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December 11, 1997

PUCO

Mr. Jeffrey R. Jones
Attorney Examiner - Legal Department
Public Utilities Commission of Ohio
180 East Broad Street, 12th Floor
Columbus, Ohio 43266-0573

Re: PUCO Docket No. 96-194-TP-UNC

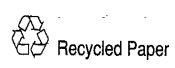
Dear Mr. Jones:

In accordance with the Attorney Examiner's November 21, 1997 Entry, by this letter AT&T is informing the Commission what issues it believes are left to be considered in AT&T's petition in the above-noted docket. As explained more fully below, AT&T requests that the Commission determine whether the ILECs have complied with the Commission's requirement that all interconnection agreements between two Class A carriers be filed. Furthermore, AT&T requests that the Commission also leave open for future consideration the issue of when it will be appropriate for the Commission to order that interconnection agreements between Class A and Class B carriers be filed.

In its petition filed in February of 1996, AT&T requested, among other things, that the Commission issue an order requiring all ILECs to publicly file each of their existing interconnection and/or service agreements for Commission approval pursuant to Sections 252(a)(1) and (e) of the 1996 Telecommunications Act (the "Act"), including, but not limited to, those agreements negotiated prior to, or after, the enactment of the Act. After AT&T filed that petition, the Commission issued local competition guidelines, which required that any interconnection agreements negotiated between Class A carriers before the date of enactment of the Act, and which are still in effect, be jointly filed with the Commission no later than June 30, 1997.

Consistent with those guidelines, in its June 5, 1997 Entry in Docket No. 97-595-TP-NAG, the Commission established that all such interconnection agreements be filed in that docket. In that Entry, the Commission further noted that "[w]ith respect to agreements between Class A carriers and Class B carriers and between other Class B carriers, we will address the timing of the filing of these agreements by separate entry at a future point in time." The Commission has not yet addressed the timing of the filing of those agreements.

Since AT&T's petition requested that all ILECs file all interconnection agreements, the filing of interconnection agreements between Class A and Class B carriers was clearly contemplated by AT&T's instant petition. Therefore, AT&T requests that the



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Commission leave open for determination the issue of whether it should now require the filing of interconnection agreements between Class A and Class B carriers. Clearly, this issue is encompassed by AT&T's petition and has not been addressed by the Commission.

Moreover, since its has been nearly seven months since the Commission ordered all Class A Carriers to file interconnection agreements between themselves, AT&T feels it would now be appropriate for the Commission to investigate whether the Class A carriers have complied with this order. In other words, the Commission should take stock of those agreements that have been filed in order to determine whether there are obvious "gaps" in those agreements that would indicate that certain types of agreements are missing. Such an investigation is a logical conclusion to both AT&T's petition and the Commission's June 5th Entry.

Although it believes that the above-noted unresolved issues are encompassed by its petition in this docket, AT&T notes that if the Commission chooses to entertain the two issues noted above in Docket No. 97-595-TP-NAG, AT&T would not object to a dismissal, without prejudice, of its instant petition. AT&T does request, however, that a Commission entry clearly indicate that the above-noted issues are to be resolved in Docket No. 97-595-TP-NAG.

Respectfully submitted,

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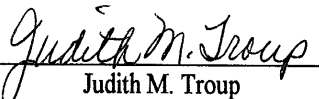
Its Attorney, AT&T Communications of Ohio, Inc.

cc: Attached Service List

CERTIFICATE OF SERVICE

Case No. 96-194-TP-UNC

I certify that a copy of the foregoing AT&T Response to AE's November 21, 1997
Entry was served upon the attached service list by regular U.S. mail, postage prepaid, this
11th day of December, 1997.



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