BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO 00 JUL 17 PM 3: 16

In the Matter of the Petition of Gary and Mary Jeanette and Numerous Other Subscribers of the Lindsey Exchange of Ameritech Ohio,	PUCU))
Complainants,))
V.) Case No. 00-721-TP-PEX
Ameritech Ohio, GTE North Incorporated, and United Telephone Company of Ohio,)))
Respondents,))
Relative to a Request for Extended Area Service From the Lindsey Exchange of Ameritech Ohio, on The One Hand, to the Bettsville, Bellevue, Clyde, Elmore, Gibsonburg, Helena, Oak Harbor, and Port Clinton Exchanges of GTE North Incorporated, and the Green Springs, Old Fort, Rising Sun, Stoney Ridge, and Woodville Exchanges of United Telephone Company of Ohio, on the Other Hand.))

ANSWER OF GTE NORTH INCORPORATED

- 1. Now comes GTE North Incorporated, by its attorney, and for its answer to the complaint herein, states that it is a public utility and a telephone company subject to the jurisdiction of the Public Utilities Commission of Ohio, and that as such it provides telephone service to subscribers in numerous exchanges throughout the State of Ohio, including its Bettsville, Bellevue, Clyde, Elmore, Gibsonburg, Helena, Oak Harbor, and Port Clinton Exchanges.
- 2. Further answering, this respondent states that in order to establish extended area service between the Lindsey exchange and the requested exchanges, it could be required to provide interexchange and central office facilities, and thereby be required to make substantial investments and incur substantial annual charges,

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which would tend to increase the cost of telephone service generally, and which is therefore not in the public interest.

3. Further answering, respondent denies each allegation of the complaint not specifically admitted herein to be true.

WHEREFORE, respondent, GTE North Incorporated prays that the complaint be dismissed.

WILLIAM H. KEATING

(OHIO REG. NO. 0020900) 1

5994 Whitecraigs Ct.

Dublin, OH 43017 (614) 799-1312

Trial Attorney for GTE North Incorporated

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INFORMATION RESPONSE OF GTE NORTH INCORPORATED

In accordance with the Commission's Entry dated May 18, 2000, GTE North Incorporated submits the following information:

a) The number of access lines and subscribers.

<u>Exchange</u>	Access Lines, 03/00
Bettsville	1,085
Bellevue	7,573
Clyde	5,337
Elmore	2,166
Gibsonburg	1,891
Helena	607
Oak Harbor	5,031
Pt. Clinton	14,563

The number of subscribers is not germane to calculations detailed in O.A.C. 4901:7. This information is not maintained in a readily usable format, and

requires detailed and costly procedures to retrieve.

- b) See MOTION OF GTE NORTH INCORPORATED FOR PARTIAL WAIVER OF FILING REQUIREMENTS, filed 7/17/00. In addition, in accordance with 4901:1-7-03 (B) (c), no information is required from the exchanges of Bettsville, Bellevue, Clyde, Elmore, Gibsonburg, Oak Harbor, or Pt. Clinton, since the Lindsey exchange access lines do not total more than 40% of the total lines of these exchanges.
- c) Given GTE North's current rate structure, if flat-rate EAS is established between the Lindsey and the requested exchanges, the Bettsville, Clyde, Elmore, Gibsonburg, Helena, and Oak Harbor exchanges would not change rate bands. The Bellevue exchange would increase from rate band II to rate band III, and the Pt. Clinton exchange would increase from rate band III to rate band IV. The rates and the differences between rate bands are shown below.

