

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

**In the Matter of the Review of Ohio :
Administrative Code Chapter : CASE NO. 14-1554-TP-ORD
4901:1-6, Telephone Company :
Procedures and Standards**

**INITIAL COMMENTS
OF THE
OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to the January 7, 2015 Entry, the Ohio Cable Telecommunications Association (the "Association" or the "OCTA") submits these Initial Comments. The OCTA, a trade association of cable telecommunication operators located throughout Ohio, appreciates the opportunity to provide input into these proposed rule revisions.

Some of the Association's members offer, or may in the future offer, telephone service using a switched network, offer or may offer telephone service through internet protocol-enabled services or broadband or utilize the services or facilities of incumbent local exchange carriers (ILECs) or competitive local exchange carriers (CLECs) in offering these services for transport and termination. Some of the OCTA members utilize pole attachment and conduit occupancy services offered by ILECs. Therefore, the Association, on behalf of its members, is an interested person and offers these Initial Comments. While the OCTA will offer comments on some of the rule revisions proposed by the Commission's staff, its failure to comment on a rule does not necessarily reflect its endorsement of any of the proposed rule revisions.

I. Comments on Specific Rules

A. Rule 4901:1-6-12 – Service Requirements for BLES

The Commission staff has only indicated correcting a misspelling in this rule. The OCTA, however, would suggest an additional revision for purposes of clarification. Because LECs are not required to provide Basic Local Exchange Service (BLES) under Chapter 4927 O.R.C., the reference in this rule to LECs providing BLES should be clarified. To clarify, the OCTA would recommend that the first line of subsection (A) and the first line of subsection (C) be revised to read as follows (added language shown with double underline and deleted language shown with double strike through):

(A) [first line] “A local exchange carrier (LEC) choosing to provide ~~providing~~ basic local exchange service (BLES) shall conduct”

(C) [first line] “A LEC choosing to provide ~~providing~~ BLES shall provide it pursuant to the following standards:”

B. Rule 4901:1-6-37 – Assessments and Annual Reports

The Commission staff has not proposed any revisions to Rule 4901:1-6-37. Under subsection (B), telephone companies subject to R.C. 4905.71 are to provide information in their annual reports as required by the commission to calculate pole attachment and conduit occupancy rates. As a result of the recent enactment of the Rules in Chapter 4901:1-3, the OCTA believes there needs to be more specificity in this rule to ensure the proper information is available. Based on this, the

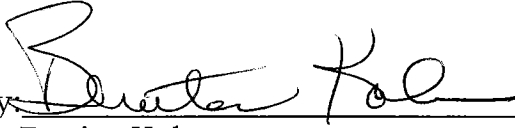
OCTA would recommend the following revisions to subsection (B) (added language shown with double underline):

(B) In addition to the information necessary for the commission to calculate the assessment provided for in section 4905.10 of the Revised Code, telephone companies subject to section 4905.71 of the Revised Code, shall provide in their annual report information required by the commission to calculate pole attachment and conduit occupancy rates. This shall include information necessary to calculate the rates in a manner consistent with the requirements of Chapter 4901:1-3 and any other information the commission determines necessary to fulfill its responsibility under section 4905.71 of the Revised Code. This information shall be provided in the format prescribed in the commission's annual reporting form for telephone companies.

II. Conclusion

The OCTA understands and appreciates the time and effort the Commission staff put into reviewing Chapter 4901:6 and the proposed revisions to the existing rules. It also appreciates the opportunity to provide input into the staff proposed rule revisions. The OCTA asks the Commission to revise suggested rule revisions as specifically recommended in these Initial Comments.

Respectfully submitted,

By 
Benita Kahn

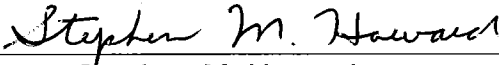
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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service of the Docket card who have electronically subscribed to the case (those individuals are marked with an asterisk below). In addition, I certify that a copy of the foregoing Initial Comments of the Ohio Cable Telecommunications Association has been and will be served via electronic mail or via hard copy on February 6, 2015 pursuant to the January 7, 2015 entry in Case No. 14-1554-TP-ORD.


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Summary: Comments Initial Comments electronically filed by Benita Kahn on behalf of Ohio Cable Telecommunications Association