

December 21, 2006

Ms. Renee J. Jenkins
Docketing Division Chief
The Public Utilities Commission of Ohio
180 East Broad Street, 12th Floor
Columbus, Ohio 43215-3793

RE: Case No. 90-5013-TP-TRF

Dear Ms. Jenkins:

Cincinnati Bell Telephone Company LLC (CBT) proposes to revise its General Exchange Tariff, PUCO No. 8, Section 52.1 to provide a winback promotion. **Residence customers who discontinued their local service with CBT for a competitor and want to return to CBT and subscribe to CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance will receive both of these services at the monthly rate of \$40 for the first twelve months. The promotion period is December 21, 2006 through February 28, 2007.**

Any questions regarding this transmittal should be directed to me at 513-397-1378.

Sincerely,

/s/ Evelyn W. King
Regulatory Specialist
Government Relations

Attachment

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS APPLICATION FORM
(Effective: 10/01/2004)

(Pursuant to Case Nos. 99-998-TP-COI and 99-563-TP-COI)

In the Matter of the Application of Cincinnati Bell Telephone)
Company LLC to modify the General Exchange Tariff,) Case No. 90 -5013 -TP - TRF
PUCO No. 8, Section 52 Regarding Promotions)

Name of Registrant(s) Cincinnati Bell Telephone Company LLC
DBA(s) of Registrant(s)
Address of Registrant(s) 221 East Fourth Street, Cincinnati Ohio 45202
Company Web Address www.cincinnati-bell.com
Regulatory Contact Person(s) Evelyn King Phone 513-397-1378 Fax 513-421-1367
Regulatory Contact Person's Email Address evelyn.king@cinbell.com
Contact Person for Annual Report Tom McCloud Phone 513-397-1312
Consumer Contact Information Tom McCloud Phone 513-397-1312

Date December 21, 2006 TRF Docket No. 90-5013-TP-TRF or - - TP-TRF

Motion for protective order included with filing? ☐ Yes ☒ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: waiver(s) tolls any automatic timeframe]

Company Type (check all applicable): ☐ CTS (IXC) ☒ ILEC ☐ CLEC ☐ CMRS ☐ AOS
☐ Other (explain) _____

NOTE: This form must accompany all applications filed by telecommunication service providers subject to the Commission's rules promulgated in Case No. 99-998-TP-COI, as well as by ILECs filing an ARB or NAG case pursuant to the guidelines established in Case No. 96-463-TP-UNC. ***It is preferable NOT to combine different types of filings, but if you do so, you must file under the process with the longest applicable review period.***

