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In the Matter of the Commission Investigation Into the Allocation of Abbreviated Dialing Arrangements, Such as N-1-1. 우님() [] Case No. 93-1799-TP-COI

INITIAL COMMENTS OF THE OHIO COUNCIL OF INFORMATION & REFERRAL PROVIDERS AND THE 211 OHIO COLLABORATIVE

On December 3, 1999, the Ohio Council of Information & Referral Providers (OCIRP) and the 211 Ohio Collaborative¹ (211 Ohio) [hereinafter collectively referred to as "Joint Applicants"] filed an application for assignment of the 211 telephone dialing code, initially throughout most areas of Ohio, and ultimately on a statewide basis. In that application, the Joint Applicants noted that the Ohio Department of Transportation (ODOT) had recently applied for a one year extension of its 211 pilot project in the Cincinnati area. The Joint Applicants recommended that, on a temporary basis, the 211 abbreviated dialing code be assigned for use by I & R organizations in areas throughout the state other than Cincinnati during the one year time period that the code would be used by ODOT, and that ODOT consider the use of another dialing code so that the 211 code could be assigned to I & R organizations on a statewide basis (Application, 12-13).

The Commission issued an Entry addressing the Joint Applicants' request for assignment of the 211 code on March 23, 2000. In the Entry, the Commission made the following

¹ Since the filing of the Application, the membership of the 211 Ohio Collaborative has changed. An updated membership list is attached hereto.

preliminary findings: 1) that the ODOT request for a one year extension of its pilot program should be granted; and 2) that the 211 code should be assigned to the I & R applicants for all areas of the state not covered by the ODOT's existing pilot use of the number, for a two year pilot program, and that one year after the effective date of the Commission's order in this case, the I & R applicants' use of the code could be expanded statewide. The ODOT was requested to consider making a formal request for the use of a different N11 code for any period beyond the one year extension of the pilot program. The Commission indicated that these preliminary findings would not be finalized in an order until interested parties were given an opportunity to file comments (due on April 14, 2000) and reply comments (due on April 28, 2000). Pursuant to this schedule, the Joint Applicants hereby submit their initial comments.

Needless to say, the Joint Applicants are quite pleased with the Commission's preliminary findings and would urge the Commission to adopt such findings in a final order. The Joint Applicants reserve their rights to file reply comments on April 28, 2000 in response to issues raised by any other parties.

The Joint Applicants do want to clarify one minor item in the March 23, 2000 Entry. At page three of the Entry, the Commission noted that use of the 211 service code for community access purposes is "already occurring" in Alabama, Connecticut, North Carolina and Texas, and at page four of the Entry the Commission comments that the 211 code has been "used extensively" in other states. Just to be perfectly clear, the public utilities commissions of Alabama and North Carolina have recently approved the use of the code in those states but it is not yet operational in those states. A statewide I & R network is being planned for implementation in Texas, and approval to use the 211 code will then be sought from the Texas

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public utilities commission. Use of the code is operational in Connecticut and in the metropolitan Atlanta area (Application, 9). Since the filing of the Application in this proceeding, the Utah public utilities commission has also approved the use of the 211 code for I & R organizations, and the Georgia public utilities commission has approved its use in the Columbus, Georgia area.

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The Joint Applicants appreciate the Commission's timely consideration of their request for use of the 211 abbreviated dialing code, and look forward to its implementation and use throughout the state of Ohio.

Respectfully submitted,

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Judith B. Sanders Bell, Royer & Sanders Co., LPA 33 S. Grant Ave. Columbus, Ohio 43215 (614) 228-0704

ATTORNEYS FOR THE OHIO COUNCIL OF INFORMATION & REFERRAL PROVIDERS AND THE 211 OHIO COLLABORATIVE

CERTIFICATE OF SERVICE

I hereby certify that I have forwarded the foregoing Initial Comments to the parties listed below, via first-class U.S. mail, postage prepaid, this 14th day of April, 2000.

Judith B. Sanders

Gordon Proctor Ohio Department of Transportation Central Office P.O. Box 899 Columbus, Ohio 43215

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Name/Address- 211 Ohio Collaborative Members

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Center for Alternative Resources 35 S. Park Place Newark, Ohio 43055

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First Call For Help 1331 Euclid Avenue Cleveland, Ohio 44115-1854

Firstlink 370 South 5th Street Columbus, Ohio 43215-5408

HelpLine of Delaware & Morrow Counties, Inc. 11 N. Franklin Delaware, Ohio 43015

HelpLink United Way of the Greater Dayton Area 184 Salem Avenue Dayton, Ohio 45406

Info Line, Inc. 474 Grant Street Akron, Ohio 44311

Infoline Volunteer Center Geauga United Way Services 209 Center Street Chardon, Ohio 44024

Information & Referral of United Way PO Box 59 Springfield, Ohio 45501

Ohio Child Care Resource and Referral Assoc (OCCRRA) 78 Jefferson Avenue Columbus, Ohio 43215

United Seniors of Athens County, Inc. 20 Kern Street Athens, Ohio 45701

United Way of Lake County—LINK 9285 Progress Parkway Mentor, Ohio 44060-1884 United Way of Tuscarawas County, Inc. 1458 5th Street NW New Philadelphia, Ohio 44663

United Way's FIRST CALL FOR HELP 126 North Prospect Street PO Box 845 Ravenna, Ohio 44266

United Way's InfoLink 215 South Walnut Street PO Box 548 Wooster, Ohio 44691