

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|--|---|------------------------|
| In the Matter of the Adoption of Rules for |) | |
| the Telecommunications Relay Service |) | |
| Assessment Pursuant to Section 4905.84 |) | Case No. 08-815-TP-ORD |
| Revised Code, as Enacted by House Bill |) | |
| 562. |) | |

REPLY COMMENTS OF THE OHIO TELECOM ASSOCIATION

THE OHIO TELECOM ASSOCIATION, for and on behalf of its members (“OTA”), hereby submits its Reply Comments in this matter as requested by the Commission’s Entry of July 9, 2008 (the “Entry”).

OTA supports and concurs in the Initial Comments filed in this matter by the AT&T Entities and by Cincinnati Bell Telephone Company. Among other things, both AT&T and Cincinnati Bell support the employment of FCC Form 477, as submitted for Ohio, as the basis for data that meet the statute’s requirement to employ “a competitively neutral formula . . . based on retail intrastate access lines or their equivalent.”

Further, and as suggested in OTA’s Initial Comments, OTA recommends employment of FCC Form 477 for CMRS carriers as well. OTA has confirmed that CMRS carriers submit state-specific subscriber data in their Forms 477, and use of that information for purposes of Ohio TRS assessments will comport with Revised Code §4905.84.

In all other respects, OTA restates its Initial Comments in this matter and urges the Commission to adopt a final rule that is consistent therewith.

Respectfully submitted,

OHIO TELECOM ASSOCIATION

By: /s/ Thomas E. Lodge
Thomas E. Lodge (0015741)

Thompson Hine LLP
10 West Broad Street, Suite 700
Columbus, Ohio 43215-3435
Telephone (614) 469-3200
Fax (614) 469-3361

Its Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing, has been served upon all parties listed on the attached Service List, by electronic delivery, this 7th day of August, 2008.

/s/ Thomas E. Lodge
Thomas E. Lodge (0015741)

SERVICE LIST
CASE No. 08-815-TP-ORD

Douglas E. Hart
441 Vine Street, Suite 4192
Cincinnati, OH 45202

Teresa Orahoad
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43216-4291

Sally W. Bloomfield
Ohio Cable Telecommunications
Association
Bricker & Eckler
100 South Third Street
Columbus, OH 43215-4291

Jon F. Kelly
AT&T Services, Inc.
150 East Gay Street
Room 4-A
Columbus, OH 43215

Stephen Howard
Vorys, Sater, Seymour and Pease
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

587001.1

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/7/2008 1:47:08 PM

in

Case No(s). 08-0815-TP-ORD

Summary: Comments - Reply Comments of the Ohio Telecom Association electronically filed by Mr. Thomas E Lodge on behalf of Ohio Telecom Association