I. Please indicate the reason for submitting this form (check one)

- ☐ 1 **(AAC)** Application to Amend Certificate by a CLEC to modify Serving Area (0-day notice, 7 copies)
- ☐ 2 **(ABN)** Abandonment of all Services
☐ a. CLEC (90-day approval, 10 copies) ☐ b. CTS (14-day approval, 10 copies) ☐ c. ILEC (NOT automatic, 10 copies)
- ☐ 3 **(ACE)** New Operating Authority for providers other than CMRS (30-day approval, 7 copies); *for CMRS, see item No. 15 on this page.*
☐ a. Switched Local ☐ b. Non-switched local ☐ c. CTS ☐ d. Local and CTS ☐ e. Other (explain) _____
- ☐ 4 **(ACO)** LEC Application to Change Ownership (30-day approval, 10 copies)
- ☐ 5 **(ACN)** LEC Application to Change Name (30-day approval, 10 copies)
- ☐ 6 **(AEC)** Carrier-to-Carrier Contract Amendment to an agreement approved in a NAG or ARB case (30-day approval, 7 copies)
NOTE: see item 25 (CTR) on page two of this form for all other contract filings.
- ☐ 7 **(AMT)** LEC Merger (30-day approval, 10 copies)
- ☐ 8 **(ARB)** Application for Arbitration (see 96-463-TP-COI for applicable process, 10 copies)
- ☐ 9 **(ATA)** Application for Tariff Amendment for Tier 1 Services, Application to Reclassify Service Among Tiers, or Change to Non-Tier Service
☐ a. Tier 1 (and Carrier-to-Carrier tariff filings as set-forth in 95-845-TP-COI)
☐ i. Pre-filing submittal (30-day pre-filing submittal with Staff and OCC; **Do Not Docket**, 4 copies)
☐ ii. New End User Service which has been preceded by a 30-day pre-filing submittal with Staff for all submittals and also with OCC for Tier 1 residential services (0-day filing, 10 copies)
☐ iii. New End User Service (NOT preceded by a 30-day filing submittal, 30-day approval, 10 copies)
☐ iv. New Carrier-to-Carrier Service which has been preceded by a 30-day pre-filing with Staff (0-day filing, 10 copies)
☐ v. Change in Terms and Conditions, textual revision, correction of error, etc. (30-day approval, 10 copies)
☐ vi. Grandfather service (30-day approval, 10 copies)
☐ vii. Initial Carrier-to-Carrier Services Tariff subsequent to ACE approval (60-day approval, 10 copies)
☐ viii. *Withdrawal of Tier 1 service must be filed as an "ATW", not an "ATA" - see item 12, below*
☐ b. Reclassification of Service Among Tiers (NOT automatic, 10 copies)
☐ c. Textual revision with no effect on rates for non-specific or non-tier service (30-day approval, 10 copies)
- ☐ 10 **(ATC)** Application to Transfer Certificate (30-day approval, 7 copies)
- ☐ 11 **(ATR)** LEC Application to Conduct a Transaction Between Utilities (30-day approval, 10 copies)
- ☐ 12 **(ATW)** Application to Withdraw a Tier 1 Service
☐ a. CLEC (60-day approval, 10 copies) ☐ b. ILEC (NOT automatic, 10 copies)
- ☐ 13 **(CIO)** Application for Change in Operations by Non-LEC Providers (0-day notice, 7 copies)
- ☐ 14 **(NAG)** Negotiated Interconnection Agreement Between Carriers (0-day effective, 90-day approval, 8 copies)
- ☐ 15 **(RRC)** For CMRS providers only to Register or to Notify of a Change in Operations (0-day notice, 7 copies)
- ☐ 16 **(SLF)** Self-complaint Application
☐ a. CLEC only -Tier 1 (60-day automatic, 10 copies)
☐ b. Introduce or increase maximum price range for Non-Specific Service Charge (60-day approval, 10 copies)
- ☐ 17 **(UNC)** Unclassified (explain) _____ (NOT automatic, 15 copies)
- ☐ 18 **(ZTA)** Tariff Application Involving only Tier 2 Services

- ☐ a. New End User Service (0-day notice, 10 copies)
☐ b. Change in Terms and Conditions, textual revision, correction of error, etc. (0-day notice, 10 copies)
☐ c. Withdrawal of service (0-day notice, 10 copies)
☐ 19 Other (explain) _____ (NOT automatic, 15 copies)

THE FOLLOWING ARE TRF FILINGS ONLY, NOT NEW CASES (0-day notice, 3 copies)

- ☒ 20 Introduction or Extension of Promotional Offering
☐ 21 New Price List Rate for Existing Service
☐ a. Tier 1
☐ b. Tier 2
☐ 22 Designation of Registrant's Process Agent(s)
☐ 23 Update to Registrant's Maps
☐ 24 Annual Tariff Option for Tier 2 Services – indicate which option you intend to adopt to maintain the tariff. NOTE, changing options is only permitted once per calendar year. Designation of Registrant's Process Agent(s)
☐ Paper Tariff ☐ Electronic Tariff If electronic, provide tariff's website. _____

THE FOLLOWING ARE CTR FILINGS ONLY, NOT NEW CASES (0-day notice, 7 copies)

- ☐ 25 Application to establish, revise, or cancel an end-user contract. (NOTE: see item 6 on page 1 of this form for carrier-to-carrier contract amendments) CTR Docket No. _____ - _____ - TP – CTR (Use same CTR number throughout calendar year)

