

May 15, 2008

By Electronic Delivery

Ms. Reneé J. Jenkins
Director of Administration
Secretary of the Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: In the Matter of the Commission's Investigation into Continuation of the Ohio Telecommunications Relay Service; PUCO Case No. 08-439-TP-COI

Dear Ms. Jenkins:

Hamilton Telephone Company d/b/a Hamilton Telecommunications submits for electronic filing Initial Comments in the above-referenced matter.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Very truly yours,

/s/ Carolyn S. Flahive

Enclosure

THE PUBLIC UTILITIES COMMISSION OF OHIO

INITIAL COMMENTS OF HAMILTON TELECOMMUNICATIONS

1) Page 13, III.C.5. In State/Out of State

2) Page 29 VI. K.

The proposed RFP requires that the provider not assign the obligation to perform in accordance with the RFP and the Commission's order in whole or in part without the prior

written consent of the Commission. Hamilton makes use of a Subcontractor who is responsible for hiring, training, and managing Communication Assistants in Hamilton's Wisconsin facility. This Subcontractor also processes specialty call types such as Speech to Speech and Spanish calls in Hamilton's Wisconsin facility. Hamilton recommends that the proposed RFP be revised to include Subcontractors if such usage is approved by the State.

3) Page 31 VI. Q.

The proposed RFP requires the selected TRS provider to procure a performance bond in the amount of \$1 million annually. Due to the declining call volumes, Hamilton recommends that the proposed RFP be revised to require either a performance bond equaling 3 months worth of projected costs or a reference letter from a financial institution attesting to the TRS Provider's ability to provide the necessary capital to manage the Ohio Relay Service.

4) Page 32 VI. S.

The proposed RFP states: "The accounting system shall maintain records pertaining to the tasks defined in the RFP and any other costs and expenditures. Specific accounting records and procedures are subject to Commission approval, and the costs properly applicable to the provision of the TRS shall be readily ascertainable therefrom."

Relay providers do not customarily provide and maintain project specific cost accounting since this is a competitively bid process. Hamilton recommends that the last two sentences (as quoted above) be revised to read:

"Provider shall maintain and provide upon request or audit all records reasonably required to substantiate all billings under the terms of this Agreement and the RFP."

Conclusion

Hamilton submits that the proposed RFP should be revised in accordance with the foregoing.

Respectfully submitted,

HAMILTON TELEPHONE COMPANY
D/B/A HAMILTON TELECOMMUNICATIONS

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Case No(s). 08-0439-TP-COI

Summary: Comments Initial Comments electronically filed by Carolyn S Flahive on behalf of Hamilton Telecommunications