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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission Investigation )  
Into the Treatment of Reciprocal Compensation )  
For Internet Service Provider Traffic. )

Case No. 99-941-TP-ARB

**MOTION TO INTERVENE  
OF INTERMEDIA COMMUNICATIONS, INC.**

Now comes Intermedia Communications, Inc. ("Intermedia"), and pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, respectfully requests that it be permitted to intervene in this matter. Intermedia has a real and substantial interest in this generic arbitration and will be affected by the outcome of this proceeding. The reasons in support of this motion are more fully set forth in the attached Memorandum in Support.

**MEMORANDUM IN SUPPORT**

In its January 13, 2000 Entry in this proceeding, the Public Utilities Commission of Ohio ("Commission") determined that it would be appropriate to initiate an investigation that would determine, on a generic basis, the appropriate compensation mechanism with respect to dial-up internet service provider ("ISP") bound traffic. The Commission invited any stakeholder interested in the generic resolution of this matter to intervene.

Intermedia is a certified local exchange company in Ohio with approved tariffs on file with the Commission. Additionally, Intermedia has Commission-approved interconnection agreements with Cincinnati Bell Telephone Company and Ameritech and has exchanged local

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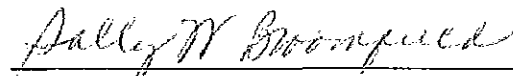
traffic with those ILECs. Some of the local traffic terminates to ISPs, which are customers of Intermedia. Intermedia currently has a complaint pending at the Commission concerning the refusal of Cincinnati Bell Telephone Company to pay for traffic terminated at Intermedia's ISP customers. (Case No. 00-271-TP-CSS)

Therefore, the results of this proceeding will affect Intermedia substantially and is of prime importance to it.

Intermedia's intervention in this proceeding will contribute to a just and expeditious resolution of the issues and would not unduly prolong or delay the proceedings.

For all the foregoing reasons, Intermedia respectfully requests that the Commission grant this motion to intervene.

Respectfully submitted,



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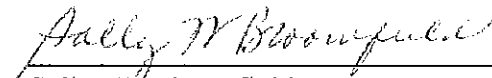
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing MOTION TO INTERVENE was served upon the parties listed on the attached Service List by regular U.S. mail, postage prepaid, this 10th day of February, 2000.

  
\_\_\_\_\_  
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