

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Richard and Anita Ondreyka,)	
)	
Complainant,)	
)	
v.)	Case No. 19-0630-TP-CSS
)	
Frontier Communications,)	
)	
Respondent.)	

**ANSWER AND AFFIRMATIVE DEFENSES
OF FRONTIER COMMUNICATIONS**

Frontier Communications, which should be identified as Frontier North, Inc. (“Frontier”), appearing specially, and through its counsel, answers the March 13, 2019 Complaint (“Complaint”) of Richard and Anita Ondreyka (“Complainant”) and raises its affirmative defenses thereto as follows:

GENERAL DEFENSE

Frontier has examined its records and billing statements and Frontier finds no record of any violation of service or billing rules.

A. ANSWER

1. In response to the allegations contained in the first paragraph, Frontier denies that Complainant was charged for poor or inadequate service, and that any repairs were unannounced. Further responding, Frontier denies all other allegations contained in the first paragraph.

2. In response to the allegations contained in the second paragraph, Frontier denies that it regularly records telephone calls for service repairs. Further responding, no response is required to Complainants’ editorial comment that “all will be made clear.” Frontier denies all other allegations contained in the second paragraph.

3. Frontier denies all allegations not expressly admitted herein.

B. AFFIRMATIVE DEFENSE

1. 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.

2. Complainant's allegations regarding inside wire maintenance charges is not within the Commission's jurisdiction, as that service is not regulated.

3. 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.

4. The Complaint fails to comply with the Ohio Administrative Code 4901:9-01(B) by not making a statement by which relief can be granted

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

Respectfully submitted,

/s/ Michele L. Noble
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Attorney for Frontier

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 this 2nd day of April 2019.

Richard and Anita Ondreyka
4266 South Medina Lane Road
Norton, Ohio 44203

Complainant

/s/ Michele L. Noble

Michele L. Noble

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in

Case No(s). 19-0630-TP-CSS

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