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PUBLIC SERVICE COMMISSION 201 E. Fourth St. P.O. Box 2301 Cincinnati, Ohlo 45201-2301

August 29, 2003

Mr. Thomas M. Dorman Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

RE: Inquiry Into the Use of Contract Service Arrangements by Telecommunications Carriers in Kentucky—Case No. 2002-00456

Dear Mr. Dorman:

Enclosed are an original and five (5) copies, plus an electronic version, of Cincinnati Bell Telephone Company's Request for an Industry Workshop for filing in the above-captioned proceeding. A duplicate original copy of this letter is enclosed; please date-stamp this copy as acknowledgement of its receipt and return it in the enclosed, self-addressed envelope. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-7260.

Sincerely,

Jouett Kinne

Cincinnati Bell Telephone

Enclosures w/ CD-ROM

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE	)	
ARRANGEMENTS BY TELECOMMUNICATIONS	)	CASE NO.
CARRIERS IN KENTUCKY	)	2002-00456

## REQUEST FOR AN INDUSTRY WORKSHOP BY CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company hereby requests that the Commission schedule an industry workshop to include Commission Staff and other parties to this proceeding prior to the date of a hearing on this matter. The grounds for this request are set forth in the attached Memorandum in Support.

Respectfully submitted,

Ann Jouett Kinney

Cincinnati Bell Telephone Company 201 East Fourth Street, 102-890

Cincinnati, Ohio 45202

David C. Olson FROST BROWN TODD LLC 201 East Fifth Street Cincinnati, Ohio 45202

Attorneys for Cincinnati Bell Telephone Company

### **MEMORANDUM IN SUPPORT**

For the reasons set forth below, CBT hereby requests that the Commission schedule an industry workshop prior to the date of hearing of this matter. CBT further asks that the Commission authorize the Commission Staff's participation in the workshop should this request be granted.

As CBT explained at the informal conference held on August 11, 2003, CBT believes that an industry workshop would be beneficial in the context of the contract service arrangement ("CSA") proceeding. While CBT understands that the Commission views the proceeding as one involving policy considerations, CBT believes that an open discussion of the policy implications surrounding the existing CSA rules and procedures as well as the Commission's concerns regarding them may enable the industry and Staff to work collaboratively to resolve some or even all of the Commission's concerns. If consensus can be reached among the participants, the group can make a recommendation to the Commission for its consideration, which the Commission could then accept or reject, in whole or in part, in its discretion. Ideally, such a discussion would involve representatives from carriers providing the complete array of telecommunications services affected by the rules—incumbent local exchange carriers ("ILECs"), competitive local exchange carriers ("CLECs") and interexchange carriers ("ILECs")—as well as Commission staff. CBT contends that Staff's participation is crucial to a thorough examination of the existing rules governing the use of CSAs as well as to addressing the Commission's policy concerns effectively.

In CBT's experience, industry workshops can be valuable tools for both the industry and for the state commissions. Specifically, CBT has participated in several workshops hosted by the Public Utilities Commission of Ohio ("PUCO") which have proven to be both informative and

useful for resolving certain industry-wide issues and concerns. For example, CBT recently participated in a workshop in Ohio to develop a process for transitioning customers from a carrier that abruptly ceases providing local exchange service to another carrier of choice. CBT also took part in a workshop to produce industry standards for white pages directories. Both workshops resulted in industry standards which obviated the need for the Commission to undertake formal rulemaking proceedings.

Finally, CBT notes that scheduling a workshop prior to the final hearing in this matter should be feasible due to the fact that the presence of all witnesses will not be required at the workshop. Furthermore, if the Commission grants this request, CBT encourages industry participants to come to the workshop prepared to discuss specific standards for the use of CSAs in lieu of tariffed rates as well as CSA filing guidelines. Participants may wish to bring specific proposals to the workshop for purposes of discussion.

For these reasons, CBT urges the Commission to grant this request for an industry workshop.

Respectfully submitted,

Ann Jouett Kinney

Cincinnati Bell Telephone Company

201 East Fourth Street, 102-890

Cincinnati, Ohio 45202

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Cincinnati, Ohio 45202

Attorneys for Cincinnati Bell Telephone Company

### CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served on the individuals on the attached Service List by first-class mail, postage prepaid, on the 29<sup>th</sup> day of August 2003.

Jouett Minney

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