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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

2012 MAR 15 PM 4:29

In the Matter of the Filing of Annual)
Reports for Calendar Year 2011 by)
Competitive and Wireless)
Telecommunications Service Providers.)

Case No 12-05-TP-RPT

PUCO

MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF THE OHIO TELECOM ASSOCIATION

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March 15, 2012

On Behalf of the Ohio Telecom Association

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MOTION TO INTERVENE OF THE OHIO TELECOM ASSOCIATION

The Ohio Telecom Association ("OTA") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The OTA respectfully requests that it be permitted to participate in these proceedings so as to assert the protections afforded under Ohio law to the confidential information of its member wireless service providers whom are impacted in this matter.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, OTA has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. OTA believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of OTA will not be adequately represented by other parties to the proceeding and, as such,

OTA is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,



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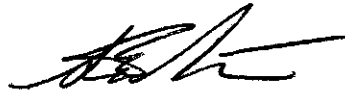
MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, the Ohio Telecom Association ("OTA") states that it is an association of telecommunication providers. A current listing of OTA member companies is available on OTA's website at <http://www.ohiotelecom.com/>. OTA member companies are a critical component of Ohio's economy. OTA member companies employ more than 20,000 Ohio citizens and contribute more than \$4 billion annually to Ohio's economy through investments in telecommunications infrastructure, payroll, taxes, goods and services and philanthropy to maintain a state of the art network for Ohioans.

OTA members work together to ensure that Ohio residential customers, businesses and other customers have ready access to the most modern telecommunications services available. Additionally, the OTA works to provide an active role in the formulation of telecommunications policy and seeks to ensure that its members have the opportunity to provide the best telecommunications services possible. To this end, OTA has worked, including actively participating in the legislative and regulatory process to produce legislative, regulatory, and market outcomes that encourage the growth of the telecommunications industry in Ohio.

OTA has a real and substantial interest inasmuch as this proceeding may directly impact its member companies. Specifically, OTA's direct interest in this proceeding is the result of the impact that this matter will have on confidential information held by OTA member companies.

Respectfully submitted,



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On Behalf of the Ohio Telecom Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of the Ohio Telecom Association*, was served upon the following parties of record this 15th day of March, 2012 via first class mail, postage prepaid.



Scott E. Elisar

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