II. Please indicate which of the following exhibits have been filed. The numbers (corresponding to the list on page (1) and above) indicate, at a minimum, the types of cases in which the exhibit is required:

<input type="checkbox"/>	[all]	A copy of any motion for waiver of O.A.C. rule(s) associated with this filing. NOTE: the filing of a motion for waiver tolls any automatic timeframe associated with this filing.
<input type="checkbox"/>	[3]	Completed Service Requirements Form.
<input type="checkbox"/>	[3, 9(vii)]	A copy of registrant's proposed tariffs. (Carrier-to-Carrier resale tariff also required if facilities-based)
<input type="checkbox"/>	[3]	Evidence that the registrant has notified the Ohio Department of Taxation of its intent to conduct operation as a telephone utility in the State of Ohio.
<input type="checkbox"/>	[3]	Brief description of service(s) proposed.
<input type="checkbox"/>	[3a-b,3d]	Explanation of whether applicant intends to provide <input type="checkbox"/> resold services, <input type="checkbox"/> facilities-based services, or <input type="checkbox"/> both resold and facilities-based services.
<input type="checkbox"/>	[3a-b,3d]	Explanation as to whether CLEC currently offers CTS services under separate CTS authority, and whether it will be including those services within its CLEC filing, or maintaining such CTS services under a separate affiliate.
<input type="checkbox"/>	[3a-b,3d]	Explanation of how the proposed services in the proposed market area are in the public interest.
<input type="checkbox"/>	[3a-b,3d]	Description of the proposed market area.
<input type="checkbox"/>	[3a-b,3d]	Description of the class of customers (e.g., residence, business) that the applicant intends to serve.
<input type="checkbox"/>	[3a-b,3d]	Documentation attesting to the applicant's financial viability, including the following: 1) An executive Summary describing applicant's current financial condition, liquidity, and capital resources. Describe internally generated sources of cash and external funds available to support the applicant's operations that are the subject of this certification application. 2) Copy of financial statements (actual pro forma income statement and a balance sheet) Indicate if financial statements are based on a certain If the pro forma income statement is based upon a certain geographical area(s) or information in other jurisdictions. 3) Documentation to support the applicant's cash and funding sources.
<input type="checkbox"/>	[3a-d]	Documentation attesting to the applicant's technical and managerial expertise relative to the proposed service offering(s) and proposed service area.
<input type="checkbox"/>	[3a-d]	Documentation indicating the applicant's corporate structure and ownership.
<input type="checkbox"/>	[3a-b,3d]	Information regarding any similar operations in other states. Also, if this company has been previously certified in the State of Ohio, include that certification number.
<input type="checkbox"/>	[3a-b,3d]	Verification that the applicant will maintain local telephony records separate and apart from any other accounting records in accordance with the GAAP.
<input type="checkbox"/>	[3a-b,3d]	Verification of compliance with any affiliate transaction requirements.
<input type="checkbox"/>	[3a-b,3d]	Explanation as to whether rates are derived through (check all applicable): <input type="checkbox"/> interconnection agreement, <input type="checkbox"/> retail tariffs, or <input type="checkbox"/> resale tariffs.
<input type="checkbox"/>	[1,3a-b,3d]	Explanation as to which service areas company currently has an approved interconnection or resale agreement.
<input type="checkbox"/>	[3a-b,3d, 9a(i-iii)]	Explanation of whether applicant intends to provide Local Services which require payment in advance of Customer receiving dial tone.
<input type="checkbox"/>	[3a,3b,3d, 9a,(i-iii)]	Tariff sheet(s) listing the services and associated charges that must be paid prior to customer receiving dial tone (if applicable).
<input type="checkbox"/>	[3a-b,3d,8]	Letters requesting negotiation pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed timeline for construction, interconnection, and offering of services to end users.
<input type="checkbox"/>	[3,4,7,10-11,13]	Certification from Ohio Secretary of State as to party's proper standing (domestic or foreign corporation, authorized use of fictitious name, etc.). In transfer of certificate cases, the transferee's good standing must be established.
<input type="checkbox"/>	[3-4,7,10-11,13]	List of names, addresses, and phone numbers of officers and directors, or partners.
<input type="checkbox"/>	[3]	A sample copy of the customer bill and disconnection notice the applicant plans to utilize.
<input type="checkbox"/>	[1,4,9,10-13,16-21]	Copy of superseded tariff sheet(s) & price list(s), if applicable, marked as Exhibit A.

