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PUCOBEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the matter of the Complaint of the)
Ohio Cable Telecommunications Association, et al.,)
Complainants,)
v.)
Ameritech Ohio,)
Respondent.)

Case No. 96-1027-TP-CSS

RESPONDENT'S MEMORANDUM CONTRA COMPLAINANTS'
RESPONSE AND OBJECTIONS TO COMPLIANCE MEMORANDUM

If there ever was any reasonable doubt as to Complainants' true motivation in these proceedings, that doubt can no longer exist. They clearly intend to misuse the regulatory process to slow down Ameritech New Media's ("ANM") entry into Complainant's monopoly markets by dragging in to the Commission every possible issue, no matter how de minimus it may be and whether or not the Commission has already established an alternative method for resolving the matter. Moreover, although this case has been heard and reheard, Complainants

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Technician Ann M. Nijm Date Processed Sept 22, 1997

continue to collaterally attack and contest essential findings of the Commission's prior Orders.¹

The Commission should reject Complainants' attempts to misuse the regulatory process and put an end to the continued sniping and guerrilla warfare being conducted by these incumbent monopolists against the only new entrant CATV company to ever challenge their strangle hold on the Ohio CATV market.

A NESC COMPLIANCE

The Commission in its Orders, has established a reasonable and workable arrangement for addressing NESC compliance by all attaching parties. Ameritech Ohio ("Ameritech") is currently following that arrangement and all potential NESC violations are being investigated and, where appropriate, remedied in a timely manner. For example, the potential violations previously identified by Complainants have been investigated and violations remedied. See Exhibit B to Compliance Memorandum. Moreover, as to those potential violations identified herein, Ameritech immediately notified ANM and ANM has already determined the necessary corrective action and is in the process of making necessary changes². See Exhibit A attached hereto. Despite the success already achieved in the few short months since the Commission's procedures were adopted, Complainants would have the Commission, through their improper collateral attack of the Orders, abandon those previously ordered NESC compliance procedures. Their attempts to do so should be rejected.

Under the current Commission ordered arrangement, Ameritech is required to inform attaching parties of the need to comply with NESC standards. Entry on Rehearing at 20.

¹ The Commission's Opinion and Order, as clarified by its Entry on Rehearing, shall be referred to as the "Orders".

If “noncompliant attachments are brought to the attention of Ameritech, Ameritech has a duty to notify the attaching party to correct the attachment”. *Id.* That notice is to include a request to the notified party to submit to Ameritech within 30 days a plan of correction. *Id.* at 5. If the corrections are not timely made, Ameritech, after notice, is to correct the violations. *Id.* The Commission also required Ameritech to file a report in this docket, and provide a copy to Complainants, detailing how violations previously identified were corrected. *Id.* at 4.

Ameritech has, as demonstrated in its Compliance Memorandum, fully complied with the Commission’s directives. See Compliance Memorandum, Exhibits A and B. As noted in that Memorandum, Ameritech has gone beyond the basic requirements of the Orders and has adopted a procedure to proactively identify any possible violations of NESC standards. *Id.*, Exhibit C (see definition of “Potential Pole Attachment Violations”). The procedures already established by the Commission are reasonable and workable. They provide a mechanism for identifying and correcting NESC violations with unnecessary expenditure of Commission time and resources. For example, had Complainants merely informed Ameritech Ohio of the possible NESC violations they have now identified, the Commission’s previously established correction mechanism would have been employed and appropriate corrective action would have been taken without the need for Commission involvement. However, such compliance with the arrangement previously established by the Commission would not have been consistent with the

² Ameritech will follow the same procedures as to all other attaching parties. For example, if NESC violations are found in Complainant’s facilities, say improper clearances from power lines, Complainants would also be so notified.

