STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Z-TEL COMMUNICATIONS, INC.	}	
	}	
Complainant	}	
	}	
vs.	}	**Docket No. 02-0160**
	}	
ILLINOIS BELL TELEPHONE COMPANY,	}	
d/b/a AMERITECH ILLINOIS	}	
	}	
Respondent	}	

Z-TEL COMMUNICATIONS, INC.'S
MOTION FOR ORAL ARGUMENT

Z-Tel Communications, Inc., by its attorneys O'Keefe, Ashenden, Lyons and Ward, pursuant to Section 200.850 of the Commission's Regulations, 83 Ill.Adm.Code Part 200.850, requests that the Commission grant oral argument to the Commission prior to the entry of the Commission's final order. Z-Tel states as follows in support of its Motion.

1. On February 22, 2002, Z-Tel filed its formal complaint in this matter pursuant to Section 13-514 of the Illinois Public Utilities Act. 220 ILCS 5/13-514. Under Section 13-515 of the Act, the Administrative Law Judge is scheduled to issue a written decision within 60 days, or by April 24, 2002. Not more than 15 days thereafter, and after parties file petitions for review, the Commission will issue its decision. The Commission's decision is due to be issue by May 9, 2002.

2. Under Section 200.850 of the Commission's rules of practice, the Commission may hear oral argument on a case upon seven days notice to the parties, either on its own motion or the motion of a party. 83 Ill. Adm. Code Part 200.850.

3. Z-Tel's complaint has raised a number of claims against Ameritech with regard to its provisioning of untimely and inaccurate line loss reports (notices that Ameritech provides to Z-Tel when a customer migrates from Z-Tel back to Ameritech) and the impact that such provisioning has on Z-Tel's operations. Among the issues in the Complaint is whether the form of line loss notice given to Z-Tel by Ameritech is inferior to the line loss information given to its retail operations.

4. Z-Tel requests that the Commission grant oral argument in this proceeding some time prior to the Commission's May 9, 2002 decision. Z-Tel believes that oral argument in this case in particular will allow the Commission to best understand the intricate nature of the proceedings and the complaint brought by Z-Tel.

5. Z-Tel notes that at the Commission's Bench Session in which the Commission considered Z-Tel's request for emergency relief, there was some minor confusion about the Line Loss Notification process and how Ameritech does or does not use that process to generate Winback marketing material. Oral argument will allow the parties to answer questions the Commission may have about Ameritech's Winback marketing efforts, how it triggers a Winback letter, and the form of information that Ameritech provides to Z-Tel.

Wherefore, for each of the foregoing reasons, Z-Tel Communications, Inc. respectfully requests that the Commission grant Z-Tel's motion and schedule oral argument in this proceeding for a time after the ALJ submits the her written decision, and before the May 9, 2002 date for the Commission's final decision.

Respectfully submitted,

Z-TEL COMMUNICATIONS, INC.

Dated: April 16, 2002

By one of its attorneys

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