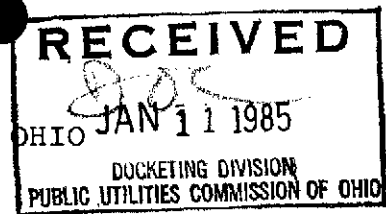


BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Commission)
Investigation Relative to Estab-) Case No. 83-464-TP-COI
lishment of Intrastate Access) (Subfile A)
Charges.

REQUEST FOR CLARIFICATION

AT&T Communications of Ohio, Inc. seeks clarification of paragraph (7)b of the Commission Entry of December 27, 1984. In paragraph (7)b, the Commission ruled upon Issue No. 3 of the Ohio Bell Telephone Company Recommendation to the Commission, filed October 9, 1984 (foreign exchange service access revenue). AT&T Communications will explain below the reason for this Request for Clarification without re-arguing this issue. See, generally, AT&T Communications' Response, filed November 2, 1984.

Ohio Bell's Recommendation sought clarification of the Commission's Opinion and Order of May 21, 1984 on the subject of open-end foreign exchange service revenue. In 1984, end-users paid Ohio Bell Feature Group A access charges for the open-end of foreign exchange service, including interLATA service. Thus, Ohio Bell received access revenue from this source in 1984. Ohio Bell's position was that corresponding (but non-access) revenue from the open-end of foreign exchange service in 1983 had been classified as local exchange revenue. Thus, the 1983 revenue requirement had not included a discrete element for open-end FX access revenue. Therefore, Ohio Bell would be required to pool all

1984 open-end FX access revenue it received because there was no 1983 revenue requirement associated with those funds.

AT&T Communications, one of the commenting parties on Ohio Bell's recommendation, contended that increasing the 1983 revenue requirement to reflect FX open-end access charge revenue, or preserving the 1984 open-end FX revenue free from the pooling mechanisms, were both improper. AT&T Communications contended that all access charge revenue received by Ohio Bell in 1984 should be available to satisfy the total local exchange company pooling requirement. The access charge revenue "surrogate" amount, put forward by Ohio Bell to calculate the 1983 revenue requirement, should be considered to include all discrete types of access charge revenue.

In its Entry, the Commission appears to authorize a remedy which in effect grants Ohio Bell the relief requested (i.e., not requiring 1984 revenues to be pooled), while at the same time disagreeing with Ohio Bell. Paragraph (7)b is set out in its entirety:

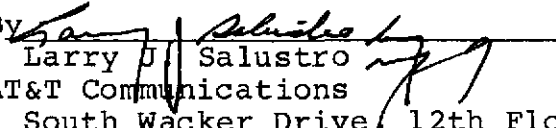
- (b) While there appears to be some confusion as to whether revenue received from the open end of interLATA intrastate FX services should be pooled for access charge purposes, the Commission would observe that open end intrastate FX revenues, whether they be inter or intraLATA, have been classed as local service revenues and, as such, are not part of the toll revenue to be pooled. The Commission therefore does not agree with Ohio Bell that any adjustment to Ohio Bell's or any local exchange

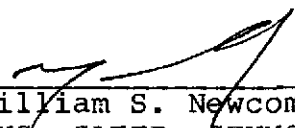
carriers' toll revenues requirement should be made for open end FX revenues. Nor does it agree that any modification should be made to the Commission ordered formula for Ohio Bell's 1983 revenue requirement. (Emphasis added)

For the reasons set out above, AT&T Communications seeks clarification of paragraph 7(b) of the Commission's Entry of December 27, 1984 as to whether open end FX revenues should be pooled along with all other interLATA access revenues.

Respectfully submitted,

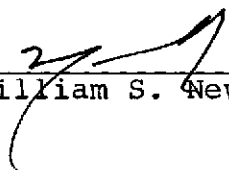
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Request for Clarification has been served upon the parties listed on the attached appendix by regular U.S. mail, postage prepaid, this 17th day of January, 1985.



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APPENDIX

Case No. 83-464-TP-COI
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