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DOCKETING DIVISION
Public Utilities Commission of Ohio

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Brooks Fiber Communications of Ohio,)
Inc. for a Certificate of Public)
Convenience and Necessity to Provide)
Local Telecommunications Services in)
Certain Specified Areas in Ohio)

Case No. 96-349-TP-ACE

MOTION TO INTERVENE AND REQUEST FOR ORAL HEARING

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 filed in accordance with the Attorney Examiner's April 18, 1996, Entry in this case. Ameritech Ohio also requests that the oral hearing required by Ohio Rev. Code Section 4905.24 be scheduled. This motion and the request for oral hearing are supported by the attached Memorandum in Support.

Respectfully submitted,

AMERITECH OHIO

By:

Michael T. Mulcahy
Michael T. Mulcahy
Trial Attorney
45 Erieview Plaza, Suite 1400
Cleveland, Ohio 44114
(216) 822-3437

Jon F. Kelly
150 E. Gay St., Room 19-S
Columbus, Ohio 43215
(614) 223-7928

Its Attorneys

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE
AND REQUEST FOR ORAL HEARING

By its application, Brooks Fiber Communications of Ohio, Inc. ("Brooks") has sought authority to provide a full range of competitive local telecommunication services in the Toledo, Ohio metropolitan area, which includes exchange areas currently served by Ameritech Ohio. Ameritech Ohio currently provides local exchange and other services to residence and business customers in portions of Lucas and Wood counties, the counties in which Brooks' proposed service area is located. As a result, Ameritech Ohio has a real and substantial interest in this proceeding as a local exchange carrier in some of the areas sought to be served by Brooks.

Like others before it, this application raises a large number of broad policy and public interest issues. While many of these issues are appropriately being addressed in the generic local competition docket, Case No. 95-845-TP-COI, the Commission is now proceeding to adjudicate the technical, managerial, and financial qualifications of applicants for local exchange certification such as Brooks in individual certification cases such as this one.

No other party can adequately represent Ameritech Ohio's interests. Ameritech Ohio's substantial experience in providing telecommunications services to customers and its

knowledge of technical issues related to local competition will contribute to a just and expeditious resolution of the issues raised by the Application.¹ If Brooks' request for certification is granted, it is likely that Ameritech Ohio will be required to interconnect and enter into financial compensation arrangements with Brooks. Ameritech Ohio, therefore, has a substantial interest in determining the extent to which Brooks is technically, managerially, and financially capable of providing the services it seeks to provide. The granting of this motion will not unduly delay this proceeding or unjustly prejudice any party. As an additional basis for its motion, Ameritech Ohio notes that the Commission has previously invited it to participate and intervene in certification applications for switched local exchange service.²

In support of its request for an oral hearing, Ameritech Ohio submits that such a hearing is required by Section 4905.24 of the Revised Code; it is also the appropriate way for the Commission and the parties to inquire into the important issues surrounding the applicant's technical, managerial, and

¹ By this motion, Ameritech Ohio does not take a position on the applicant's technical, managerial, or financial qualifications.

² Time Warner AXS of Western Ohio, Case No. 93-1370-TP-ACE, Finding and Order, December 9, 1993, at p. 6.

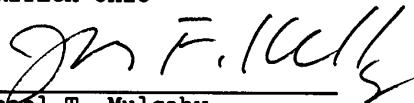
financial qualifications to provide basic local exchange
telephone service in the State of Ohio.³

For all of these reasons, Ameritech Ohio requests that
its Motion to Intervene and Request for Oral Hearing be granted.

Respectfully submitted,

AMERITECH OHIO

By:


Michael T. Mulcahy
Trial Attorney
45 Erieview Plaza, Suite 1400
Cleveland, Ohio 44114
(216) 822-3437

Jon F. Kelly
150 E. Gay St., Room 19-S
Columbus, Ohio 43215
(614) 223-7928

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³ Ameritech Ohio submits, however, that the issue of whether or not granting the applicant's request for certification will serve the public interest is also a matter that must be scheduled for hearing.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following parties by regular U.S. mail, postage prepaid, this 28th day of May, 1996.

Sally W. Bloomfield
Bricker & Eckler
100 South Third St.
Columbus, Ohio 43215-4291



Jon F. Kelly