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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO AUG 30 1996

DOCKETING DIVISION  
Public Utilities Commission of Ohio

In the Matter of the Application )  
of The Ohio Bell Telephone Company ) Case No. 93-487-TP-ALT  
for Approval of an Alternative )  
Form of Regulation. )

AMERITECH OHIO'S MOTION FOR STAY

Ameritech Ohio moves for a stay of that aspect of the Commission's Entry of August 22, 1996, in the captioned proceeding that denied the company's motion for a protective order. The requested stay would permit the Commission to address the application for rehearing concurrently filed by Ameritech Ohio while maintaining the protected status of the company's trade secret information pending rehearing. The reasons underlying this motion are set forth in the attached memorandum in support.

Respectfully submitted,

AMERITECH OHIO

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MEMORANDUM IN SUPPORT OF MOTION FOR STAY

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Ameritech Ohio has sought rehearing of the Commission's August 22, 1996, Entry insofar as that Entry denied the motion for a protective order sought by the company on June 28, 1996.

In light of the serious issue presented by the denial of the company's requested stay, Ameritech Ohio submits that the issuance of a stay pending rehearing is an appropriate action under the circumstances presented.

Ameritech Ohio has presented sound reasons, both factual and legal, why the Commission erred in denying the requested stay. Ohio law compels the result sought by Ameritech Ohio, which is the continued protection of the confidential trade secret information that it filed under seal on June 28, 1996. Ameritech Ohio stands to be irreparably harmed by the disclosure of its trade secret information. Conversely, no harm would befall the public if the information, which is currently held under seal by the Commission's Docketing Division, were to continue to be held under seal pending resolution of the important issues presented in the company's application for rehearing.

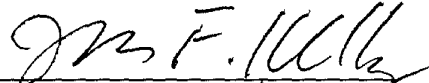
In light of the issues presented in its application for rehearing, Ameritech Ohio's confidential information should not be publicly disclosed until the Commission has a full opportunity

to review and reconsider its August 22, 1996, action. The company's motion for stay should therefore be granted.

Respectfully submitted,

AMERITECH OHIO

By:

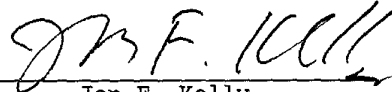
  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Stay and Memorandum in Support was served upon counsel for the parties as shown on the attached service list, by prepaid first class U. S. mail, this 30th day of August, 1996.

  
Jon F. Kelly

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