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Public Utilities Commission of Ohio

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
The Germantown Independent Telephone )  
Company to Establish IntraLATA Equal ) Case No. 96-1200-TP-UNC  
Access And To Amend Its Tariff )  
Accordingly. )

MOTION TO INTERVENE

Ameritech Ohio, by its attorneys, moves to intervene in this case pursuant to Ohio Revised Code § 4903.221 and Ohio Administrative Code § 4901-1-11. This motion is supported by the attached Memorandum in Support.

Respectfully submitted,

AMERITECH OHIO

By: Jon F. Kelly

Jon F. Kelly  
150 E. Gay St., Room 4-C  
Columbus, Ohio 43215  
(614) 223-7928

Its Attorney

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

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By its application, The Germantown Independent Telephone Company ("Germantown") seeks authority to institute intraLATA equal access and to withdraw and amend, as and if necessary, its concurrence with the Ameritech Message Toll Service ("MTS") Tariff upon the implementation of intraLATA equal access and 1+ dialing. Germantown also seeks the Commission's approval of any necessary amendment of the existing ORP-SCO agreement to which Germantown and Ameritech Ohio are parties.

Ameritech Ohio has a real and substantial interest in this proceeding as the primary toll carrier for intraLATA interexchange service to Germantown's customers, as is noted in Germantown's Memorandum in Support of its application. Memorandum, p. 1. Ameritech Ohio is also interested as a party to the Commission-approved agreement governing the current relationship between Germantown, as a secondary toll carrier, and Ameritech, as the primary toll carrier.

No other party can adequately represent Ameritech Ohio's interests. Ameritech Ohio's substantial experience in providing telecommunications services to customers in this setting and its knowledge of the technical and economic issues involved will contribute to a just and expeditious resolution of the issues raised by the Germantown application. Ameritech Ohio, therefore, has a substantial interest in the outcome of this

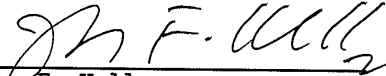
proceeding. The granting of this motion will not unduly delay this proceeding or unjustly prejudice any party. Ameritech Ohio's participation is necessary and will aid in a well-considered resolution of the matter.

For all of these reasons, Ameritech Ohio requests that its Motion to Intervene be granted.

Respectfully submitted,

AMERITECH OHIO

By:

  
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(614) 223-7928

Its Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon counsel for all parties as shown below by regular U.S. mail, postage prepaid, this 6th day of December, 1996.

THE GERMANTOWN INDEPENDENT  
TELEPHONE COMPANY

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