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BAILEY CAVALIERI LLC
ATTORNEYS AT LAW

One Columbus 10 West Broad Street, Suite 2100 Columbus, Ohio 43215-3793
telephone 614.221.3155 facsimile 614.221.0479
www.baileycavalieri.com
direct dial: 614.229.3278
email: William.Adams@BaileyCavalieri.com

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PUCO

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 Farmers Mutual Telephone
Company for a "Me Too" Edge-Out Waiver*
Case No. 08-702-TP-WVR

Dear Ms. Jenkins:

Enclosed herewith are the original and ten (10) copies of the Redacted Application of Farmers Mutual Telephone Company 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 Farmers Mutual Telephone Company'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

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician SM Date Processed 6/11/08

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV
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In the Matter of the Application of Farmers)
Mutual Telephone Company for a "Me Too")
Edge-Out Waiver)

Case No. 08-702-TP-WVR

**APPLICATION OF FARMERS MUTUAL TELEPHONE COMPANY
FOR A "ME TOO" EDGE-OUT WAIVER**

Farmers Mutual Telephone Company ("Farmers Mutual") 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.

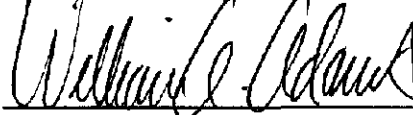
Farmers Mutual received authority in Case No. 02-1103-TP-UNC to edge-out into neighboring exchanges. Farmers Mutual serves edge-out customers with the same NPA-NXX code as ILEC customers and switches traffic on the same switch. Each long-distance carrier currently receives a single bill from Farmers Mutual 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. Farmers Mutual 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.

Farmers Mutual 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 Farmers Mutual 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, Farmers Mutual 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

BAILEY CAVALIERI LLC

10 West Broad Street, Suite 2100

Columbus, OH 43215-3422

(614) 229-3278 (telephone)

(614) 221-0479 (fax)

William.Adams@baileycavalieri.com

Attorneys for Farmers Mutual Telephone Company

REDACTED

**FILED UNDER
SEAL**