



**Via E-FILE**

July 10, 2012

Ms. Betty McCauley, Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street, 13th Floor  
Columbus, OH 43215-3794

Re: CenturyTel Solutions, LLC d/b/a CenturyLink Solutions Access Tariff P.U.C.O. Tariff No. 2  
Case No. 12-1809-TP-ATA  
Case No. 90-9330-TP-TRF

Dear Ms. McCauley:

Enclosed for filing is CenturyTel Solutions, LLC d/b/a CenturyLink Solutions' filing of revised tariff pages per Staff's request. All pages in Exhibit B are included for ease of administration. The following pages were revised.

Section 2

First Revised Page 16.1

Original Page 16.1.1

First Revised Page 16.3

If you have any questions regarding this filing, please call me or Gary Baki at (614) 220-8629.

Sincerely,

/s/ Debra A. Levy

Debra A. Levy

Enclosures

cc: Gary Baki  
Ann Prockish  
Vicki Norris

2012-39V OH-CTS

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# EXHIBIT B

EXPLANATION OF SYMBOLS, REFERENCE MARKS AND  
ABBREVIATIONS OF TECHNICAL TERM USED IN THIS TARIFF

(T)

The following symbols shall be used in this tariff for the purpose indicated below:

C	To signify changed regulation or rate structure.
D	To signify discontinued material.
I	To signify an increased rate.
N	To signify a new rate or regulation
R	To signify a reduced rate.

The following abbreviations shall be used in this tariff in place of the definition indicated below:

Hz	-	Hertz
Kbps	-	Kilobits Per Second
LATA	-	Local Access and Transport Area
NPA	-	Numbering Plan Area
NXX	-	Three-Digit Central Office prefix
PBX	-	Private Branch Exchange
POT	-	Point of Termination
PSTN	-	Public Switched Telephone Network
PVU	-	Percent VoIP Usage
PVU-C	-	Percent VoIP Usage-Customer
PVU-T	-	Percent VoIP Usage-Telephone Company
SWC	-	Service Wire Center
VoIP	-	Voice over Internet Protocol

(N)

(N)

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in Case No. 90-9330-TP-TRF  
Case No. 12-1809-TP-ATA  
Todd Schafer, Region President  
CenturyLink Solutions  
Wake Forest, North Carolina

## SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic(A) Scope

Toll 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 and compensation of Toll VoIP-PSTN Traffic that is required to be compensated at 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 (November 18, 2011)("FCC Order"). Specifically this section establishes the method of separating Toll VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that Toll VoIP-PSTN Traffic can be billed in accordance with the FCC Order. This section of the tariff does not preclude customers from negotiating different rates, terms and conditions governing compensation for Toll VoIP-PSTN traffic. This tariff does not supersede rates, terms and conditions governing compensation for Toll VoIP-PSTN traffic in existing interconnection agreements. Rates, terms and conditions governing compensation for Toll VoIP-PSTN traffic in this tariff apply prospectively.

(C)  
(D)

The FCC released its Second Order of Reconsideration in WC Docket No. 10-90, etc., FCC Release No. 12-47 (April 25, 2012) which temporarily modified the compensation of originating Toll VoIP-PSTN Traffic on a prospective basis. Upon receipt, validation and acceptance of the Percent VoIP Usage factor, originating Toll VoIP-PSTN Traffic will be compensated as follows:

(N)

- Between the Initial Implementation date described in 2.3.4(D)(1), and July 12, 2012, the applicable rate elements used in providing originating access for Toll VoIP-PSTN Traffic and associated facilities will be billed according to interstate access rates.
- Effective July 13, 2012 thru June 30, 2013 the applicable rate elements used in providing originating access for intrastate Toll VoIP-PSTN Traffic and associated facilities will be billed according to intrastate access rates.
- Effective July 1, 2014 the applicable rate elements used in providing originating access for intrastate Toll VoIP-PSTN Traffic and associated facilities will be billed according to interstate access rates.
- After the Initial Implementation date described in 2.3.4(D)(1), terminating intrastate Toll VoIP-PSTN Traffic and associated facilities will be billed according to interstate access rates.

(N)

(M)

(M) Material moved to Original Page 16.1.1 of this section.

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## SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)

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|-----|--|------|-----|
| (B) | Toll VoIP-PSTN Traffic and associated facilities 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 CenturyTel Solutions, LLC F.C.C. No. 1, Section 5 when applicable based on the schedule shown above.   | (M)  | (C) |
| (C) | <u>Calculation and Application of Percent VoIP Usage Factors</u>   |      | (C) |
| (1) | The 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 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 and by applying a terminating PVU factor to the total intrastate access MOU terminated by a customer to the Telephone Company's end user.   | (M)  | (T) |
| (2) | The customer will calculate and furnish to the Telephone Company an originating Percent VoIP Usage-Customer ("PVU-C") factor representing the whole number percentage of the customer's total originating intrastate access MOU that the customer exchanges with the Telephone Company in the state that is received from the Telephone Company and that is terminated in IP format and that would be billed by the Telephone Company as intrastate access MOU. At such time that the Telephone Company offers VoIP service, the Telephone Company originating Percent VoIP Usage-Telephone Company ("PVU-T") factor will be calculated in the same manner as set forth above for customers. | (M1) | (T) |
| (3) | The customer will calculate and furnish to the Telephone Company a terminating PVU-C factor representing the whole number percentage of the customer's total terminating 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. At such time that the Telephone Company offers VoIP service, the Telephone Company terminating PVU-T factor will be calculated in the same manner as set forth above for customers.   | (M1) | (T) |

(M) Material moved from Original Page 16.1 of this section.

