



21 East State Street • 17th Floor • Columbus, OH 43215-4288
Tel: 614.469.8000 • Fax: 614.469.4653

December 1, 2011

Ms. Betty McCauley
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: *In the Matter of the Implementation of Section 749.10 of Amended Substitute
House Bill 153, Case No. 11-5384-AU-UNC*

Dear Ms. McCauley:

The Ohio Telecom Association ("OTA") for and on behalf of its members submits this letter in response to Staff's November 22, 2011 proposal in the above captioned case.

The Staff proposal recommending that the full reduction of the Office of the Ohio Consumers' Counsel's assessment for Fiscal Year 2012, \$2,856,907.00, be applied to the electric Percentage of Income Payment Plan ("PIPP") rider is commendable. It endeavors to provide a straightforward approach to the application of this credit to the benefit of many Ohio customers.

Because the refund includes monies generated from telephone customers of its members, the OTA would be remiss in not stating that its customers have a vested interest in this credit and could reap the benefits of investment of these funds through improved and expanded broadband, computing centers or other advanced services.

Additionally, if there are no changes in the distribution methodology, OTA requests that when the PIPP rider credit is applied to electric utility bills that the source of the refund is recognized as coming from all Ohio utilities, Gas, Pipeline, Telecommunications, Water, Wireless and Electric as per the Commission Order.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Scott E. Elisar', is written over a horizontal line.

Scott E. Elisar
MCNEES WALLACE & NURICK LLC
ON BEHALF OF THE OHIO TELECOM ASSOCIATION

cc: Parties of Record

{C36195: }

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Commission of Ohio Docketing Information System on

12/1/2011 12:12:53 PM

in

Case No(s). 11-5384-AU-UNC

Summary: Comments in Response to Staff's November 22, 2011 proposal electronically filed by Scott E. Elisar on behalf of Ohio Telecom Association