



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 3720

January 23, 2007

**Via U.S. Mail and Fax (614) 798-1299**

Ms. Julia A. Fratianne  
Chief Financial Officer  
Applied Innovation Inc.  
5800 Innovation Drive  
Dublin, OH 43016

**RE: Applied Innovation Inc.  
Form 10-K for the fiscal year ended December 31, 2005  
Filed March 20, 2006**

**File No. 0-21352**

Dear Ms. Fratianne:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director