

BEFORE TECRIVED-DOCKETHS DIV THE PUBLIC UTILITIES COMMISSION OF OHIO 00 SEP -6 PH 12: 24

In the Matter of the Commission Ordered Investigation of the Existing Local Exchange Competition Guidelines.)	P VL V Case No. 99-998-TP-COI
In the Matter of the Commission Review of the Regulatory Framework for)	
Competitive Telecommunications)	Case No. 99-563-TP-COI
Services Under Chapter 4927, Revised)	
Code.)	

AMERITECH OHIO'S MEMORANDUM CONTRA OCC'S MOTION FOR EXTENSION OF TIME

Ameritech Ohio, by its attorneys and pursuant to Section 4901:1-12(B)(1) of the Commission's rules (Ohio Admin. Code § 4901:1-12(B)(1)), submits this opposition to OCC's motion for extension of time filed in the captioned cases on August 31, 2000. OCC's motion seeks an extension of time - - until October 16, 2000, and November 6, 2000, respectively, for the filing of comments and reply comments on the Staff's proposal that was issued for comment on August 24, 2000.

Ameritech Ohio submits that the OCC's requested extension should be denied. The August 24, 2000 Entry provided interested parties with over three weeks to prepare and file initial comments on the Staff's proposal. OCC does not demonstrate why additional time is necessary to make this filing, other than claiming that there are other pressing matters before the Commission. Ameritech Ohio would observe that the Commission must continue to make steady and substantial progress in reforming its

 regulatory processes. Steady progress would be unduly interrupted by the extension of time advocated by OCC. As competition advances in all sectors of the telecommunications business, it is important - - and in the public interest - - that the Commission's rules keep pace with those advances.

Moreover, as OCC notes, the Staff's proposal does not take the form of rules. OCC, p. 2, note 1. Even if the Staff's proposal was adopted without changes by the Commission (a circumstance that Ameritech Ohio neither predicts nor advocates), the necessary step of promulgating rules will require additional time. OCC's proposed extension cuts into the time available to accomplish that step if the Commission hopes to conclude its work in these cases during calendar year 2000, as it should.

For these reasons, Ameritech Ohio submits that OCC's requested extension of time should be denied.

Respectfully submitted,

Ameritech Ohio

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served via first class mail, postage prepaid, to the persons shown on the attached service lists this 6th day of September, 2000.

Jon F. Kelly

SERVICE LIST Case No. 99-998-TP-COI

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