	FLAT-RATE SERVICE			
	Present	Rates		
Type & Class	Rates	w/EAS	Monthly	
of Service	<u>Band II</u>	Band III	Increase	
Business:				
1-Party	\$26.94	\$27.86	\$0.92	
Key Trunk	\$52.00	\$52.00	\$0.00	
Trunks	\$39.00	\$39.00	\$0.00	
COPT Coin	\$26.94	\$27.86	\$0.92	
Residence:				
1-Party	\$13.47	\$13.93	\$.46	
			RVICE - USS	
T 0.01	Present	Rates		
Type & Class	Present Rates	Rates w/EAS	Monthly	
of Service	Present	Rates		
of Service Business:	Present Rates Band II	Rates w/EAS <u>Band III</u>	Monthly Increase	
of <u>Service</u> Business: 1-Party	Present Rates Band II \$16.16	Rates w/EAS Band III \$16.74	Monthly Increase \$.58	
of Service Business: 1-Party Key Trunk	Present Rates Band II \$16.16 \$32.83	Rates w/EAS Band III \$16.74 \$34.60	Monthly Increase \$.58 \$ 1.77	
of Service Business: 1-Party Key Trunk Trunks	Present Rates Band II \$16.16 \$32.83 \$24.25	Rates w/EAS Band III \$16.74 \$34.60 \$25.07	Monthly <u>Increase</u> \$.58 \$ 1.77 \$.82	
of Service Business: 1-Party Key Trunk Trunks COPT Coin	Present Rates Band II \$16.16 \$32.83	Rates w/EAS Band III \$16.74 \$34.60	Monthly Increase \$.58 \$ 1.77	
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Type & Class of Service Business:	FLAT-RAT Present Rates Band III	E SERVICE Rates w/EAS Band IV	Monthly Increase	
1-Party	\$27.86	\$29.16	\$1.30	
Key Trunk	\$52.00	\$52.00	\$0.00	
Trunks	\$39.00	\$39.00	\$0.00	
COPT Coin	\$2 7.86	\$29.16	\$1.30	
Residence:				
1-Party	\$13.93	\$14.58	\$.65	
Type & Class	USAGE SENSITIVE SERVICE - USS Present Rates Rates w/EAS Monthly			
of Service	Band III	Band IV	Increase	
Business:				
1-Party	\$16.74	\$17.64	\$.90	
Key Trunk	\$34.60	\$36.37	\$ 1.77	

\$25.07

\$16.74

\$ 8.36

\$26.24

\$17.64

\$ 8.75

\$ 1.17

\$.90

\$.39

d) Alternative Service to Flat-Rate EAS.
 ltem 1 applies to GTE carried traffic.

Trunks

COPT Coin

Residence: 1-Party

1. GTE's optional Local Calling Plan is available from each of the GTE requested exchanges. This provides three options for either flat-rate calling or per minute usage (\$.05), for increased monthly charges.

The next items pertain to IXC alternatives:

- 1. AT&T, LCI, and Sprint provided alternatives to EAS. These are contained in Ameritech Ohio's Information Response, Exhibits 1 through 3, due on July 17, 2000, which are incorporated herein by reference.
- e) Based upon a review of the information provided by the IXCs, it appears that GTE has the following information:

The number of AT&T's MTS calls placed; the number of calls placed using LCI's America Plus, Simple, Fair, and Inexpensive, All-American Plan, Easyline, Carrier Service, Switch Rebiller Service, Integrity, Simply Business, and Lightcall Plus, and the number of LCI subscribers; the number of MCI calls placed using

MCI service; the number of customers subscribing to Sprint's Select service and its Sprint Service (MTS) and the number of calls placed using Sprint's MTS service; and the number of WorldCom calls placed using WorldCom's service.

GTE has been advised by the IXCs that this information is proprietary and is not to be disclosed without a protective order.

- f) AT&T, LCI, and Sprint indicated to GTE that their alternative services listed in d) will remain in-service if EAS is granted.
- g) AT&T, Sprint, and LCI indicated that they provide telecommunications calling services to meet a variety of customer needs, and these services do not specifically address EAS calling needs; and that their options will exist regardless of whether or not EAS is granted.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer and Information Response of GTE North Incorporated has been served upon: Gary and Mary Jeanette, 2238 CR 127, Lindsey, OH 43442; Joseph Stewart, Sprint, 50 West Broad, Suite 3000, Columbus, OH 43215; and Scott Rawlings, Attorney for Ameritech, 2639 Wooster Road, Rocky River, OH 44115; by first-class mail, postage prepaid, this 17th day of July 2000.

William Keating