

**MEMORANDUM**

**TO:** Daisy Crockron, Chief  
Docketing Division

**FROM:** Dan Shields **DFS**  
Telecommunications Division

**SUBJECT:** Comments to be filed in the Telecommunications  
Federal Activities Docket No. 93-4000-TP-FAD

**DATE:** September 25, 1997

Attached are two copies of a document to be filed in Case No. 93-4000-TP-FAD. The daily activities report description of the filing should read verbatim as follows:

The Public Utilities Commission of Ohio's Petition for an Extension of Time in Which to File its Application for Renewal of its Telecommunications Relay Service Certification filed with the Federal Communications Commission (FCC) in CC Docket No. 90-571 (In the Matter of Telecommunications Relay Service, the Americans with Disabilities Act, and the Telecommunications Act of 1996). The petition for extension of time requests that the deadline for filing be moved back to November 17, 1997 from October 1, 1997.

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 Diana M. Nixon Date Processed Sept 26, 1997

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PUCO



Attorney General  
Betty D. Montgomery

September 25, 1997

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*Via Overnight Mail*

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: TRS State Certification Application.

*In the Matter of Telecommunications Relay Services, the Americans with Disabilities Act of 1990, and the Telecommunications Act of 1996, CC Docket No. 90-571.*

Dear Mr. Caton:

Enclosed please find and accept the original and two copies, and the MS DOS WP 5.1 ROM diskette, of the **Petition for Extension of Time on Behalf of the Public Utilities Commission of Ohio for an Extension of time in which to file its Application for Renewal of its Telecommunications Relay Service Certification**, in the above-referenced matter. Please return a time-stamped copy to me in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this matter.

Respectfully submitted,

Betty D. Montgomery  
Attorney General of Ohio

A handwritten signature in dark ink, appearing to read "Stephen A. Reilly".

Stephen A. Reilly  
Assistant Attorney General  
Public Utilities Section  
180 East Broad Street  
Columbus, OH 43215-3793  
(614) 466-4396  
FAX: (614) 644-8764

SAR/kja  
Enclosure  
cc: FCC, Network Services Division

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services,	)	CC Docket No. 90-571
the Americans with Disabilities Act of 1990,	)	
and the Telecommunications Act of 1996	)	

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**PETITION FOR EXTENSION OF TIME ON BEHALF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO  
FOR AN EXTENSION OF TIME IN WHICH TO FILE ITS  
APPLICATION FOR RENEWAL OF ITS TELECOMMUNICATIONS  
RELAY SERVICE CERTIFICATION**

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The Public Utilities Commission of Ohio (PUCO or Ohio Commission) is the designate agency within the state of Ohio with oversight responsibility concerning the provision of intrastate telecommunications relay service (TRS). In this petition, the PUCO requests an extension of time until November 17, 1997, to provide the FCC with a high-quality application for renewal of TRS certification. Support for the Ohio Commission's request for an extension of time follows.

On June 24, 1997, the Federal Communications Commission (FCC) released a Public Notice (DA 97-1321) indicating that it would accept applications for renewal of state telecommunications relay service program certifications until October 1, 1997. Current state certifications expire July 26, 1998. The FCC's rules provide that states may apply for renewal of their certified state TRS program one year prior to

expiration of certification. 47 C.F.R. Part 64.605(c). Certifications are valid for a five-year period from July 26, 1998 to July 25, 2003.

On July 10, 1997, the PUCO issued a Finding and Order in Case No. 96-1139-TP-COI (In the Matter of the Commission's Investigation Into Continuation of the Ohio Telecommunications Relay Service). In its Finding and Order, the PUCO tentatively chose, for a five-year period commencing January 1, 1998, the Sprint Communications Company, L.P. (Sprint) as Ohio's intrastate TRS provider. The Ohio Commission, however, has yet to issue its final decision in its 96-1139 investigation formally awarding to Sprint the state of Ohio's intrastate contract since it is still working through the specific details of the TRS contract with Sprint. Ameritech is the current provider of intrastate TRS in Ohio for the time period through December 31, 1997.

Consequently, while being able to assure the FCC that any intrastate provider ultimately selected by the PUCO will meet or exceed the FCC's 47 C.F.R. Part 64.604 TRS rules, the PUCO is currently unable to provide the FCC with the level of detail necessary to ensure a high-quality application for renewal of state certification. Specifically, since the PUCO has not formally selected a TRS provider for the ensuing contract period, it is unable to provide the FCC with specifics concerning the provider. These include, for example, the name of the TRS provider, location of the provider, special services provided to users, etc.

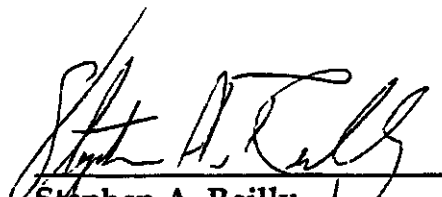
The PUCO intends to issue a decision formally selecting an intrastate TRS provider by October 30, 1997. The PUCO further anticipates that it will need only an additional 10 business days after formally selecting a vendor to compile a high-quality application for renewal of state TRS certification. Consequently, the PUCO is requesting an extension until November 17, 1997 to provide the FCC with its application for renewal.

The PUCO wishes to thank the FCC for timely considering this petition for an extension of time to file for renewal of state TRS certification.

Respectfully submitted,

**Betty D. Montgomery**  
Attorney General

**Duane W. Luckey**  
(Chief, Public Utilities Section)



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