<input checked="" type="checkbox"/>	[1,4,9,10-13,16-21]	Copy of revised tariff sheets & price lists, marked as Exhibit B.
<input type="checkbox"/>	[3]	Provide a copy of any customer application form required in order to establish residential service, if applicable.
<input checked="" type="checkbox"/>	[1-2,4-7,9,12-13,16,18-24]	Description of and rationale for proposed tariff changes, including a complete description of the service(s) proposed or affected. Specify for each service affected whether it is <input type="checkbox"/> business; <input checked="" type="checkbox"/> residence; or <input type="checkbox"/> both. Also indicate whether it is a <input checked="" type="checkbox"/> switched or <input type="checkbox"/> dedicated service. Include this information in either the cover letter or Exhibit C.
<input type="checkbox"/>	[1,2,4,9a(v-vi), 5,10,16,18(b-c), 21]	Specify which notice procedure has been/will be utilized: <input type="checkbox"/> direct mail; <input type="checkbox"/> bill insert; <input type="checkbox"/> bill notation or <input type="checkbox"/> electronic mail. NOTE: <input type="checkbox"/> Tier 1 price list increases must be within an approved range of rates. <input type="checkbox"/> SLF 00 Filings – Do not send customer notice until it has been reviewed and approved by Commission Staff.
<input type="checkbox"/>	[2,4-5,9a(v), 9b, 10,12-13,16, 18(b-c),20-21]	Copy of real time notice which has been/will be provided to customers. NOTE: SLF Filings – Do not send customer notice until it has been reviewed and approved by Commission Staff.
<input type="checkbox"/>	[1,2,5,9a(v),11-13, 18, 21(increase only)]	Affidavit attesting that customer notice has been provided.
<input type="checkbox"/>	[2,12]	Copy of Notice which has been provided to ILEC(s).
<input type="checkbox"/>	[2,12]	Listing of Assigned (NPA) NXX's where in the LECs (NPA) NXX's would be reassigned.
<input type="checkbox"/>	[2,4,10,12-13,]	List of Ohio counties specifically involved or affected.
<input type="checkbox"/>	[14]	The interconnection agreement adopted by negotiation or mediation.
<input type="checkbox"/>	[15]	For commercial mobile radio service providers, a statement affirming that registrant has obtained all necessary federal authority to conduct operations being proposed, and that copies have been furnished by cellular, paging, and mobile companies to this Commission of any Form 401, 463, and / or 489 which the applicant has filed with the Federal Communications Commission.
<input type="checkbox"/>	[15]	Exhibits must include company name, address, contact person, service description, and evidence of registration with the Ohio Secretary of State.
<input type="checkbox"/>	[24]	Affidavit that total price of contract exceeds total cost of all regulated services.
<input type="checkbox"/>	[5,13]	New title sheet with proposed new company name.
<input type="checkbox"/>	[1,3,13]	List of Ohio exchanges the applicant intends to serve.
<input type="checkbox"/>	[1,3a-b,3d,7, 10,13, 23]	Maps depicting the proposed serving and calling areas of the applicant. <u>If Mirroring Large ILEC</u> exchanges for both serving area and local calling areas: <ul style="list-style-type: none"> • <i>Serving area</i> must be clearly reflected on an Ohio map attached to tariffs and textually described in tariffs by noting that it is reflecting a particular large ILEC/CLEC territory, and listing the involved exchanges. • <i>Local calling areas</i> must be clearly reflected on an Ohio map attached to the tariffs, and/or clearly delineated in tariffs, including a complete listing of each exchange being served and all exchanges to which local calls can be made from each of those exchanges. <u>If Self-defining</u> serving area and/or local calling area as an area other than that of the established ILEC exchange(s): <ul style="list-style-type: none"> • <i>Serving Area</i> must be clearly reflected on an Ohio map attached to the tariffs, and textually described in tariffs by listing the involved exchanges. • <i>Local Calling Areas</i> must be described in the tariff through textual delineation and clear maps. Maps for self-defined <i>serving and local calling areas</i> are required to be traced on United States Geological Survey topography maps. These maps are the Standard Topographic Quadrangle maps, 7.5 minute 1:24,000.
<input type="checkbox"/>		Other information requested by the Commission staff.
<input type="checkbox"/>	[3]	Initial certification that includes Tier 2 Services, indicate which option you intend to adopt to maintain the tariff: <input type="checkbox"/> Paper Tariff <input type="checkbox"/> Electronic Tariff - If electronic, provide tariff's site.

