

ORIGINAL

OPEN MEETING



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MEMORANDUM

Arizona Corporation Commission

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TO: THE COMMISSION

FROM: Utilities Division

DATE: June 6, 2012

DOCKETED BY *TM*

CORP COMMISSION  
DOCKET CONTROL

RE: MCIMETRO ACCESS TRANSMISSION SERVICES, L.L.C. DBA VERIZON ACCESS TRANSMISSION SERVICES TARIFF FILING TO REVISE TARIFF PAGES. (DOCKET NO. T-03574A-11-0436)

On December 6, 2011, MCIMetro Access Transmission Services, L.L.C. dba Verizon Access Transmission Services (“Verizon”) filed an application to make changes to its tariff as it relates to intercarrier compensation for Voice over Internet Protocol-Public Switched Telephone Network (“VoIP-PSTN”) traffic. Voice over Internet Protocol (“VoIP”) is a technology that allows a subscriber to make and receive voice calls using a broadband Internet connection instead of a phone line.

On November 18, 2011, the Federal Communications Commission (“FCC”) issued a Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, et al. (FCC 11-161) (“the USF-ICC Order”) that puts in place a process that will change the current process by which carriers pay for the use of each other’s facilities and network. The FCC’s name for this process is “intercarrier compensation.” As a result of the USF-ICC Order, carriers are filing revisions to their access tariffs to conform to the provisions of the Order. Specifically, carriers are addressing access charges imposed on VoIP-PSTN traffic.

The FCC adopted the following intercarrier compensation framework for VoIP traffic, in particular, VoIP-PSTN traffic<sup>2</sup>:

*Voice over Internet Protocol (VoIP):* The intercarrier compensation treatment of VoIP traffic that is exchanged between LECs and other carriers has been the subject of long-running disputes. This plan does not take a position on the appropriate intercarrier compensation treatment of VoIP traffic prior to January 1, 2012. Under the plan, the Commission will adopt a new rule, effective January 1, 2012, to govern the intercarrier compensation rates applicable to VoIP traffic exchanged between LECs and other carriers. Such traffic will be rated at interstate access rates if the call detail indicates an “access” call, or at reciprocal compensation rates if the call detail indicates a “non-access” call. *All “toll” traffic that originates in IP or terminates in IP will be subject to current interstate access rates (regardless of whether it is interstate or intrastate) (Italics*

<sup>1</sup> “VoIP-PSTN traffic” is “traffic exchanged over the Public Switched Telephone Network that originates and/or terminates in internet protocol (“IP”) format.

<sup>2</sup> The USF-ICC Order at para. 933, footnote 1869.

*and underlining added.*); local termination rates would not be affected. All such traffic is incorporated into the overall transition as rates for terminating interstate access traffic are reduced and eventually unified at \$0.0007 pursuant to the comprehensive reform plan described below. *Under the plan, intrastate access rates will not be applied to VoIP traffic. (Italics added.)*

The USF-ICC Order also makes clear that on a going-forward basis payment obligations apply to VoIP traffic and adopts a transitional intercarrier compensation framework for VoIP.<sup>3</sup> Under the transitional framework<sup>4</sup>:

- Default charges for “toll” VoIP-PSTN traffic will be equal to interstate access rates applicable to non-VoIP traffic, both in terms of the rate level and rate structure;
- Default charges for other VoIP-PSTN traffic will be the otherwise-applicable reciprocal compensation rates; (footnote omitted); and
- LECs are permitted to tariff these default charges for toll VoIP-PSTN traffic in relevant federal and state tariffs in the absence of an agreement for different intercarrier compensation.

Based on the above language and Staff’s interpretation of the USF-ICC Order, Staff believes that interstate access rates are applicable to both originating and terminating VoIP-PSTN traffic.

