

file

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Germantown  
Independent Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1200-TP-UNC /

In the Matter of the Ottoville  
Mutual Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1295-TP-ATA /

In the Matter of the Telephone  
Service Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1312-TP-ATA /

In the Matter of the Sherwood  
Mutual Telephone Association's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1313-TP-ATA /

In the Matter of the Nova  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1314-TP-ATA /

In the Matter of the Arthur  
Mutual Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1315-TP-ATA /

In the Matter of the Ayersville  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering )  
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Case No. 96-1316-TP-ATA /

This is to certify that the images appearing are an  
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In the Matter of Frontier  
Communications of Michigan's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1320-TP-ATA ✓

In the Matter of the Doylestown  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1321-TP-ATA ✓

In the Matter of the Middle Point  
Home Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1323-TP-ATA ✓

In the Matter of the Columbus  
Grove Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1327-TP-ATA ✓

In the Matter of the Benton  
Ridge Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1328-TP-ATA ✓

In the Matter of the Conneaut  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1330-TP-ATA ✓

In the Matter of the Champaign  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1331-TP-ATA ✓

In the Matter of the Orwell )  
Telephone Company's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1332-TP-ATA ✓

In the Matter of the McClure )  
Telephone Company's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1333-TP-ATA ✓

In the Matter of the Sycamore )  
Telephone Company's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1334-TP-ATA ✓

In the Matter of the Minford )  
Telephone Company's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1335-TP-ATA ✓

In the Matter of the Vaughnsvile )  
Telephone Company Inc.'s )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1337-TP-ATA ✓

In the Matter of the United )  
Telephone Company of Ohio's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1341-TP-ATA ✓

In the Matter of the Fort Jennings )  
Telephone Company's )  
Application to Amend its Tariff to )  
Include an IntraLATA Toll )  
Presubscription Service Offering )

Case No. 96-1343-TP-ATA ✓

In the Matter of the Glandorf  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1344-TP-ATA ✓

In the Matter of the Farmers  
Mutual Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1345-TP-ATA ✓

In the Matter of Alltel  
Ohio, Inc.'s Application to Amend  
its Tariff to Include an IntraLATA  
Toll Presubscription Service Offering

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Case No. 96-1351-TP-ATA ✓

In the Matter of the Western  
Reserve Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1352-TP-ATA ✓

In the Matter of the Chillicothe  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1355-TP-ATA ✓

In the Matter of the Century  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1358-TP-ATA ✓

In the Matter of the Kalida  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1360-TP-ATA ✓

In the Matter of the New Knoxville  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1361-TP-ATA ✓

In the Matter of the Ridgeville  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1362-TP-ATA ✓

In the Matter of the Bascom  
Mutual Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1372-TP-ATA ✓

In the Matter of the Arcadia  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1395-TP-ATA ✓

In the Matter of the Continental  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1396-TP-ATA ✓

In the Matter of the Little  
Miami Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1397-TP-ATA ✓

In the Matter of the Vanlue  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1398-TP-ATA ✓

In the Matter of the Oakwood

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Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1399-TP-ATA ✓

In the Matter of the Wabash  
Mutual Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 96-1401-TP-ATA ✓

In the Matter of the Buckland  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 97-132-TP-ATA ✓

In the Matter of the Buckland  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 97-520-TP-ATA ✓

In the Matter of the Pattersonville  
Telephone Company's  
Application to Amend its Tariff to  
Include an IntraLATA Toll  
Presubscription Service Offering

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Case No. 97-846-TP-ATA ✓

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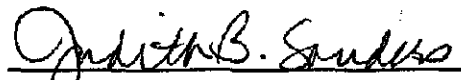
**SUPPLEMENTAL MOTION OF  
MCI TELECOMMUNICATIONS CORPORATION  
FOR LEAVE TO INTERVENE  
AND REQUEST FOR CLARIFICATION AND/OR  
COMMISSION-ORDERED INVESTIGATION**

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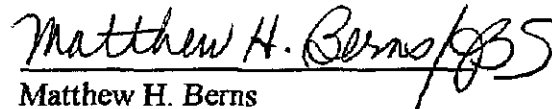
On September 24, 1998 MCI Telecommunications Corporation (MCI) filed a motion to

intervene in the above-captioned dockets pursuant to R.C. §4903.221 and Rule 4901-1-11 OAC, and also moved that the Commission suspend that effective date of the proposed intraLATA 1+ implementation charges so that a determination could be made that the charges have been calculated in compliance with Local Service Guideline X.F. Because the MCI motion was filed after some of the charges had already become effective, MCI hereby files this supplemental motion requesting clarification of the Guideline and/or an investigation of the manner in which the intraLATA presubscription charges at issue in these cases have been calculated. A memorandum in support of this motion is attached hereto and incorporated by reference herein.

