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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Germantown)
 Independent Telephone Company's)
 Application to Amend its Tariff to) Case No. 96-1200-TP-UNC
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Ottoville)
 Mutual Telephone Company's)
 Application to Amend its Tariff to) Case No. 96-1295-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Telephone)
 Service Company's)
 Application to Amend its Tariff to) Case No. 96-1312-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Sherwood)
 Mutual Telephone Association's)
 Application to Amend its Tariff to) Case No. 96-1313-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Nova)
 Telephone Company's)
 Application to Amend its Tariff to) Case No. 96-1314-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Arthur)
 Mutual Telephone Company's)
 Application to Amend its Tariff to) Case No. 96-1315-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

In the Matter of the Ayersville)
 Telephone Company's)
 Application to Amend its Tariff to) Case No. 96-1316-TP-ATA
 Include an IntraLATA Toll)
 Presubscription Service Offering)

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 Anna M. Hise Date Processed Sept 25, 1998

In the Matter of Frontier Communications of Michigan's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1320-TP-ATA
In the Matter of the Doylestown Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1321-TP-ATA
In the Matter of the Middle Point Home Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1323-TP-ATA
In the Matter of the Columbus Grove Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1327-TP-ATA
In the Matter of the Benton Ridge Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1328-TP-ATA
In the Matter of the Conneaut Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1330-TP-ATA
In the Matter of the Champaign Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1331-TP-ATA
In the Matter of the Orwell)	

Telephone Company's)
Application to Amend its Tariff to) Case No. 96-1332-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the McClure)
Telephone Company's)
Application to Amend its Tariff to) Case No. 96-1333-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the Sycamore)
Telephone Company's)
Application to Amend its Tariff to) Case No. 96-1334-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the Minford)
Telephone Company's)
Application to Amend its Tariff to) Case No. 96-1335-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the Vaughnsvile)
Telephone Company Inc.'s)
Application to Amend its Tariff to) Case No. 96-1337-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the United)
Telephone Company of Ohio's)
Application to Amend its Tariff to) Case No. 96-1341-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the Fort Jennings)
Telephone Company's)
Application to Amend its Tariff to) Case No. 96-1343-TP-ATA
Include an IntraLATA Toll)
Presubscription Service Offering)

In the Matter of the Glandorf)
Telephone Company's)

Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))	Case No. 96-1344-TP-ATA
In the Matter of the Farmers Mutual Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1345-TP-ATA
In the Matter of Alltel Ohio, Inc.'s Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering))))	Case No. 96-1351-TP-ATA
In the Matter of the Western Reserve Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1352-TP-ATA
In the Matter of the Chillicothe Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1355-TP-ATA
In the Matter of the Century Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1358-TP-ATA
In the Matter of the Kalida Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll Presubscription Service Offering)))))	Case No. 96-1360-TP-ATA
In the Matter of the New Knoxville Telephone Company's Application to Amend its Tariff to Include an IntraLATA Toll))))	Case No. 96-1361-TP-ATA

Presubscription Service Offering)	
In the Matter of the Ridgeville Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1362-TP-ATA
Presubscription Service Offering)	
In the Matter of the Bascom Mutual Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1372-TP-ATA
Presubscription Service Offering)	
In the Matter of the Arcadia Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1395-TP-ATA
Presubscription Service Offering)	
In the Matter of the Continental Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1396-TP-ATA
Presubscription Service Offering)	
In the Matter of the Little Miami Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1397-TP-ATA
Presubscription Service Offering)	
In the Matter of the Vanlue Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1398-TP-ATA
Presubscription Service Offering)	
In the Matter of the Oakwood Telephone Company's)	
Application to Amend its Tariff to Include an IntraLATA Toll)	Case No. 96-1399-TP-ATA
Presubscription Service Offering)	

In the Matter of the Wabash)	
Mutual Telephone Company's)	
Application to Amend its Tariff to)	Case No. 96-1401-TP-ATA
Include an IntraLATA Toll)	
Presubscription Service Offering)	
In the Matter of the Buckland)	
Telephone Company's)	
Application to Amend its Tariff to)	Case No. 97-132-TP-ATA
Include an IntraLATA Toll)	
Presubscription Service Offering)	
In the Matter of the Buckland)	
Telephone Company's)	
Application to Amend its Tariff to)	Case No. 97-520-TP-ATA
Include an IntraLATA Toll)	
Presubscription Service Offering)	
In the Matter of the Pattersonville)	
Telephone Company's)	
Application to Amend its Tariff to)	Case No. 97-846-TP-ATA
Include an IntraLATA Toll)	
Presubscription Service Offering)	

**MOTION OF MCI
TELECOMMUNICATIONS CORPORATION
FOR LEAVE TO INTERVENE AND
TO SUSPEND THE IMPLEMENTATION
OF INTRALATA
TOLL PRESUBSCRIPTION CHARGES**