Frontier Communications Corp. (“Frontier”) filed a Petition for Clarification and/or Reconsideration (“Petition”) at the FCC to clarify, or reconsider its decision to state, that initially the interstate access charges for VoIP-PSTN calls will apply only for the termination of such calls and intrastate charges will apply to the origination of such calls.

Verizon’s proposed tariff states that VoIP-PSTN traffic is traffic that is exchanged in Time Division Multiplexing (“TDM”) format and originates and/or terminates in IP format. The proposed tariff further states that this traffic is required to be compensated at interstate access rates unless the parties have negotiated that applicable rate as is permitted by the FCC. This differs from Frontier’s position that the charges apply only to traffic that is exchanged in TDM format and terminates in IP format.

On March 30, 2012, AT&T Services, Inc. (“AT&T”) filed objections to Verizon’s proposed tariff revisions. AT&T states Verizon Access’ revised tariff states that the Percent VoIP Usage (“PVU”) factors will be calculated based on the total “intrastate and interstate access” minutes of use. However, the PVU calculation should be based only on intrastate

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<sup>3</sup> The USF-ICC Order at para. 652.

<sup>4</sup> The USF-ICC Order at para. 944.

minutes of use because it will be applied to intrastate traffic. AT&T further states Verizon Access' revised tariff indicates that the PVU factors will be applied retroactively to January 1, 2012, which AT&T believes is inconsistent with the fact that the FCC Order became effective on December 29, 2011 and required immediate implementation.<sup>5</sup> AT&T requests the proposed tariff be revised to eliminate the reference to interstate minutes of use and be applied retroactively to December 29, 2011. On April 6, 2012, Verizon filed an amendment to its December 6, 2011 filing to include revisions outlined in comments filed the docket by AT&T Services, Inc.

On April 24, 2012, the FCC issued an Order<sup>6</sup> addressing Frontier's petition, stating "it would permit LECs to tariff default rates equal to their intrastate originating access rates when they originate VoIP traffic from the effective date<sup>7</sup> of the revised rules until June 30, 2014. On July 1, 2014, LECs will be permitted to tariff default rates for such traffic equal to their interstate originating access rates."<sup>8</sup>

During its review of numerous proposed tariff revisions to implement the FCC's decision as it relates to VoIP-PSTN calls, Staff was informed by AT&T and others that they believed that because the FCC's Order regarding these calls became effective on December 29, 2011, the new rates should apply to traffic beginning on that date and that there should be a rate adjustment. The Commission's tariff approval procedures apply and the tariffs become effective after Commission approval.

Staff has reviewed the proposed tariff revisions, the relevant FCC Orders and the comments that have been filed in the Docket. Staff recommends approval of Verizon's proposed tariff revisions, as amended.

Steven M. Olea  
Director  
Utilities Division

SMO:LLM:lhm\BH

ORIGINATOR: Lori Morrison

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<sup>5</sup> The USF-ICC Order at para. 939, footnote 1890.

<sup>6</sup> The USF-ICC Order, *Second Order On Reconsideration*, FCC 12-47, rel. April 25, 2012, ¶ 2 and ¶35 and footnote 96.

<sup>7</sup> Id., Footnote 96, "Accordingly, our revised rules will become effective 45 days after publication in the Federal Register."

<sup>8</sup> Id., ¶35.

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BEFORE THE ARIZONA CORPORATION COMMISSION

- GARY PIERCE  
Chairman
- BOB STUMP  
Commissioner
- SANDRA D. KENNEDY  
Commissioner
- PAUL NEWMAN  
Commissioner
- BRENDA BURNS  
Commissioner

IN THE MATTER OF THE APPLICATION )  
 OF MCIMETRO ACCESS TRANSMISSION )  
 SERVICES, L.L.C. DBA VERIZON ACCESS )  
 TRANSMISSION SERVICES TARIFF )  
 FILING TO REVISE TARIFF PAGES )

DOCKET NO. T-03574A-11-0436  
 DECISION NO. \_\_\_\_\_  
ORDER

Open Meeting  
 June 19 and 20, 2012  
 Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. MCIMetro Access Transmission Service, L.L.C dba Verizon Access Transmission Services ("Verizon") is certificated to provide telecommunications service as a public service corporation in the State of Arizona.

