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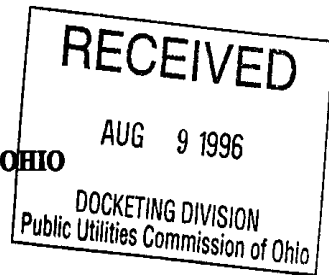
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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Cincinnati Bell Telephone Company for)
Approval of a Retail Pricing Plan Which)
May Result In Future Rate Increases)

Case No. 96-707-TP-UNC



MOTION TO INTERVENE OF
AT&T COMMUNICATIONS OF OHIO, INC.

Now comes AT&T Communications of Ohio, Inc. ("AT&T") which respectfully moves the Public Utilities Commission of Ohio for leave to intervene as a party in this proceeding pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code.

WHEREFORE, AT&T respectfully requests that the Commission grant its motion for leave to intervene as a party in this proceeding.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Benita Kahn".

William S. Newcomb, Jr.

Benita Kahn

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Attorneys for
AT&T COMMUNICATIONS OF OHIO, INC.

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Technician Anna M. [unclear] Date Processed Aug 12, 1996

MEMORANDUM IN SUPPORT

AT&T is a corporation duly authorized to conduct business in Ohio and is subject to the jurisdiction of the Public Utilities Commission of Ohio (the "Commission"). AT&T is in the business of providing interexchange telecommunication services in Ohio and is authorized to provide both interLATA and intraLATA services. AT&T must purchase access services from Cincinnati Bell Telephone Company ("CBT") in order to reach AT&T's customers. CBT's tariffed intrastate access charges are a component of AT&T's Ohio intrastate rates.

On July 18, 1996, CBT filed an application with this Commission seeking approval to amend its current alternative regulation plan and to approve a retail pricing plan which could very likely result in future rate increases. AT&T was granted intervention in CBT's first alternative regulation case, In the Matter of the Application of Cincinnati Bell Telephone Company for Approval of an Alternative Form of Regulation and for a Threshold Increase in Rates, Case No. 93-432-TP-ALT. In fact, CBT's initial alternative regulation plan was the result of a stipulation by all parties to the case, including AT&T. CBT claims its July 18, 1996 filing is an amendment to its initial alternative regulation plan and has indicated its filing herein as a companion filing to its alternative regulation case. Although AT&T resolutely contests¹ the characterization of CBT's July 18 filing as a "mere amendment," as a stipulating party in Case No. 93-432-TP-ALT, AT&T has a substantial interest in CBT's significant revisions to the initial plan and related issues for which CBT is asking approval in Case No. 96-707-TP-UNC.

In considering a motion to intervene pursuant to Section 4903.221, Revised Code, the Commission must consider the nature and extent of the prospective intervenor's interests, the

¹See, Joint Initial Comments and Request to Suspend Application, Case Nos. 93-432-TP-ALT and 96-707-TP-UNC, filed on even date herewith.

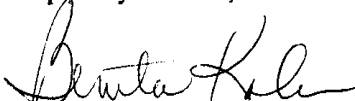
legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention of the prospective intervenor will unduly prolong the proceedings, and whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues. Rule 4901-1-11 of the Ohio Administrative Code similarly provides standards by which the Commission must consider whether an intervenor has made a showing that it has a statutory right to intervene or it has a real and substantial interest that cannot be adequately protected by existing parties. Under the rule, the Commission may consider the nature of the person's interests, the extent to which the person's interests are represented by existing parties, the person's contribution to a just and expeditious resolution of the issues involved in the proceedings, and whether granting the request to intervene would unduly delay the proceeding or unjustly prejudice any existing party.

CBT proposes a rate restructuring which includes a \$2.7 million net rate reduction, including a \$500,000 reduction in the carrier common line charge (CCLC). CBT also proposes pricing flexibility for primary services including carrier common line charges and switched access charges. CBT's alleged amended plan, if approved, will most likely result in rate increases in future years.

AT&T has a real and substantial interest in this proceeding which is currently not being adequately represented by other interests. Because it purchases intraLATA access services from CBT, its interest may be adversely affected. AT&T believes the proposed reduction to the CCLC should be greater than \$500,000 and is concerned about the prospect of unreasonable future rate increases to access services. AT&T will significantly contribute to the full development and equitable resolution of the factual issues and its intervention would not unduly delay the proceeding or unjustly prejudice any existing party. AT&T respectfully submits that it

has demonstrated that it has a real and substantial interest which should be recognized in this proceeding and that the Commission should grant its motion to intervene.

Respectfully submitted,



William S. Newcomb, Jr.

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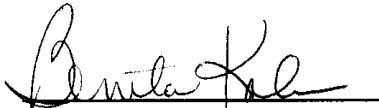
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Attorneys for

AT&T COMMUNICATIONS OF OHIO, INC.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Intervene of AT&T Communications of Ohio, Inc. has been served upon Thomas E. Taylor, Frost & Jacobs, 2500 PNC Center, 201 East Fifth Street, P.O. Box 5715, Cincinnati, Ohio 45201-5715, Counsel for Cincinnati Bell Telephone, Richard P. Rosenberry, Emens, Kegler, Brown, Hill & Ritter, 65 E. State Street, Suite 1800, Columbus, Ohio 43215-4294, Counsel for Time Warner Communications of Ohio, L.P., and Andrea M. Kelsey, 77 South High Street, 15th Floor, Columbus, Ohio 43266-0550, Counsel for Office of the Ohio Consumers' Counsel this 9th day of August, 1996 by ordinary U.S. Mail.



Benita Kahn