



525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

August 1, 2017

Filing Center
Oregon Public Utility Commission
201 High Street SE
Salem, OR 97301-3612

**RE: Advice No.128, Asotin Telephone Company; PUC Or. No. 3
Identification and Rating of Toll VoIP-PSTN Traffic - Originating**

To Whom It May Concern:

Included in this submission are the following tariff pages for Asotin Telephone Company:

Section 2

Third Revised Sheet 28

The purpose of this filing is to add language to indicate that the Company's aggregate intrastate originating switched access rates are lower than their aggregate interstate originating switched access rates. All intrastate originating Toll VoIP-PSTN traffic will be billed at intrastate originating switched access rates. Per the FCC's Second Order of Reconsideration [FCC 12-47 released April 25, 2012], originating intrastate Toll VoIP-PSTN traffic will be billed at interstate rates unless the overall originating intrastate rates are lower than the company's overall originating interstate rates.

The proposed effective date is September 1, 2017.

If you have any questions, please contact me at (608) 664-4169.

Sincerely,

A handwritten signature in black ink that reads "Rachelle A. Ladwig". The signature is written in a cursive, flowing style.

Rachelle A. Ladwig
Senior Administrator-Tariffs
rachelle.ladwig@tdstelecom.com

Enclosures

ACCESS SERVICES

2. **GENERAL REGULATIONS** (Continued)

2.3 Obligations of the Customer (Continued)

2.3.10 Identification and Rating of VoIP-PSTN Traffic

(A) Scope

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 F.C.C. in its Report and Order in WC Dockets Nos. 10-90, etc., F.C.C. Release No. 11-161 (November 18, 2011) (F.C.C. Order) and the FCC's Second Order of Reconsideration (12-47) released April 25, 2012. Specifically, this section establishes the method of separating VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that such VoIP-PSTN Traffic can be billed in accordance with the F.C.C. Order.

(B) Rating of Toll VoIP-PSTN Traffic

(1) Terminating

In the absence of an interconnection agreement between the Telephone Company and the customer specifying the treatment of VoIP-PSTN Traffic, VoIP-PSTN Traffic-Terminating identified in accordance with this tariff section will be billed at rates equal to the Telephone Company's applicable tariffed interstate terminating switched access rates as set forth in the John Staurulakis, Inc. (JSI) Tariff F.C.C. No. 1.

(2) Originating

The Company's aggregate intrastate originating switched access rates are lower than their aggregate interstate originating switched access rates. All intrastate originating traffic will be billed at intrastate originating switched access rates.

(C) Calculation and Application of Percent-VoIP-Usage Factor

(1) The Telephone Company will determine the number of terminating intrastate Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied under (A), preceding, by applying a terminating PVU factor to the total intrastate access MOU terminated by a Customer to the Telephone Company's end user.

(2) The Telephone Company will determine the portion of dedicated facilities to which interstate rates will be applied under (A), preceding, by applying a PVU factor for dedicated switched access facilities to the dedicated facilities between the Telephone Company and the Customer.

(3) The Telephone Company will determine the number of originating intrastate Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied under (2), preceding, by applying an originating Percent VoIP Usage (PVU) factor to the total intrastate access MOU originated by a Telephone Company end user and delivered to the customer.

(4) The Customer will calculate and furnish to the Telephone Company a terminating PVUC factor (along with the supporting documentation as specified in (C)(10) below) representing the whole number percentage of the Customer's total terminating intrastate access MOU that the Customer sent to Telephone Company and which originated in IP format and that would be billed by the Telephone Company as intrastate terminating access MOU.

(T)
|
(T)
(N)
|
(N)

ACCESS SERVICES

TARIFFS FILED NOT APPROVED

2. GENERAL REGULATIONS (Continued)

2.3 Obligations of the Customer (Continued)

2.3.10 Identification and Rating of VoIP-PSTN Traffic

(A) Scope

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 F.C.C. in its Report and Order in WC Dockets Nos. 10-90, etc., F.C.C. Release No. 11-161 (November 18, 2011) (F.C.C. Order) and the FCC's Second Order of Reconsideration (12-47) released April 25, 2012. Specifically, this section establishes the method of separating VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that such VoIP-PSTN Traffic can be billed in accordance with the F.C.C. Order.

(B) Rating of Toll VoIP-PSTN Traffic - Terminating

(1) In the absence of an interconnection agreement between the Telephone Company and the customer specifying the treatment of VoIP-PSTN Traffic, VoIP-PSTN Traffic identified in accordance with this tariff section will be billed at rates equal to the Telephone Company's applicable tariffed interstate switched access rates as set forth in the John Staurulakis, Inc. (JSI) Tariff F.C.C. No. 1.

(C) Calculation and Application of Percent-VoIP-Usage Factor

- (1) The Telephone Company will determine the number of terminating intrastate Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied under (A), preceding, by applying a terminating PVU factor to the total intrastate access MOU terminated by a Customer to the Telephone Company's end user.
- (2) The Telephone Company will determine the portion of dedicated facilities to which interstate rates will be applied under (A), preceding, by applying a PVU factor for dedicated switched access facilities to the dedicated facilities between the Telephone Company and the Customer.
- (3) The Telephone Company will determine the number of originating intrastate Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied under (2), preceding, by applying an originating Percent VoIP Usage (PVU) factor to the total intrastate access MOU originated by a Telephone Company end user and delivered to the customer.
- (4) The Customer will calculate and furnish to the Telephone Company a terminating PVUC factor (along with the supporting documentation as specified in (C)(10) below) representing the whole number percentage of the Customer's total terminating intrastate access MOU that the Customer sent to Telephone Company and which originated in IP format and that would be billed by the Telephone Company as intrastate terminating access MOU.

Add lang

→(2)

-Originating

(T)
|
(T) (T)
(N)
|
(N)