Optional Services

Inside Wire Maintenance - Bus
Telecom Relay Service
Total Optional Services

7.50
.03
7.53

TOTAL**44.14****CUSTOMER TALK**

Please immediately pay any Balance Before Current Charges to avoid collection activities. All other charges should be paid when due to keep your account current. To avoid disconnection of local service, you must pay \$36.64.

The Federal Communications Commission (FCC), in conjunction with the Federal Trade Commission (FTC), has established a National Do Not Call Registry for consumers who wish to avoid receiving many kinds of telemarketing calls. Customers previously registered with State Do Not Call registries should be registered with the National Registry. Telemarketers who continue to call consumers who have placed their telephone numbers on the registry or had previously registered for any State Do Not Call list are subject to substantial fines. In addition, the FCC amended its rules to require, among other things, that telemarketers transmit their Caller ID information and to unblock their numbers. To sign up a residential number for the National Do-Not-Call Registry or to verify a number is included on the Registry, visit www.donotcall.gov or call the FTC's toll-free number at 1-888-382-1222, (TTY users, 1-866-290-4236), from the number to be registered.

Consumers must re-register if they change their telephone number. Numbers remain on the Do-Not-Call List until a customer actively deletes the number from the Registry by calling 1-888-382-1222 (TTY users, 1-866-290-4236).

Additional Notification for Customers Making Telephone Solicitations - Customers making telephone solicitations can obtain the federal Do Not Call requirements by accessing the FCC's Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991 at <http://www.fcc.gov/cgb/policy/telemarketing.html>, 47 CFR Section 64.1200; and the FTC's amended Telemarketing Sales Rule at <http://www.ftc.gov/bcp/rulemaking/tsr/>, 16 CFR Part 310. Telemarketers can access the Do-Not-Call list at <https://telemarketing.donotcall.gov/>.

THREE MONTHS OF FREE INTERNET. Purchase a qualifying plan of new Business High-Speed Internet and phone with our new lower pricing and receive three months of free Internet service. Plus your price is protected for the length of your two-year agreement. It'll be your best business decision of the season. Find out how you can start saving at 1-877-501-5663.

HAVE YOU SIGNED UP FOR ONLINE BILL PAY YET? Save time and money by paying bills electronically. Frontier Online Bill Pay helps you manage your bills without the worry of paper bills, writing checks and paying postage. Set up is quick and easy at Frontier.com/BillPay. It's simple, secure and free.

FRONTIER CONFERENCING. Connect and collaborate with customers and employees across the country or around the world. Audio and web conferencing let you stay productive and save on travel costs at the same time. Call 1-877-501-5663 to find out more.

CURRENT BILLING SUMMARY

Local Service from 05/22/16 to 06/21/16

Qty Description	937/835-3217.0	Charge
Basic Charges		
Business Line - Measured		26.59
2 Federal Subscriber Line Charge - Bus		8.13
Other Charges-Detailed Below		10.00
Federal Excise Tax		1.15
Federal USF Recovery Charge		1.45
OH St Access Recovery Surcharge		3.00
OH St Telecom Relay Service Surcharge		.03
OH 911 Surcharge		.24
Total Basic Charges		50.59
Non Basic Charges		
Inside Wire Maintenance - Bus		7.50
Total Non Basic Charges		7.50

TOTAL 58.09

**** ACCOUNT ACTIVITY ****

Qty Description	Order Number	Effective Dates	
1 Late Payment Fee		5/22	10.00
937/835-3217		Subtotal	10.00
		Subtotal	10.00

CUSTOMER TALK

If your bill reflects that you owe a Balance Forward, you must make a payment immediately in order to avoid collection activities. You must pay a minimum of \$101.18 by your due date to avoid disconnection of your local service. All other charges should be paid by your due date to keep your account current.



Your Monthly Invoice

Check out www.FrontierOnline.com for great products, special offers and complete customer service information.

Account Summary

Date Due	11/16/15
Billing Date	10/22/15
Account Number	937-835-3217-031896-5
Amount of Last Bill	50.49
Payments Received Thru 10/05/15	50.49CR
Thank you for your payment!	
Balance Before Current Charges	.00
New Charges	48.00
Total Amount Due	\$48.00

Contacting Us

Your Personal Identification Number is 7910
 Billing Questions www.frontier.com
 Business 1-877-387-3477

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Get up to a \$5,000 Trade-In Allowance toward the purchase of a new, feature-rich business phone system, including a 3-year Smart Maintenance plan, when you trade in and upgrade to Frontier! Choose from two great providers, AVAYA® and Mitel®.

Visit frontiercanhelp.com/tradein or call 877.270.9836

AVAYA
Mitel



Limited time offer for West Virginia and Ohio customers. Offer expires October 31, 2015. Requires trade-in of old phone system with 10 or more handsets, purchase of new Mitel or Avaya phone system with number of handsets equal to or greater than the number of handsets of phone system being traded in, and purchase of 36-month Smart Maintenance plan. Old phone system must be in acceptable condition as determined in Frontier's sole discretion. Cannot trade in batteries or other hazardous materials. Trade-in allowance is \$5000 for old systems with 25 or more handsets or \$2500 for old systems with 10 to 24 handsets. Other terms and conditions apply. Frontier reserves the right to withdraw this offer at any time. All services marks and trademarks belong to their respective owners and are used with permission. © 2015 Frontier Communications Corporation.





