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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

ALL CUSTOM RE-BATH

v.

AMERITECH OHIO,

Complainant,

Respondent.

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Case No. 99-251-TP-CSS

ANSWER OF AMERITECH OHIO

Now comes Ameritech Ohio, Respondent herein and for its Answer to the Complainant states as follows:

FIRST DEFENSE

1. The allegations of the first unnumbered paragraph of the Complaint are admitted.
2. In response to the allegations of the second unnumbered paragraph, Respondent denies for want of knowledge the allegations of the Complaint relating to "moving next door." Further responding, Respondent admits it received orders from Digicom in June 1998 relating to Complainant's service; however, Respondent alleges that such orders were improperly prepared by Digicom and rejected by Respondent for good and sufficient reasons. Therefore Respondent expressly denies that Digicom "followed proper procedure" as alleged.
3. In response to the remaining allegations of the Complaint, Respondent denies each and every allegation or denies such allegations for want of knowledge sufficient to form a belief, except Respondent admits that it did send to Complainant the letter dated August 17, 1998 attached to the Complaint.

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SECOND DEFENSE

4. The within Complaint fails to state reasonable cause for Complaint as required by Ohio Rev. Code Sec. 4905.26 and fails to state a claim upon which relief may be granted.

THIRD DEFENSE

5. Respondent avers that to the extent the within Complaint seeks relief in the form of monetary damages, the requested relief is beyond the jurisdiction of this Honorable Commission.

FOURTH DEFENSE

6. Respondent avers that it has breached no legal duty owing Complainant and that its service at all relevant times has been in full accordance with all applicable provisions of law, its tariffs and accepted standards within the communications industry.

FIFTH DEFENSE

7. To the extent Complainant has experienced any problems with the regulated telephone service provided by Respondent, such problems have been caused by the acts and/or omissions of Complainant or Digicom or one or more third parties over whom Respondent has no control.

SIXTH DEFENSE

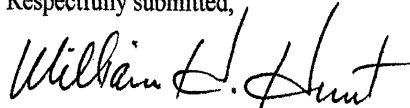
8. Complainant has failed to join an indispensable party without whom this matter cannot be justly adjudicated.

SEVENTH DEFENSE

9. Respondent reserves the right to raise additional defenses as they become known through discovery and further investigation.

WHEREFORE, having fully answered and set forth its defenses, Respondent prays the within complaint be dismissed.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "William H. Hunt".

WILLIAM H. HUNT (Atty. Reg. 0008847)
Trial Attorney

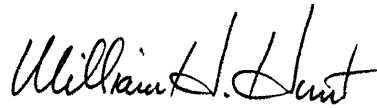
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Ameritech Ohio
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CERTIFICATE OF SERVICE

A copy of the foregoing Answer of Ameritech Ohio, has been served upon the following by regular U.S. mail, postage prepaid, this 29th day of March, 1999.

All Custom Re-Bath
Attn: Daniel E. Koster, President
26145 Center Ridge Road
Westlake, OH 44145



WILLIAM H. HUNT