2. On December 6, 2011, Verizon filed an application to make changes to its tariff as it relates to intercarrier compensation for Voice over Internet Protocol-Public Switched Telephone Network ("VoIP-PSTN")<sup>1</sup> traffic. Voice over Internet Protocol ("VoIP") is a technology that allows a subscriber to make and receive voice calls using a broadband Internet connection instead of a phone line.

3. On November 18, 2011, the Federal Communications Commission ("FCC") issued a Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, et al.

<sup>1</sup> "VoIP-PSTN traffic" is "traffic exchanged over the Public Switched Telephone Network that originates and/or terminates in internet protocol ("IP") format.

1 (FCC 11-161) (“the USF-ICC Order”) that puts in place a process that will change the current  
2 process by which carriers pay for the use of each other’s facilities and network. The FCC’s name  
3 for this process is “intercarrier compensation.” As a result of the USF-ICC Order, carriers are  
4 filing revisions to their access tariffs to conform to the provisions of the Order. Specifically,  
5 carriers are addressing access charges imposed on VoIP-PSTN traffic.

6 4. The FCC adopted the following intercarrier compensation framework for VoIP  
7 traffic, in particular, VoIP-PSTN traffic<sup>2</sup>:

8 *Voice over Internet Protocol (VoIP):* The intercarrier compensation treatment of VoIP  
9 traffic that is exchanged between LECs and other carriers has been the subject of long-  
10 running disputes. This plan does not take a position on the appropriate intercarrier  
11 compensation treatment of VoIP traffic prior to January 1, 2012. Under the plan, the  
12 Commission will adopt a new rule, effective January 1, 2012, to govern the intercarrier  
13 compensation rates applicable to VoIP traffic exchanged between LECs and other carriers.  
14 Such traffic will be rated at interstate access rates if the call detail indicates an “access”  
15 call, or at reciprocal compensation rates if the call detail indicates a “non-access” call. *All*  
16 *“toll” traffic that originates in IP or terminates in IP will be subject to current interstate*  
17 *access rates (regardless of whether it is interstate or intrastate) (Italics and underlining*  
18 *added.); local termination rates would not be affected. All such traffic is incorporated into*  
19 *the overall transition as rates for terminating interstate access traffic are reduced and*  
20 *eventually unified at \$0.0007 pursuant to the comprehensive reform plan described below.*  
21 *Under the plan, intrastate access rates will not be applied to VoIP traffic. (Italics added.)*

22 5. The USF-ICC Order also makes clear that on a going-forward basis payment  
23 obligations apply to VoIP traffic and adopts a transitional intercarrier compensation framework for  
24 VoIP.<sup>3</sup> Under the transitional framework<sup>4</sup>:

- 25 • Default charges for “toll” VoIP-PSTN traffic will be equal to interstate access  
26 rates applicable to non-VoIP traffic, both in terms of the rate level and rate  
27 structure;
- 28 • Default charges for other VoIP-PSTN traffic will be the otherwise-applicable  
reciprocal compensation rates; (footnote omitted); and
- LECs are permitted to tariff these default charges for toll VoIP-PSTN traffic in  
relevant federal and state tariffs in the absence of an agreement for different  
intercarrier compensation.

29 Based on the above language and Staff’s interpretation of the USF-ICC Order, Staff believes that  
30 interstate access rates are applicable to both originating and terminating VoIP-PSTN traffic.

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32 <sup>2</sup> The USF-ICC Order at para. 933, footnote 1869.

33 <sup>3</sup> The USF-ICC Order at para. 652.

34 <sup>4</sup> The USF-ICC Order at para. 944.