Complainants true motivations - - to continually entangle Ameritech in Commission proceedings and to collaterally attack the Orders.³

Consistent with these motivations, Complainants' Response proposes that the Commission now impose new and special NESC compliance duties on Ameritech Ohio. They assert that Ameritech Ohio should have the affirmative burden to somehow prove that all the ANM cable facilities (and presumably those of all other attaching parties) will continue to comply with NESC standards, particularly as they relate to ground clearance requirements under maximum ice loading conditions. Such a requirement would be extremely costly and time consuming and would impose on Ameritech the exact audit and insurer requirements which the Commission has previously refused to adopt. As Complainants acknowledge, albeit indirectly, numerous factors affect the degree of sag of each span of cable hung between utility poles. Complainants Response at 2. (Cable sag depends on the type and weight of the cable, the length of the span, the load capacity of the associated poles and "other factors"). ANM has attached to some 30,000 utility poles in the Columbus, Ohio area alone. Complainants have attached to many more. Obviously, if Ameritech Ohio were required to perform such an analysis for each span of ANM cable crossing a driveway, street, parking lot or walkway, and to consider each of the factors affecting the degree of cable span, an audit of massive proportions would be required. Ameritech would in effect be insuring NESC compliance, and the cost of constructing any

³ In considering the intent of these incumbents and the merits of their proposals, the Commission should recall the statements of the CEO of Coaxial Communications, "Before we had competition, it was our goal to keep competition out". (Tr-111, 138) and that if a new competitor such as ANM were entering a densely populated area such as Columbus and was required to attach its facilities above that of the incumbents, its costs would be "horrendous". (Tr 111-136). The testimony of Dr. Currie should also be considered "Requiring new entrants to incur the unnecessary costs of conforming to historical (and higher cost) standards would substantially raise barriers to entry and shield existing monopoly providers from the impact of competition". Ameritech Ex. 10 at 4.

facilities based CATV or communications network would be prohibitive. As a result, no new CATV Network could ever be built and the monopoly grip of Complainants' members would never be broken.

Complainants' attempts to alter the procedures previously ordered by the Commission to identify and resolve NESC violations are nothing more than improper attempts to seek rehearing of previously resolved matters and to continue to embroil Ameritech in these costly and time consuming proceedings. ANM has hired qualified contractors to construct its network in conformance with all code requirements. If and when NESC violations are found, they are quickly remedied. See Exhibit A (ANM has already identified the corrective action required as to each of the violations currently identified by the Complainants and correction action is under way). The Commission has previously examined the NESC compliance issue and has resolved it in a manner which is both appropriate and working. There is simply no reason to now abandon those procedures. Ameritech has initiated a positive reporting mechanism for reporting and handling of possible NESC violations. It has directed all its construction, engineering and CP&M forces to report all possible NESC violations observed by those employees or "reported to the Ameritech employee by another party". See Exhibit C to Ameritech Compliance Memorandum. If NESC violations of any attaching party come to Ameritech Ohio's attention, prompt corrections are required. No more should be required.⁴

⁴ It should be noted that as to ANM, out of some 30,000 plus attachments in the Columbus, Ohio area, Complainants, after actively searching for violations have identified a grand total of 37 alleged clearance violations (many of which actually meet NESC standards and most of the remainder were but a few inches off the NESC requirement). This amounts to claimed violations for .001% of the ANM attachments. While Ameritech's goal is obviously 100% compliance, 99.9% on a new construction project certainly provides no basis to alter the mechanism previously established by the Commission for identifying and resolving claimed NESC violations. In

B. JOINT RIDE OUTS

Ameritech Ohio has fully complied with the joint rideout requirements of the Commission's Orders in this matter. It has notified over 180 parties as to the required rideout procedures. See example attached as Exhibit B. Moreover, it is conducting on an ongoing basis rideouts with ANM in respect to its post Order pole attachment applications. Those rideouts will continue until otherwise ordered by the Commission.

C. POLE ATTACHMENT TARIFF

As the Commission is well aware, Ameritech Ohio has filed in Commission Case No. 96-974-TP-ATA, a proposed unbundled network element tariff that includes all of Ameritech Ohio's pole attachment terms and conditions. Because that docket involves issues beyond pole attachments, it has required careful review by the Staff of the Commission.

