

OCTVA3

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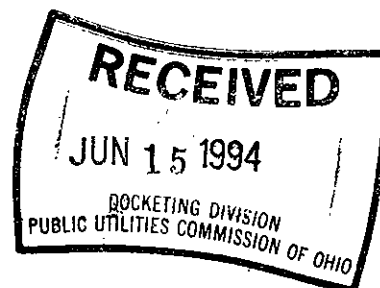
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June 15, 1994

Mr. Gary E. Vigorito  
Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43266-0573



Re: PUCO Case No. 93-487-TP-ALT  
Ameritech-Ohio  
Requests for Admission

Dear Mr. Vigorito:

Please accept for filing the original and 20 copies of Ameritech Ohio's Response to the Ohio Cable Television Association's Revised Requests for Admission. This filing is being made to conclusively establish the admissions made by Ameritech Ohio pursuant to Rule 4901-1-22(d) of the Ohio Administrative Code.

These Revised Requests for Admission are a "subset" of the First and Second Sets previously served by the Ohio Cable Television Association. The numbered requests in the subject Revised Requests for Admission follow the numbers contained in the original requests. However, not all of the 152 original requests are contained in the revised request.

Thank you for your cooperation.

Sincerely yours,

*Stephen M. Howard*

Stephen M. Howard

SMH/bjf  
Enclosure

cc: All Counsel for Parties of Record (w/encl.)

Ameritech Ohio  
45 Erieview Plaza  
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Ameritech

Michael T. Mulcahy  
General Attorney

June 8, 1994

William S. Newcomb, Jr.  
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Columbus, OH 43216-1008

Re: P.U.C.O. Case No. 93-487-TP-ALT

Enclosed is Ameritech Ohio's Response to OCTVA  
Revised Requests for Admission.

Very truly yours,

*Michael T. Mulcahy*  
Michael T. Mulcahy

Enclosure

cc: Counsel for All Parties of Record

OCTVA REVISED REQUESTS FOR ADMISSIONS

6. Ohio Bell has performed no analysis to determine whether long-run service incremental costs, as used by Ohio Bell in this case, are less than or greater than the fully distributed costs for
- a) major regulated services offered by OBT;
  - b) services anticipated to be offered by OBT; and
  - c) proposed unregulated services and products of OBT.  
(Interrogatory No. 15)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

8. Ohio Bell has performed no analysis which identifies those regulated services offered by OBT for which LRSIC are greater than fully distributed costs. (Interrogatory No. 17)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

9. Ohio Bell has performed no analysis which identifies those services anticipated to be offered by OBT for which LRSIC are less than fully distributed costs. (Interrogatory No. 18)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

10. Ohio Bell has performed no analysis which identifies those services anticipated to be offered by OBT for which LRSIC are greater than the fully distributed costs.  
(Interrogatory No. 19)

---

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

11. Ohio Bell has performed no analysis which identifies those unregulated services and products of OBT for which LRSIC are less than the fully distributed costs. (Interrogatory No. 20)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

12. Ohio Bell has performed no analysis which identifies those unregulated services and products of OBT for which LRSIC are greater than the fully distributed costs. (Interrogatory No. 21)

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Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

13. Ohio Bell does not maintain revenue data for the past five years for each of OBT's regulated services. (Interrogatory No. 26.a.)

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The Company admits to the extent "maintain" refers to Part 32 Uniform System of Accounts books and records. Nor is five years' data for each regulated service maintained in any other data base.

OCTVA REVISED REQUESTS FOR ADMISSIONS

19. The estimated cost for the three project commitments identified in Ms. Klais' testimony relating to deployment of fiber optics is \$248.4 million. (Interrogatory No. 34)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

21. Ohio Bell has performed no analysis which would identify the average growth rate in demand for individual services identified in Exhibit 3 to the application from 1991 to 1992. (Interrogatory No. 40)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

23. Ohio Bell has not conducted nor has it caused to be conducted any elasticity of demand studies or analyses in conjunction with any of the services listed on Exhibit 3 to its application and plan in Case No. 93-487-TP-ALT. (Interrogatory No. 51)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

25. Ohio Bell does not know when alternative providers competing with Ohio Bell for each of the services which are proposed to be classified in Cell 2 began providing service.  
(Interrogatory Nos. 56 and 57)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

26. The known competitors competing with Ohio Bell for market share for each of the services proposed to be categorized as Cell 4 are listed in Ms. Kline's and Mr. Hudzik's testimony. (Interrogatory No. 58)
- 

Admit, as of the date Applicant's testimony was filed.

