# BEFORE

# THE PUBLIC UTILITIES COMMISSION OF OHIO

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| In the Matter of the Application of Middle Point Home Telephone Company to amend its Basic Local Exchange Service “BLES” Tariff and to Authorize a Mechanism to Change its BLES Rates under R.C. 4927.15(C). | )  )  )  )  ) | Case No. 90-5027-TP-TRF  Case No. 14-191-EL-UNC |

**MOTION TO AMEND APPLICATION AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 4901-1-12, Ohio Administrative Code (“OAC”), Middle Point Home Telephone Company (“Middle Point”) moves to amend its Application in this matter for the reasons set out in the accompanying memorandum in support. A copy of the Amended Application is attached. Further, Middle Point requests an expedited ruling on its motion.

Respectfully submitted,

*/s/ Frank P. Darr*

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**March 25, 2014** **On Behalf of Middle Point Home Telephone Company**

# BEFORE

# THE PUBLIC UTILITIES COMMISSION OF OHIO

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**MEMORANDUM IN SUPPORT OF MOTION TO AMEND APPLICATION AND REQUEST FOR EXPEDITED RULING**

Rule 4901-1-12, OAC, provides the procedure by which a party may seek an order of the Public Utilities Commission of Ohio (“Commission”). Rule 4901-1-06, OAC, permits a party to seek to amend an application by motion. Middle Point, through this Motion, seeks to amend its application to address issues raised in discussions with the Commission Staff and comments raised by one of the intervening parties. A copy of the Amended Application is attached.

To address concerns raised by interested parties, Middle Point is requesting the authority to increase its basic local exchange service (“BLES”) rates by $3 per month and for authority to implement a mechanism to adjust its BLES rates in the future to address changes brought about in federal regulation of High Cost Loop Support (“HCLS”). A detailed explanation of the requested changes is outlined in Exhibit C of the attached Amended Application.

Middle Point also requests that the Motion be addressed on an expedited basis. See Rule 4901-1-12(C), OAC. Counsel for Middle Point contacted counsel for intervening parties, and they do not object to the expedited issuance of a ruling granting the Motion to Amend.

Because timing is critical to minimizing the revenue effect of the changes in HCLS and there is no objection to expedited approval of the Motion to Amend, Middle Point urges the Commission to grant the Motion to Amend on an expedited basis and promptly establish a comment cycle as set out in the Amended Application.

Respectfully submitted,

*/s/ Frank P. Darr*

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On Behalf of Middle Point Home Telephone Company

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *MOTION TO AMEND APPLICATION AND REQUEST FOR EXPEDITED RULING* was served upon the following parties of record this 25th day of March 2014, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

/s Frank P. Darr

Frank P. Darr

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**On Behalf of AT&T Services, Inc.**

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**On Behalf of the Ohio Telecom Association**

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