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DOCKETING DIVISION
Public Utilities Commission of Ohio

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application)
of Ameritech Ohio to Revise Its)
Ameritech Tariff, P.U.C.O. No. 20,)
To Introduce a New Service Called)
Utility Reporting and Inquiry)
Service.)

Case No. 96-838-TP-ATA

AMERITECH OHIO'S MEMORANDUM CONTRA

Ameritech Ohio, by its attorney, submits this memorandum in opposition to the renewed protest and request for hearing filed on November 27, 1996, in the captioned proceeding by Columbus Southern Power Company and Ohio Power Company ("the AEP Companies" or "AEP").¹

The AEP Companies' latest filing focuses on the rates set forth in Ameritech Ohio's amended Utility Reporting and Inquiry Service ("URIS") tariff proposal filed on November 18, 1996. AEP asserts that those rates are unjust and unreasonably high. AEP, p. 2. AEP also questions the references to transport charges in the proposed tariff and reiterates its concern that Ameritech might collect multiple rates for those counties in which more than one public or municipal utility requests the service. AEP, p. 2, notes 1 and 2.

¹ As stated in its Memorandum Contra filed on October 3, 1996, Ameritech Ohio does not oppose the AEP Companies' motion to intervene in this proceeding.

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1. The Proposed Rates Are Reasonable.

As Ameritech Ohio stated in its October 3rd Memorandum Contra, the company is obligated to pay its vendor for each copy of the URIS database and for each update to it. Consistent with the Commission's order, the company proposes to pass that cost and related administrative costs on to each customer of the URIS. The adjusted rates set forth in the proposed tariff amendment are fully supported by the previously-submitted cost study. Under these circumstances, AEP's comparison to the rates proposed by other LECs does not establish that Ameritech Ohio's rates are unreasonable.

2. The References To Transport Services And Charges Are Appropriate.

Contrary to AEP's assertion, the references to transport charges in the proposed URIS tariff make clear that transport of database information is not a component of the service. Exhibit B, Sheet 3. Section C.3 specifies that the transport medium for URIS is optional, and the customer is responsible for selection of the transport medium and for all associated costs. Section C.7 specifies that the URIS database report and subsequent updates will be provided to the customer on paper and magnetic tape only. Thus, if a customer wants the data delivered in some other form, making the necessary arrangements

is the customer's responsibility and is not included as a part of URIS.²

3. AEP's Request For A Multiple Customer Discount Should Not Be Adopted.

Ameritech Ohio might have more than one customer per county for the database information, and it is appropriate to levy the tariffed charges on each URIS customer. AEP seems to suggest that the rates for each customer should be lower if there are multiple customers in a county; this suggestion is inconsistent with Ameritech Ohio's cost structure underlying the service and is also inconsistent with reasonable ratemaking principles. The URIS database must be reproduced, and the necessary updates must be provided, on an individual basis for each municipal or public utility that requests the service. In the multiple customer scenario, Ameritech Ohio incurs a vendor charge for each URIS database run and each update and it is therefore appropriate to pass the costs incurred along to each customer requesting the service. The company's costs are not reduced if there are multiple orders; in fact, its costs are multiplied by a factor equal to the number of additional customers.

² The provision of URIS over telecommunications facilities could be the subject of a contract between the company and a customer.

For the foregoing reasons, AEP's protest and request for hearing in this proceeding should be denied, and the amended tariff application should be approved.

Respectfully submitted,

AMERITECH OHIO

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CERTIFICATE OF SERVICE

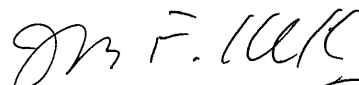
I hereby certify that a copy of the foregoing Memorandum Contra has been served on the following by depositing it in the U. S. Mail, postage prepaid, this 16th day of December, 1996.

COLUMBUS SOUTHERN POWER COMPANY AND
OHIO POWER COMPANY

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