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Amount owed: \$143.19

CHURCH OF MIRACLE MINSTRIES Your Monthly Invoice

Page 1 of 3

Account Summary

Date Due	7/16/15
Billing Date	6/22/15
Account Number	937-835-3217-031896-5
Amount of Last Bill	47.73
Payments Received Thru 6/02/15	47.73CR
Thank you for your payment!	
Balance Before Current Charges	.00
New Charges	47.73
Total Amount Due	\$47.73

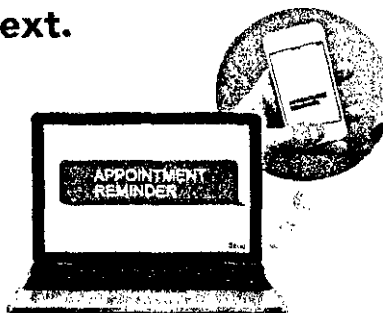
Contacting Us

Your Personal Identification Number is	7910
Billing Questions	www.frontier.com
Business	1-877-387-3477

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1398 S. Woodland Blvd. Suite B, Deland, FL 32720

MB 01 005219 73553 B 22 E



CHURCH OF MIRACLE MINSTRIES
1417 SWINGER DR
DAYTON, OH 45417-8226

PAYMENT STUB

Total Amount Due	\$47.73
Date Due	7/16/15
Account Number	937-835-3217-031896-5
Please do not send correspondence with your payment. Make checks payable to Frontier.	

Amount Enclosed \$



Check here for billing address change (see reverse)

FRONTIER
PO BOX 20550
ROCHESTER NY 14602-0550



CURRENT BILLING SUMMARY

Local Service from 01/22/16 to 02/21/16

Qty Description	937/835-3217.0	Charge
Basic Charges		
Business Line - Measured		26.59
2 Federal Subscriber Line Charge - Bus		8.13
Federal Excise Tax		1.15
Federal USF Recovery Charge		1.48
OH St Access Recovery Surcharge		3.00
OH St Telecom Relay Service Surcharge		.03
OH 911 Surcharge		.24
Total Basic Charges		40.62
Non Basic Charges		
Inside Wire Maintenance - Bus		7.50
Total Non Basic Charges		7.50

TOTAL 48.12

CUSTOMER TALK

If your bill reflects that you owe a Balance Forward, you must make a payment immediately in order to avoid collection activities. You must pay a minimum of \$40.62 by your due date to avoid disconnection of your local service. All other charges should be paid by your due date to keep your account current.

Effective January 1, 2016, both the Federal Universal Service Fund (USF) Surcharge and the Frontier Long Distance (USF) surcharge are increasing to 18.2%. Please call Customer Service with any questions.





Check out www.FrontierOnline.com for great products, special offers and complete customer service information.

Amount owed: \$143.19

CHURCH OF MIRACLE MINSTRIES
Your Monthly Invoice

Page 1 of 3

Account Summary

Date Due	7/16/15
Billing Date	6/22/15
Account Number	937-835-3217-031896-5
Amount of Last Bill	47.73
Payments Received Thru 6/02/15	47.73CR
Thank you for your payment!	
Balance Before Current Charges	.00
New Charges	47.73
Total Amount Due	\$47.73

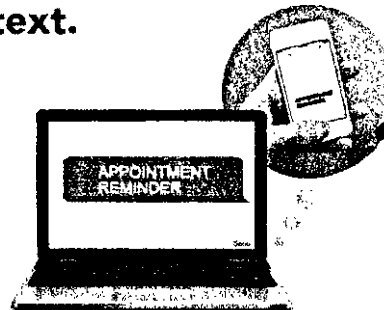
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MB 01 005219 73553 B 22 E



CHURCH OF MIRACLE MINSTRIES
1417 SWINGER DR
DAYTON, OH 45417-8226

PAYMENT STUB

Total Amount Due **\$47.73**

Date Due 7/16/15

Account Number 937-835-3217-031896-5

Please do not send correspondence with your payment. Make checks payable to Frontier.

Amount Enclosed \$



Check here for billing address change (see reverse)

FRONTIER
PO BOX 20550
ROCHESTER NY 14602-0550



The Church of Miracle Ministries

Pastor Johnnie Graham Jr

308 Maeder Ave. Dayton, Ohio, 45427

Case No 17-2014-TP-CSS

I Brough my paper work up to Columbus Ohio
December 5 2017 so my paper work were in Columbus
three month before March 7. 2012 I had Frontier to
monitor the phone phone no 937-835 3217. they found
out very letter called were going out so they cut the Bill
on 308 Maeder Ave the Bill were cut down to 41.00
or 44.60. this is with inside wire maintenance-bas
telecom Relay Service 44.14. all the Bill. over
44.14 are to much when i had a monitor to stop
the inside wire maintenance this is when they send
this man over to cut my line on 937-835-3217

Pastor Johnnie Graham Jr

May The Lord Bless And Keep You---

Pastor Johnnie Graham