1           6.       Frontier Communications Corp. (“Frontier”) filed a Petition for Clarification and/or  
2 Reconsideration (“Petition”) at the FCC to clarify, or reconsider its decision to state, that initially  
3 the interstate access charges for VoIP-PSTN calls will apply only for the termination of such calls  
4 and intrastate charges will apply to the origination of such calls.

5           7.       Verizon’s proposed tariff states that VoIP-PSTN traffic is traffic that is exchanged  
6 in Time Division Multiplexing (“TDM”) format and originates and/or terminates in IP format.  
7 The proposed tariff further states that this traffic is required to be compensated at interstate access  
8 rates unless the parties have negotiated that applicable rate as is permitted by the FCC. This differs  
9 from Frontier’s position that the charges apply only to traffic that is exchanged in TDM format and  
10 terminates in IP format.

11           8.       On March 30, 2012, AT&T Services, Inc. (“AT&T”) filed objections to Verizon’s  
12 proposed tariff revisions. AT&T states Verizon Access’ revised tariff states that the Percent VoIP  
13 Usage (“PVU”) factors will be calculated based on the total “intrastate and interstate access”  
14 minutes of use. However, the PVU calculation should be based only on intrastate minutes of use  
15 because it will be applied to intrastate traffic. AT&T further states Verizon Access’ revised tariff  
16 indicates that the PVU factors will be applied retroactively to January 1, 2012, which AT&T  
17 believes is inconsistent with the fact that the FCC Order became effective on December 29, 2011  
18 and required immediate implementation.<sup>5</sup> AT&T requests the proposed tariff be revised to  
19 eliminate the reference to interstate minutes of use and be applied retroactively to December 29,

20           9.       On April 6, 2012, Verizon filed an amendment to its December 6, 2011 filing to  
21 include revisions outlined in comments filed the docket by AT&T Services, Inc.

22           10.      On April 24, 2012, the FCC issued an Order<sup>6</sup> addressing Frontier’s petition, stating  
23 “it would permit LECs to tariff default rates equal to their intrastate originating access rates when  
24 they originate VoIP traffic from the effective date<sup>7</sup> of the revised rules until June 30, 2014. On  
25

26 \_\_\_\_\_  
27 <sup>5</sup> The USF-ICC Order at para. 939, footnote 1890.

28 <sup>6</sup> The USF-ICC Order, *Second Order On Reconsideration*, FCC 12-47, rel. April 25, 2012, ¶ 2 and ¶35 and footnote 96.

<sup>7</sup> *Id.*, Footnote 96, “Accordingly, our revised rules will become effective 45 days after publication in the Federal Register.”

1 July 1, 2014, LECs will be permitted to tariff default rates for such traffic equal to their interstate  
2 originating access rates.”<sup>8</sup>

3 11. During its review of numerous proposed tariff revisions to implement the FCC’s  
4 decision as it relates to VoIP-PSTN calls, Staff was informed by AT&T and others that they  
5 believed that because the FCC’s Order regarding these calls became effective on December 29,  
6 2011, the new rates should apply to traffic beginning on that date and that there should be a rate  
7 adjustment. The Arizona Corporation Commission’s (“Commission”) tariff approval procedures  
8 apply and the tariffs become effective after Commission approval.

9 12. Staff has reviewed the proposed tariff revisions, the relevant FCC Orders  
10 and the comments that have been filed in the Docket. Staff recommends approval of Verizon’s  
11 tariff, as amended.

12 CONCLUSIONS OF LAW

13 1. Verizon is a public service corporation within the meaning of Article XV of the  
14 Arizona Constitution.

15 2. The Commission has jurisdiction over Verizon and the subject matter in this filing.

16 3. The Commission, having reviewed the filing and Staff’s Memorandum dated  
17 June 6, 2012, concludes that the proposed tariff revisions, as amended, are reasonable, fair and  
18 equitable and therefore in the public interest.

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28 <sup>8</sup>Id., ¶35.