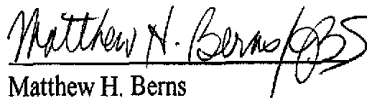
Now comes MCI Telecommunications Corporation (MCI) and hereby moves for intervention in the above-captioned cases pursuant to Rule 4901-1-11 Ohio Administrative Code and R. C. §4903.221. In addition, MCI moves that the Commission suspend the effective date (to

the extent that any of the proposed charges have automatic effective dates) of the intraLATA presubscription implementation charges proposed by the carriers until the Commission has had an opportunity to determine whether the charges have been developed in compliance with Local Service Guideline X.F. adopted in Case No. 95-845-TP-COI. A memorandum in support of this motion is attached hereto and incorporated by reference herein.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT
OF MOTION OF MCI
TELECOMMUNICATIONS CORPORATION
FOR LEAVE TO INTERVENE AND
TO SUSPEND THE IMPLEMENTATION
OF INTRALATA
TOLL PRESUBSCRIPTION CHARGES**

The local exchange carriers in the above-captioned proceedings have all filed proposed charges to recover the costs of implementing intraLATA toll presubscription within their service territories. MCI is an interexchange long distance carrier providing toll services to the customers of these companies and, as such, will be assessed the presubscription charge which is ultimately approved by the Commission. Because MCI will be required to pay the proposed charges, MCI has a real and substantial interest in the proceeding for the purposes of determining that the charges have been properly calculated.

Guideline X.F. of the Local Service Guidelines established in Case No. 95-845-TP-COI provides:

The incremental costs directly associated with the introduction of 1+ intraLATA dialing parity shall be borne by providers of telephone exchange service and telephone toll service. Costs shall be recovered through a Commission-approved switched access per minute of use charge applied to all originating intraLATA switched access minutes generated on lines that are presubscribed for intraLATA toll service. Recovery of these costs shall not include recovery of costs incurred for PIC charges during the initial 90-day no-charge period.

This guideline generally follows the cost recovery mechanism established by stipulations in the Western Reserve Telephone Company alternative regulation proceeding, Case No. 93-230-TP-ALT and the Cincinnati Bell Telephone Company alternative regulation proceeding, Case No. 93-

432-TP-ALT and clearly contemplates that both local exchange providers and toll providers will bear the presubscription implementation charges, based on all originating intraLATA minutes generated by all presubscribed lines. As explained in the motion filed in these cases by United Telephone Company d/b/a Sprint and Sprint Communications Company L.P. (Sprint), the calculation of the implementation charge was understood by Sprint and other ILECs to be based on the intraLATA switched access minutes of both the ILEC providing the local exchange service (such as Sprint) and the interexchange carriers (such as MCI).¹ MCI would also note that all other state commissions have also approved calculations based on the switched access minutes of both the local exchange providers and toll providers.

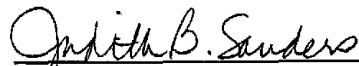
MCI shares Sprint's concerns that the calculation of the presubscription implementation charges used by the carriers in these cases may be based solely on interexchange switched access minutes, which not only is contrary to the Local Service Guidelines and the Commission's orders in other cases, but forces the IXCs to pay the entire cost of intraLATA presubscription. These concerns are based on comments which were made by the Commission's staff at the workshop on intraLATA presubscription held on March 17, 1998. The Commission should not permit the carriers to implement the charges proposed in these cases until the Commission and other interested parties are satisfied that there has been compliance with the Guidelines and with other orders addressing this issue.

MCI's request for intervention satisfies the requirements of Rule 4901-1-11 OAC and R. C. §4903.221. As an intrastate interexchange carrier, MCI has a real and substantial interest in

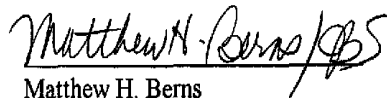
¹ It is MCI's understanding that GTE North, Incorporated also used its own switched access minutes in calculating the presubscription implementation charge. See Case No. 96-457-TP-ATA, Finding and Order, November 14, 1996.

the appropriate calculation of intraLATA presubscription implementation charges which it ultimately must pay. MCI's interests are not adequately represented by any other party to these proceedings, and MCI's participation in the case will assist the Commission in an expeditious evaluation of the charges. Furthermore, MCI is so situated that the disposition of these cases will greatly affect MCI's ability to protect its interests. Fundamental fairness dictates that the Commission suspend the effectiveness of the proposed charges and grant MCI intervention in the proceeding for the purpose of determining whether the charges have been properly calculated. It is noteworthy that Sprint has requested a suspension of its own implementation charges until the Commission is able to determine that all carriers have followed the Guidelines and included switched access minutes of local exchange providers as well as toll providers. MCI's motion should be granted forthwith.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have forwarded the foregoing Reply Comments to the parties listed below, via first-class U.S. mail, postage prepaid, this 24th day of September, 1998.


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