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DOCKETING DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter Of The Application Of The)
Ohio Bell Telephone Company For Approval)
Of An Alternative Form Of Regulation.)

CASE NO. 93-487-TP-ALT

In The Matter Of The Complaint Of The)
Office Of Consumers' Counsel,)

Complainant,)

v.)

Ohio Bell Telephone Company,)

Respondent,)

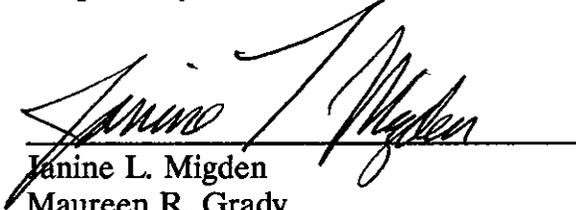
CASE NO. 93-576-TP-CSS

Relative To The Alleged Unjust And)
Unreasonable Rates And Charges.)

MOTION FOR INTERVENTION

Pursuant to Sec. 4903.221 Ohio Revised Code and Rule 4901:1-11 Ohio Administrative Code, the Ohio Domestic Violence Network ("ODVN") respectfully requests the Public Utilities Commission of Ohio ("Commission") to grant its Motion to Intervene for the reasons set forth in the accompanying memorandum.

Respectfully submitted,



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MEMORANDUM IN SUPPORT OF
MOTION FOR INTERVENTION

Pursuant to Sec. 4903.221 Ohio Revised Code and Rule 4901:1-11 Ohio Administrative Code, the Ohio Domestic Violence Network ("ODVN") respectfully requests that its Motion to Intervene be granted because ODVN will be adversely affected if the Commission approves Ohio Bell's Application for Alternative Regulation.

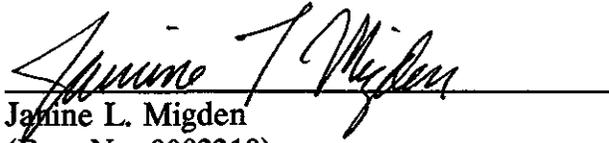
The Ohio Domestic Violence Network ("ODVN") is a cohesive network of organizations and individuals from across the State of Ohio which advocates with and for battered persons, produces and shares information, educates about options, and advances social change.

ODVN will be adversely affected by Ohio Bell's proposal as it relates to Signaling System 7 ("SS7") and the impact of SS7 on providing blocking for Automatic Callback features. The failure of Ohio Bell to provide adequate blocking features in its Application poses a serious and potentially life-threatening adverse affect on women and children who are victims of domestic violence in this State.

Intervention by ODVN will not unduly prolong or delay the proceeding and it will significantly contribute to the full development and equitable resolution of the issues. Moreover, the issues raised by ODVN cannot be fully articulated by any other party and thus, its involvement is essential to a complete understanding of the issues.

WHEREFORE, the Ohio Domestic Violence Network respectfully requests that the Public Utilities Commission of Ohio grant its Motion to Intervene.

Respectfully submitted,

A handwritten signature in cursive script, reading "Janine L. Migden", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Motion For Intervention and Memorandum In Support have been served by first class mail, postage prepaid, or hand delivered to all parties of record to this proceeding on this 25th day of April, 1994.

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