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June 11, 2008

VIA HAND DELIVERY

Ms. Renee Jenkins
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, OH 43215-3793

Re: *In the Matter of the Application of Glandorf Telephone Company, Inc.
for a "Me Too" Edge-Out Waiver*
Case No. 08-701-TP-WVR

Dear Ms. Jenkins:


Enclosed herewith are the original and ten (10) copies of the Redacted Application of Glandorf Telephone Company, Inc. for a "Me Too" Edge-Out Waiver. Please file stamp the two (2) additional copies of the Redacted Application and return them with our courier.

Also enclosed please find the original and thirteen (13) copies of Glandorf Telephone Company, Inc.'s Motion for Protective Order for filing in this matter, with three (3) unredacted copies of the Application for a "Me Too" Edge-Out Waiver. Please file stamp and return the additional two (2) copies of the Motion for Protective Order, along with the extra copies of the confidential information being filed under seal, and return them with our courier.

Thank you for your attention to this matter.

Very truly yours,

~~BAILEY CAVALIERI LLC~~



William A. Adams

WAA/sg
Enclosures

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Glandorf)	Case No. 08-701-TP-WVR
Telephone Company, Inc. for a "Me Too")	
Edge-Out Waiver)	

**APPLICATION OF GLANDORF TELEPHONE COMPANY, INC.
FOR A "ME TOO" EDGE-OUT WAIVER**

Glandorf Telephone Company, Inc. ("Glandorf") requests that the Public Utilities Commission of Ohio ("Commission") grant it an eighteen-month extension to comply with the edge-out access rate reductions required by the Commission's August 22, 2007 Opinion and Order in the *Carrier-to-Carrier Rulemaking*, Case No. 06-1344-TP-ORD, as more fully set forth in this Application. The new Commission requirement mandates a reduction in intrastate access charges in the edge-out service areas from existing rates to the rate of the ILEC in whose territory the edge-out company is operating over a three-year period beginning on August 22, 2008. Case No. 06-1344-TP-ORD, Opinion and Order at 56-57.

Doylestown Telephone Company ("Doylestown") previously filed an application for a waiver of this requirement in Case No. 08-117-TP-WVR. The Commission issued a Finding and Order on May 28, 2008 granting Doylestown an eighteen-month extension of the August 22, 2008 deadline to commence the three-year transition period. The Commission granted this extension to provide Doylestown with additional time to establish the necessary billing system changes, to seek if desired alternative methods to recover such billing system expenditures, and to afford Doylestown the opportunity to amend its edge-out business plan to include the offering of CLEC market-based retail rates. Finding and Order at 14, 15. The Commission invited all

other similarly situated edge-out companies requiring billing system updates to file a pleading on or before June 11, 2008 to seek the same relief. *Id.* This Application is for that purpose.

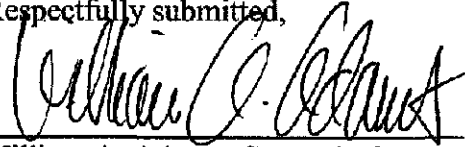
Glandorf received authority in Case No. 01-1141-TP-UNC to edge-out into the Ottawa Exchange of United Telephone Company of Ohio d/b/a Embarq. Glandorf serves edge-out customers with the same NPA-NXX code as ILEC customers and switches traffic on the same switch. Each long-distance carrier currently receives a single bill from Glandorf for access traffic in the ILEC service area and the edge-out service area.

Because all customers have the same NPA-NXX code, the access rate changes ordered by the Commission will require significant billing system changes to isolate the edge-out traffic and apply a different rate. Glandorf has obtained a quote for changes required to the billing system (attached at **Tab 1** and filed under seal), which has a significant cost and requires a forty-eight to fifty-four week lead time to implement. This significant cost is grossly disproportionate to the revenue stream at issue.

Glandorf is similarly situated to Doylestown and requests the same relief provided to Doylestown: an eighteen-month extension of the August 22, 2008 deadline to commence the edge-out access three-year transition period so Glandorf can (1) make the necessary billing system changes, (2) seek if desired alternative methods to recover such billing system expenditures, and (3) amend its edge-out business plan to include the offering of CLEC market-based retail rates.

In accordance with the Doylestown Finding and Order, Glandorf requests that this Application be automatically approved fourteen days after filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William A. Adams", written over a horizontal line.

William A. Adams, Counsel of Record

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