

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Establishment)
of Tariff Filing Dockets and)
Tariff Filing Procedures.)

Case No. 89-500-AU-TRF

INITIAL COMMENTS OF CENTRAL TELEPHONE COMPANY OF OHIO

Central Telephone Company of Ohio respectfully submits these initial comments in response to the Commission's Entry of May 31, 1989, which requested comments on the generic issues raised by the new tariff administration system proposed by that Entry.

Introduction

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Central Telephone Company of Ohio ("Central Telephone Company" or "Company") believes that the May 31, 1989 Entry's proposal by the Staff should not be implemented for telephone companies. The tariffs of telephone companies are more voluminous and, because of

the proliferation of telecommunications services and products, are significantly more complex than the tariffs of energy, waterworks and sewage utilities. As a result, the Company believes that the administration of its tariffs at the Commission is most reliably and efficiently done by those who are most familiar with the telecommunications industry and its rapidly changing technical nature and Commission regulation, i.e., the Commission's telecommunications Staff. The telecommunications Staff currently does a good job of maintaining the Company's tariffs. The Company believes the existing procedure for tariff filings as applicable to telephone utilities is effective and should remain as it is.

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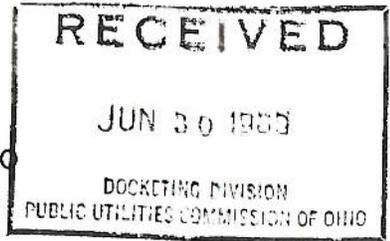
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Respectfully submitted,



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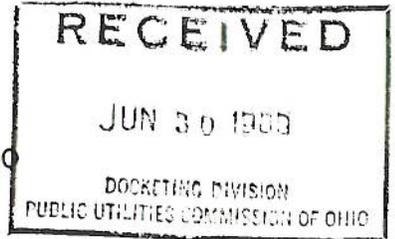
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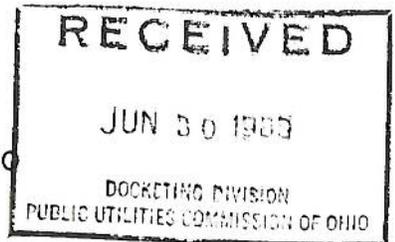
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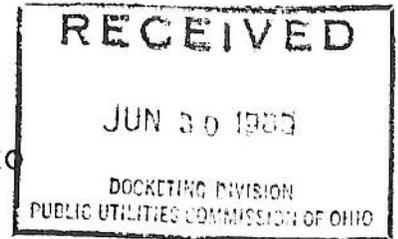
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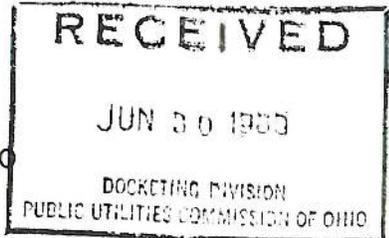
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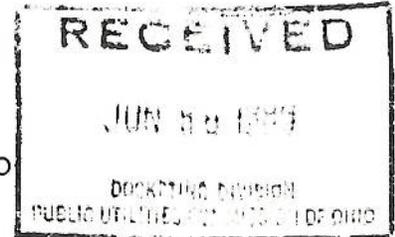
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AT&T Communications of Ohio, Inc. ("AT&T") hereby submits its Comments in accordance with Finding (5) of the Commission's May 31, 1989 Entry ("Entry") in this docket.

The Commission's Entry indicates that the modified tariff filing proposals submitted by the Staff apply only to energy, waterworks and sewage disposal companies. The Entry also indicates that "a subsequent Entry in this docket will establish proposed supplemental filing procedures, as well as a specific timeline for the implementation of this new tariff process, for Ohio telephone utilities subject to the Commission's jurisdiction..." However, the Entry solicits comments from telephone companies concerning the Staff's generic tariff filing proposals at this time.

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In proposing tariff filing procedures for telecommunications companies, the Staff should take into consideration the fact that telecommunications companies file tariff changes with greater frequency, that rate bands have been approved for competitive telecommunications services, the telecommunications companies typically offer a greater variety of services or options, and that, in general, telecommunications companies' tariffs are more complex than tariffs covering energy and water and sewage disposal services. Obviously, AT&T cannot at this time comment on every aspect of what the Staff may propose because such proposal has not yet been set forth. However, AT&T would offer the following general comments.