III. Registrant hereby attests to its compliance with the following requirements in the Service Requirements Form, as well as all pertinent entries and orders issued by the Commission with respect to these issues. Further, registrant hereby affirms that it will maintain with its TRF docket an up-to-date, properly marked, copy of the Service Requirements Form available for public inspection.

MANDATORY REQUIREMENTS FOR ALL BASIC LOCAL EXCHANGE AND CTS PROVIDERS:

- ☒ Sales tax
- ☒ Minimum Telephone Service Standards (MTSS)
- ☒ Surcharges

MANDATORY REQUIREMENTS FOR ALL BASIC LOCAL EXCHANGE PROVIDERS:

- ☒ 1+ IntraLATA Presubscription

SERVICE REQUIREMENTS FOR PROVISION OF CERTAIN SERVICES (CHECK ALL APPLICABLE):

- ☒ Discounts for Persons with Communication Disabilities and the Telecommunication Relay Service [Required if toll svc provided]
- ☒ Emergency Services Calling Plan [Required if toll service provided]
- ☐ Alternative Operator Service (AOS) requirements [Required for all providing AOS (including inmate services) service]
- ☒ Limitation of Liability Language [Required for all who have tariff language that may limit their liability]
- ☒ Termination Liability Language [Required for all who have early termination liability language in their tariffs]
- ☒ Service Connection Assistance (SCA) [Required for all LECs]
- ☒ Local Number Portability and Number Pooling [Required for facilities-based LECs]
- ☐ Package Language [Required for tariffs containing packages or service bundles containing both local and toll and/or non-regulated services]

IV. List names, titles, phone numbers, and addresses of those persons authorized to make and/or affirm or verify filings at the Commission on behalf of the applicant:

Evelyn King, Regulatory Specialist, (513) 397-1378, 221 E. Fourth Street, Room 103-1280, Cincinnati, Ohio 45202

NOTE: An annual report is required to be filed with the Commission by each company on an annual basis. The annual report form will be sent for completion to the address and individual(s) identified in this Section unless another address or individual is so indicated.

V. List names, titles, phone numbers, and addresses of those persons authorized to respond to inquiries from the Consumer Services Department on behalf of the applicant regarding end-user complaints:

Tom McCloud, Regulatory Specialist, (513) 397-1312, 221 E. Fourth Street, Room 103-1280, Cincinnati, Ohio 45202

AFFIDAVIT

Minimum Telephone Service Standards

I am an officer of the applicant corporation, Cincinnati Bell Telephone Company LLC, and am authorized to make this statement
(Name of Company)

on its behalf. I attest that these tariffs comply with the Minimum Telephone Service Standards (MTSS) for the state of Ohio. I understand that the Minimum Telephone Service Standards, as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 21, 2006 at 221 E. Fourth Street, Cincinnati, Ohio 45202
(Date) (Location)

/s/ Assistant Secretary and Director of Regulatory Affairs, December 21, 2006
(Signature and Title) (Date)

**** This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.***

VERIFICATION

I, D. Scott Ringo, Jr., verify that I have utilized, verbatim, the Commission's Telecommunications Application Form and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

/s/ Assistant Secretary and Director of Regulatory Affairs, December 21, 2006
(Signature and Title) (Date)

****Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.***

Send your completed Application Form, including all required attachments as well as the required number of copies, to:

