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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

**MOTIONS TO AMEND & MOTION TO RESCIND
MEMORANDUM IN SUPPORT**

September 12, 1996

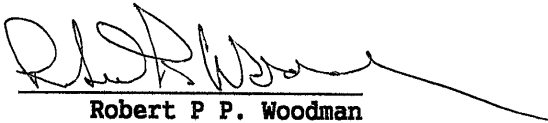
Daisy Crockron
Chief of Docketing
The Public Utilities Commission of Ohio
180 Broad Street
Columbus, OH 43266-0573

RECEIVED
SEP 13 1996
DOCKETING DIVISION
Public Utilities Commission of Ohio

Dear Ms. Crockron:

Enclosed is an original and 10 copies of subject MOTIONS & MEMORANDUM IN SUPPORT. Please file in accordance with Commission rules. Please time stamp the enclosed extra copy and return it to me in the enclosed self-addressed stamped envelope. Thank you.

Sincerely,


Robert P P. Woodman

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician J. Watson Date Processed 9-16-96

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SEP 13 1996

DOCKETING DIVISION
Public Utilities Commission of Ohio

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

| | | |
|--------------------------|---|--|
| Thomas Warholic, Carl N. | } | |
| Woodman, and Robert P. | } | |
| Woodman, as Trustees of | } | |
| WeShare, Inc. | } | |
| Complainants | } | Case Nos. 96-853-TP-CSS, 96-863-TP-CSS, |
| | } | 96-876-TP-CSS, 96-900-TP-CSS, 96-901-TP-CSS, |
| | } | 96-902-TP-CSS, 96-903-TP-CSS, 96-904-TP-CSS, |
| v. | } | 96-905-TP-CSS, 96-906-TP-CSS, 96-907-TP-CSS, |
| | } | 96-908-TP-CSS, 96-909-TP-CSS |
| AMERITECH OHIO, Inc. | } | |
| Respondent | } | |

MOTIONS TO AMEND and MOTION TO RESCIND

The above captioned Case Numbers have been assigned to Complaints
which were filed AGAINST Ohio Bell Telephone Company,
NOT against Ameritech Ohio,
as ERRONEOUSLY stated in ORDER NUMBER 96-492-TP-ACE et. al.

MOTIONS TO AMEND ALL COMPLAINTS LISTED IN THE CAPTIONED CASES:

COMPLAINANTS HEREBY MOVE the Commission TO AMEND each and every
 complaint in the captioned cases in accordance with the following
MOTIONS:

1. STRIKE from the facing page of each complaint, all wording
 which follows the name and address of the Ohio Bell Telephone Company,
 and

2. STRIKE from page two [2] of each complaint, ALL WORDING
 following the words "OHIO BELL" where they first appear in the last
 paragraph of page two [2] and

3. ADD in each complaint the FOLLOWING WORDS after the then final words of OHIO BELL appearing in the last paragraph of page two [2]:

"for unlawfully, unjustly, unreasonably, and discriminately charging [the named customer]* in this Complaint for its local exchange telephone service.

* For purposes of this Motion to Add, the words "named customer" shall mean IN EACH COMPLAINT all words EXCEPTING the words { "ON BEHALF OF***" }, which were struck in the above Number One [1] Motion to Strike.

4. STRIKE from each complaint the words beginning with "COMPLAINANT WWW" appearing on Page Four [4] of the Complaint and ending with the words "ten per cent." appearing on Page Five [5] of the Complaint, and

5. STRIKE from each complaint the words "on behalf" appearing in the last line on Page Five [5] of the Complaint, and

6. ADD the following paragraph to each complaint following the words "RESIDENTIAL SERVICE customer" appearing on Page Four [4]:

"Upon a finding that OHIO BELL, an Ohio public utility does, in fact, unlawfully, unjustly, unreasonably, and discriminately charge the named customer in this Complaint for its local exchange telephone service, then Complainant asks for that relief which is provided for by law."

MOTION TO RESCIND

Complainant hereby moves the Commission TO RESCIND ORDER contained in ENTRY docketed September 6, 1996, 96-492-TP-ACE et. al.

MEMORANDUM OF SUPPORT for granting MOTIONS TO AMEND and MOTION TO RESCIND, is attached hereto.

MEMORANDUM OF SUPPORT
for granting
MOTIONS TO AMEND and MOTION TO RESCIND

MOTIONS TO AMEND

Section 4901-9-01{A} [OAC] [Complaint Proceedings] reads in part as follows:

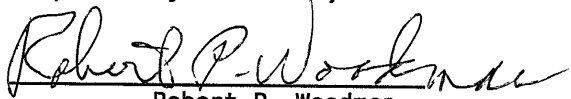
"All complaints filed under section 4905.26 of the Revised Code, except complaints filed by a public utility concerning a matter affecting its own product or service, shall be in writing and shall contain the name of the public utility complained against, a brief statement of the facts which constitute the basis of the complaint, and a statement of the relief sought....."

All Motions to Amend when granted will correct all complaints included in the captioned cases to conform with the requirement that complaints filed under section 4905.26 of the Revised Code "shall be in writing and shall contain the name of the public utility complained against, a brief statement of the facts which constitute the basis of the complaint, and a statement of the relief sought.

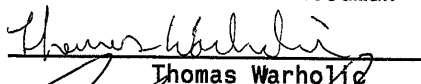
In addition, when granted, ALL Motions to Amend will make moot the ORDER 96-492-TP-ACE et. al., contained in the ENTRY docketed September 6, 1996. Therefore the MOTION TO RESCIND is in order.

Respectfully submitted,

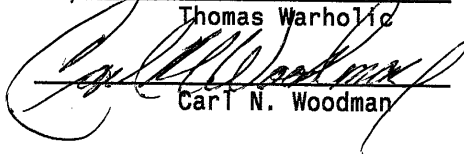
September 9, 1996



Robert P. Woodman



Thomas Warholik



Carl N. Woodman

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motions has been served upon MICHAEL MULCAHY, COUNSEL for THE OHIO BELL TELEPHONE COMPANY at 45 Erieview Plaza, Cleveland, Ohio 44114, this ninth day of September 1996 by regular United States Mail, postage prepaid.

A handwritten signature in black ink, appearing to read "Robert P. Woodman", written over a horizontal line.

Robert P. Woodman