Telecommunications companies have, in certain instances, adopted price lists to display the particular price, which is currently applicable, within a band of tariffed prices. These price lists have been filed on colored paper to distinguish price lists from tariff sheets. This procedure facilitates the process of tariff administration and should be continued for telecommunications companies. Colored pages have also been used for

promotional offerings and, likewise, should be continued. The Staff's proposal applicable to energy and water and sewage disposal companies recommends adopting an index to be submitted with the tariff. This index would require showing the effective date of each tariff sheet. AT&T believes that such a proposal, if adopted, for telecommunications companies would be burdensome because of the greater frequency with which telecommunications companies change their tariffs. Furthermore, each tariff page already includes the effective date at the bottom of the page. Therefore, the requirement to place effective dates in the index appears to be somewhat redundant.

Tariff filing procedures for telecommunications companies also should address how price lists and promotional sheets should be filed in addition to tariff sheets and any other characteristics of tariff filings unique to the telecommunications industry.

AT&T would be pleased to assist the Staff in developing its tariff filing procedures for the telecommunications industry. AT&T believes that such a cooperative effort would ensure development of tariff filing procedures tailored to the specific needs of telecommunications companies, the public, and the Commission.

AT&T respectfully requests that the Staff take into consideration AT&T's Comments herein in preparing the supplemental tariff filing proposal applicable to telecommunications companies.

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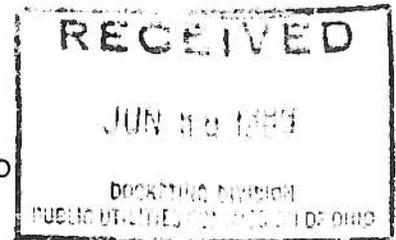
AT&T Communications of Ohio, Inc.

by DENNIS S. PINES
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227 W. Monroe Street, 6th Floor
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Its Attorney

Date: June 30, 1989

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AT&T respectfully requests that the Staff take into consideration AT&T's Comments herein in preparing the supplemental tariff filing proposal applicable to telecommunications companies.

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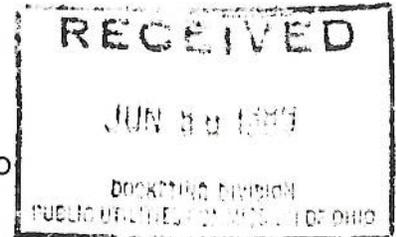
AT&T Communications of Ohio, Inc.

by Dennis S. Pines
Dennis S. Pines
227 W. Monroe Street, 6th Floor
Chicago, Illinois 60606
(312)230-2683

Its Attorney

Date: June 30, 1989

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establishment)
of Tariff Filing Dockets and Tariff) Case No. 89-500-AU-TRF
Filing Procedures.)

COMMENTS OF AT&T COMMUNICATIONS OF OHIO, INC.

AT&T Communications of Ohio, Inc. ("AT&T") hereby submits its Comments in accordance with Finding (5) of the Commission's May 31, 1989 Entry ("Entry") in this docket.

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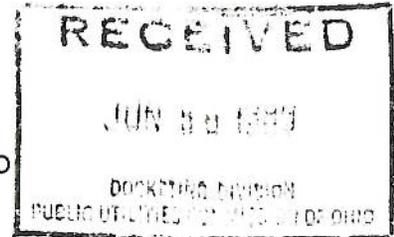
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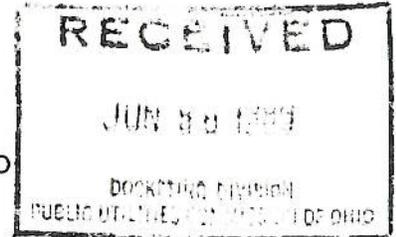
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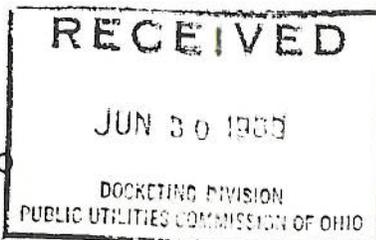
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Its Attorney

Date: June 30, 1989

BEFORE
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In the Matter of the Establishment)
of Tariff Filing Dockets and)
Tariff Filing Procedures.)

Case No. 89-500-AU-TRF

INITIAL COMMENTS OF CENTRAL TELEPHONE COMPANY OF OHIO

Central Telephone Company of Ohio respectfully submits these initial comments in response to the Commission's Entry of May 31, 1989, which requested comments on the generic issues raised by the new tariff administration system proposed by that Entry.

Introduction

While the May 31, 1989, Entry states that the proposed new tariff administration system only applies to energy, waterworks, and sewage utilities, the Commission indicated that modification of the procedures for filing telephone utilities tariffs would be proposed by a subsequent Entry. The Commission specifically requested telephone utilities to comment on the generic issues raised by the tariff administration system proposed for energy, waterworks, and sewage utilities, implying that the Commission is considering proposing a similar system for the telephone utilities.

