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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
CenturyTel of Ohio, Inc. for Approval of )  
An Alternative Form of Regulation ) Case No. 04-62-TP-ALT  
Pursuant to Chapter 4901:1-4, Ohio )  
Adm. Code. )

AT&T'S REPLY MEMORANDUM

Pursuant to §4903.221 of the Revised Code and Rules 4901-1-11 and 4901-1-12(2) of the Ohio Administrative Code ("O.A.C."), AT&T Communications of Ohio, Inc. and TCG Ohio, both wholly owned subsidiaries of AT&T Corp. (collectively, "AT&T") hereby reply to the Memorandum Contra of CenturyTel of Ohio, Inc. ("Century"). As is discussed in more detail below and in its motion to intervene, AT&T should be permitted to intervene in Century's application for alternative regulation.

Century opposes AT&T's motion to intervene for two reasons. Century first contends that AT&T does not meet the standards for intervention since the instant case only focuses on retail services pricing. Hence, since AT&T's comments focus on Century's access charges, then intervention is not appropriate, and the Commission should deny intervention and ignore AT&T's comments. (Century Memorandum Contra, p. 2). Century's second claim is that AT&T should not be allowed to intervene because this will somehow delay the granting of its application. (Id., pp. 2-3).

Century's arguments are meritless. First, AT&T has a direct interest in Century's application as a *wholesale* customer of the company and as a potential competitor in the *retail* market. Today, of course, AT&T is not permitted to compete with Century, in great part due to the lack of reasonable UNE rates. Moreover, for the reasons stated in AT&T's motion to

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intervene, Century's bloated access charges are also an impediment to competition. Hence, Century is flatly incorrect in saying AT&T has no interest in the proceeding.

Century's second contention is even more unavailing. AT&T is merely intervening so it can file comments. These comments were incorporated in AT&T's motion to intervene. AT&T is not seeking hearings or the right to file anything else here. If anything leads to delay in this case, it is Century's opposition to AT&T's motion to intervene.

WHEREFORE, AT&T respectfully requests that the Commission grant it leave to intervene in this matter as was discussed in its motion to intervene and herein, and to consider its comments, which were incorporated into its motion to intervene.

Dated: February 19, 2004

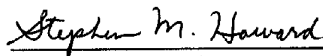
Respectfully Submitted:

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing AT&T's Reply Memorandum was served upon the parties listed below via email and regular U.S. mail, postage prepaid, this 19th day of February, 2004.



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