OCTVA REVISED REQUESTS FOR ADMISSIONS

32. Ohio Bell has performed no analysis which identifies those services which are proposed to be categorized in Cell 2 where LRSIC is decreasing and is below (less than) average total costs (fully distributed costs). (Interrogatory No. 62.a.)

---

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

33. Ohio Bell has performed no analysis which identifies those services which are proposed to be categorized in Cell 3 where LRSIC is decreasing and is below (less than) average total costs (fully distributed costs). (Interrogatory No. 62.b.)

---

Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

34. Ohio Bell has performed no analysis which identifies those services which are proposed to be categorized in Cell 4 where LRSIC is decreasing and is below (less than) average total costs (fully distributed costs). (Interrogatory No. 62.c.)

---

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

35. As of the date the Applicant's testimony was filed, information that Ohio Bell is aware of which is responsive to a request for the estimated market share held by Ohio Bell for Cell 2 services can be found solely in the testimonies of Robert Hudzik and Carol Kline.  
(Interrogatory No. 63.a.)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

36. Cell 3 services are not addressed solely in the testimony of Mr. Hudzik and Ms. Kline.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

37. As of the date the Applicant's testimony was filed, information that Ohio Bell is aware of which is responsive to a request for the estimated market share held by Ohio Bell for Cell 4 services can be found solely in the testimonies of Robert Hudzik and Carol Kline.  
(Interrogatory No. 63.c.)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

41. Ohio Bell has not conducted a study to compare the expense of ISDN with a broadband switched public network.  
(Interrogatory No. 66)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

42. The provision of ISDN does not require the installation of fiber optic cable, but instead can be provided through existing copper wire.
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

43. ISDN will be available to 100% of Ohio Bell's network access lines within 5 years of approval of Advantage Ohio. The commitment dates were based on the assumption that Advantage Ohio becomes effective.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

44. The estimated time to perform a specified LRSIC study depends on the service being studied. (Interrogatory No. 70)

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Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

47. OBT has no present plans to conduct any studies of the elasticity of demand. (Interrogatory No. 73)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

51. As ISDN is a new service, with a base near zero, the demand for ISDN service is growing faster than the total demand for total company services. (Interrogatory No. 78)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

52. During 1992, less than 1% of total jurisdictional revenues were attributable to ISDN services. (Interrogatory No. 79)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

53. Less than 1% of Ohio Bell's customers use ISDN services.  
(Interrogatory No. 80)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

54. Ohio Bell made no attempt to measure the competitiveness of any service categorized in Cells 2, 3, or 4 using the 4-firm concentration ratio or index. (Interrogatory No. 81.a.)

---

Admit to the extent that Ameritech was unable to obtain the necessary data.

OCTVA REVISED REQUESTS FOR ADMISSIONS

55. Ohio Bell made no attempt to measure the competitiveness of any service categorized in Cells 2, 3, or 4 using the Gini-Coefficient test. (Interrogatory No. 81.b.)

---

Admit to the extent that Ameritech was unable to obtain the necessary data.

OCTVA REVISED REQUESTS FOR ADMISSIONS

56. Ohio Bell made no attempt to measure the competitiveness of any service categorized in Cells 2, 3, or 4 using the Herfindahl-Hirschman index. (Interrogatory No. 81.c.)

---

Admit to the extent that Ameritech was unable to obtain the necessary data.

OCTVA REVISED REQUESTS FOR ADMISSIONS

57. Ohio Bell does not keep books and records in such a format to determine the total revenues for 1992 for each of the services categorized in Cells 2, 3, and 4. (Interrogatory No. 84.a.)

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Admit that Ohio Bell's books and records for 1992 were not kept in a cell classification format so that the "total revenues", however OCTVA might define that term, cannot be determined for each and every service categorized in Cells 2, 3 and 4 for that year.



OCTVA REVISED REQUESTS FOR ADMISSIONS

62. Relevant cost data from the same year will be consistently applied in all of the LRSIC models. (Interrogatory No. 89)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

63. Ohio Bell has not set up a mechanism to compare the dollar level of assumed or hypothetical investment used for purposes of a LRSIC study with the level of investment actually made. (Interrogatory No. 90)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

70. Ohio Bell believes that local school districts should determine which type of distance education or distance learning application is best for its particular situation. (Interrogatory No. 103)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

71. Ohio Bell believes that each vendor of different types of distance learning or distance education applications should provide information (regarding types, costs and funding alternatives) on the services they provide to local schools. (Interrogatory No. 104)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

77. If asked how many of the 559 schools have affirmatively requested that Ohio Bell deploy its proposed distance learning network and which further asks Ohio Bell to identify the school by name, district, and county, Ohio Bell would respond that [t]he Advantage Ohio commitments are not based on any specific affirmative requests, but intended to serve the public interest as defined in the testimony of Dr. Singleton and others.