Public Utilities Commission of Ohio

Attention: Docketing Division (or to the Telecommunications Division Chief if a prefiling submittal)

180 East Broad Street, Columbus, OH 43215-3793

GENERAL EXCHANGE TARIFF
PUCO NO. 8

CINCINNATI BELL TELEPHONE COMPANY LLC

Section 52.1
3rd Revised Page 1.10
Cancels 2nd Revised Page 1.10

PROMOTIONS - RESIDENCE

A. INDEX (Continued)

<u>Section</u>	<u>Subject</u>	<u>Page</u>	
B.34	Complete Connections Service	2.33	
	- Residence customers, who are new Complete Connections Service subscribers.		
	- Receive a waiver of the first month's recurring charge for Complete Connections Service.		
	- August 11, 2006 – December 31, 2006		
B.35	Home Phone Pak 2 with Unlimited Long Distance Service	2.34	
	- Existing Home Phone Pak 2 with Unlimited Long Distance customers who become new subscribers to Local Service Freeze.		
	- Receive a discount of \$5 off six months' recurring charges for Home Phone Pak 2 with Unlimited Long Distance Service.		
	- December 5, 2006 – December 31, 2006		
B.36	Winback - CBT High Speed 3.0 Mbps ADSL Service	2.35	
	- Customers who discontinued their CBT High Speed 3.0 Mbps ADSL Service for a competitor during November, 2006, and want to return to CBT and subscribe to CBT High Speed 3.0 Mbps ADSL Service.		
	- Discounted monthly rate of \$20.00 for the first 12 months.		
	- December 6, 2006 – December 31, 2006		
B.37	Winback - CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance Service	2.36	(N)
	- Customers who discontinued their local service with CBT to go to a competitor and are returning to CBT to subscribe to CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance.		
	- Discounted monthly rate of \$40 for both services for the first 12 months.		
	- December 21, 2006 – February 28, 2007.		(N)

Issued: December 21, 2006

By: D. Scott Ringo Jr., Assistant Secretary – Regulatory Affairs
Cincinnati, Ohio

Effective: December 21, 2006
In accordance with Case No.
04-720-TP-ALT, issued by the
Public Utilities Commission
of Ohio on July 21, 2005

GENERAL EXCHANGE TARIFF
PUCO No. 8

CINCINNATI BELL TELEPHONE COMPANY LLC

Section 52.1
Original Page 2.36

PROMOTIONS – RESIDENCE

B. PROMOTIONAL OFFERINGS

37. CBT High Speed 3.0 Mbps ADSL Service – Section 44, Page 4.
Home Phone Pak 2 with Unlimited Long Distance Service – Section 45, Page 2.3.

a. Promotional Offer - Recurring Charge

Residence customers who discontinued their local service with CBT to go to a competitor and are returning to CBT to subscribe to CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance Service will receive both services at the monthly rate of \$40.00 for the first twelve months.

This promotion cannot be offered in conjunction with any other CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance Service promotions.

b. Market Area Exchange Targeted By Special Promotion

All exchange areas served by Cincinnati Bell Telephone Company LLC.

c. Promotional Period

Beginning Date: December 21, 2006
Ending Date: February 28, 2007

(N)

(N)

Issued: December 21, 2006

By: D. Scott Ringo Jr., Assistant Secretary – Regulatory Affairs
Cincinnati, Ohio

Effective: December 21, 2006
In accordance with Case No.
04-720-TP-ALT, issued by the
Public Utilities Commission
of Ohio on July 21, 2005

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/21/2006 10:41:32 AM

in

Case No(s). 90-5013-TP-TRF

Summary: Tariff Residence customers who discontinued their local service with CBT for a competitor and want to return to CBT and subscribe to CBT High Speed 3.0 Mbps ADSL Service and Home Phone Pak 2 with Unlimited Long Distance will receive both of these services at the monthly rate of \$40 for the first twelve months. The promotion period is December 21, 2006 through February 28, 2007. electronically filed by Ms. Evelyn W King on behalf of CINCINNATI BELL TELEPHONE COMPANY