The Commission stated that "Ameritech needs to revise its tariff and work with staff to ensure that its tariff language comports with these directives". Opinion and Order at 2. That is precisely what is occurring. Ameritech's filing and Staff's associated review process has in no way caused Ameritech Ohio to somehow be out of compliance with the Orders in this case. The Orders recognized the review process inherent in such tariff filings and they do not require Ameritech to have a Commission approved tariff in place by any specific date. Ameritech has taken all reasonable steps to revise its tariff and to incorporate therein all policies and practices affecting pole attachments.

all cases, NESC violations were and are being quickly remedied. The Commission's prior directives have worked well and are achieving the desired result – NESC compliance.

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D. 702 CASE FILING

Ameritech's Compliance Memorandum fully addressed each of the matters as to which the Commission found Ameritech Ohio's policies and practices to be wanting including, but not limited to, the notification of pole attachment policy changes which formed the basis of the Commission's inadequate service findings. The Memorandum was served on each party to the 96-702-TP-COI proceeding. A copy of this Memorandum Contra will also be so served.

E. ATTACHMENT CREDIT

Ameritech Ohio has received no applications to attach to the poles which are subject to the Commission ordered credit in this case. Credits will be properly provided as those attachments are made. Complainant's attempts to have this Commission find that Ameritech has somehow failed to meet its obligations is without basis in fact or logic. It should be rejected.

CONCLUSION

Ameritech has fully complied with the Commission's Orders herein. The Commission should bring an end Complainants' attempts to continuously embroil Ameritech in Commission proceedings. All proceedings need finality. This matter is at an end. Complainant's energies and efforts should be directed at serving their CATV customers and delivering the yet to be provided telecommunications services previously promised to Ohio consumers.

Respectfully Submitted,

Kevin M. Sullivan by JH per authorization
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Respondent's Memorandum Contra Complainants' Response and Objections to Compliance Memorandum was served upon the following parties of record by regular U.S. Mail, postage prepaid, this 19th day of September, 1997.

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Kevin M. Sullivan by JDS per authorization

One of the Attorneys for
Ameritech Ohio

Amitech New Media Response to P.U.C.O. Case #80-1027-TP-CSS

EXHIBIT A

Source	Page & Line Number	Address	Pole Number	Condition reported	Field Results	Corrective Action	Job Status
Time Warner- Sept 1997	P.3	1889 Greenwch	no tag	low clearance 14'11" over road	PWR-not attached, CATV-16'7", TELCO-13'11", ANM-14'1", across alley entrance.	MR issued 8/18/97 to raise CATV, TELCO & ANM. ANM work to complete upon completion of MR by other parties. MR issued 8/18/97 to request pole replacement (Ameltech). ANM work to complete upon completion and notice by pole owner.	In progress
"	P.3	2727 Westerville Road	no tag	low clearance 14'4" over road	PWR-not attached, CATV-not attached, TELCO-15'5", ANM-14'6", along roadway.	MR issued 8/18/97 to raise TELCO & ANM. ANM work to complete upon completion of MR by other party and other attachments.	In progress
"	P.3	1873 Marnebrook, REAR	250454	low clearance 12' over driveway	PWR-not attached, CATV-not attached, TELCO-13'6", ANM-12'3", along alley.	MR issued 8/18/97 to raise PWR, CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8885-8888 Alloway St E.	1853070, 767188	low clearance 14'8"	PWR-15'9", CATV-13'0", TELCO-not attached, ANM-14'10", across roadway.	MR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8885-8888 Downe St	1853027, 767281	low clearance 15'3"	PWR-24'0", CATV-15'8", TELCO-not attached, ANM-15'6", across roadway. * ANM ON CATV.	MR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MR by other party.	In progress
"	P.8	305-300-6823 Haligan Av	1859030, 768478	low clearance 15'3"	PWR-18'5", CATV-14'3", TELCO-not attached, ANM-15'5", across roadway	MR issued 8/18/97 to raise PWR, CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	7014-7010 Rockwood Pl	1857552, 767857	low clearance 15'2"	PWR-25'0", CATV-18'10", TELCO-not attached, ANM-15'4", across roadway.	MR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MR by other party.	In progress
"	P.8	58 South St & Hartford N/E line	1855513, 758531	low clearance 15'3"	PWR-22'0", CATV-17'4", ANM-15'1", across roadway. TELCO-not crossing roadway; Telco class S-30 pole cut at top.	MR issued 8/18/97 to request pole replacement (Ameltech). ANM work to complete upon completion and notice by pole owner and other parties.	In progress
Time Warner- Sept 1997	P.8	Rear of 66-74 Orchard Dr	1855594, 759009	low clearance 15'4"	PWR-20'11", CATV-17'5", TELCO-15'9", ANM-15'4", across roadway. *NR trees	MR issued 8/18/97 to raise TELCO & ANM. ANM work to complete upon completion of MR by other party.	In progress
"	P.8	328-317 Wygon	1852888, 763745	low clearance 15'0"	PWR-22'1", CATV-17'7", Telco-15'0", ANM-15'0", across roadway.	MR issued 8/18/97 to raise CATV, TELCO & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	6824-6845 Worthington-Galena	1856854, 755100	low clearance 14'9"	PWR-15'3", CATV-does not cross roadway, TELCO-not attached, ANM-14'9", across roadway	MR issued 8/18/97 to raise PWR & ANM. ANM work to complete upon completion of MR by other party.	In progress
Time Warner- Sept 1997	P.8	433-418 Northland Rd	1857660, 763505	low clearance 14'9"	PWR-21'11", CATV-16'1", TELCO-15'5", ANM-15'2", across roadway.	MR issued 8/18/97 to raise TELCO & ANM. ANM work to complete upon completion of MR by other party.	In progress

