

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Wide Voice, LLC)	
to Provide Facilities-Based and Resold Local)	Case No. 14-1472-TP-ACE
and Interexchange Services Throughout)	
the State of Ohio)	

THE AT&T ENTITIES' MOTION TO INTERVENE

The Ohio Bell Telephone Company d/b/a AT&T Ohio, AT&T Corp., and Teleport Communications America, LLC ("the AT&T Entities"), by their attorney and pursuant to R. C. § 4903.221 and O.A.C. §§ 4901-1-11 and 4901:1-6-08, move to intervene in the captioned case. They do so in order to show good cause why the application filed in the referenced case should not be granted. The attached memorandum in support details the reasons underlying this motion.

Respectfully submitted,

THE AT&T ENTITIES

By: /s/ Jon F. Kelly
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Their Attorney

MEMORANDUM IN SUPPORT OF
THE AT&T ENTITIES' MOTION TO INTERVENE

The AT&T Entities have a real and substantial interest in the proceeding, and they are so situated that the disposition of the proceeding may, as a practical matter, impair or impede their ability to protect that interest.

The AT&T Entities are each telephone companies that provide both local and interexchange services and are likely to exchange traffic with the applicant, Wide Voice, LLC ("Applicant"). The exchange of traffic will be subject to the provisions of Applicant's proposed access service tariff, including the proposed rates for the exchange of that traffic and the terms and conditions under which service may be cancelled. Thus, the AT&T Entities' interest is substantial and potentially impacts their services statewide.

The AT&T Entities are concerned that proposed tariff language set forth in the application has recently been declared unlawful by the FCC, as explained in the accompanying Statement of Good Cause, filed contemporaneously. To address this issue, the AT&T Entities propose that the application be suspended and investigated by the Commission Staff.

The AT&T Entities have raised a substantial legal issue with the Applicant's proposed tariff. The AT&T Entities' intervention will not unduly prolong or delay the proceeding, but will likely result in a just outcome that would not otherwise be reached. The

AT&T Entities, through their intervention, will significantly contribute to full development and equitable resolution of the factual issues. The AT&T Entities' interests are not represented by any existing parties.

For all of the foregoing reasons, the AT&T Entities' motion to intervene should be granted.

Respectfully submitted,

THE AT&T ENTITIES

By: /s/ Jon F. Kelly

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Certificate of Service

I hereby certify that a copy of the foregoing has been served by e-mail this 10th day of September, 2014 on the following:

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Summary: Motion to intervene and memorandum in support electronically filed by Jon F Kelly
on behalf of The AT&T Entities