Central Telephone Company of Ohio ("Central Telephone Company" or "Company") believes that the May 31, 1989 Entry's proposal by the Staff should not be implemented for telephone companies. The tariffs of telephone companies are more voluminous and, because of

the proliferation of telecommunications services and products, are significantly more complex than the tariffs of energy, waterworks and sewage utilities. As a result, the Company believes that the administration of its tariffs at the Commission is most reliably and efficiently done by those who are most familiar with the telecommunications industry and its rapidly changing technical nature and Commission regulation, i.e., the Commission's telecommunications Staff. The telecommunications Staff currently does a good job of maintaining the Company's tariffs. The Company believes the existing procedure for tariff filings as applicable to telephone utilities is effective and should remain as it is.

Discussion

The May 31, 1989, Entry proposed several changes that cause particular concern for Central Telephone Company. These changes and the Company's objections to them are outlined briefly below. First, the Entry proposes to require each utility to resubmit three copies of its presently authorized tariff. One copy is to be identified and filed with a permanent identification number, a "TRF" code. Two other copies of the tariff are to be submitted for use by the Utilities Department. Second, subsequent, authorized tariff filings are to be filed identified by the "TRF" record number (one copy) and three copies are to be filed identified by the specific case number assigned. Third, new and revised tariff filings will require a tariff index to accompany the tariff sheets. Fourth, final tariff sheets are to be printed on white paper only.

Central Telephone Company respectfully objects to these proposals for the following reasons. First, the Company questions why duplication of tariffs is necessary when the Commission presently has the Company's authorized tariff on file. The Company believes this exercise is wasteful. Second, the Company believes two docket numbers, assigned to the same case is cumbersome and confusing.

Third, the Company believes the requirement to file an index sheet with each tariff filing is ambiguous. Currently, the index sheet for the Company's tariffs, P.U.C.O. No. 9, P.U.C.O. No. 11 and P.U.C.O. No. 12 and the Table of Contents preceding the sections within P.U.C.O. No. 12 are revised according to the tariff filing. There are certain filings, however, that do not require a change in the index. For example, changes to the tariff language would not affect the index sheet. As another example, eligibility requirements recently were revised for the Link Up America plan. A tariff rider was submitted by the Company in compliance with an Entry issued by the Commission. This filing did not affect either the main index sheet or the tariff section index sheet. If the May 31, 1989, Entry is proposing another type of index sheet, the Company requests clarification of what the "index sheet" required under the new filing procedures refers to.

Fourth, telephone companies distinguish between current prices and minimum prices by printing the current price list on colored sheets of paper. The May 31, 1989, proposal would prohibit this practice. The Company believes the use of colored pricing sheets provides a useful convention for signalling what the Company's

current pricing is for services whose pricing may fluctuate within a range.

Conclusion

Central Telephone Company urges the Commission to retain the existing tariff filing procedure for telephone companies and not to include telephone companies in the tariff administration system proposed in the May 31, 1989, Entry.

Respectfully submitted,



Daniel R. Conway
Porter, Wright, Morris & Arthur
41 South High Street
Columbus, Ohio 43215
(614) 227-2270

Attorney for Central Telephone
Company of Ohio

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establishment)
of Tariff Filing Dockets and Tariff) Case No. 89-500-AU-TRF
Filing Procedures.)

COMMENTS OF GTE NORTH INCORPORATED

In accordance with the Commission's Entry in the above referenced case dated May 31, 1989, GTE North Incorporated (Company or GTE) is filing the following comments for the Commission's consideration.

The Entry, Finding (3)(a) through (g), and Attachments 1 and 2, calls for numerous changes in tariff filings that are designed to address perceived problems with energy, water and sewer company tariffs. It is not clear that the perceived problems exist for telephone company tariffs or that the changes recommended are, in fact, suitable for telephone company tariffs.

The services described in telephone company tariffs, as compared to energy, waterworks and sewage disposal tariffs, are far more voluminous and infinitely variable. The current filing requirements for telephone company tariffs are appropriate and are adequate to meet the needs of the Commission, the Company, and of tariff holders. Therefore, no changes in the filing standards should be forced upon the telephone companies unless some specific new need develops.

GTE North can see no need for the Commission to require telephone companies to establish TRF files for their tariffs. The Commission Staff

has three (3) sets of the tariff sheets approved by each Order. These files are continually updated with each Order affecting the tariffs. GTE North has no objection to the Commission's requiring the filing of an additional copy of a final tariff sheet(s) on a going forward basis, but does object to the Commission requiring that it be provided with a new updated copy of all existing tariffs. This would require numerous hours to complete as well as duplicative costs.

