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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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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 TIME WARNER TELECOM OF OHIO, L.P.,
ICG TELECOM GROUP, INC.,
CORECOMM NEWCO, INC. AND
TELECOMMUNICATIONS RESELLERS ASSOCIATION**

Pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, Time Warner Telecom of Ohio, L.P., ICG Telecom Group, Inc., CoreComm Newco, Inc. and Telecommunications Resellers Association (collectively "Initial Petitioners") hereby move to intervene in this proceeding. Initial Petitioners filed their Petition with the Public Utilities Commission of Ohio ("Commission") on August 12, 1999 requesting that the Commission investigate and decide the treatment of reciprocal compensation for Internet Service Provider ("ISP") traffic. The Commission issued its entry on January 17, 2000 setting forth the procedure to be followed and indicated that those parties who subsequently moved to intervene in this matter (specifically GTE, Sprint, AT&T, and Level 3 Communications) were granted intervention status (at Finding No. 10).

Initial Petitioners believe they are most probably already considered parties in this case; however, since the Entry did not mention them specifically, they hereby file this Motion to Intervene.

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The Commission should grant Initial Petitioners' leave to intervene because Initial Petitioners have a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect Initial Petitioners' ability to protect their interests. Reasons which support Initial Petitioners' Motion are addressed below.

MEMORANDUM IN SUPPORT

Initial Petitioners are competitive local exchange carriers who either currently or prospectively provide competitive local exchange carrier ("CLEC") service to ISPs. Thus, the treatment and compensation for traffic destined to an ISP is of substantial interest and concern to Initial Petitioners. Specifically, this proceeding will directly and substantially affect Initial Petitioners' operations in Ohio and their negotiations and contracts with Incumbent Local Exchange Carriers ("ILECs").

Moreover, by their nature, existing interconnection agreements and negotiations leading to new agreements with ILECs are unique to the CLECs involved because the nature of each CLEC's needs, serving areas, operations, systems, and customer bases are unique. Therefore, Initial Petitioners' interests cannot be represented by any other parties.

Finally, Initial Petitioners will bring their unique perspectives and positions to this proceeding, which would contribute to a just and expeditious resolution of the procedural and substantive issues involved. Their participation will not unduly delay the proceeding. The Initial Petitioners' motion having satisfied the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, request that their Motion to Intervene be granted.

WHEREFORE Initial Petitioners move the Commission to grant their Motion to Intervene.

Respectfully submitted,

TIME WARNER TELECOM OF OHIO, L.P.

Marsha Rockey Schermer ^{gub}

Marsha Rockey Schermer (0005883)
Vice President Regulatory Midwest Region
TIME WARNER TELECOM OF OHIO, L.P.
65 East State Street, Suite 1800
Columbus, Ohio 43215
Telephone: (614) 358-4000
Facsimile: (614) 358-4400

ICG TELECOM GROUP, INC.

Boyd B. Ferris ^{gub}

Boyd B. Ferris (0032143)
FERRIS & FERRIS
2733 West Dublin-Granville Road
Columbus, Ohio 43235-1798
Telephone: (614) 889-4777
Facsimile: (614) 889-6515

CORECOMM NEWCO, INC.

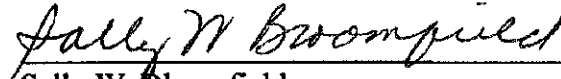
Sally W. Bloomfield

Sally W. Bloomfield (0022038)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: (614) 227-2368
Facsimile: (614) 227-2390

Thomas J. O'Brien ^{gub}

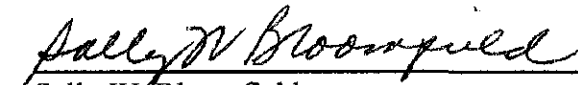
Thomas J. O'Brien (0066249)
CORECOMM NEWCO, INC.
450 W. Wilson Bridge Road, Suite 100
Worthington, Ohio 43085
Telephone: (614) 430-5101
Facsimile: (614) 846-7225

**TELECOMMUNICATIONS RESELLERS
ASSOCIATION**


Sally W. Bloomfield (0022038)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: (614) 227-2368
Facsimile: (614) 227-2390

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion to Intervene was served upon the parties listed on the attached Service List by regular U.S. Mail, postage prepaid, this 24th day of January, 2000.


Sally W. Bloomfield (0022038)

SERVICE LIST
Case No. 99-941-TP-UNC

Roger P. Sugarman
Leigh A. Reardon
KEGLER, BROWN, HILL & RITTER
65 East State Street
Suite 1800
Columbus, Ohio 43215

Marsha Rockey Schermer
Vice-President Regulatory Midwest Region
Time Warner Telecom of Ohio, L.P.
65 East State Street
Suite 1800
Columbus, Ohio 43215

Boyd B. Ferris
FERRIS & FERRIS
2733 West Dublin-Granville Road
Columbus, Ohio 43235-1798

Thomas J. O'Brien
Assistant General Counsel
Corecomm Newco, Inc.
450 West Wilson Bridge Road
Suite 100
Worthington, Ohio 43085

Benita A. Kahn
VORY, SATER, SEYMOUR and PEASE, LLP
52 East Gay Street
Post Office Box 1008
Columbus, Ohio 43216-1008

David J. Chorzempa
AT&T Communications of Ohio, Inc. and TCG Ohio, Inc.
222 West Adams Street
Suite 1500
Chicago, Illinois 60606

William H. Keating
5994 Whitecraigs Court
Dublin, Ohio 43017

SERVICE LIST
Case No. 99-941-TP-UNC

Lee T. Lauridsen
Senior Attorney
United Telephone Company of Ohio
dba Sprint & Sprint Communications Company L.P.
8140 Ward Parkway
Kansas City, Missouri 64114

Joseph R. Stewart
Senior Attorney
United Telephone Company of Ohio
dba Sprint & Sprint Communications Company L.P.
50 West Broad Street
Suite 3600
Columbus, Ohio 43215

Daniel R. Conway
PORTER WRIGHT MORRIS & ARTHUR
41 South High Street
Columbus, Ohio 43215