Ohio Bell would further respond that many schools have, however, publicly announced their support for Advantage Ohio and its education commitments.

---

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

78. If asked how many of the 484 libraries, courthouses, jails and hospitals in Ohio Bell's service territory have affirmatively Ohio Bell to deploy fiber in the local loop and if further asked to identify the libraries, courthouses, jails and hospitals by name and address, Ohio Bell would respond that [t]he Advantage Ohio commitments are not based on any specific affirmatively requests, but intended to serve the public interest as defined in the testimony of the witnesses.

Ohio Bell would further respond that many libraries, etc. have, however, publicly announced their support for Advantage Ohio.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

80. Since receiving the flexibility of the "944" and "1144" orders, Ohio Bell is not aware of the loss of any customer directly due to regulatory delay. However, according to Ohio Bell the market for its services has become increasingly competitive, creating a growing opportunity to lose customers due to a delay in regulatory approval. According to Ohio Bell, for example, the CAPs currently have regulatory freedom and flexibility that can provide them with a competitive advantage over Ohio Bell in this regard.
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

96. If asked to identify any specific CATV networks in Ohio which have a significant impact on Ameritech's consumer market are referenced on Ohio Bell Ex. 21.0, p. 19, and to describe the specific market which is significantly impacted by CATV networks, Ohio Bell would respond that "the networks of TimeWarner, Continental Cablevision and others can have a significant impact on all-Ameritech markets. The two named CATV providers have announced their intentions to provide various telecommunications services and have in fact obtained PUCO approval to begin providing private Line services."

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Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

107. In OBT's LRSIC study, joint costs are not allocated to a specific service. (Interrogatory No. 157)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

109. In Ohio Bell's view, cost recovery is not an objective and has no place in LRSIC design. (Interrogatory No. 160)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

110. It is possible that all of the joint costs attributable to a family of services might be recovered from some members of the family and none of such joint costs might be covered from other members of the family. (Interrogatory No. 161)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

111. According to OBT, the joint cost test is not intended to test how joint costs are recovered from individual services. According to OBT, joint costs are not identifiable with or attributable to individual services. (Interrogatory No. 162)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

112. According to OBT, the LRSIC methodology does not allocate any costs. (Interrogatory No. 163)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

113. According to OBT, joint costs are not included in an LRSIC for a particular service. (Interrogatory No. 164)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

114. Common overhead costs, as used in the Commission's Alt Reg Rules, are not included in an LRSIC for a particular service. (Interrogatory No. 165)
- 

Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

116. Ohio Bell does not consider LRSIC to be a cost recovery method. (Interrogatory No. 168)

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Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

117. If Ohio Bell were to price all of its services at the LRSIC, it would not recover all of its costs of providing both competitive and monopoly services because joint and common costs do exist. (Interrogatory No. 169)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

118. A three KHz transmission bandwidth is required for voice communication. (Interrogatory No. 171.a.)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

119. A six MHz transmission bandwidth is required for full-motion video communication. (Interrogatory No. 171.c.)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

120. An analog full-motion, interactive, video communication system requires two six MHz channels and a digital system requires two 45 Mb/s channels. (Interrogatory No. 171.d.)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

129. If a loop to a customer already in place is a separate service, it will have an LRSIC cost of its own. If, however, it is bundled with a competitive service, its cost will be included in the LRSIC of the competitive service.  
(Interrogatory No. 180)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

140. In Dr. Currie's example on page 34 of Ohio Bell Ex. 28.0, if Ohio Bell priced the service at the total incremental cost (TIC), there would be no contribution to cover shared and common costs. (Interrogatory No. 192)

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

141. Reference is made to Dr. Currie's example on page 34 of Ohio Bell Ex. 28.0. If Ohio Bell were asked how it would recover allocated and shared common costs if it did not recover the allocated shared and common costs of \$2,000 from the customers utilizing this service, Ohio Bell would respond that Dr. Currie's example illustrates potential consequences should Ohio Bell be forced into such a scenario, but does not describe how Ohio Bell proposes that rates be developed.