GTE North believes that the tariff index described in the Entry is unnecessary and serves no purpose. GTE North's tariffs have subject indexes which are helpful in locating specific tariffed regulations and service offerings. The Company's tariffs also include check lists which list each current tariff sheet, thus permitting tariff holders to verify that their tariffs are up-to-date.

The tariff and filing specification No. 5, page 1 of 1, Attachment 2 to the Commission's Entry requires that all tariff sheets be on white paper. This will cause confusion in telephone company tariffs if the Pricing Lists are printed on the same color paper as the corresponding Minimum/Maximum rate tariff sheets. We strongly recommend that the Commission permit the continuation of the use of colored paper for the Pricing List tariff sheets.

Tariff and filing specification No. 8 requires that the date of the Commission's Order authorizing the tariff changes appear on each tariff sheet. This serves no useful purpose. The case or docket number, the issue date and the effective date of each tariff sheets is currently located at the bottom of each tariff sheet. This adequately serves the purpose of referencing the Commission's authority for the contents or changes in contents for the tariff sheet. The date of the Order is not

necessary and, therefore, should not be required by the Commission.

GTE North objects to tariff and filing specification No. 10 which would require telephone companies to file copies of withdrawn tariff sheets stamped CANCELLED AND WITHDRAWN. The Commission's tariffs section is currently stamping each withdrawn tariff sheet as it is removed from the active tariffs and placed in the cancelled tariff sheet file. This procedure is adequate and should be continued. There is no need for the telephone companies to provide stamped copies of withdrawn tariff sheets.

Tariff and filing specification No. 11 is not applicable to telephone company tariffs as they do not engage in settlements with municipalities.

SUMMARY

GTE North believes that the current filing requirements and procedures for telephone company tariffs are adequate and not in need of change. The proposed changes contained in Attachment 2 of the Entry are designed to meet special needs of energy, waterworks and sewage disposal tariffs. Telephone services tariffs are vastly different than energy, waterworks and sewage disposal tariffs in both complexity and in volume. The proposed tariff and filing specifications outlined in the Commission's May 31, 1989 Entry are not appropriate for telephone services tariffs and, therefore, should not be made applicable to telephone services tariffs.

Submitted by:


JOSEPH R. STEWART
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BEFORE
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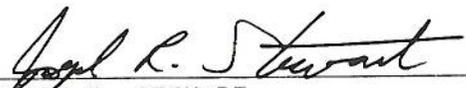
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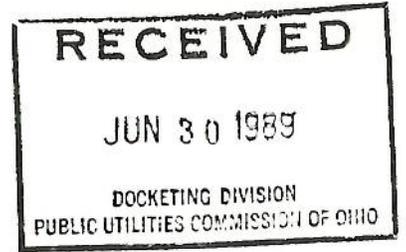
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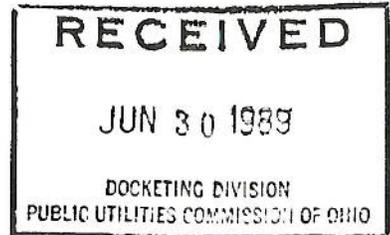
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Submitted by:


JOSEPH R. STEWART
Attorney for GTE North Incorporated

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establishment)
of Tariff Filing Dockets and Tariff) Case No. 89-500-AU-TRF
Filing Procedures.)

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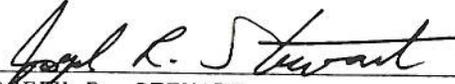
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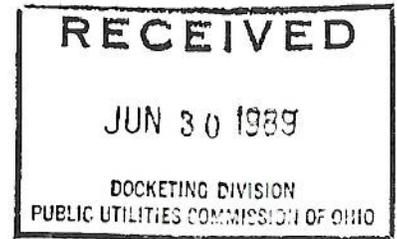
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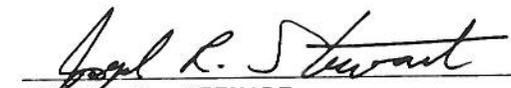
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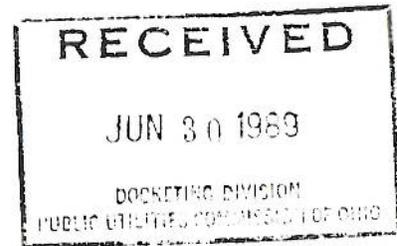
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WRITERS DIRECT DIAL NUMBER

(513) 651-6758

June 29, 1989

The Public Utilities
Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215



Re: Case No. 89-500-AU-TRF

Gentlemen:

Enclosed please find an original and fifteen (15) copies of the Comments that we are today filing on behalf of Cincinnati Bell Telephone Company in the above-referenced proceeding. Please return a time-stamped copy to us in the enclosed self-addressed stamped envelope.

