

<b>In the Matter of the Application of Intrado</b>	)	
<b>Communications Inc. to Provide Competitive</b>	)	<b>Case No. 07-1199-TP-ACE</b>
<b>Local Exchange Services in the State of Ohio.</b>	)	
	)	

The City of Cincinnati (“Cincinnati”) hereby moves to intervene in the above-captioned proceeding pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code Section 4901-1-11(A)(2). As set forth in the attached Memorandum in Support, Cincinnati submits that it has a real and substantial interest in the proceeding, and is so situated that the disposition of the proceeding in the absence of Cincinnati’s participation may, as a practical matter, impair or impede Cincinnati’s ability to protect that interest. Cincinnati further submits that its interest is not adequately represented by existing parties and that granting its motion to intervene will not unduly delay this proceeding or unjustly prejudice any existing party.

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## MEMORANDUM IN SUPPORT

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On July 25, 2008, the Hamilton County Department of Communications (“County”) and Intrado Communications, Inc. (“Intrado”) filed a Joint Petition for Waiver and Supplemental Order with the Public Utilities Commission of Ohio (“Commission”). The County and Intrado (hereinafter jointly referred to as the “Petitioners”) request that the Commission grant a waiver of the requirement that Public Service Answering Points (“PSAPs”) may only be served by a competitive emergency services telecommunications carrier on a countywide basis. The Petitioners seek this waiver in order to allow the County to engage Intrado to serve as their telecommunications provider.

Hamilton County is served by four (4) PSAPs – the Hamilton County Communications Center, the City of Cincinnati PSAP, the City of Norwood Communications and Amberley Village Public Safety. In their Memorandum in Support of their Joint Petition, the Petitioners represent that the other PSAPs (Cincinnati, Norwood and Amberley Village) would “prefer to wait until Intrado Comm has deployed services to the [the County] before agreeing to engage Intrado Comm for their 9-1-1 operational districts.” This statement inaccurately represents the position of the remaining PSAPs. Specifically, Cincinnati, along with the remaining PSAPs, is concerned that this statement will be interpreted to indicate an agreement by the remaining PSAPs to use Intrado once its technology is successfully proven. In an effort to clarify its

position, and that of the other PSAPs, Cincinnati offers the attached Affidavit of Lt. Col. Cindy M. Combs, Assistant Police Chief.

Consistent with the requirements of Ohio Revised Code Section 4903.221 and Ohio Administrative Code Section 4901-1-11(A)(2), Cincinnati is a real party in interest herein, who can make an important contribution to this proceeding and whose participation will not unduly delay this proceeding or prejudice any existing party. Cincinnati further submits that its interest is not represented by any existing party, and that its participation will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding.

WHEREFORE, the City of Cincinnati respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,

**Patricia M. King**

**INTERIM CITY SOLICITOR**

/s/ Allison A. Davidson

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Counsel for City of Cincinnati

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene with Memorandum in Support and attached Affidavit of Lt. Col. Cindy M. Combs was served upon the Parties of record listed below this 25th day of August 2008 via U.S. mail, postage prepaid.

/s/ Allison A. Davidson

Allison A. Davidson

**Intrado Communications Inc.**

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/25/2008 10:44:15 AM**

**in**

**Case No(s). 07-1199-TP-ACE**

Summary: Motion Motion to Intervene of City of Cincinnati electronically filed by Ms. Allison A Davidson on behalf of City of Cincinnati