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BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Complaint of)
Donald W. Vertrees,)

Complainant,)

v.)

Case No. 01-3319-TP-CSS

United Telephone Company of Ohio)
d/b/a Sprint,)

Respondent.)

**ANSWER OF RESPONDENT UNITED
TELEPHONE COMPANY OF OHIO d/b/a SPRINT**

Now comes United Telephone Company of Ohio d/b/a Sprint ("Sprint"), and for its answer to the complaint herein states and avers as follows:

1. Sprint avers that it is a public utility engaged in the business of providing telephone service and, as such, is subject to the jurisdiction of the Public Utilities Commission of Ohio.
2. Sprint did provide local exchange service to Donald W. Vertrees at Indian Lake with a telephone number of 937-842-3377 until December 4, 2001 when the service was ordered totally disconnected.
3. Sprint admits that vacation service, which the customer ordered, does not permit the making of or receiving of calls; however, the telephone number is held for the customer, a directory listing and the line facilities are maintained.
4. Sprint continues to collect the taxes and surcharges that are applicable to the account since the facilities are maintained.

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5. Sprint admits that various taxes and surcharges have increased since year end 2000.
6. Sprint denies that the fees are unreasonable.
7. Sprint denies each and every allegation of the Complaint not specifically admitted to be true herein.

FIRST AFFIRMATIVE DEFENSE

8. Sprint further states that the interstate access surcharge, federal universal service fund, and number portability surcharge are authorized tariffed rates that have been approved by the FCC. Therefore, this Commission lacks subject matter jurisdiction with respect to these charges.

SECOND AFFIRMATIVE DEFENSE

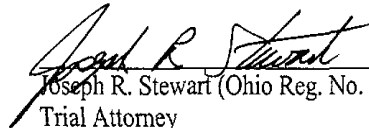
9. Sprint tariff provisions specifically state that the interstate access surcharge, federal universal service fund, number portability surcharge and the intrastate access fee apply to all customers who obtain local exchange service.

THIRD AFFIRMATIVE DEFENSE

10. The Complaint fails to state a claim upon which relief can be granted.

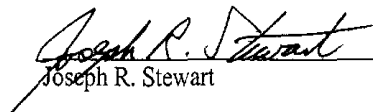
WHEREFORE, Sprint prays that the complaint be dismissed with prejudice.

Respectfully submitted,


Joseph R. Stewart (Ohio Reg. No. 0028763)
Trial Attorney
Sprint
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Columbus, OH 43215
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Fax: (614) 224-3902

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Answer of Respondent United Telephone Company of Ohio was sent via U.S. Mail, with adequate postage affixed thereto, to: Donald W. Vertrees at 3906 Delmar Circle, Springfield, Ohio 45503 on this 17th day of January, 2002.


Joseph R. Stewart