Any questions regarding this filing should be addressed to the undersigned or to Mr. D. Scott Ringo at Cincinnati Bell Telephone Company.

Sincerely yours,

FROST & JACOBS

David W. Hills

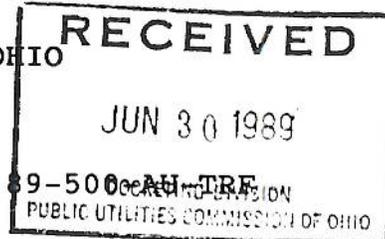
DWH/krw

Enclosures

cc: Mr. D. Scott Ringo
Cincinnati Bell Telephone Company

0752a

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establish-)
ment of Tariff Filing Dockets and)
Tariff Filing Procedures)

Case No. 89-5006-TRF

COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company ("CBT") submits the following comments to the Commission's Entry dated May 31, 1989 in this proceeding (the "Entry"). While CBT supports streamlining the tariffing process, the Commission should balance the administrative burdens imposed on telephone companies against the benefits to be obtained from changing the procedures for filing and maintaining tariffs as outlined in the Entry. The following is a brief discussion of CBT's specific concerns in this regard.

A. TARIFF INDEX

The Entry states that all new and revised tariffs shall contain a tariff index showing the effective date of each tariff sheet.^{1/} The sample tariff index proposed by the Commission^{2/} is organized sequentially by tariff sheet and not alphabetically based on the utility's services and regulations.

CBT believes a tariff serves two main purposes. First, it informs the Commission what rates and regulations the utility proposes to follow, subject to the Commission's supervisory

^{1/} Entry, p. 2.

^{2/} Entry, Attachment 2, p. 4

authority. Second, and perhaps most important, it informs the utility's customers, and the public in general, of the terms and conditions under which the utility will render service.

Accordingly, a tariff index should be structured so as to facilitate these goals. CBT feels it is much easier to access a utility's tariffed services and regulations using a tariff index organized alphabetically as opposed to an index organized sequentially by tariff sheet.

Likewise, CBT questions the need to indicate in the tariff index the effective date of each tariff sheet. This information can easily be obtained by inspecting the lower portion of the tariff sheet in question. This requirement would impose significant administrative burdens on the public utilities without, CBT would submit, resulting in equivalent or greater public benefits.

Thus, CBT submits that a tariff index need only contain two items: each service or regulation of the utility and the tariff page on which information regarding such service or regulation can be obtained. In addition, the utility's services and regulations should be indexed alphabetically to provide ease of access. This practice would promote easier review of tariffs by the Commission's Staff and the general public while minimizing administrative burdens for the utilities.

B. COLORED PAGES

The Entry states categorically that colored paper will not be acceptable for tariff filings.^{3/} CBT and other telephone

^{3/} Entry, Attachment 2, p. 1, ¶5.

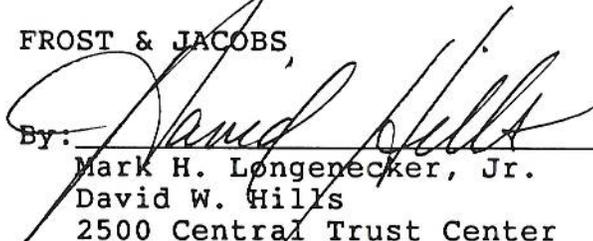
utilities have traditionally used colored paper for purposes of identifying and separating the utility's current Price List sheets for competitive services from the body of the tariff. CBT feels this practice should be retained, as it facilitates the Commission Staff's and the public's review of the utility's current pricing of competitive services.

C. WITHDRAWN TARIFF SHEETS

Once a tariff sheet is approved by the Commission, the Entry would require the public utility to file copies of the tariff sheets to be withdrawn stamped "CANCELED AND WITHDRAWN."^{4/} CBT questions the need for this additional step. Currently each utility submits copies of its tariff sheets to be withdrawn when it files its Application with the Commission to revise the tariff sheets in question. This practice has worked well in the past and there appears to be no obvious public benefit to be derived from requiring this additional filing.

Respectfully submitted,

FROST & JACOBS,

By: 

Mark H. Longenecker, Jr.
David W. Hills
2500 Central Trust Center
Cincinnati, Ohio 45202
(513) 651-6800

Attorneys for Cincinnati Bell
Telephone Company

6238a/6241a

^{4/} Entry, Attachment 2, p. 2, ¶10.