Reference is made to Dr. Currie's example on page 34 of Ohio Bell 28.0. If Ohio Bell were asked if it would recover such costs (the allocated shared and common costs of \$2,000 from the customers utilizing this service) from other customers, Ohio Bell would respond that the example does not posit a cost recovery mechanism.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

149. Ameritech Ohio has sent letters to various individuals who had previously expressed support for Advantage Ohio informing them of Price Cap Educational Forums. These letters also asked for continued support for Advantage Ohio.

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Admit.



OCTVA REVISED REQUESTS FOR ADMISSIONS

150. The attached letter and reminder notice identified as Attachment No. 1 is an accurate copy of the form of a letter sent by Ohio Bell's agents to certain entities with the identity of the addressee redacted.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

151. Ohio Bell authorized its agents to send Attachment No. 1 to more than one entity.

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Admit.

OCTVA REVISED REQUESTS FOR ADMISSIONS

152. Ohio Bell is not aware of any study or analysis which would suggest that OBT would fall outside of the range of experience of other former Bell operating companies when it comes to the proportion of total costs which are comprised of joint and common overhead costs. (Interrogatory No. 263)

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Admit.

**ATTACHMENT NO. 1**  
**(OCTVA REQUEST FOR ADMISSIONS, 2ND SET**  
**Nos. 150 and 151)**

February 2, 1994

Dear

Despite extremely bad weather, a small gathering of the members of JOBS 2000: The Information Superhighway met at The Great Southern Hotel on Thursday, January 27. Those present:

1. Heard a review of progress on the telecommunications infrastructure in other states;
2. Received an update on the status of the recent filing of Ameritech with the PUCO;
3. Discussed a draft Mission Statement for JOBS 2000, a copy of which is attached;
4. Witnessed a demonstration of advanced telecommunications applications;
5. Held a lively discussion regarding the various changes necessary to affect a major investment in telecommunications infrastructure in Ohio, including some discussion of alternative providers and technologies and the best way to accomplish policy changes to ensure that Ohio remains competitive in the new telecommunications age.

The next meeting is scheduled for March 11, 1994, at 9:30 a.m. in Columbus, at a location yet to be determined, although we will try to return to The Great Southern Hotel. At that session, when hopefully the weather will be more favorable, we will hear a presentation from John Griffin of Battelle regarding a recent economic study conducted by their organization and also from a representative of The Ohio Manufacturers Association, which has expressed an ongoing concern about policy changes necessary to keep Ohio competitive.

Also at the March 11 meeting, the group will be discussing the adoption of a Mission Statement and Action Plan so that we can effectively communicate our concerns to the state's policy makers.

You will be receiving further information soon. Meanwhile, please mark Friday, March 11, on your calendars. We look forward to seeing you then.

Sincerely,



James E. Betts

JEB/DMB:kh



D. Michael Betts

Enclosures

P.S. Enclosed you will find current news clips on the development of our nation's information superhighway. They are meaningful to us as we talk about progress in Ohio.

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# BETTS & ASSOCIATES, INC.

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## REMINDER NOTICE

As stated in our letter to you dated February 2, the next meeting of the JOBS 2000: The Information Superhighway Consortium will be held on Friday, March 11, from 9:30 a.m. to 12:00 noon, at The Great Southern Hotel, 310 South High Street, Columbus, in the Jefferson Room.

John Griffin, Vice President - Business and Technology Integration, of Battelle Memorial Institute, will give a presentation regarding a recent economic study conducted by that organization; and either Eric Burkland, President, or Bill Burns, Managing Director of Information Services, of The Ohio Manufacturers Association, will discuss the OMA's concerns and position.

An update regarding Ameritech's current PUCO filing will also be provided and we will discuss the adoption of a Mission Statement and Action Plan.

Please R.S.V.P. to Karrie Hilles at 216/781-1500, ext. 217, to advise us of your attendance. We look forward to seeing you on the 11th.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Ameritech Ohio's Response to OCTVA Revised Requests for Admission was served upon counsel for all parties as shown on the attached service list by regular U.S. mail, postage prepaid, this 8<sup>th</sup> day of June, 1994.

Michael T. Mulcahy  
Michael T. Mulcahy



SERVICE LIST

CASE NO. 93-487-TP-ALT

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SERVICE LIST

CASE NO. 93-487-TP-ALT

PAGE 2

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SERVICE LIST

CASE NO. 93-487-TP-ALT

PAGE 3

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# CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Ameritech Ohio's Response to OCTVA Revised Requests for Admission were hereby served upon all counsel of record listed below, either by regular U.S. mail, postage prepaid, or by hand-delivery, this 15th day of June, 1994.

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