Respectfully submitted,



Judith B. Sanders  
BELL, ROYER & SANDERS Co. LPA  
33 South Grant Avenue  
Columbus, Ohio 43215-3927  
(614)228-0704



Matthew H. Berns  
MCI Telecommunications Corporation  
205 North Michigan Avenue  
Chicago, Illinois 60601  
(312) 470-3380

Attorneys for  
MCI Telecommunications Corporation

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**MEMORANDUM IN  
SUPPORT OF SUPPLEMENTAL  
MOTION FOR LEAVE TO INTERVENE  
AND REQUEST FOR CLARIFICATION  
AND/OR COMMISSION ORDERED  
INVESTIGATION**

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Both MCI and Sprint filed motions for leave to intervene in the forty above-captioned cases involving most of the small ILECs in the state. The IXCs raised concerns that the intraLATA presubscription charges filed by the carriers were based on a misinterpretation of the Local Service Guideline and that, by implication, the charges could not lawfully levied. The Commission was asked to suspend the effective date of the tariffs so that the basis of the charges and the language contained in the proposed tariffs could be clarified.

Because the tariff filing dates differ by carrier, the Commission's Staff brought to MCI's attention the fact that the tariffs in many of the cases had effective dates which preceded MCI's request for suspension. Since the suspension process would not be available for tariffs which had already been made effective, MCI hereby clarifies its motion for the purposes of those cases.

*Before providing further explanation, MCI has prepared a summary of the status of the involved cases:*

Cases with final tariff sheets filed on 9/21/98:

96-1200-TP-UNC Germantown Independent Telephone  
96-1295-TP-ATA Ottoville Mutual Telephone  
96-1312-TP-ATA Telephone Service Company  
96-1315-TP-ATA Arthur Mutual Telephone Company  
96-1321-TP-ATA Doylestown Telephone Company



96-1323-TP-ATA Middle Point Home Telephone Company  
96-1327-TP-ATA Columbus Grove Telephone Company  
96-1333-TP-ATA McClure Telephone Company  
96-1334-TP-ATA Sycamore Telephone Company  
96-1335-TP-ATA Minford Telephone Company  
96-1337-TP-ATA Vaughnsville Telephone Company  
96-1345-TP-ATA Farmers Mutual Telephone Company  
96-1362-TP-ATA Ridgeville Telephone Company  
96-1401-TP-ATA Wabash Mutual Telephone Company

Cases with final tariff sheets filed on 9/24/98:

96-1313-TP-ATA Sherwood Mutual Telephone Assn.  
96-1320-TP-ATA Frontier Communications of Michigan  
96-1330-TP-ATA Conneaut Telephone Company  
96-1395-TP-ATA Arcadia Telephone Company  
96-1397-TP-ATA Little Miami Communications Company  
96-1398-TP-ATA Vanlue Telephone Company  
96-1399-TP-ATA Oakwood Telephone Company

Status of Remaining Cases:

96-1314-TP-ATA Nova Telephone Company; final tariff sheet filed 9/25/98.  
96-1316-TP-ATA Ayersville Telephone Company; proposed rate filed on 8/19/98.  
96-1328-TP-ATA Benton Ridge Telephone Company; proposed rate to be filed prior to 12/16/98.  
96-1331-TP-ATA Champaign Telephone Company; no proposed tariff.  
96-1332-TP-ATA Orwell Telephone Company; proposed rate filed 9/30/98.  
96-1341-TP-ATA United Telephone Company; final tariff filed 9/11/98<sup>1</sup>.  
96-1343-TP-ATA Fort Jennings Telephone Company; no proposed tariff<sup>2</sup>.  
96-1351-TP-ATA Alltel Ohio, Inc.; proposed tariff pages filed 8/24/98.  
96-1352-TP-ATA Western Reserve Telephone Company; proposed tariff pages filed 8/24/98.  
96-1355-TP-ATA Chillicothe Telephone Company; proposed tariff filed 8/12/98.  
96-1358-TP-ATA Century Telephone Company; no proposed tariff.  
96-1360-TP-ATA Kalida Telephone Company; information filed on 9/11/98.

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<sup>1</sup> As part of the motion filed in these cases, Sprint has requested that this tariff be suspended.

<sup>2</sup> Docketing records show a final tariff filed on June 26, 1997; presumably this tariff did not include the presubscription implementation charge since it predated the Commission's workshop.

96-1361-TP-ATA New Knoxville Telephone Company; proposed tariff filed on 9/25/98.  
96-1372-TP-ATA Bascom Mutual Telephone Company; no proposed tariff.  
96-1396-TP-ATA Continental Telephone Company; no proposed tariff.  
97-132-TP-ATA/97-520-TP-ATA Buckland Telephone Company; no proposed tariff.  
97-846-TP-ATA Pattersonville Telephone Company; no proposed tariff.

