

OLAPRIG AM 9:39
PUCO

Mark Griffin

Direct Phone: 216.274.2468
Direct Fax: 216.241.2824
E-mail: mdgriffin@hahnlaw.com

April 13, 2001

VIA FEDERAL EXPRESS

Ms. Daisy Crockron
Chief of Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
10th Floor
Columbus, OH 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 Telecommunications Services Under Chapter 4927, Revised Code PUCO Case No.: 99-563-TP-COI

Dear Ms. Crockron:

Enclosed please find an original and sixteen (16) copies of Initial Comments of Enron Broadband in the above-referenced matters. Please file the original and return a time-stamped copy to me in the envelope enclosed for your convenience.

Thank you for your cooperation. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Mark Griffin

document delivered in the regular course of the mechanician Since Date Processed Himler

lml

Enclosures

cc: All Counsel and Parties of Record (via regular U.S. mail w/encl.)

CLE - 657025.1

Hahn Loeser • Parks

BEFORE

LOCIVED LONG TING OFF OT APR 16 AM 9: 39

THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

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 Telecommunications Services Under Chapter 4927, Revised Code.)))	Case No. 99-563-TP-COI	

INITIAL COMMENTS OF

ENRON BROADBAND

By Entry issued March 1, 2001, the Commission requested comments on the Staff's proposal relating to the Existing Local Exchange Competition Guidelines and the Regulatory Framework for Competitive Telecommunications Services under Chapter 4927, Revised Code. Enron Broadband for its initial comments, respectfully reserves its rights to file reply comments on all issues.

Respectfully submitted,

OF COUNSEL:

Randy J. Hart (0046793)

(Trial Attorney) (rjhart@hahnlaw.com)

Mark D. Griffin (0064141)

(mdgriffin@hahnlaw.com)

HAHN LOESER & PARKS LLP

3300 BP Tower 200 Public Square Cleveland, OH 44114 216/621-0150 (telephone)

216/241-2824 (facsimile)

Attorneys for Enron Broadband

CERTIFICATE OF SERVICE

A copy of the foregoing Comments of Enron Broadband was served by regular U.S. mail this

13th day of April, 2001 upon the following:

Sally W. Bloomfield
Bricker & Eckler
100 South Third Street
Columbus, OH 43215
Counsel for McLeodUSA
Telecommunications Services,
Inc./McLeodUSA Technology Park;
Association of Communications Enter; Time
Warner Telecom of Ohio, L.P.; Broadband
Office Communications, Inc.; Intermedia
Communications Ohio, Inc.; Rhythms Links
Inc.; Allegiance Telecom of Ohio, Inc.;
Teligent Services, Inc.;

Mary W. Christensen Christensen, Shoemaker & Winkler 77 East Nationwide Blvd. 2nd Floor Columbus, OH 43215-2539 Counsel for McLeodUSA Telecommunications Services, Inc./McLeodUSA Technology Park

Jason J. Kelroy Vorys, Sater, Seymour & Pease LLP 52 East Gay Street P.O. Box 1008 Columbus, OH 43216-1008 Counsel for Suretel, Inc. David C. Bergmann
Joseph P. Serio
Terry L. Etter
Robert S. Tongren
Office of Consumers Counsel
10 W. Broad Street, Suite 1800
Columbus, OH 43215
Counsel for Office of Consumers' Counsel

AT&T Corporation of Ohio, Inc.
222 W. Adams Street
Suite 1500
Chicago, IL 60606
and
Benita A. Kahn
Vorys, Sater, Seymour and Pease
52 E. Gay Street
P.O. Box 1008
Columbus, OH 43216
Counsel for TCG Ohio; AT&T
Communications of Ohio, Inc.

David Chorzempa

Jon F. Kelly

Legal Department
Ameritech Ohio
150 E. Gay Street, Room 4-C
Columbus, OH 43215
and
Michael T. Mulcahy
Attorney at Law
Ohio Bell Telephone Company
45 Erieview Plaza, Suite 1400
Cleveland, OH 44114
Counsel for Ameritech Ohio

James P. Miggans
Regulatory Manager
GTE Service Corp.
600 Hidden Ridge, HQE02E94
Irving, TX 75038
and
William H. Keating
Attorney at Law
5994 Whitecraigs Ct.
Dublin, OH 43017
Counsel for Verizon North, Inc.; GTE
Wireless of the Midwest; GTE
Communications Corporation

Peggy P. Lee
Attorney at Law
490 Richard Avenue
Athens, OH 45701
and
Michael R. Smalz
Ohio State Legal Service Association
861 North High Street
Columbus, OH 43215
Counsel for Appalachian Peoples Action
Coalition

Judith B. Sanders
Bell, Royer & Sanders Co., L.P.A.
33 South Grant Avenue
Columbus, OH 43215-3927
Counsel for MCI Worldcom Communications,
Inc.; MCIMetro Access Transmission

Joseph R. Stewart Sprint 50 West Broad Street Suite 3600 Columbus, OH 43215 Counsel for Sprint Thomas E. McCullough
United Telephone Long Distance, Inc.
P.O. Box 3555
Mansfield, OH 44097-0555
Counsel for Sprint; Sprint Communications
Company L.P.

