

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Request of SBC Ohio)
For a Waiver of Certain Procedural Rules)
To Permit Electronic Filings on a Trial Basis.)

Case No. 05-548-AU-WVR

SBC OHIO'S MOTION FOR A WAIVER OF THE COMMISSION'S PROCEDURAL RULES
TO ACCOMMODATE A TRIAL OF THE ELECTRONIC FILING SYSTEM

SBC Ohio¹, by its attorneys, seeks a waiver of Sections 4901-1-02, -03, and -04 of the Commission's rules to the extent necessary to permit the Company to make electronic filings with the Commission's Docketing Division on a trial basis. As the Commission is aware, the Docketing Division is making steady progress toward an electronic filing system in which applications, pleadings, and other items could be filed electronically. SBC Ohio has worked closely with Commission personnel on many aspects of this project. It has participated in an experiment in which several parties have made and retrieved electronic filings in a fictitious docket created for that purpose. The next logical step in this process is for a regulated utility to make electronic filings of a routine nature. Toward that end, SBC Ohio proposes to make its routine "CTR" and stand-alone "TRF" filings electronically. The Company will work with the Staff on the necessary format of all such filings to insure that they are timely filed and available on the Commission's Docketing Information System for interested parties to view.

Several of the Commission's procedural rules are implicated in this initiative. Section 4901-1-02 contemplates the filing of "hard copies" of applications and other documents, but makes provision for the filing of facsimile copies. Section 4901-1-03 also contemplates the

¹ SBC Ohio is a registered trade name of The Ohio Bell Telephone Company.

filing of "hard copies" of documents. Section 4901-1-04 requires that all applications filed by any person be "signed" by that person or his or her attorney. To the extent reasonably necessary to permit the filing of its CTR and stand-alone TRF filings electronically, SBC Ohio seeks a waiver of these rules. The electronic filings will be made in a manner that complies with the standards specified by the Staff. While the Company is willing to transmit PDFs that contain signatures, the Staff has expressed an interest in having filings made via a secure "electronic signature" process to test such a system.

The waivers requested here will serve the public interest in assisting the Commission and its Staff in modernizing the Docketing Department's processes, while maintaining full access to materials filed with the Commission to interested parties. Pursuant to Section 4901-1-12(F) of the Commission's rules, SBC Ohio requests an expedited ruling on this request, and asserts that the granting of this motion will not adversely affect a substantial right of any party.

Respectfully submitted,

SBC OHIO

By: /s/ Jon F. Kelly
Jon F. Kelly
SBC
150 E. Gay St., Rm. 4-A
Columbus, Ohio 43215

(614) 223-7928

Its Attorney

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