PUCO
Page 1

9/18/97

Amendtech New Media Response to P.U.C.O. Case #89-1027-TP-CSS

EXHIBIT A

Source	Page & Line Number	Address	Pole Number	Condition reported	Field Remarks	Corrective Action	Job Status
"	P.8	347-358 E. North St W/O Procter/Kear Rd	1857852, 762908	low clearance 15'2"	PWR-18' 5" CATV-16' 5" TELCO-nd attached, ANM-15' 2", across roadway.	MR issued 8/18/97 to raise PWR, CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8784-0783 John F. A. Hedeckman	1854895, 768187	low clearance 14'9"	PWR-21' 2", CATV-17' 3", TELCO-15' 10", ANM-19' 2", across roadway.	MR issued 8/18/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8786 Alcott Pl	1856180, 768239	low clearance 15'0"	PWR-21' 7", CATV-17' 7", TELCO-nd attached, ANM-15' 5", across roadway.	MR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8739-8745 Meloy Blvd	1843282, 768078	low clearance 14'5"	PWR-18' 4", CATV-15' 5", TELCO-nd attached, ANM-14' 10", across roadway.	MR issued 8/18/97 to raise PWR, CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8637-8643 Meloy Blvd	1844322, 768067	low clearance 15'4"	PWR-18' 3", CATV-15' 5", TELCO-nd attached, ANM-15' 3", across roadway.	MR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8620-8921 Riebel	1862351, 767563	(nd arm) 14'1"	PWR-21' 4", CATV-17' 9", TELCO-14' 5", ANM-14' 4", across roadway.	MR issued 8/18/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	140-133 Larimer Ave	1854322, 768314	low clearance 15'4"	PWR-19' 2", CATV-16' 7", TELCO-15' 7", ANM-15' 6", across roadway.	MR issued 8/18/97 to raise PWR, CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8613-8607 Evening St	1853775, 764864	(nd arm) 15'4"	PWR-23' 3", CATV-18' 2", TELCO-16' 7", ANM-15' 5", across roadway.	MR issued 8/18/97 to raise PWR, CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	8610-8505 Tompkins St	1852500, 764243	(nd arm) 15'4"	PWR-20' 4", CATV-17' 2", TELCO-16' 1", ANM-14' 4", across roadway.	MR issued 8/18/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	810 Hlock Rd & 8th	1887020, 691069	low clearance 15'3"	PWR-nd attached, CATV-16' 5", TELCO (1) 17' 1", TELCO (2) 16' 1", ANM-15' 2", across roadway.	MR issued 8/18/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress
"	P.8	755 Hlock Rd	1855553, 691268	low clearance 14'10"	PWR-23' 0", CATV-17' 5", TELCO (1) 16' 5", TELCO (2) 14' 7", ANM-14' 11", across roadway. AEP and new pole, working on utilities to transfer.	MR issued 8/18/97 to notify utilities of pole relocation (AEP). ANM work to complete upon transfer and notice by other parties.	In progress
Time Warner-Sept 1997	P.8	500 Hlock Rd	1884737, 691432	low clearance 15'0"	PWR-22' 2", CATV (1) 18' 3", CATV (2) 17' 6", TELCO (1) 16' 2", TELCO (2) 13' 7", TELCO (3) 13' 5", ANM-13' 5", across roadway.	MR issued 8/18/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MR by other parties.	In progress

