

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

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

INITIAL COMMENTS OF  
HAMILTON TELECOMMUNICATIONS

By Entry dated April 16, 2008, the Public Utilities Commission of Ohio (the "Commission") initiated the above proceeding, inviting interested parties to comment on the proposed Request for Proposal ("RFP") that was attached as an appendix to the Entry. Hamilton Telephone Company d/b/a Hamilton Telecommunications ("Hamilton") submits the following comments for the Commission's consideration.

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

The proposed RFP requires that a minimum of 85 percent of the calls must be processed by a relay center located in the State of Ohio. There has been a nationwide trend of declining TRS minutes of use and this certainly appears to be true for Ohio as well. The 2002 RFP indicated a monthly calling volume of 220,000 incoming TRS calls and an average call duration of eight minutes. The proposed RFP indicates a monthly calling volume of 78,000 incoming TRS calls and an average call duration of two minutes. This continued decline in TRS minutes of use would certainly inflate the cost of an in-state center. Hamilton recommends that the proposed RFP be revised to include an out-of-state call processing solution to keep the per-minute rate costs down and prices competitive.

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

By: /s/ Carolyn S. Flahive  
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Its Attorneys

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/15/2008 10:58:01 AM**

**in**

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

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