

THOMPSON
HINE & FLORY LLP

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August 8, 2000

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

RECEIVED PUCO
00 AUG -8 PM 4:58
PUCO

Re: In the Matter of the Application of Verizon North Inc. for Approval to Introduce a New Resale and Recourse Tariff, P.U.C.O. No. 9, Containing Resale Services and MTSS Recourse Credits Which Will be Provided to Competitive Local Exchange Carriers, PUCO Case No. 00-1183-TP-ATA

Dear Ms. Crockron:

Enclosed are an original and ten (10) copies of a Memorandum of Verizon North Inc. In Response to Ohio Consumers' Counsel's Motion to Intervene, to be filed in connection with the above-referenced matter.

Thank you for your assistance. If you have any questions, please feel free to call.

Very truly yours,


Todd A. Mazzola

TAM/tjh

cc: Joseph P. Serio, Esq.
Kimberly A. Newman, Esq.
Thomas E. Lodge, Esq.

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.
Technician Anna M. Hix Date Processed Aug 9, 2000

FILE

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Verizon)
North Inc. for Approval to Introduce a New Resale)
And Recourse Tariff, P.U.C.O. No. 9, Containing)
Resale Services and MTSS Recourse Credits Which)
Will be Provided to Competitive Local Exchange)
Carriers.)

Case No. 00-1183-TP-ATA

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MEMORANDUM OF VERIZON NORTH INC.
IN RESPONSE TO OHIO CONSUMERS' COUNSEL'S
MOTION TO INTERVENE

Verizon North Inc., Applicant herein¹, hereby responds to the Motion to Intervene filed by the Ohio Consumers' Counsel on July 21, 2000.

The Applicant objects to intervention by the Ohio Consumers' Counsel in this matter, because the issues of this case revolve around pricing of products and services that will be made available exclusively to competitive local exchange carriers. None of the products or services that are proposed in this Application are provided to end-use customers; necessarily, none of the products and services involved in this Application will be made available to consumers by Verizon North Inc.

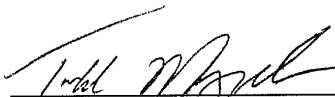
In its Motion to Intervene, OCC states only that it wishes to "intervene in this proceeding on behalf of the Applicant's residential consumers." The Applicant will offer none of these products or services to those residential consumers. Consequently, the Applicant submits that the interest of the Ohio Consumers' Counsel is no more than minimal, and that intervention should therefore be denied.

¹ GTE North Incorporated recently changed its name to Verizon North Inc.

If intervention is granted in this matter, the Applicant submits that the involvement of the Ohio Consumers' Counsel should be limited to those issues involving products or services that are ultimately made available to residential consumers. As may be determined in subsequent proceedings in this matter, the Ohio Consumers' Counsel's participation, if authorized at all, should be limited accordingly.

Respectfully submitted,

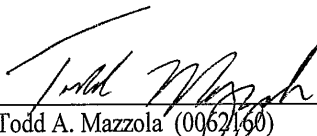
VERIZON NORTH INC.

By: 
Thomas E. Lodge (0015741)
Todd A. Mazzola (0062160)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the forgoing has been served upon Joseph P. Serio, Trial Attorney, Assistant Consumers' Counsel, Ohio Consumers' Counsel, 10 West Broad Street, Suite 1800, Columbus, Ohio 43215-3485, by hand-delivery, this 8th day of August, 2000.



Todd A. Mazzola (0062160)

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