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October 15, 2020

Ms. Tanowa M. Troupe, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 11th Floor  
Columbus, Ohio 43215

Re: *In the Matter of the Commission's Review of the Ohio Adm.Code Chapter  
4901:1-6 of the Ohio Administrative Code, Regarding Telephone Company  
Procedures and Standards*  
PUCO Case No. 14-1554-TP-ORD

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Dear Ms. Troupe:

We are submitting this correspondence on behalf of the Ohio Cable Telecommunications Association ("OCTA") to comment on the revision to Ohio Adm.Code 4901:1-6-02(H) proposed in the Commission's October 7, 2020 Entry in the above-referenced proceeding and set forth below:

(H) Each citation contained within this chapter that is made either to a section of the United States Code or a regulation in the code of federal regulation is intended, and shall serve, to incorporate by reference the particular version of the cited matter that was effective on ~~September 13,~~ **2010 October 1, 2020.**

The OCTA supports the above revision because the citations to the United States Code and Code of Federal Regulation that are incorporated by reference will become the current citations, not citations more than ten years old. Since the Commission previously decided to mirror the federal laws incorporated by reference, this revision will re-establish the mirroring to the current version of the federal citations. This revision creates greater consistency between Ohio's regulatory requirements and federal laws. The OCTA is not commenting today on the substantive impact that the above revision may have on any other rule or policy in Chapter 4901:1-6. Rather, the OCTA supports the public policy goal of promoting uniformity and for that reason, the above revision is appropriate and should be adopted.

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The OCTA also encourages the Commission to take actions to ensure that citations to federal law in other regulations that are incorporated by reference are updated regularly, to avoid long lapses.

The OCTA appreciates the Commission's consideration of these comments.

Very truly yours,

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

Vorys, Sater, Seymour and Pease LLP

Attorneys for the Ohio Cable Telecommunications  
Association

cc: Parties of record

GLP/jlw

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