4



THOMPSON HINE & FLORY LLP

RECEIVED-DOCKETING DIV

Attorneys at Law

CO SEP -7 ANII: 02

(614) 469-3246 ● Thomas E. Lodge ● tlodge@thf.com

PUCO

September 7, 2000

Daisy Crockron, Chief of Docketing Division PUBLIC UTILITIES COMMISSION OF OHIO 180 East Broad Street Columbus, Ohio 43215

Re: In the Matter of the Commission Ordered Investigation of the Existing
Local Exchange Competition Guidelines, PUCO Case No. 99-998-TP-COI
In the Matter of the Commission Review of The Regulatory Framework
for Competitive Telecommunication Services under Chapter 4927,
Revised Code, Case No. 99-563-TP-COI

Dear Ms. Crockron:

Enclosed for filing are an original and ten (10) copies of a Memorandum of The Ohio Telecommunications Industry Association in Opposition to OCC's Motion for Extension of Time, to be filed in connection with the above-referenced matter.

Thank you for your assistance. If you have any questions, please call.

Very truly yours,

Thomas E. Lodge

TEL/tjh

cc:

Jeffrey R. Jones, Attorney Examiner

Parties of Record

Enclosures

PECELVED-DOCKETING DIV

BEFORE

00 SEP -7 AM 11:02

THE PUBLIC UTILITIES COMMISSION OF OHIO	PUC(
---	------

In the Matter of the Commission Ordered Investigation of the Existing Local Exchange Competition Guidelines.))	Case No. 99-998-TP-COI
In the Matter of the Commission Review of The Regulatory Framework for Competitive Telecommunication Services under Chapter 4927, Revised Code)))	Case No. 99-563-TP-COI

MEMORANDUM OF THE OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION IN OPPOSITION TO OCC'S MOTION FOR EXTENSION OF TIME

The Ohio Telecommunications Industry Association ("OTIA"), opposes the Motion for Extension of Time filed by the Ohio Consumers' Counsel on August 31, 2000. Given the importance of the issues in this proceeding, as well as the daily pressures faced by the Commission and the industry to foster competition, the 30-day extension requested by OCC's Motion appears unwarranted. OCC's requested extension of time should be denied.

Respectfully submitted,

THE OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By:

Thomas E. Lodge (0015741)

Thompson Hine & Flory LLP

One Columbus

10 West Broad Street, Suite 700 Columbus, Ohio 43215-3435

(614) 469-3200

Its Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon all parties listed on the attached list, by ordinary U.S. Mail, postage prepaid, this _____ day of September, 2000.

Thomas E. Lodge

SERVICE LIST CASE NO. 99-998-TP-COI

Ellis Jacobs, Esq. Legal Aid Society of Dayton 333 West First Street, Suite 500 Dayton, Ohio 45402

Sally W. Bloomfield, Esq. Bricker & Eckler LLP 100 South Third Street Columbus, Ohio 43215-4291

David J. Chorzempa AT&T Corp. 222 West Adams, Suite 1500 Chicago, IL 60606

Benita A. Kahn Vorys, Sater, Seymour & Pease 52 East Gay Street P.O. Box 1008 Columbus, Ohio 43215-1008

Judith B. Sanders, Esq. Bell, Royer & Sanders Co., LPA 33 South Grant Avenue Columbus, Ohio 43215-3927

Michael T. Mulcahy Ameritech Ohio 45 Erieview Plaza, Suite 1400 Cleveland, Ohio 44114

Jon F. Kelly Ameritech Ohio 150 East Gay Street, Room 4C Columbus, Ohio 43215 Joseph P. Serio
David C. Bergmann
Terry Etter
Assistant Consumers' Counsel
Ohio Consumers' Counsel
77 South High Street, 15th Fl.
Columbus, Ohio 43266

Joseph R. Stewart United Telephone Company of Ohio d/b/a Sprint 50 West Broad Street, Suite 3600 Columbus, Ohio 43215

Don Marshall Cincinnati Bell Telephone Company 201 East Fourth Street Cincinnati, Ohio 45201

Thomas J. O'Brien CoreComm Newco, Inc. 450 West Wilson Bridge Road, Suite 100 Worthington, OH 43085

Boyd B. Ferris ICG Telecom Group, Inc. 2733 W. Dublin-Granville Road Columbus, Ohio 43235

Thomas J. O'Brien CoreComm Newco, Inc. 450 W. Wilson Bridge Road Columbus, Ohio 43085