(M1) Material moved from Original Page 16.2 of this section.

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## SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)(C) Calculation and Application of Percent VoIP Usage Factors (cont'd) (T)

- (M) (T)
- (4) The Telephone Company will use the originating PVU-C and PVU-T factors to calculate an originating PVU factor that represents the percentage of total intrastate access MOU exchanged between the Telephone Company and the customer that is originated in IP format, whether at Telephone Company's end or at the customer's end. The originating PVU factor will be calculated as the sum of: (A) the originating PVU-C factor and (B) the originating PVU-T factor times (1.0 minus the originating PVU-C factor). (T)
- (5) The Telephone Company will use the terminating PVU-C and terminating PVU-T factors to calculate a terminating PVU factor that represents the percentage of total intrastate access MOU exchanged between a Telephone Company and the customer that is terminated in IP format, whether at Company's end or at the customer's end. The terminating PVU factor will be calculated as the sum of: (A) the terminating PVU-C factor and (B) the terminating PVU-T factor times (1.0 minus the terminating PVU-C factor). (M1) (T)
- (6) The Telephone Company will apply the originating and terminating PVU factors to the intrastate access MOU exchanged with the customer to determine the number of Toll VoIP-PSTN MOU. (T)

Example 1: The PVU calculation is applied to the customer's originating and terminating intrastate MOU.

$$PVU = PVU-C + (PVU-T \times (1 - PVU-C))$$

The customer reported that their originating PVU-C as 15%. The Telephone Company's originating PVU-T is 6%. This results in the following:

$$PVU = 15\% \text{ plus } (6\% \text{ times } (1 - 15\%)) = 20\%$$

This means that 20% of the originating Intrastate MOU exchanged between the customer and the Telephone Company will be rated at Interstate rates. (M1)

(M) Material moved to 1st Revised Page 16.1 of this section.

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## SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)

- |      |  |      |            |
|------|--|------|------------|
| (C)  | <u>Calculation and Application of Percent VoIP Usage Factors</u> (cont'd)  | (M)  | (T)        |
| (7)  | The customer will calculate and furnish to the Telephone Company a Facility PVU factor representing the whole number percentage of the customer's total monthly recurring dedicated switched transport charges that are associated with the intrastate access MOU included in the PVU factor.  | (N)  | (N)        |
| (8)  | The Telephone Company will use state average data and the customer provided Facility PVU to determine the monthly recurring credit for terminating Toll VoIP-PSTN Traffic.   | (N)  | (N)        |
| (9)  | The customer shall not modify their reported PIU factor to account for Toll VoIP-PSTN traffic.   | (T)  | (T)        |
| (10) | The customer provided originating PVU-C, the terminating PVU-C and the Facility PVU 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. | (M1) | (C)<br>(C) |
| (11) | The customer shall retain the call detail, work papers and information used to develop the PVU-C factors for a minimum of one year.  | (T)  | (T)        |
| (12) | If the customer does not furnish the Telephone Company with a PVU-C factor, the Telephone Company will utilize a PVU equal to the Telephone Company's originating and/or terminating PVU-T.  | (M1) | (T)        |

(M) Material moved to 1st Revised Page 16.2 of this section.

(M1) Material moved from Original Page 16.4 of this section.

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SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)

2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)

(M)

(M)

(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 can be implemented, the Telephone Company will adjust the customer's bills to reflect the PVU factors prospectively in the next bill period, if the PVU-C factors are provided by the customer to the Telephone Company prior to April 15, 2012.
- (2) The Telephone Company shall provide credits based on the reported PVU-C factors on a quarterly basis until such time as the billing system modifications can be implemented.

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## SECTION 2 – REGULATIONS (Cont'd)

2.3 Obligations of the Customer (cont'd)2.3.4 Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)(F) PVU-C Factor Verification (Cont'd)

- (2) The Telephone Company may dispute the customer's PVU-C factor based upon:
  - (a) A review of the requested data and information provided by the customer, or customer's refusal to provide the data and information to support the PVU factors. (C)
  - (b) The Telephone Company's 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 Report or other relevant data. (C)
  - (c) A change in the reported PVU-C factor by more than five percentage points from the preceding quarter.
- (3) If after review of the data and information, the customer and the Telephone Company establishes revised PVU-C factors, the customer and the Telephone Company will begin using those revised PVU-C factors with the next bill period.
- (4) If the dispute is unresolved, the Telephone Company may initiate an audit. The Telephone Company shall limit audits of the customer's PVU-C factor to no more than twice per year. The customer may request that the audit be conducted by an independent auditor. In such cases, the associated auditing expenses will be paid by the customer.
  - (a) In the event that the customer fails to provide adequate records to enable the Telephone Company or an independent auditor to conduct an audit verifying the customer's PVU-C factors, the Telephone Company will bill the usage and associated facilities for all contested periods using the most recent undisputed PVU-C factors reported by the customer. If no undisputed PVU factors exist, then PVU factors of zero percent will be used for all contested periods. These PVU-C factors will remain in effect until the audit can be completed (C)

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Summary: Tariff CenturyTel Solutions, LLC d/b/a CenturyLink Solutions' filing of revised tariff pages per Staff's request. electronically filed by Ms. Debra A Levy on behalf of CenturyTel Solutions, LLC d/b/a CenturyLink Solutions