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ORDER

IT IS THEREFORE ORDERED that the proposed tariff revisions, as attached, be and hereby are approved for MCI Metro Access Transmission Services, LLC.

IT IS FURTHER ORDERED that this Decision be and hereby is effective immediately.

**BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, ERNEST G. JOHNSON, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

\_\_\_\_\_  
ERNEST G. JOHNSON  
EXECUTIVE DIRECTOR

DISSENT: \_\_\_\_\_

DISSENT: \_\_\_\_\_

SMO:LLM:lhmbh

1 SERVICE LIST FOR: MCIMETRO ACCESS TRANSMISSION SERVICES, L.L.C. DBA  
2 VERIZON ACCESS TRANSMISSION SERVICES  
3 DOCKET NO.: T-03574A-11-0436

3  
4 Ms. Sandy Chandler  
5 Tariff Manager, Verizon Business  
6 State Government Relations  
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11 Director, External Affairs  
12 AT&T Services, Inc.  
13 2003 Point Bluff  
14 Austin, Texas 78746

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16 Mr. Steven M. Olea  
17 Director, Utilities Division  
18 Arizona Corporation Commission  
19 1200 West Washington Street  
20 Phoenix, Arizona 85007

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22 Ms. Janice M. Alward  
23 Chief Counsel, Legal Division  
24 Arizona Corporation Commission  
25 1200 West Washington Street  
26 Phoenix, Arizona 85007

27  
28

ACCESS SERVICES

CHECK SHEETS

The Title Page and Pages 1 – 63 and Price List pages PL1 – PL3 inclusive of this tariff and Price List are effective as of the date shown. Original and revised pages, as named below, comprise all changes from the original tariff in effect on the date indicated.

<u>Page</u>	<u>Revision</u>
Title	Original
1	4 *
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\* New or Revised Page

Issued: December 6, 2011

Effective: December 29, 2011

Sandy Chandler  
Tariff Manager  
5055 North Point Pkwy, 2nd FL  
Alpharetta, Georgia 30022

ACCESS SERVICES

CHECK SHEETS

<u>Page</u>	<u>Revision</u>
22	Original
22.1	Original
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Issued: December 6, 2011

Effective: December 29, 2011

Sandy Chandler  
Tariff Manager  
5055 North Point Pkwy, 2nd FL  
Alpharetta, Georgia 30022

ACCESS SERVICES

CHECK SHEETS

<u>Page</u>	<u>Revision</u>
40.1	Original
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45	Original
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46.1	Original
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\* New or Revised Page

Issued: December 6, 2011

Effective: December 29, 2011

Sandy Chandler  
Tariff Manager  
5055 North Point Pkwy, 2nd FL  
Alpharetta, Georgia 30022

ACCESS SERVICES

2. REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3 Jurisdictional Reporting (Cont.)

2.3.3.4 Identification and Rating of VoIP-PSTN Traffic

2.3.3.4.1 Scope

2.3.3.4.1.1 VoIP-PSTN Traffic is defined as traffic exchanged between a Company end user and the customer in time division multiplexing ("TDM") format that originates and/or terminates in Internet protocol ("IP") format. This section governs the identification of VoIP-PSTN Traffic that is required to be compensated at interstate access rates (unless the parties have agreed otherwise) by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (Nov. 18, 2011) ("FCC Order"). Specifically, this section establishes the method of separating such traffic (referred to in this tariff as "Relevant VoIP-PSTN Traffic") from the customer's traditional intrastate access traffic, so that such Relevant VoIP-PSTN Traffic can be billed in accordance with the FCC Order.

2.3.3.4.1.2 This section will be applied to the billing of switched access charges to a customer that is a local exchange carrier only to the extent that the customer has also implemented billing of interstate access charges for Relevant VoIP-PSTN Traffic in accordance with the FCC Order.

