

CITYNET

RECEIVED-DOCKETING DIV

2009 JUL 27 PM 3: 02

Jeffrey A. Ray
jeff.ray@citynet.net

July 22, 2009

PUCO

Reneé Jenkins
Docketing/Administration
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215

Re: Case No. 09-586-TP-WVR

Dear Ms. Jenkins:

I am General Counsel for Citynet Ohio, LLC ("Citynet"), and I am writing in support of the Application of the Ohio Telecom Association (the "OTA") for an Order granting a permanent waiver to all local exchange companies from the obligations of Ohio Administrative Code §4901:1-7-27, which would require the semi-annual submission of FCC form 477 to the Commission Staff (the "477 Rule"). The continued enforcement of the 477 Rule is no longer necessary and has become unduly burdensome to CLECs such as Citynet due to the electronic filing process implemented by the FCC. Accordingly, Citynet respectfully requests that the Commission grant a permanent waiver to all local exchange carriers from the obligations of Ohio Administrative Code §4901:1-7-27.

Sincerely,



Jeffrey A. Ray
General Counsel

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 Am Date Processed 7/27/09