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April 3, 2012

Ms. Reneé J. Jenkins  
Director of Administration  
Secretary of the Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

RE: PUCO Case # 12-0930-TP-ATA

Dear Ms. Jenkins:

Please accept the attached revised Exhibit B filed on behalf of New Knoxville Telephone Company in the above referenced case at the request of staff.

Thank you for your assistance. If you have any questions, I may be reached at 770-649-1886.

Sincerely,

A handwritten signature in black ink that reads 'Eileen M Bodamer'. The signature is written in a cursive, flowing style.

Eileen M Bodamer  
Consultant to New Knoxville Telephone Company

Enclosures

INTRASTATE ACCESS SERVICES TARIFF  
P.U.C.O TARIFF NO. 1

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REGULATIONS, RATES AND CHARGES (Cont'd)

Intrastate Carrier Common Line Access Service reference Tariff (Continued)

7. Rate Regulations (cont'd)

7.6 Identification and Rating of VoIP-PSTN Traffic

(N)

(A) Scope

VoIP-PSTN Traffic is defined as traffic exchanged between a Telephone 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, per the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (November 18, 2011)("FCC Order"). Specifically this section establishes the method of separating VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that VoIP-PSTN Traffic can be billed in accordance with the FCC Order.

- (B) 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 rate as specified in National Exchange Carrier Tariff F.C.C. No. 5, Section 17.

(C) Calculation and Application of Percent-Toll VoIP-Usage Factors

Telephone Company will determine the number of Toll VoIP-PSTN Traffic minutes of use ("MOU") to which interstate rates will be applied under (B) preceding, by applying the Percent VoIP Usage ("PVU") factor to the total intrastate access MOU originated by the Customer's end-user in IP format and delivered to the Telephone Company; and by applying the PVU factor to the total intrastate access MOU originated by the Customer's end-user and terminated by the Telephone Company in IP format.

(N)

INTRASTATE ACCESS SERVICES TARIFF  
P.U.C.O TARIFF NO. 1

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REGULATIONS, RATES AND CHARGES (Cont'd)

Intrastate Carrier Common Line Access Service reference Tariff (Continued)

7. Rate Regulations (cont'd)

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

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

- (1) The Telephone Company will calculate and make available to the Customer the Percentage VoIP Usage – Telephone Company (PVU-T) factor representing the whole number percentage of the Telephone Company's total intrastate access MOU that the Customer exchanges with the Telephone Company in the state that terminated in IP format and that would be billed by the Telephone Company as intrastate access MOU.
- (2) The Customer will calculate and furnish to the Telephone Company a Percentage VoIP Usage-Customer factor representing the whole number percentage of the customer's total intrastate access MOU that the Customer exchanges with the Telephone Company in the state that is sent to the Telephone Company and which originated in IP format and that would be billed by the Telephone Company as intrastate access MOU.
- (3) The Telephone Company will use the PVU-T and the PVU-C factors to calculate a PVU that represents the percentage of the total intrastate access MOU exchanged between the Telephone Company and the Customer that is originated in IP format by the Customer and/or terminated by the Telephone Company in IP format. The PVU factor will be calculated as the sum of: (A) the PVU-C factor and (B) the PVU-T factor times (1.0 minus the PVU-C factor).
- (4) The customer shall not modify their reported PIU factor to account for VoIP PSTN traffic.
- (5) Both the PVU-T and the 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 which will be provided to Telephone Company upon request.
- (6) The customer shall retain the call detail, work papers and information used to develop the PVU-C factor for a minimum of one year.
- (7) If the customer does not furnish the Telephone Company with a PVU-C factor, the Telephone Company will utilize a PVU-C of 0% and the PVU equal to the Telephone Company's PVU-T.

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ISSUED: March 14, 2012

EFFECTIVE: April 14, 2012

Issued under authority of the Public Utilities Commission of Ohio, in Case No. 12-0930TP-ATA

Preston Meyer, General Manager  
New Knoxville, OH 45871

INTRASTATE ACCESS SERVICES TARIFF  
P.U.C.O TARIFF NO. 1

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REGULATIONS, RATES AND CHARGES (Cont'd)

Intrastate Carrier Common Line Access Service reference Tariff (Continued)

7. Rate Regulations (cont'd)

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

(D) Initial Implementation of PVU Factors

- (1) If the PVU factors cannot be implemented in the Telephone Company's billing systems by December 29, 2011, once the factors is available can be implemented, the Telephone Company will adjust the customer's bills to reflect the PVU factor retroactively to December 29, 2011, if the PVU factor is provided by the customer to the Telephone Company within 30 days of the approval of this tariff.
- (2) The Telephone Company will provide credits based on the reported PVU factor on a quarterly basis until such time as the billing system modifications can be implemented.

(E) PVU Factor Updates

The customer may update the PVU factors quarterly using the method set forth in (C)(1) and (2) preceding. If the customer chooses to submit such updates, it shall forward to the Telephone Company, no later than 15 days after the first of January, April, July and/or October of each year, revised PV-CU factor based on data for the prior three months, ending the last day of December, March, June and September, respectively. The revised PVU-C factor will serve as the basis for future billing and will be effective on the next bill date, and shall serve as the basis for subsequent monthly billing until superseded by a new PVU-C factor. No prorating or backbilling will be done based on the updated PVU-C factor.

(F) PVU Factor Verification

- (1) The Telephone Company or the Customer (Requesting Party) may ask the other Party to verify the PVU factor furnished to the other party. The other party shall comply, and shall reasonably provide the records and other information used to determine the PVU factor within fifteen (15) days of the Requesting Party's request.

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REGULATIONS, RATES AND CHARGES (Cont'd)

Intrastate Carrier Common Line Access Service reference Tariff (Continued)

7. Rate Regulations (cont'd)

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

(F) PVU Factor Verification (Cont'd)

- (2) The customer-provided PVU-C and supporting documentation for the factor shall be based on information that is verifiable by the Telephone Company, including but not limited to 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.
- (3) The Telephone Company may revise the customer's PVU-C or the Customer may dispute the Telephone Company's PVU-T factor based upon:
  - (a) A review of the requested data and information provided by the customer.
  - (b) A reasonable review of other market information, FCC reports on VoIP lines, such as FCC Form 477 or state level results based on FCC Local Competition Reports or other relevant data.
  - (c) Failure to provide information requested pursuant to subsection (F)(1) of this Section.
- (4) The Telephone Company will notify the customer within fifteen (15) days of the PVU revised under F(3) of this Section.
- (5) No more than twice a year, either the Telephone Company or the Customer may requests an Audit pursuant to terms and conditions contained in the National Exchange Carrier Association Tariff FCC No. 5, Section 2.3.11.

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## **EXHIBIT C**

The Applicant proposes to modify its Intrastate Access Service Tariff to add VoIP-PSTN provisions in accordance with the Federal Communications Commission's Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 10-90, et al., FCC No. 11-161 (Released Nov. 18, 2011) with respect to intercarrier compensation.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/3/2012 11:40:52 AM**

**in**

**Case No(s). 12-0930-TP-ATA**

Summary: Tariff Revised tariff filing electronically filed by Ms. Eileen M Bodamer on behalf of  
The New Knoxville Telephone Company