

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Petition Of Intrado Communications)
Inc. for Arbitration Pursuant to Section 252(b) of the)
Communications Act of 1934, as Amended, to Establish)
An Interconnection Agreement with United Telephone) Case No. 07-1216-TP-ARB
Company of Ohio and United Telephone Company of)
Indiana (collectively, "Embarq"))

**MEMORANDUM CONTRA OF UNITED TELEPHONE COMPANY OF OHIO
AND UNITED TELEPHONE COMPANY OF INDIANA, INC. TO MOTION TO
SHORTEN TIME FOR RESPONDING TO DISCOVERY AND FOR EXPEDITED
RULING OF INTRADO COMMUNICATIONS, INC.**

Intrado Communications, Inc. ("Intrado") has moved to shorten the time for United Telephone Company of Ohio and United Telephone Company of Indiana, Inc. (collectively, "Embarq") to respond to discovery. Intrado also seeks an expedited ruling on this motion. The Commission should deny Intrado's motion.

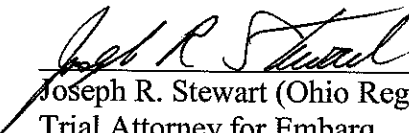
Intrado offers two reasons in support of its motion. First, Intrado claims that the time for response should be shortened because the hearing in this case will commence May 27, while, pursuant to the applicable rule, responses are not due until June 3. Second, Intrado notes that it previously agreed to a request made by Embarq to respond to interrogatories in a shortened time frame. Neither of Intrado's proffered reasons justifies shortening the time for response.

First, Intrado does not say why it waited until May 14 to serve its interrogatories. Intrado filed this case almost 6 months ago. Intrado has given no justification for why it has waited until the 11th hour to serve these interrogatories.

The fact that Intrado agreed to respond to several interrogatories served by Embarq in a shortened time frame is also irrelevant. The interrogatories served by Embarq in Ohio were identical to the interrogatories Embarq had served on Intrado in Florida. The answers in Florida were due 8 days before the date that Intrado agreed to in Ohio. Thus, Intrado was (or should have been) already working on the answers to the Ohio interrogatories before they were served in Ohio. But that situation simply does not apply to the interrogatories Intrado served on Embarq in Ohio. Intrado had not previously served these interrogatories on Embarq in Florida; therefore, Embarq had not commenced the necessary research to respond to them.

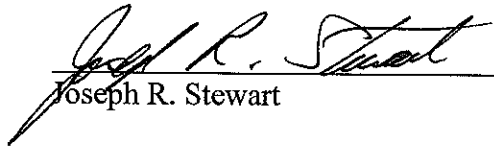
Embarq commits to a good faith effort to respond to the interrogatories as promptly as possible, but asserts that the Commission should not require Embarq to respond in a shortened time frame because there is no valid reason to do so.

Respectfully submitted,


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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing memorandum contra was served via e-mail, mailed postage pre-paid, to the parties listed below on this 22nd day of May 2008.



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Case No(s). 07-1216-TP-ARB

Summary: Memorandum contra to motion to shorten time for responding to discovery and for expedited ruling of Intrado Communications, Inc. electronically filed by Sonya I Summers on behalf of United Telephone Company of Ohio d/b/a Embarq