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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Complaint )  
of ICG Telecom Group, Inc. )  
Against Ameritech Ohio Regarding ) Case No. 97-1557-TP-CSS  
The Payment of Reciprocal Compensation )

**AMERITECH OHIO'S MOTION FOR LEAVE TO FILE COMMENTS**

Ameritech Ohio, by its attorneys, respectfully requests an opportunity to comment on the impact of the Federal Communications Commission's (FCC) Order in Docket Nos. 96-98, et al, expected to be released today, on the issue of whether internet calls qualify for reciprocal compensation. Such comments would be of assistance to the Commission's deliberations on rehearing.

Respectfully submitted,



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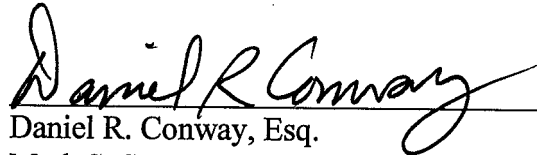
## MEMORANDUM IN SUPPORT

The Commission's Entry on Rehearing granted Ameritech Ohio's Application for Rehearing for the limited purpose of affording the Commission more time to consider the rehearing arguments raised by Ameritech Ohio that calls to Internet Service Providers (ISPs) do not qualify for reciprocal compensation under the parties' interconnection agreement. The FCC just yesterday, on February 25, 1999, announced that it has reached a decision re-affirming its long-standing precedents, consistently relied upon by Ameritech Ohio, that calls to the Internet do not terminate at the ISP's local servers, but rather, terminate at destinations located often in other states or countries. The FCC indicated that it would release its decision today.

Ameritech Ohio respectfully requests the Commission to grant the parties to this proceeding an opportunity to review the FCC's decision and submit initial and reply comments which discuss the impact of the FCC's decision on the Commission's Opinion and Order in this case. Comments from the parties should prove helpful to the Commission's deliberations on rehearing and will assure the parties a meaningful opportunity to be heard on this significant recent development. The Commission has in the past during rehearing recognized the value of granting parties the opportunity to comment on rehearing regarding significant legal developments. See e.g., In the Matter of the Review of Ameritech Ohio's Economic Costs for Interconnection, Unbundled Network Elements, and Reciprocal Compensation for Transport and Termination of Local Telecommunications Traffic, Case No. 96-922-TP-UNC, Entry (August 19, 1997). Given the significant legal, financial and policy implications of the Commission's

decisionmaking in this case, the parties should be permitted to address the impact of the FCC's Order on the proper resolution of the issues before the Commission on rehearing.

Respectfully submitted,

A handwritten signature in cursive script that reads "Daniel R. Conway". The signature is written in black ink and is positioned above a horizontal line.

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**CERTIFICATE OF SERVICE**

This is to certify that a true and accurate copy of Ameritech Ohio's foregoing Motion was served upon the following by regular U.S. Mail, this 26th day of February, 1999:

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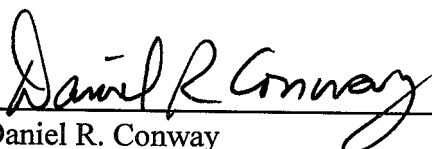
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