PUCO
Page 2

8/18/97

Amitech New Media Response to P.U.C. Case #96-1027-TP-CSS

EXHIBIT A

Source	Page & Line Number	Address	Page Number	Condition reported	Field Results	Corrective Action	Job Status
"	P.8	3174 Lewis & Hillock	1863072, 691573	low clearance 15'5"	PWR-20' 5", CATV-17' 9", TELCO-16' 5", ANM-15' 5"; across roadway.	MIR issued 8/15/97 to raise ANM.	In progress
"	P.8	3385 Lewis Rd	1863760, 693882	low clearance 15'5"	PWR-does not cross roadway, TELCO, does not cross roadway, CATV-17' 10", ANM-15' 5"; across roadway.	MIR issued 8/15/97 to raise ANM.	In progress
"	P.8	Road East Side 5355 Runway St	1864609, 693744	low clearance 15'1"	PWR-22' 5", CATV-17' 4", TELCO-16' 3", ANM-15' 2"; across roadway.	MIR issued 8/15/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	3363 Runway & Lewis	1863760, 688872	low clearance 14'8"	PWR-15' 0", CATV-14' 5", TELCO-14' 2", ANM-14' 5"; across roadway.	MIR issued 8/15/97 to raise PWR, CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	Bluemood & Lewis	1863032, 690811	low clearance 15'5"	PWR-22' 5", CATV-15' 5", TELCO (1) 16' 4", TELCO (2) 15' 5", ANM-15' 5"; across roadway.	MIR issued 8/15/97 to raise CATV, TELCO (1), (2), & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	1135 Runway	1868455, 693882	low clearance 14'11"	PWR-21' 0", CATV-does not cross roadway, TELCO-not attached, ANM-15' 1"; across roadway.	MIR issued 8/15/97 to raise ANM.	In progress
"	P.8	4023 Oakher Rd	no log	low clearance 15'2"	PWR-not attached, CATV (1) 16' 7", CATV (2) 16' 1", Telco (1) 16' 6", TELCO (2) 16' 7", ANM-15' 3"; across roadway.	MIR issued 8/15/97 to raise TELCO (1), (2), & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	888 Runway Rd	1863918, 693773	low clearance 15'3"	PWR-22' 2", CATV-16' 2", TELCO-not attached, ANM-15' 5"; across roadway.	MIR issued 8/15/97 to raise CATV & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	3917 Frazier Rd West	1863900, 693890	low clearance 15'1"	PWR-20' 8", CATV-15' 7", ANM-15' 7", ANM-FIBER-11' 2"; across driveway.	MIR issued 8/15/97 to raise CATV, ANM, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
Time Warner-Sat 1027	P.8	551 Barclay Rd	1864005, 697285	low clearance 14'10"	PWR-22' 1", CATV-17' 6", TELCO-15' 5", ANM-14' 11"; across roadway.	MIR issued 8/15/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	3440 S. 8th St & Coburn	1863612, 693825	low clearance 15'1"	PWR-21' 10", CATV-17' 11", TELCO (1) 17' 3", TELCO (2) 15' 6", ANM-14' 9"; across roadway.	MIR issued 8/15/97 to raise CATV, TELCO (2), & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P.8	3350 S. 8th St	1863831, 693984	low clearance 15'3"	PWR-23' 5", CATV-17' 7", TELCO-15' 11", ANM-15' 1"; across roadway.	MIR issued 8/15/97 to raise CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress

