



**Ohio Consumers' Counsel**

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Consumers' Counsel

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January 27, 2000

Ms. Daisy Crockron  
Docketing Division Chief  
The Public Utilities Commission of Ohio  
180 East Broad St., 10<sup>th</sup> Floor  
Columbus, OH 43215-3793

Re: Case No. 99-1496-TP-UNC,  
Cincinnati Bell Waiver Requests

Dear Ms. Crockron:

On November 17, 1999, Cincinnati Bell Telephone (CBT) and Cincinnati Bell Long Distance (CBLD) jointly requested waivers from certain of the Commission's local service guidelines (as issued in Case No. 95-845-TP-COI). The waivers would, inter alia, allow CBT to be relieved of the burden of having a separate affiliate to compete for local service outside CBT's territory; and would also allow the "unseparated" affiliate to compete against CBT in CBT's territory. On December 1, 1999, the Ohio Consumers' Counsel (OCC) filed Objections to the Application, stating that CBT could be granted the separate subsidiary waiver as a "pilot" if CBLD would commit to serving residential consumers outside CBT's territory. The OCC also stated that the waiver to allow affiliate-against-affiliate competition for basic local exchange service should not be granted.

On January 11, 2000, the Attorney Examiner issued an Entry inviting comment on the CBT/CBLD Application. The comments are to be filed by January 27, 2000.

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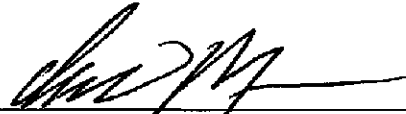
77 S. High St., 15th Floor, Columbus, Ohio 43266-0550  
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The OCC submits that the Objections to the Application filed December 1, 1999 should be considered to be comments as if freshly filed on January 27. The OCC will file Reply Comments per the Examiner's Entry.

Respectfully submitted,

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CONSUMERS' COUNSEL



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CC: Attorney Examiner Daniel E. Fullin, and All Parties of Record