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Via E-File

October 2, 2012

Ms. Renee J. Jenkins  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

RE: Trans National Communications International, Inc.  
Case No. 12-2433-TP-ATA - Response to Staff Data Request

Dear Ms. Jenkins:

Attached for filing with the Public Utilities Commission of Ohio ("Commission") in the above-referenced matter are revised Sheet Nos. 44.1 through 44.4 for incorporation into Trans National Communications International, Inc.'s ("TNCII") carrier-to-carrier switched exchange access tariff, P.U.C.O. Tariff No. 4.

With this filing, TNCII incorporates revisions requested by the Commission in its September 24, 2012 Staff Data Request.

Thank you for your attention to this matter. Questions concerning this filing may be directed to met at 650.676.8767.

Sincerely,

For MILLER ISAR, INC.

Gina M. Guiley

Regulatory Consultants to  
Trans National Communications International, Inc.

Attachments

**SERVICE DESCRIPTIONS, Continued****3.2 VOICE OVER INTERNET PROTOCOL – PUBLIC SWITCHED TELEPHONE NETWORK (“VOIP – PSTN”) TRAFFIC**

A. This section governs the identification and treatment of Toll VoIP-PSTN Traffic that is required to be compensated at interstate access rates unless the parties have agreed otherwise in a written agreement. Specifically, this section establishes the method of separating such traffic (referred to in this tariff as “Relevant Toll VOIP-PSTN Traffic”) from a Customer’s traditional intrastate access Tariff, so that such Relevant Toll VOIP-PSTN traffic can be billed in accordance with the FCC Order.

- This section of the tariff does not preclude carriers from negotiating different rates, terms and conditions governing compensation for Toll VoIP-PSTN traffic.
- This tariff does not supersede rates, term and conditions governing compensation for Toll VoIP-PSTN traffic in existing interconnection agreements.

Company will bill and collect the full Access Reciprocal Compensation on traffic exchanged with Customers when such traffic originates and/or terminates in Internet Protocol format, as set forth in Section 51.913 of the Federal Communications Commission’s rules, 47 C.F.R. § 51.913, regardless of whether the Company itself delivers such traffic to the called party’s premises or delivers the call to the called party’s premises via contractual or other arrangements with an affiliated or unaffiliated provider of interconnected Voice over Internet Protocol service or a non-interconnected Voice over Internet Protocol service that does not itself seek to collect Access Reciprocal Compensation charges for this traffic.<sup>1</sup> Beginning October 5, 2012, through June 30, 2014, the applicable rate elements used in providing access for Toll VoIP-PSTN Traffic that originates on the Company’s network for termination to the Customer’s end users (originating traffic) will be billed at intrastate access rates.

<sup>1</sup> See, *In the Matter of Connect America Fund A National Broadband Plan for Our Future Establishing Just and Reasonable Rates for Local Exchange Carriers High-Cost Universal Service Support Developing an Unified Inter-carrier Compensation Regime Federal-State Joint Board on Universal Service Lifeline and Link-Up Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, Docket Nos. WC Docket No. 10-90, *et al.*, FCC 11-161, (Rel. November 18, 2011).

As Approved in Case No. 10-0051-TP-ACE

Issued: September 5, 2012

Effective: October 5, 2012

Issued By:

Manager - Regulatory  
Trans National Communications International, Inc.  
2 Charlesgate West  
Boston, Massachusetts 02215

(N)

(N)

**SERVICE DESCRIPTIONS, Continued****3.2 VOICE OVER INTERNET PROTOCOL – PUBLIC SWITCHED TELEPHONE NETWORK (“VOIP – PSTN”) TRAFFIC, Continued**

(N)

Intrastate VoIP – PSTN traffic is subject to the Company’s applicable interstate switched access rate per minute, as set forth in the Company’s F.C.C. Tariff No. 2.

**B. Calculations and Application of Percent-VoIP-PSTN Usage**

Company will determine the number of Relevant VoIP-PSTN Traffic minutes of use (“MOU”) to which interstate rates will be applied under subsection 3.2.A, 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.

1. The Customer will calculate and furnish to Company a factor (the “PVU-A”) representing the percentage of the total terminating intrastate access MOU that the Customer exchanges with Company in the State, that (a) is sent to Company and that originated in IP format; or (b) is received from Company and terminated in IP format. This PVU-A 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. Company will similarly calculate a factor (the “PVU-B”) representing the percentage of Company’s total terminating intrastate access MOU in the State that Company originates or terminates on its network in IP format. This PVU-B shall be based on information such as the number of 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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**SERVICE DESCRIPTIONS, Continued****3.2 VOICE OVER INTERNET PROTOCOL - PUBLIC SWITCHED TELEPHONE NETWORK (VOIP-PTSN), Continued**

(N)

**B. Calculations and Application of Percent-VoIP-PSTN Usage, Continued**

3. Company will use the PVU-A and PVU-B factors to calculate a PVU factor that represents the percentage of total terminating intrastate access MOU exchanged between a Company End User and the Customer that is originated or terminated in IP format, whether at 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-A factor and (B) the PVU-B factor times (1.0 minus the PVU-A factor).

4. Company will apply the PVU factor to the total terminating intrastate access MOU exchanged with the Customer to determine the number of Relevant VoIP-PSTN Traffic MOUs.

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

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

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

5. If the Customer does not furnish Company with a PVU factor, the Company will utilize a PVU-A factor of zero.

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**SERVICE DESCRIPTIONS, Continued****3.2 VOICE OVER INTERNET PROTOCOL – PUBLIC SWITCHED TELEPHONE NETWORK (“VOIP – PSTN”) TRAFFIC, Continued**

(N)

**C. Initial PVU-A Factor**

If the PVU-A factor is not available and/or cannot be implemented in Company's billing systems within 30 days of the approval of this Tariff, the Company will adjust the Customer's initial PVU-A to zero retroactively to January 1, 2012.

**D. PVU Factor Updates**

The Customer may update the PVU-A factor quarterly. The Customer shall submit such update no later than the 15th day of January, April, July, and October of each year. Revised PVU factors must be based on the data for the prior three months ending the last day of December, March, June, and September respectively. The Company will use the revised PVU-A factor to calculate a revised PVU. The revised PVU will be used for future billing and will be effective on the bill date of each month and will be used for subsequent monthly billing until superseded by a new PVU factor. No prorating or back billing will be done based on the updated PVU factors. The PVU factor will be billed beginning on January 1, 2012.

**E. PVU Factor Verification**

Not more than twice in any year, Company may ask the Customer to verify the PVU-A factor furnished to Company and a Customer may ask Company to verify the PVU-B 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-A and PVU-B factors.

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Summary: Response Response to Staff Data Request including amended tariff pages.  
electronically filed by Mr. Andrew O. Isar on behalf of TRANS NATIONAL COMMUNICATIONS  
INTERNATIONAL INC DBA TNCI TAX & REG SPECIALIST