Ellis Jacobs
Attorney at Law
Legal Aid Society of Dayton
333 W. First Street, Suite 500
Dayton, OH 45402
Counsel for Appalachian Peoples Action
Coalition Edgemont Neighborhood Coalition,
Inc.

Thomas E. Lodge
Thompson, Hine and Flory
One Columbus
10 West Broad Street, Suite 700
Columbus, OH 43215-3435
Counsel for Ohio Telecommunications
Industry Association; Verizon North, Inc.
Western Reserve Telephone Company, The
Small Telephone Companies; Alliel Ohio,
Inc.; Alltel Communications, Inc.

William A. Adams Arter & Hadden One Columbus 10 West Broad Street Columbus, OH 43215 Counsel for SBC Telecom, Inc. Nextlink Ohio, L.L.C.
Two Easton Oval
Suite 300
Columbus, OH 43219
and
John W. Bentine
Todd M. Rodgers
Chester, Willcox & Saxbe
17 S. High Street
Suite 900
Columbus OH 42215

Douglas W. Kinkoph

Columbus, OH 43215 Counsel for XO Ohio, Inc.

Boyd B. Ferris
Carlile, Patchen & Murphy, LLP
366 East Broad Street
Columbus, OH 43215
Counsel for ICG Telecom Group, Inc.

Evelyn Schaeffer, Coordinator Ashtabula County Telephone Coalition 1211 Route 45 Austinburg, OH 44010 Counsel for Ashtabula County Telephone Coalition

Lee Lauridsen
Senior Attorney
Sprint Communications Company L.P.
8140 Ward Parkway
Kansas City, MO 64114
Counsel for Sprint Communications
Company L.P.

Stephen M. Howard Vorys, Sater, Seymour and Pease 52 East Gay Street P.O. Box 1008 Columbus, OH 43216-1008 Counsel for Ohio Cable Telecommunications Thomas J. O'Brien
Corecomm Newco, Inc.
450 West Wilson Bridge Road
Worthington, OH 43085
Counsel for Corecomm Newco, Inc.

Mark Romito
Cincinnati Bell Telephone Company
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201
and

Jack B. Harrison
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202
Counsel for Cincinnati Bell Telephone
Company

Kerry Bruce
Department of Public Utilities
420 Madison Avenue
Suite 100
Toledo, OH 43604-1219
Counsel for City of Toledo

Nancy Neylon
Executive Director
Ohio Domestic Violence Network
4041 N. High Street
Suite 400
Columbus, OH 43214
Counsel for Ohio Domestic Violence Network

Bruce Weston
Attorney at Law
169 W. Hubbard Avenue
Columbus, OH 43215
Counsel for Ohio State Legislative Board of
The American Association of Retired Persons

Southern Ohio Communications Services Gregory S. Lang P.O. Box 488 100 E. Third Street Waverly, OH 45690

Aerial Communications, Inc. Latrice Kirkland 8410 W. Bryn Mawr Avenue Suite 1100 Chicago, IL 60631

Ohio Council of Retail Merchants John C. Mahaney, Jr., President 50 W. Broad Street Suite 2020 Columbus, OH 43215

Ohio Farm Bureau Development Corp. D. Michael Pullins Two Nationwide Plaza P.O. Box 479 Columbus, OH 43216-0479

Thomas Rowland Rowland & Moore 55 E. Monroe Street Suite 3230 Chicago, IL 60603 Randy Creach
Dayton Power & Light Company
1 S. Gebhart Church Road
Miamisburg, OH 45342

Ron Huffman 12900 Fox Run Court, N. Pickerington, OH 43147

Thomas Reid Ohio University 385 HDL Center Athens, OH 45701

Larry Stevens Newpath Holdings, Inc. 4634 114th Street Des Moines, IA 50322

William M. Ondrey Gruber Attorney at Law 2714 Leighton Road Shaker Heights, OH 44120

Ohio Chamber of Commerce Kelly Kinder Director of Energy P.O. Box 15159 Columbus, OH 43215-0159

Landy J. Hart/mag