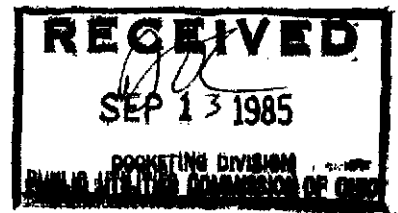


file copy

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Commission)
Investigation Relative to)
Establishment of Intrastate)
Access Charges.)

Case No. 83-464-TP-COI
(Subfile A)

RESPONSE OF AT&T COMMUNICATIONS OF OHIO, INC.
TO THE MOTION OF THE OHIO BELL TELEPHONE COMPANY
FOR LEAVE TO FILE COMMENTS

On September 3, 1985, Ohio Bell Telephone Company ("Ohio Bell") filed a Motion for Leave to File Comments ("Motion") in this proceeding. The Comments sought to be filed largely repeat Ohio Bell's November 14, 1985 Recommendation to the Commission concerning the treatment of equal access ("EA") and network reconfiguration ("NR") costs. The ostensible reason for these additional Comments, offered by Ohio Bell, is the testimony of Mr. David Effron, a witness on behalf of the Office of Consumers' Counsel in Ohio Bell's pending rate case, No. 84-1435-TP-AIR. Mr. Effron apparently recommended that the costs associated with EA/NR should be removed from the jurisdictional revenue requirements of Ohio Bell. For the reasons set forth below, Ohio Bell's Motion should be rejected by the Commission.

In its earlier Recommendation, Ohio Bell sought to exclude a certain portion of its 1984 access charge revenues from the pooling requirements established by the Commission in its May 21, 1984 Opinion and Order. If the Commission adopted the Recommendation, it would, in effect, increase the revenue requirement previously established by the Commission in its

Opinion and Order. Ohio Bell's Motion essentially reiterates that argument. On November 29, 1984, AT&T Communications of Ohio, Inc. submitted Comments opposing the Recommendation. Because the Ohio Bell Motion largely covers the same ground, in an effort to respond to the Motion in a manner which does not unduly burden the Commission, AT&T Communications' previously filed Comments are incorporated herein as if fully rewritten. However, a brief further response is necessary in light of Ohio Bell's latest Motion.

The Comments offered by Ohio Bell, attached to its Motion, add nothing material which should persuade the Commission to adopt its position. Ohio Bell's initial additional argument is at best premature and is in any case based on mere speculation, for it rests on an assumption that the costs in question have been disallowed. The Commission has not issued an Opinion and Order in Ohio Bell's pending rate case. Thus, the Commission has not decided the appropriate treatment of EA/NR costs for ratemaking purposes at this time. Contrary to the speculation of Ohio Bell as to the ultimate Commission decision, the Commission may reject the position adopted by the Consumers' Counsel. In such circumstances, Ohio Bell's Motion and Comments are premature. Second, as pointed out in AT&T Communications' previously filed Comments, Ohio Bell has not supported its naked assertion that it is not recovering its EA/NR costs with any record evidence. Mr. Effron's prefiled testimony confirms AT&T Communications' position. In responding to a question concerning whether Ohio Bell or the Staff removed the costs associated with

EA/NR from the test year investment and expenses, Mr. Effron states:


- A. No. The Company (Ohio Bell) has stated that it is unable to provide a dollar amount of costs that it has incurred associated with equal access/network reconfiguration. Therefore, the Company has made no adjustment to remove the costs associated with equal access/network reconfiguration from the determination of jurisdictional revenue requirements; nor has the Staff adjusted the Company's determination of investment and expenses to remove costs associated with equal access/network reconfiguration. (Effron testimony at 10)

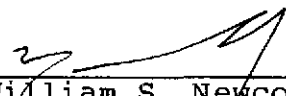
The Comments now offered by Ohio Bell do not remedy this second defect. Nor does Ohio Bell in the offered Comments respond to or address any of the other concerns raised in AT&T Communications' Comments, filed November 29, 1985, in response to the Recommendation.

Thus, this response and AT&T Communications' previously filed Comments demonstrate that Ohio Bell's Motion for Leave to File Comments should be denied.

Respectfully submitted,

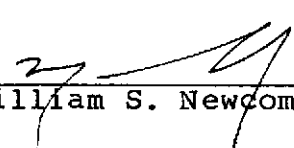
AT&T COMMUNICATIONS OF OHIO, INC.

