

FILE

ALLTEL COMMUNICATIONS

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November 21, 2001

PUCO

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

Re: In the Matter of the Amendment of the Minimum Telephone Service Standards as Set Forth  
In Chapter 4901:1-5 of the Ohio Administrative Code.  
PUCO Case No. 00-1265-TP-ORD

Dear Ms. Crockron:

On September 13, 2001, the Public Utilities Commission of Ohio issued an Entry on Rehearing addressing outstanding issues in the new Minimum Telephone Service Standards (MTSS). The effective date of the Entry was October 25, 2001.

ALLTEL Ohio, Inc. and The Western Reserve Telephone Company hereby request a waiver to extend the effective date to allow sufficient time to complete the implementation of the following new standard:

Rule 4901:1-5-6 (B) requiring information and changes in the telephone directories

The Entry requires that additional information and changes to existing information be added to all telephone directories. However, to reasonably meet this new requirement, a new directory must first be published. Telephone directories are published at various intervals throughout the year, and there is some lead time required to make the changes required by the new MTSS. Therefore, the reasonable approach is for the new information to be placed in all directories as each new directory is published.

ALLTEL Ohio Inc. and The Western Reserve Telephone Company estimate that it can begin to have the changes made in all directories beginning in February 2002.

ALLTEL Ohio, Inc. requests a waiver from the requirement for one (1) directory - the St. Paris Exchange directory - which was already at print prior to the effective date of the new standard.

The Western Reserve Telephone Company requests a waiver for (2) directories - (1) the Bloomingdale, Hopedale Exchanges directory and (2) the Centerville, Cumberland, Fairview, Moffistown, Old Washington, Powhatan Point, Quaker City Exchanges directory - which were already at print prior to the effective date of the new standard.

For the reasons stated above, ALLTEL Ohio, Inc. and The Western Reserve Telephone Company cannot reasonably implement the one standard in the time period provided by the entry and request the Commission approve the waiver to allow additional time for the ALLTEL companies to implement this standard.

Sincerely,

*Kathy Hobbs*  
Kathy Hobbs  
Vice President - External Affairs

CC: Dan Fullin, Legal Dept., PUCO

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