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Joseph R. Stewart  
Associate General Counsel

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GTE Service Corporation

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PUCO

OHODALA  
100 Executive Drive  
Marion, OH 43302  
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February 13, 1998

Sent via Facsimile 614/466-0313

Daisy Crockron  
Docketing  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43266-0573

Dear Ms. Crockron:

Subject: IN THE MATTER OF THE COMPLIANT OF ICG TELECOM GROUP, INC.  
V. AMERITECH OHIO, CASE NO. 97-1557-TP-CSS

Please accept the attached Motion for Leave to be Granted Amicus Curiae Status for filing in the above-referenced matter. The original and ten copies are being mailed from my office today. Upon receipt of the original and copies, please return a time-stamped copy, in the enclosed, self-addressed envelope.

If you have any questions, please call. Thank you for your assistance in this matter.

Very truly yours,

JOSEPH R. STEWART

JRS:cjm  
Attachment

c: All Parties of Record w/attach.

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. White Date Processed Feb 18, 1998

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BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Complaint of ICG  
Telecom Group, Inc.,

Complainant,

v.

Ameritech Ohio,

Respondent.

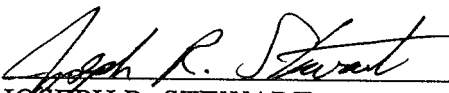
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Case No. 97-1557-TP-CSS

**GTE NORTH INCORPORATED'S MOTION FOR  
LEAVE TO BE GRANTED AMICUS CURIAE STATUS**

GTE North Incorporated ("GTE") respectfully moves for an order granting it amicus curiae status in this case. GTE's motion is supported by the memorandum below.

Respectfully submitted,

  
JOSEPH R. STEWART

(OH. REG. NO. 0028763)

100 Executive Drive

Marion, OH 43302

Telephone: 614/383-0227

Trial Attorney for GTE North Incorporated

**MEMORANDUM IN SUPPORT**

In its Entry herein journalized January 22, 1998, the Commission granted amicus curiae status to TCG Ohio, Brooks Fiber Communications of Ohio, Inc., Time Warner Communications of Ohio,

L.P., and MCImetro Access Transmission Services, Inc. The Commission rejected the motions to intervene of those entities (collectively "the NECs"), concluding that amicus curiae status is appropriate because the NECs were similarly, but not identically, situated to ICG Telecom Group, Inc. ("ICG"), the complainant herein.

The Commission's rationale for granting amicus curiae status to the NECs supports the granting of amicus curiae status to GTE.

Just as the NECs are similarly situated to ICG, GTE is similarly situated to Ameritech Ohio ("Ameritech"). Both Ameritech and GTE are incumbent local exchange companies ("ILECs"). Ameritech has an interconnection agreement with ICG and with the NECs. Similarly, GTE anticipates that it will shortly have an approved interconnection agreement with AT&T Communications of Ohio, Inc., a NEC.

The interconnection agreements which GTE will have with AT&T and other NECs will require reciprocal compensation for the exchange of traffic. It is likely that a disagreement similar to that which appears to exist between Ameritech and the NECs will exist between GTE and the NECs with which it has interconnection agreements.

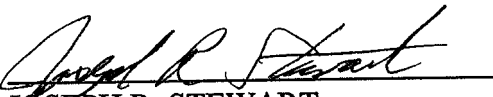
The fact that the language contained in GTE's interconnection agreements may differ from that contained in the interconnection agreement between ICG and Ameritech does not constitute a valid reason for denying GTE amicus curiae status. MCImetro acknowledged that the wording contained in its interconnection agreement differed from that of the other agreements, but MCImetro was nonetheless granted amicus curiae status.

Similarly, the fact that GTE North may not have a current billing dispute with a NEC is not a reason to deny amicus curiae status since the Commission noted that neither TCG, Brooks, Time

Warner nor MCImetro have current billing disputes.

Granting GTE North amicus curiae status will not delay this proceeding, but will instead provide the Commission with additional information upon which to base its decision. Therefore, GTE should be granted amicus curiae status.


Respectfully submitted,



JOSEPH R. STEWART  
(OH. REG. NO. 0028763)  
100 Executive Drive  
Marion, OH 43302  
Telephone: 614/383-0227  
Trial Attorney for GTE North Incorporated

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of GTE North Incorporated's Motion for Leave to be Granted Amicus Curiae Status has been served on the following parties of record, by first-class mail, postage prepaid, this 27<sup>th</sup> day of February, 1998.

  
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