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June 29, 1989

The Public Utilities
Commission of Ohio
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180 East Broad Street
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Re: Case No. 89-500-AU-TRF

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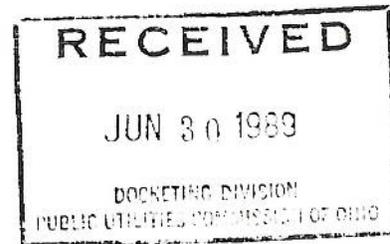
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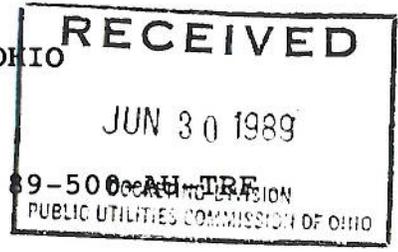
Enclosures

cc: Mr. D. Scott Ringo
Cincinnati Bell Telephone Company

0752a



BEFORE
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In the Matter of the Establish-)
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Tariff Filing Procedures)

Case No. 89-5000-TRF
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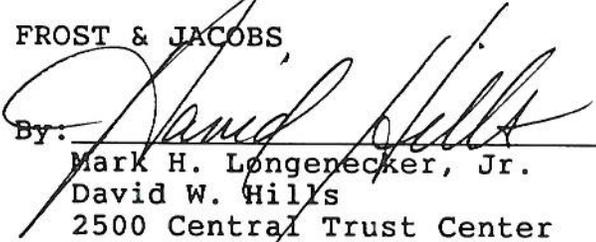
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(513) 651-6800

Attorneys for Cincinnati Bell
Telephone Company

6238a/6241a

^{4/} Entry, Attachment 2, p. 2, ¶10.

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180 East Broad Street
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Re: Case No. 89-500-AU-TRF

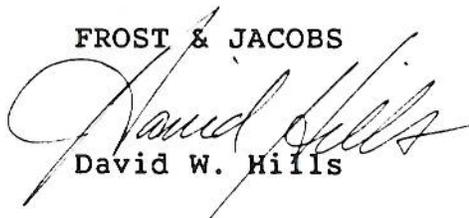
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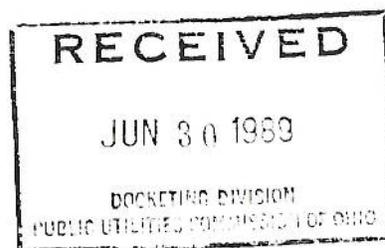
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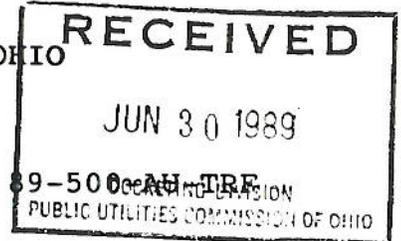
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0752a



BEFORE
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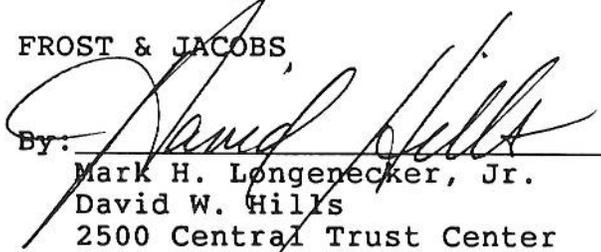
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Attorneys for Cincinnati Bell
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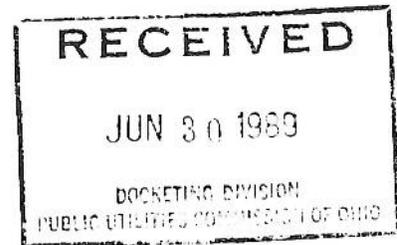
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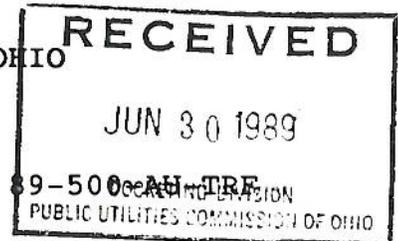
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0752a

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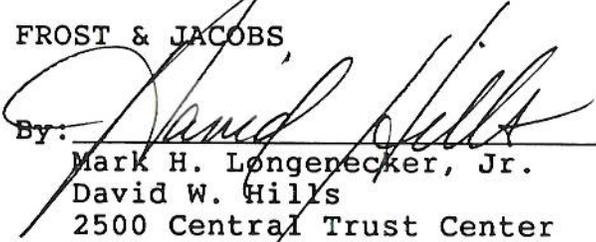
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(513) 651-6800

Attorneys for Cincinnati Bell
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^{4/} Entry, Attachment 2, p. 2, ¶10.