2.3.3.4.2 Rating of VoIP-PSTN Traffic

The Relevant VoIP-PSTN Traffic identified in accordance with this tariff section will be billed at rates equal to the Company's applicable tariffed interstate switched access rates in MCImetro Access Transmission Services LLC Tariff FCC No. 1.

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ACCESS SERVICES

2. REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3 Jurisdictional Reporting (Cont.)

2.3.3.4 Identification and Rating of VoIP-PSTN Traffic (Cont.)

2.3.3.4.3 Calculation and Application of Percent-VoIP-Usage Factor

The Company will determine the number of Relevant VoIP-PSTN Traffic minutes of use ("MOU") to which interstate rates will be applied under subsection 2.3.3.4.2, above, by applying a Percent VoIP Usage ("PVU") factor to the total intrastate access MOU exchanged between a Company end user and the customer. The PVU will be derived and applied as follows:

2.3.3.4.3.1 The customer will calculate and furnish to the Company a factor (the "PVU-C") representing the percentage of the total intrastate 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.

2.3.3.4.3.2 The Company will, likewise, calculate a factor (the "PVU-V") 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-V 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.

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ACCESS SERVICES

2. REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3 Jurisdictional Reporting (Cont.)

2.3.3.4 Identification and Rating of VoIP-PSTN Traffic (Cont.)

2.3.3.4.3 Calculation and Application of Percent-VoIP-Usage Factor (Cont.)

2.3.3.4.3.3 The Company will use the PVU-C and PVU-V factors to calculate a PVU factor that represents the percentage of total intrastate access MOU exchanged between a Company end user 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-V factor times (1.0 minus the PVU-C factor).

2.3.3.4.3.4 The Company will apply the PVU factor to the total intrastate access MOU exchanged with the customer to determine the number of Relevant VoIP-PSTN Traffic MOUs.

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

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

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

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ACCESS SERVICES

2. REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3 Jurisdictional Reporting (Cont.)

2.3.3.4 Identification and Rating of VoIP-PSTN Traffic (Cont.)

2.3.3.4.3 Calculation and Application of Percent-VoIP-Usage Factor (Cont.)

2.3.3.4.3.5 If the customer does not furnish the Company with a PVU-C pursuant to the preceding paragraph 1, the Company will utilize a PVU equal to the PVU-V.

2.3.3.4.4 Initial PVU Factor

If the PVU factor is not available and/or cannot be implemented in the Company's billing systems by December 29, 2011, once the factor is available and can be implemented the Company will adjust the customer's bills to reflect the PVU retroactively to December 29, 2011. In calculating the initial PVU, the Company will take the customer-specified PVU-C into account retroactively to December 29, 2011, *provided that* the customer provides the factor to the Company no later than April 15, 2012; otherwise, it will set the initial PVU equal to the PVU-V, as specified in subsection 2.3.3.4.3.5, above.

2.3.3.4.5 PVU Factor Updates

The customer may update the PVU-C factor quarterly using the method set forth in subsection 2.3.3.4.3.1, above. If the customer chooses to submit such updates, it shall forward to the Company, no later than 15 days after the first day of January, April, July and/or October of each year, a revised PVU-C factor based on data for the prior three months, ending the last day of December, March, June and September, respectively. The Company will use the revised PVU-C to calculate a revised PVU. The revised PVU factor will apply prospectively and serve as the basis for billing until superseded by a new PVU.

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ACCESS SERVICES

2. REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3 Jurisdictional Reporting (Cont.)

2.3.3.4 Identification and Rating of VoIP-PSTN Traffic (Cont.)

2.3.3.4.6 PVU Factor Verification

Not more than twice in any year, the Company may ask the customer to verify the PVU-C factor furnished to the Company and customer may ask the Company to verify the PVU-V factor and the calculation of the PVU factor. The party so requested shall comply, and shall reasonably provide the records and other information used to determine the respective PVU-C and PVU-V factors.

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