PUCO
Page 3

8/18/97

Amitech New Media Response to P.U.C.O. Case #96-1027-TP-CSS

EXHIBIT A

Source	Page & Line Number	Address	Pole Number	Condition reported	Field Results	Corrective Action	Job Status
"	P. 8	2411 S. 7th St	1802915, 0536580	low clearance 15'4"	PWR-21' 10", CATV-18' 0", TELCO-14' 9", ANM-15' 1" ; across roadway.	MIR issued 8/18/97 to raise TELCO & ANM. ANM work to complete upon completion of MIR by other party.	In progress
"	P. 9	3515 Eakin Rd	1834118, 7065008	low clearance 14'9"	PWR-20' 3", CATV-18' 2", TELCO-not attached, ANM-15' 6" ; across roadway.	MIR issued 8/18/97 to raise CATV & ANM. ANM work to complete upon completion of MIR by other party.	In progress
"	P. 9	3508 Eakin Rd	1803258, 7068373	low clearance 15'3"	PWR-18' 0", CATV-18' 0", TELCO-16' 0", ANM-15' 6" ; across roadway.	MIR issued 8/18/97 to raise PWR, CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress
"	P. 9	Thomas Ave & Nace Ave	3091	low clearance 15'4"	PWR-not attached, CATV-not attached, TELCO-16' 2", ANM-15' 3" ; across roadway.	MIR issued 8/18/97 to raise TELCO & ANM. ANM work to complete upon completion of MIR by other party.	In progress
"	P. 9	Rear of 429 Nace Ave	1849870, 7105445	low clearance 15'0"	PWR-17' 7", CATV-15' 1", TELCO-15' 8", ANM-15' 4" ; across roadway.	MIR issued 8/18/97 to raise PWR, CATV, TELCO, & ANM. ANM work to complete upon completion of MIR by other parties.	In progress

The Ameritech logo, consisting of the word "Ameritech" in a stylized font, with a large, handwritten "U" mark over it.EXHIBIT B

23500 Northwestern Highway
Room E230
Southfield, Michigan 48075
July 3, 1997

Shelly Company
80 Park Dr.
Thornville, Oh 43076

NOTICE REGARDING CHANGE IN AMERITECH STRUCTURE ACCESS PRACTICES

Re: Structure Access Practice Regarding Joint Rideouts for Pole Attachment Requests

Effective immediately, until further notice, joint rideouts (Pole Field Surveys) will be required for the provisioning of all requests for attachment to Ameritech Ohio owned or controlled poles. A joint rideout is a field survey of the poles to which attachment is requested by representatives of the requesting party, Ameritech Ohio, the power company jointly owning or using the poles (if applicable) and other parties attached to the poles (if applicable).

In September of 1995, Ameritech had changed its practice so as not to require joint rideouts. In an order made in Docket No. 96-1027-TP-CSS, the Public Utility Commission of Ohio required Ameritech Ohio to re-instate its prior policy regarding joint rideouts. It should be noted that neither this practice change nor the September 1995 change in any way impacted the policies or practices of power companies which jointly own or jointly use poles which Ameritech Ohio owns or controls.

This change in practice applies to all requests for access to Ameritech Ohio poles either currently pending or submitted after the date of this notice. The Ameritech Structure Access Center (ASAC) will be responsible for scheduling and coordinating Pole Field Surveys.

Questions regarding this notice may be directed to the Ameritech Structure Access Center at (248) 424-0114.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheila Wilson".

Sheila Wilson
Manager - Structure Access Coordinator