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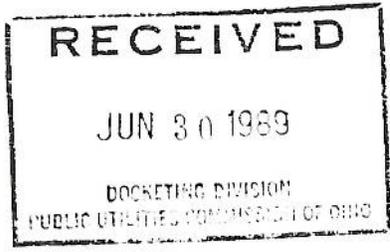
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June 29, 1989

The Public Utilities
Commission of Ohio
Docketing Division
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Re: Case No. 89-500-AU-TRF

Gentlemen:

Enclosed please find an original and fifteen (15) copies of the Comments that we are today filing on behalf of Cincinnati Bell Telephone Company in the above-referenced proceeding. Please return a time-stamped copy to us in the enclosed self-addressed stamped envelope.

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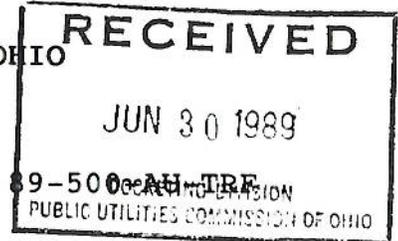
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Enclosures

cc: Mr. D. Scott Ringo
Cincinnati Bell Telephone Company

0752a

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establish-)
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Case No. 89-500-ATTORNEY GENERAL

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A. TARIFF INDEX

The Entry states that all new and revised tariffs shall contain a tariff index showing the effective date of each tariff sheet.^{1/} The sample tariff index proposed by the Commission^{2/} is organized sequentially by tariff sheet and not alphabetically based on the utility's services and regulations.

CBT believes a tariff serves two main purposes. First, it informs the Commission what rates and regulations the utility proposes to follow, subject to the Commission's supervisory

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authority. Second, and perhaps most important, it informs the utility's customers, and the public in general, of the terms and conditions under which the utility will render service.

Accordingly, a tariff index should be structured so as to facilitate these goals. CBT feels it is much easier to access a utility's tariffed services and regulations using a tariff index organized alphabetically as opposed to an index organized sequentially by tariff sheet.

Likewise, CBT questions the need to indicate in the tariff index the effective date of each tariff sheet. This information can easily be obtained by inspecting the lower portion of the tariff sheet in question. This requirement would impose significant administrative burdens on the public utilities without, CBT would submit, resulting in equivalent or greater public benefits.

Thus, CBT submits that a tariff index need only contain two items: each service or regulation of the utility and the tariff page on which information regarding such service or regulation can be obtained. In addition, the utility's services and regulations should be indexed alphabetically to provide ease of access. This practice would promote easier review of tariffs by the Commission's Staff and the general public while minimizing administrative burdens for the utilities.

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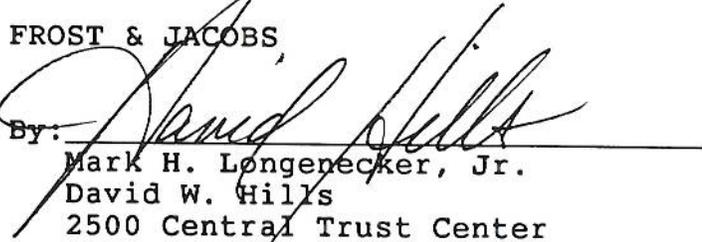
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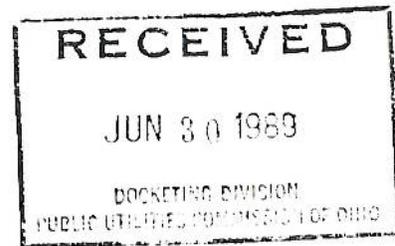
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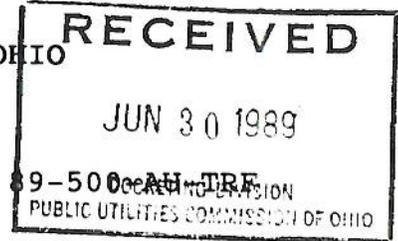
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0752a

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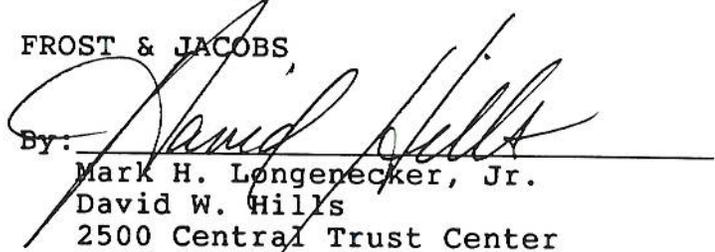
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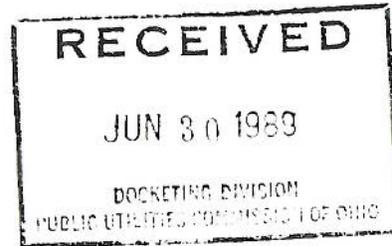
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June 29, 1989



