

Ft Jennings Telephone Co.

Ft Jennings Telephone Co.
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FILE

Tuesday, September 25, 2001

Ms. Daisy Crockron
Chief of Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 10th Floor
Columbus, Ohio 43266-0573

RECEIVED - SERVICE TRF DIV
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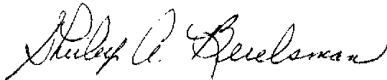
RE: Fort Jennings Telephone Company
Case No. 01-2252-TP-COI
TRF No. 90-5020-TP-TRF

Dear Ms. Crockron:

Enclosed please find 13 copies of Fort Jennings Telephone Company's entry regarding comments of the Ft. Jennings Telephone Company.

Acknowledgment of receipt of this transmittal is requested. A duplicate letter of transmittal and a self-addressed envelope are enclosed for your convenience.

Respectfully yours,



Shirley A. Berelsman
Secretary - Treasurer

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In the Matter of the Commission Ordered)
Investigation of TSC Communications, Inc.)
Relative to it Compliance with Certain) Case No. 01-2252-TP-COI
Provisions of the Commission's Local)
Service Guidelines.)

COMMENTS OF THE FORT JENNINGS TELEPHONE COMPANY

The Ft. Jennings Telephone Company (Company), is a small incumbent local exchange company serving 994 access lines in rural Ohio. The company is submitting this letter to the Public Utilities Commission of Ohio (Commission) to express its interest and concern with the investigation in the above captioned case.

The Company is not fully aware of the issues involved in this case, however, we are concerned if another company is able to enter our territory to pick away our very few business customers without the competitive safeguards established in the 1996 Telecommunications Act.

The loss of just one or two customers (as appears to be the case for Buckland Telephone Company) can have devastating effects on a Company's financial viability. The Commission is well aware of the extremely low basic rates of many of the small LECs. In an environment where those low rates are largely supported by a very few key customers, the loss of those customers would likely necessitate a rate case with a significant increase in basic rates for the remaining, mostly rural, residential customers.


The 1996 Act recognized the unique nature of small rural telephone companies by establishing rural carrier exemptions and the ability of a rural company to request a suspension or modification

of certain aspects of the Act. Unfortunately, it appears in this case that TSC Communications, Inc. (TSCCI) has been permitted to use its affiliate, TSC, and existing EAS arrangements to possibly avoid the 1996 Act. TSCCI's use of foreign exchange service seems to be a clever work around for providing competitive local exchange service, provided either through an entire facilities build or an interconnection agreement.

The Ft. Jennings Telephone Company urges the Commission to carefully consider the issues in this case. We understand that competitive entry may be an eventual reality, but we believe it must be accomplished through the use of consistently applied rules. In addition to the uniform application of rules, we urge the Commission to examine the likely impact of rules that would enable a competitive entrant to simply pick the few best customers while passing through town. The creation of competitive choice for a couple of business customers, while the remaining customers must bear a rate increase, is certainly not sound public policy.

Respectfully submitted,

FORT JENNINGS TELEPHONE COMPANY

By: 
Shirley A. Berelsman, Secretary/Treasurer

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