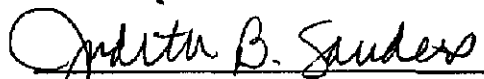
As can be seen, in approximately one-half of the cases, final tariff sheets were filed immediately prior to MCI's request for intervention or on the same day that the request was filed. The rest of the cases range in status from proposed implementation charges to no filings at all. However, regardless of the status of the cases, MCI's concern remains the same: what methodology has been used, or will be used, by the small ILECs to derive the charge? This methodology, which may be based on discussions held during the workshop, cannot be ascertained from a reading of the proposed or final tariffs, the docketing sheets, or any of the other filings in these cases. MCI believes that the charges which have been proposed, or have already gone into effect, may inappropriately be based solely on the originating intraLATA minutes of IXCs and not the minutes of both the local exchange carriers and the IXCs as required by the Local Service Guidelines.

With this supplemental pleading and the motion filed on September 24, 1998 MCI is simply requesting that the Commission seek information from the small ILECs as to how the charges were calculated, and clarify that Guideline X.F. contemplates the use of the originating minutes of local exchange and toll providers. For those cases that have final tariffs, MCI would ask that the Commission consider its pleadings to be a request for a Commission-ordered investigation of the charges, or, if necessary, a complaint by MCI challenging the lawfulness and reasonableness of the rates which have been placed into effect. The clarification process need not be cumbersome and MCI certainly does not intend to burden the Commission's already overtaxed

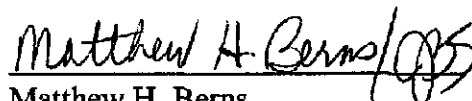
resources by suggesting that forty individual complaint proceedings should be initiated. Rather, MCI seeks a formal or an informal resolution of its concerns, perhaps through the use of a conference or meeting at which all interested parties could participate. To the best of MCI's knowledge, only one workshop was held regarding intraLATA presubscription cost recovery, and it is the comments made at that workshop which have given rise to MCI's concerns.

As an IXC providing service throughout Ohio, MCI is clearly a stakeholder in this process and should be granted intervention and an opportunity to participate in these proceedings. MCI would also welcome an opportunity to work informally with the Staff and the ILECs to clarify the methodology which has been used, or will be used, to develop the presubscription implementation charges. MCI's motion, as supplemented herein, should be granted.

Respectfully submitted,



Judith B. Sanders  
BELL, ROYER & SANDERS Co.. LPA  
33 South Grant Avenue  
Columbus, Ohio 43215-3927  
(614)228-0704

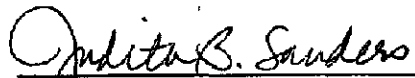


Matthew H. Berns  
MCI Telecommunications Corporation  
205 North Michigan Avenue  
Chicago, Illinois 60601  
(312) 470-3380

Attorneys for  
MCI Telecommunications Corporation

## CERTIFICATE OF SERVICE

I hereby certify that I have forwarded the foregoing Reply Comments to the parties listed below, via first-class U.S. mail, postage prepaid, this 2<sup>nd</sup> day of October, 1998.

  
Judith B. Sanders

Gerald A. Cooper  
Thompson, Hine & Flory, LLP  
One Columbus  
10 West Broad St.  
Columbus, Ohio 43215-3435

Orwell Telephone Company  
Gwenn Maguire  
70 South Maple St.  
P.O. Box 337  
Orwell, Ohio 44076-0037

Kathy Hobbs  
Alltel Ohio, Inc.  
21 East State St.  
Suite 1400  
Columbus, Ohio 43215

Tami Pontious  
Ayersville Telephone Company  
27932 Walston Rd.  
Defiance, Ohio 43512

Sandra Wolfe  
Chillicothe Telephone Company  
60 East Main St.  
P.O. Box 480  
Chillicothe, Ohio 45601-0480

Nancy V. Buchan  
Century Telephone  
P.O. Box 4065  
Monroe, LA 71211-4065

Kalida Telephone Company  
121 E. Main St.  
Box 267  
Kalida, Ohio 45853

Dennis Depinet  
Bascom Mutual Telephone Company  
P.O. Box 316  
Bascom, Ohio 44809

Buckland Telephone Company  
105 S. Main St.  
Buckland, Ohio 45819

Frontier Communications of Michigan  
109 Randolph Street  
Brooklyn, MI 49230

Doylestown Telephone Company  
81 N. Portage St.  
Doylestown, Ohio 44230

Germantown Independent Telephone  
36 N. Plum  
P.O. Box 157  
Germantown, Ohio 45327

Pattersonville Telephone Company  
Box 276  
Carrollton, Ohio 44615

Telephone Service Company  
2 Willipie St.  
P.O. Box 408  
Wapakoneta, Ohio 45895