The Public Utilities
Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215

Re: Case No. 89-500-AU-TRF

Gentlemen:

Enclosed please find an original and fifteen (15) copies of the Comments that we are today filing on behalf of Cincinnati Bell Telephone Company in the above-referenced proceeding. Please return a time-stamped copy to us in the enclosed self-addressed stamped envelope.

Any questions regarding this filing should be addressed to the undersigned or to Mr. D. Scott Ringo at Cincinnati Bell Telephone Company.

Sincerely yours,

FROST & JACOBS

David W. Hills

DWH/krw

Enclosures
cc: Mr. D. Scott Ringo
Cincinnati Bell Telephone Company

0752a

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Establish-)
ment of Tariff Filing Dockets and)
Tariff Filing Procedures)

Case No. 89-500-~~AN-TRE~~

COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company ("CBT") submits the following comments to the Commission's Entry dated May 31, 1989 in this proceeding (the "Entry"). While CBT supports streamlining the tariffing process, the Commission should balance the administrative burdens imposed on telephone companies against the benefits to be obtained from changing the procedures for filing and maintaining tariffs as outlined in the Entry. The following is a brief discussion of CBT's specific concerns in this regard.

A. TARIFF INDEX

The Entry states that all new and revised tariffs shall contain a tariff index showing the effective date of each tariff sheet.^{1/} The sample tariff index proposed by the Commission^{2/} is organized sequentially by tariff sheet and not alphabetically based on the utility's services and regulations.

CBT believes a tariff serves two main purposes. First, it informs the Commission what rates and regulations the utility proposes to follow, subject to the Commission's supervisory

^{1/} Entry, p. 2.

^{2/} Entry, Attachment 2, p. 4

authority. Second, and perhaps most important, it informs the utility's customers, and the public in general, of the terms and conditions under which the utility will render service.

Accordingly, a tariff index should be structured so as to facilitate these goals. CBT feels it is much easier to access a utility's tariffed services and regulations using a tariff index organized alphabetically as opposed to an index organized sequentially by tariff sheet.

Likewise, CBT questions the need to indicate in the tariff index the effective date of each tariff sheet. This information can easily be obtained by inspecting the lower portion of the tariff sheet in question. This requirement would impose significant administrative burdens on the public utilities without, CBT would submit, resulting in equivalent or greater public benefits.

Thus, CBT submits that a tariff index need only contain two items: each service or regulation of the utility and the tariff page on which information regarding such service or regulation can be obtained. In addition, the utility's services and regulations should be indexed alphabetically to provide ease of access. This practice would promote easier review of tariffs by the Commission's Staff and the general public while minimizing administrative burdens for the utilities.

B. COLORED PAGES

The Entry states categorically that colored paper will not be acceptable for tariff filings.^{3/} CBT and other telephone

^{3/} Entry, Attachment 2, p. 1, ¶5.

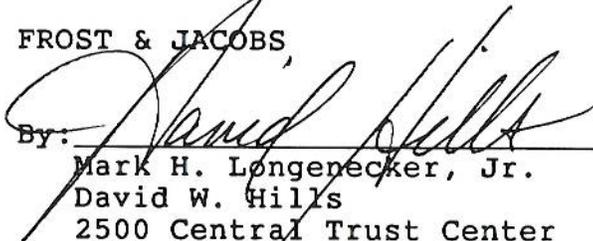
utilities have traditionally used colored paper for purposes of identifying and separating the utility's current Price List sheets for competitive services from the body of the tariff. CBT feels this practice should be retained, as it facilitates the Commission Staff's and the public's review of the utility's current pricing of competitive services.

C. WITHDRAWN TARIFF SHEETS

Once a tariff sheet is approved by the Commission, the Entry would require the public utility to file copies of the tariff sheets to be withdrawn stamped "CANCELED AND WITHDRAWN."^{4/} CBT questions the need for this additional step. Currently each utility submits copies of its tariff sheets to be withdrawn when it files its Application with the Commission to revise the tariff sheets in question. This practice has worked well in the past and there appears to be no obvious public benefit to be derived from requiring this additional filing.

Respectfully submitted,

FROST & JACOBS,

By: 

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6238a/6241a

^{4/} Entry, Attachment 2, p. 2, ¶10.