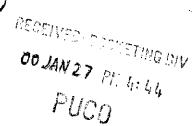
No.

BEFORE



THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission Investigation)	
Into the Treatment of Reciprocal Compensation)	Case No. 99-941-TP-ARB
for Internet Service Provider Traffic.)	

MOTION OF THE OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION FOR INTERVENTION

In accordance with the Commission's Entry of January 13, 2000 in this matter, The Ohio Telecommunications Industry Association ("OTIA"), for and on behalf of its members, hereby seeks intervention in this matter.

A Memorandum in Support of this Motion is supplied herewith.

Respectfully submitted,

OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: Thomas E. Lodge (0015741)

THOMPSON HINE & FLORY LLP 10 West Broad Street, Suite 700 Columbus, Ohio 43215-3435 PH: (614) 469-3246

FAX: (614) 469-3361

Its Attorney

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission Investigation)	
Into the Treatment of Reciprocal Compensation)	Case No. 99-941-TP-ARB
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MEMORANDUM IN SUPPORT OF THE MOTION OF THE OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION FOR INTERVENTION

In the Commission's Entry of January 13, 2000, the Commission ordered that this case should proceed as "a generic arbitration." Because this case will thus influence the interconnection arrangements for all incumbent local exchange carriers in the State of Ohio, the OTIA believes that its intervention and participation in this matter is appropriate. Further, paragraph 10 of the January 13, 2000 Entry stated that "[a]ny other stakeholder interested in the generic resolution of this matter is invited to intervene at this time." For and on behalf of its members, the OTIA hereby accepts that invitation.

For the foregoing reasons, the OTIA submits that it has a real and substantial interest in this matter, and that its intervention is appropriate to both the procedure and the substance of this case as outlined in the Commission's Entry of January 13, 2000. Accordingly, its Motion to Intervene herein should be granted.

Respectfully submitted,

OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION

Bv:

Thomas E. Lodge (0015741)

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FAX: (614) 469-3361

Its Attorneys

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon all parties listed on the attached list, by ordinary U.S. Mail, postage prepaid, this 27^{t3} day of January, 2000.

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