

MEMORANDUM IN SUPPORT

On November 26, 1997, ICG Telecom Group, Inc. ("ICG"), filed a complaint with the Public Utilities Commission of Ohio (the "Commission") against Ameritech Ohio alleging that Ameritech Ohio had wrongfully refused since July, 1997 to pay certain bills that ICG had submitted pursuant to the parties' Interconnection Agreement. ICG had claimed that Ameritech had wrongfully refused to pay reciprocal compensation for traffic which has been exchanged and which involved calls to enhance service providers, in violation of the Interconnection Agreement of ICG and Ameritech and in violation of the Commission's Local Service Guidelines.

Subsequently, motions to intervene were filed by TCG Ohio, Brooks Fiber Communications of Ohio, Inc., Time Warner Communications of Ohio, L.P., and MCImetro Access Transmission Services, Inc. By Entry of January 12, 1998, the Commission denied these motions to intervene, but granted each of the above parties *amicus curiae* status in this case.

The OCTA is a trade association made up of over 20 cable television service and telecommunications service providers in Ohio. The Association's members have an interest in the issue before the Commission and wish to provide input into the Commission's consideration of this matter. The OCTA seeks *amicus curiae* status to emphasize the anti-competitive effects that Ameritech Ohio's position in this case would have on the local telecommunications market. There will be no undue delay created by granting *amicus curiae* status to the Association. A copy of this motion and the *amicus curiae* brief have been served upon all counsel of record.

WHEREFORE, the OCTA respectfully requests that this Commission grant it amicus curiae status for the purpose of allowing it to file its brief in this matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foreign Motion Requesting Leave to File an Amicus Curiae Brief was served by first class U.S. mail, postage prepaid, upon the following persons this 3rd day of March, 1998.

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