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XO

Communications

13865 Sunrise Valley Drive
Herndon, VA 20171

April 18, 2012

2012 APR 18 P 2:10

AZ CORP COMMISSION
DOCKET CONTROL

Mr. Brian McNeil
Executive Secretary
Docket Control Center
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

Re: *XO Communications Services, Inc. Arizona Tariff No. 7 Revisions*
Docket T-043-02A-12-0048

Dear Mr. McNeil:

In response to AT&T's Objections dated March 27, 2012, XO Communications Services, Inc. is removing the word "interstate" from its previously filed tariff language regarding the treatment of Toll VoIP-PSTN Traffic.

The following pages are included with this filing:

Original Page 11.2

This tariff is being filed with an issued date of February 13, 2012 and effective date of March 14, 2012.

Also enclosed is an additional copy and a self-addressed stamped envelope, please return a date-stamped copy of this letter in the envelope provided. Should you have any questions, please contact me by telephone at 703-547-2615 or by email at sharon.e.adams@xo.com.

Sincerely,

Sharon Adams
Senior Regulatory Analyst

Arizona Corporation Commission

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Enclosures

ACCESS SERVICE

SECTION 2 - TERMS AND CONDITIONS

2.3 Obligations to the Customer, (Cont'd.)

2.3.1 Identification and Rating of Toll VoIP-PSTN Traffic (Cont'd)

C. Calculation and Application of Percent-VoIP-Usage Factor (Cont'd)

1. The Customer will calculate and furnish to the Company a factor (the "PVU-C") representing the percentage of the total intrastate switched access MOU that the Customer exchanges with the Company in the state, that (a) is sent to the Company and that originated in IP format; or (b) is received from the Company and terminated in IP format. This PVU-C shall be based on information such as the number of the Customer's retail VoIP subscriptions in the state (e.g., as reported on FCC Form 477), traffic studies, actual call detail, or other relevant and verifiable information.
2. The Company will, likewise, calculate a factor (the "PVU-X") representing the percentage of the Company's total intrastate access MOU in the state that the Company originates or terminates on its network in IP format. This PVU-X shall be based on information, such as the number of the Company's retail VoIP subscriptions in the state (e.g., as reported on FCC Form 477), traffic studies, actual call detail, or other relevant and verifiable information.
3. The Company will use the PVU-C and PVU-X factors to calculate a PVU factor that represents the percentage of total intrastate access MOU exchanged between the Company and the Customer that is originated or terminated in IP format, whether at the Company's end, at the Customer's end, or at both ends. The PVU factor will be calculated as the sum of: (A) the PVU-C factor and (B) the PVU-X factor times (1.0 minus the PVU-C factor).
4. The Company will apply the PVU factor to the total intrastate access MOU exchanged with the Customer in order to determine the number of intrastate Toll VoIP-PSTN Traffic MOU.

Example 1: The PVU-C is 40% and the PVU-X is 10%. The PVU factor is equal to $40\% + (10\% \times 60\%) = 46\%$. The Company will bill 46% of the Customer's intrastate access MOU at the Company's tariffed interstate switched access rates.

Example 2: The PVU-C is 0% and the PVU-X is 10%. The PVU factor is equal to $0\% + (10\% \times 100\%) = 10\%$. The Company will bill 10% of the Customer's intrastate access MOU at the Company's tariffed interstate switched access rates.

Example 3: The PVU-C is 100%. No matter what the PVU-X factor is, the PVU is 100%. The Company will bill 100% of the Customer's intrastate access MOU at the Company's tariffed interstate switched access rates.