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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission Investi- )  
gation into the Treatment of Reciprocal ) Case No. 99-941-TP-ARB  
Compensation for Internet Service Pro- )  
vider Traffic. )

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**OHIO CONSUMERS COUNSEL'S  
MOTION TO INTERVENE**

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Robert S. Tongren, in his capacity as the Ohio Consumers' Counsel ("OCC") on behalf of the residential consumers of the State of Ohio, moves the Public Utilities Commission of Ohio ("Commission") to grant his intervention in this matter pursuant to Ohio Rev. Code Chapter 4911, Ohio Rev. Code § 4903.221, Ohio Adm. Code § 4901-1-11.

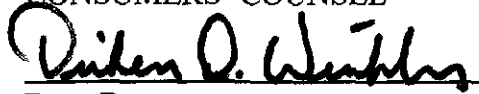
The Commission should grant this motion to intervene because Ohio Rev. Code § 4911.02, expressly grants the OCC the responsibility to represent the interests of Ohio's residential telephone consumers. Because a determination regarding reciprocal compensation implicitly involves the interests of Ohio's telephone consumers, the OCC should be allowed to intervene to protect such interests. Neither the Incumbent Local Exchange Carriers nor the Competitive Local Exchange Carriers are able to adequately represent the interests of Ohio's telephone consumers. Rather, the OCC is best able to provide such representation.

For the reasons set-forth above, the OCC respectfully requests the Commission to grant its motion to intervene in this matter.

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Respectfully submitted,

ROBERT S. TONGREN  
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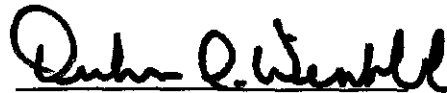


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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene was served by first-class mail, postage prepaid, to the parties of record listed below, on this 25th day of January 2000.



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