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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Implementation of the)
Mediation and Arbitration Provisions of the) Case No. 96-463-TP-UNC
Federal Telecommunications Act of 1996.)

MOTION FOR WAIVER OF
UNITED TELEPHONE COMPANY d/b/a SPRINT

United Telephone Company of Ohio d/b/a Sprint ("Sprint"), by its attorney and pursuant to Section 4901-1-12 of the Commission's rules and Section XIII of the Commission's Guidelines for Mediation and Arbitration ("Guidelines"), moves for a waiver of the service requirements of Section VI.B of the Guidelines. The Guidelines were adopted in the captioned proceeding on July 18, 1996 and amended on March 27, 1997.

The reasons supporting the requested waiver are set forth in the attached memorandum in support.

Respectfully submitted,



Joseph R. Stewart (Ohio Reg. No. 0028763)
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Ohio d/b/a Sprint
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Dated: September 2, 1998

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MEMORANDUM IN SUPPORT OF MOTION FOR WAIVER

Sprint seeks a waiver of the service requirements of the Commission's Guidelines for Mediation and Arbitration ("Guidelines") which were adopted in the captioned proceeding on July 18, 1996 and amended on March 27, 1997. Section VI.B of those Guidelines requires, in the case of interconnection agreements reached through negotiation or mediation, that the local exchange carrier shall serve a copy of the agreement upon all other parties who have made a request for interconnection and upon all parties to the carrier's alternative regulation case, if applicable. Guidelines VI.B. A copy of Guideline VI, as amended on March 27, 1997 is attached for reference.

Guideline XIII provides, in part, that the Commission may permit variance from the Guidelines for good cause shown or if the Commission finds compliance to be impossible, impractical, or unreasonable.

Sprint seeks this waiver because the service requirement has proven to be an unreasonable and wasteful burden on it. Since the Guidelines were issued, Sprint has filed numerous interconnection agreements for Commission approval, and in each case has served copies of those filings as directed by Guideline VI.B. The service list is, of course, growing as new local exchange competitors seek certification and request interconnection or resale arrangements with Sprint.

On July 20, 1998, Sprint filed an agreement with Communications Options, Inc. The entire agreement was 185 pages. On August 17, 1998, Sprint filed two such agreements. One agreement was with SprintCom d/b/a Sprint PCS (50 pages) and one was with Preferred Carrier Services, Inc. (42 pages). Copies of these agreements were served on 25 parties. In addition to postage, the personnel and reproduction demands associated with the service of such filings are ever-increasing.

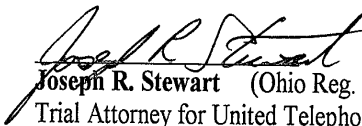
It is clear that for at least some of the parties being served with copies of the many filings under the current rule and practice, no benefit is seen. It should be noted that, for any party desiring access to the company's interconnection agreements, they are available in the Commission's Docketing Division.

Sprint proposes an alternative to the mandatory service of such copies. The company proposes to adopt the same procedures that the Commission has approved for both Ameritech Ohio (June 2, 1998 Entry) and GTE North Incorporated (August 6, 1998 Entry). Specifically, Sprint will provide, within two business days of filing an interconnection agreement, a short written notice to all parties who have requested interconnection with Sprint. The notice will disclose the name of the other party to the agreement, the case number, the date of filing, and the name and telephone number of a person who can provide copies of the agreement or additional information. Also, Sprint

will maintain a standing distribution list for those who wish to be served copies on a continuing basis.

Based on the foregoing, Sprint submits that it has shown good cause for the requested waiver, and that compliance with the existing service requirement is unreasonable. Therefore, it requests that the Commission grant the requested waiver.

Respectfully submitted,

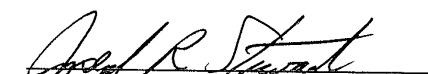


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Dated: September 2, 1998

CERTIFICATE OF SERVICE

Copies of the foregoing Application were served on the following persons by first class mail, postage prepaid on this ___2nd___ day of September 1998.


Joseph R. Stewart

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Carl E. Erhart
GTE Mobilenet
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Preferred Carrier Services, Inc.
500 Grapevine Hwy, #300
Hurst, TX 76054-2782

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GUIDELINES FOR
MEDIATION AND ARBITRATION
(Amended March 27, 1997)

- VI. Commission Review of Agreements Reached by Negotiation and/or Mediation
- A. If the parties to the negotiation resolve all their differences and reach an interconnection agreement, eight copies of the agreement shall be filed with the Commission's docketing division. Docketing will assign a docket number using the industry code TP and the purpose code NAG (negotiated agreement).
 - B. An agreement adopted by negotiation or mediation shall become effective upon filing, but will still be subject to a 90-day review and approval process. Interested persons may file written comments supporting or opposing the proposed interconnection agreement within 21 days of the filing of the agreement. Responses to the comments may be filed within ten days following the filing of the comments. The local exchange carrier shall serve a copy of the agreement upon all other parties who have made a request for interconnection with the carrier and upon all parties to the carrier's alternative regulation case, if applicable.
 - C. The Commission shall review the agreement and may reject the agreement if it finds that the agreement, or any portion of the agreement, discriminates against a telecommunications carrier not a party to the agreement, or the implementation of the agreement or portion is not consistent with the public interest, convenience, and necessity.
 - D. Unless the Commission orders otherwise, an agreement shall be deemed approved on the 91st day after the filing of an agreement. The Commission will not issue an opinion and order in the case except to reject an agreement or to make any clarification that it deems necessary or appropriate.