By 
Dennis S. Pines
AT&T Communications
1 South Wacker Drive, 12th Floor
Chicago, Illinois 60606

By 
William S. Newcomb, Jr.
Vorys, Sater, Seymour and Pease
52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Response of AT&T Communications of Ohio, Inc. to the Motion of The Ohio Bell Telephone Company for Leave to File Comments has been served upon the parties of record as listed on the Appendix attached hereto by regular U.S. mail, postage prepaid, this 13th day of September, 1985.



William S. Newcomb, Jr.

APPENDIX

Case No. 83-464-TP-COI
(Subfile A)

Randolph S. Eide, Esq.
Kevin M. Sullivan, Esq.
Ohio Bell Telephone Company
45 Erieview Plaza
Suite 1400
Cleveland, Ohio 44114

Craig A. Glazer, Esq.
City of Cleveland
Hahn, Loeser, Freedheim, et al.
800 National City E. 6th Bldg.
Cleveland, Ohio 44114

Bruce Weston, Esq.
Office of Consumers' Counsel
137 East State Street
Columbus, Ohio 43215

Rita A. Barmann, Esq.
GTE Sprint Communications
1828 L. Street, N.W., Suite 500
Washington, D.C. 20036

Stanley Doten, Esq.
MCI Telecommunications Corp.
Morrison & Foerster
1920 N. Street, N.W.
Washington, D.C. 20036

William H. Schneider, Esq.
Champaign Telephone Co.
Schneider, Prohaska & Sams
906 East Broad Street
Columbus, Ohio 43215

Donald Pokorny, Esq.
Orwell Telephone Company
70 South Maple Street
Orwell, Ohio 44076

Robert S. Tongren, Esq.
Assistant Attorney General
Public Utilities Commission
of Ohio
180 East Broad Street
Columbus, Ohio 43215

Daniel R. Loftus, Esq.
Alarm Intervenors
Watkins, McGugin, McNeilly
& Rowan
First American Center,
18th Floor
Nashville, Tennessee 37238

Jack L. Fortini, Esq.
General Telephone Co. of Ohio
100 Executive Drive
Suite 124
Marion, Ohio 43302

Sally W. Bloomfield
Karl R. Inman, Esq.
Bricker & Eckler
100 East Broad Street
Columbus, Ohio 43215

Alan P. Buchmann, Esq.
United Telephone Co. of Ohio
Squire, Sanders & Dempsey
1800 Union Commerce Building
Cleveland, Ohio 44115

George C. McConnaughey, Esq.
Telephone Service Co.
Thompson, Hine & Flory
100 East Broad Street
Suite 1700
Columbus, Ohio 43215

Dennis J. Murphy, Esq.
Carlile, Patchen, Murphy
& Allison
100 East Broad Street
Columbus, Ohio 43215

Stephen H. Nemerovski, Esq.
Allnet Communications
Services, Inc.
100 South Wacker Drive
7th Floor
Chicago, Illinois 60606

APPENDIX CONTINUED

Donald B. Gardiner, Esq.
Central Telephone Co. of Ohio
Murphey, Young & Smith
250 East Broad Street
Columbus, Ohio 43215

Anne E. Johnston
MCI Communications Corp.
1133 19th Street, N.W.
Washington, D.C. 20036

John W. Bentine, Esq.
Bell, Randazzo & Bentine
21 East State Street
Columbus, Ohio 43215

William G. Milne, Esq.
U.S. Telephone of Midwest, Inc.
108 S. Akard Street
Dallas, Texas 75202

Mark H. Longenecker, Jr., Esq.
Frost & Jacobs
2500 Central Trust Center
201 East Fifth Street
Cincinnati, Ohio 45202

Gene A. Hogan
The Ohio Bell Telephone Company
45 Erieview Plaza, Room 1041
Cleveland, Ohio 44114

John A. Rozic, Esq.
United Telephone Co. of Ohio
P.O. Box 3555
Mansfield, Ohio 44907

Vernon Damman, Esq.
c/o Farmers Mutual
Telephone Company
P.O. Box 118
Okolona, Ohio 43550

John F. Ward, Jr., Esq.
U.S. Telephone Inc.
O'Keefe, Ashenden, Lyons
& Ward
One First National Plaza
Suite 5100
Chicago, Illinois 60603

Ms. Maryann Gall
Jones, Day, Reavis & Pogue
50 West Broad Street
Suite 400
Columbus, Ohio 43215