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July 6, 2009

VIA ELECTRONIC FILING

Renee Jenkins
Director of Administration
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: **Case 07-1280-TP-ARB, *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 The Ohio Bell Telephone Company d/b/a AT&T Ohio***

Dear Ms. Jenkins:

Intrado Communications Inc. (“Intrado Comm”), by its attorneys, hereby submits this response to AT&T Ohio’s request that the Public Utilities Commission of Ohio (“Commission”) issue a briefing schedule regarding the remaining disputed contract language between the Parties.¹ Intrado Comm respectfully requests that the Commission reject AT&T Ohio’s request.

The Commission’s *Entry on Rehearing*² (as well as its previous orders in Intrado Comm’s arbitrations with other carriers)³ addresses how the point of interconnection (“POI”) should be defined. There is no need for the Parties to make any further filings in connection with their competing language, which has now been presented to the Commission for review. In

¹ Case No. 07-1280-TP-ARB, Letter from Mary Ryan Fenlon, AT&T Ohio, to Renee Jenkins, Public Utilities Commission of Ohio (filed July 2, 2009).

² Case No. 07-1280-TP-ARB, *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 The Ohio Bell Telephone Company dba AT&T Ohio*, Entry on Rehearing at 20 (June 17, 2009) (“*Entry on Rehearing*”).

³ See, e.g. Case No. 07-1216-TP-ARB, *Petition of Intrado Communications, Inc. for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with United Telephone Company of Ohio dba Embarq and United Telephone Company of Indiana dba Embarq Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Arbitration Award at 33 (Sept. 24, 2008); Case No. 08-198-TP-ARB, *Petition of Intrado Communications Inc. for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with Verizon North Inc., Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Arbitration Award at 5 (June 24, 2009).

addition, AT&T Ohio's request is inconsistent with the Commission's rules, which state "no comments addressing disputed language" in a conforming interconnection agreement "will be entertained" and that the Commission "will select the competing language that most closely reflects the commission's award."⁴ Thus, the Commission is in the best position to determine which Party's proposed language for the definition of "POI" best conforms with its *Entry on Rehearing*. Accordingly, AT&T Ohio's request for a briefing schedule on the disputed language should be denied.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ *Chérie R. Kiser*

Chérie R. Kiser

Counsel for Intrado Communications Inc.

cc: Service List (via electronic mail)

⁴ OAC 4901:1-7-09(G)(6).

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Summary: Response Intrado Comm Response to AT&T Ohio Request for Briefing Schedule electronically filed by Angela F Collins on behalf of Intrado Communications Inc.