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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Intrado)
Communications Inc. to Provide)
Competitive Local Exchange Services in)
the State of Ohio.)

Case No. 07-1199-TP-ACE

PUCO

**STATEMENT IN SUPPORT OF JOINT PETITION
FOR SUPPLEMENTAL ORDER**

On behalf of the Ohio Chapter of the Association of Public Safety Communications Officials ("APCO") we would like to express our support for Intrado Communications, Inc.'s ("Intrado Comm") desire to introduce and facilitate new, competitive 9-1-1 solutions within the State of Ohio.

On July 25, 2008, Intrado Comm and the Hamilton County Department of Communications (the "Department") filed a Joint Petition For Waiver and Supplemental Order ("Joint Petition") to facilitate the deployment of competitive 9-1-1 services in Hamilton County, Ohio. APCO agrees with, and supports, the waiver for a "beta test" for the Department and Intrado Comm. as set forth in the Joint Petition.

The "beta testing" period, as described in detail in the Joint Petition, will serve to test Intrado Comm's deployment of technologically-advanced 9-1-1 services in Ohio. This initiative, which is the only one of its kind currently proposed in the State of Ohio, directly serves the interest of public safety and the dire need public safety answering points have to achieve two critical goals: 1) accommodate the advanced technologies that currently cannot access 9-1-1 service such as text messaging, images and videos; and 2) allow for inter-county redundancy and data transfer capability over an advance network. It is APCO's opinion that the implementation of such beta testing prior to the full use of Intrado Comm's services for live 9-1-1 calls is the

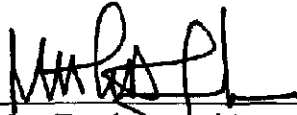
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proper method for testing such new technologies and services. This process will provide the four Hamilton County public safety answering points, this Commission, and other concerned Ohioans with the opportunity to analyze, test and evaluate Intrado Comm's offerings to determine its future in Hamilton County and the State of Ohio.

Finally, and most importantly, it is imperative that Ohio's public safety agencies be able to reap the benefits of competitive 9-1-1 offerings in this state. To do so, there must be a regulatory environment in which competitive providers, such as Intrado Comm, can freely offer and sell their services. APCO has seen no movement on the part of the ILECs in the state of Ohio to address the new technological needs of Ohio's public safety answering points. In fact, they have demonstrated a clear unwillingness to even talk with their customers about such needs. APCO must state that the ILECs are to be commended for the establishment and maintenance of the existing, first generation 9-1-1 system implemented in the State of Ohio. Their dedication to this effort during the decade of the 1980s has clearly made the public safer. However, it is the opinion of APCO that those same ILECs have failed miserably in listening to the needs of the public safety community during the ensuing 25+ years by failing to continue development and answer the cries of public safety answering points in need of an advanced, second generation network. The irony of that failure is demonstrated by the fact that the very services and devices that the LECs, wireless providers and VoIP providers are aggressively marketing everyday to their customers directly creates the very need expressed by those in public safety, needs which are rooted in the expectations of those very customers. APCO believes that granting the Joint Petition is a critical step toward achieving the goal of a next generation network and commends the petitioners for their foresight and willingness to lead this critical effort to serve the public's safety.

Therefore, Ohio APCO respectfully requests that the Joint Petition be granted.

Respectfully submitted by,



Matt Franke, President
Association of Public Safety Communications
Officials, Ohio Chapter