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18 November 1997

Daisy Crockron, Chief of Docketing
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

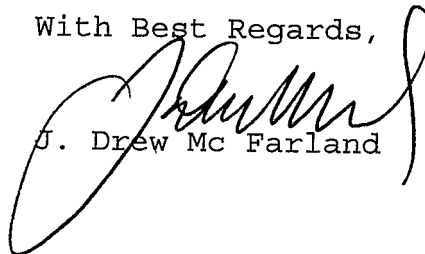
RE: 97-547-TP-CSS; 97-709-TP-CSS

Dear Ms. Crockron:

Enclosed please find eleven original copies of our response/memorandum contra to Powell's Motion to Intervene etc., for filing with the above noted cases. Please file the same. We are not requesting a return copy of this document.

Please contact me at 587-3633 should there be any questions.

With Best Regards,


J. Drew Mc Farland

NS:JDMCF
ENCLOSURES

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.
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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV
97 NOV 19 AM 10:54
PUCO

J. Drew McFarland

and

The Village of Granville, Ohio

Complainants

v.

Ameritech Ohio,

Respondent

N^o 97-547-TP-CSS

N^o 97-709-TP-CSS

Reply & Memorandum

Contra to Consolidated Application
etc. of the Village of Powell

Now come Complainants, the Village of Granville, and J. Drew McFarland (hereinafter the "Complainants"), in Reply to the Village of Powell's "Consolidated Application" "to Intervene as an Interested Party and for Rehearing."

Complainants ask the Commission to deny each of Powell's requests for the reasons hereinafter stated, except upon the limited basis as noted below.

MEMORANDUM

Powell seeks to now enter this case, which has been of public record since May 19, 1997, and while not a Party to the matter, had every opportunity to become an intervening Party.

Since May, the Complaints in this case have been publicized repeatedly in: *The Columbus Dispatch*, *Delaware This Week*, *Business First*, *Alive*, *Reynoldsburg This Week*, *The Johnstown Independent*, *The (Newark) Advocate*, *The Marion Star*, *The (Lancaster) Eagle-Gazette*, and on WBNS, WSYX, WCMH television stations, and WOSU and WTVN radio stations -- and undoubtedly on/in many other stations and papers. In addition the Party participation of the Delaware County Commissioners and the nearby City of Dublin surely should have given Powell a "heads up" on this issue. They cannot now complain of being left out.

Further, there is no manifest right of a municipality to be notified or automatically included in proceedings before the Commission under a Complaint based in R.C. §4905.26.

Powell states it is "directly affected" by the Order of the Commission, and although all communities in the current 614, especially those subject to change to 740 or division between the two are affected most, Powell fails to state any manner in which it is affected in which other communities are not. As to averments of being split, Powell is not unique in this, and based on *Parma v. Ameritech*, 97-650-TP-CSS, a split community is not criteria used for substantial consideration by the Commission, when determining

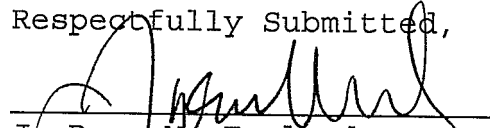
the propriety of NPA relief. Further, as noted in Granville/McFarland Reply to Applications of Dublin and Delaware (p. 7), the undersigned is not even certain that the municipal boundaries will fall in more than one NPA.

Once again, Complainants would state that this issue would not be before the Commission, if a "Metro Area Plan" had been adopted, in accord with the known successful implementation the relief plan used in Salt Lake City.

CONCLUSION

The Village of Powell had every opportunity to Intervene in this case during the well publicized, over five months of its pendency. As such, Intervention, Leave and Stay should be denied, except that Complainants would favor re-hearing for the limited purpose of adopting a Metro area plan in which each CO based in Franklin, Delaware, Licking, Fairfield, Pickaway, and Madison Counties, plus Marion County, (and to the extent applicable, Union County) would retain the 614 NPA, as the same would resolve the concerns of each party who has ask for post-Order relief herein, and would provide the best use of NPA resources into the future.

Respectfully Submitted,



J. Drew McFarland, Esq.

for himself and the

Village of Granville

Sup. Ct. Reg. #0037814

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A copy of the foregoing was served upon the following this 18 November 1997 by the method indicated:

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