



525 JUNCTION RD.  
Madison, WI 53717

March 26, 2012

By Electronic Filing

Ms. Betty McCauley  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

RE: Continental Telephone Company: TRF Docket No. 90-5016

Dear Ms. McCauley:

Continental Telephone Company submits a Notice of Tariff Filing for electronic filing. The TRF Number for Arcadia is 90-5016-TP-TRF.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Very truly yours,

/s/ Karen J. Fehrman  
TDS Telecom  
Manager – Tariffs  
Phone 608-664-4173  
Fax 608-830-5519  
Email [karen.fehrman@tdstelecom.com](mailto:karen.fehrman@tdstelecom.com)

Enclosure

**The Public Utilities Commission of Ohio**  
**TELECOMMUNICATIONS FILING FORM**

(Effective: 01/20/2011)

This form is intended to be used with most types of required filings. It provides check boxes with rule references for the most common types of filings. It does not replace or supersede Commission rules in any way.

In the Matter of the Application of Continental Telephone )  
Company to add provisions for Toll VoIP-PSTN Traffic )  
Pursuant to FCC Release No. 11-161 on 11/18/11 )

TRF Docket No. 90-5016-TP-TRF

Case No. 12 - 0952 - **TP** - ATA

NOTE: Unless you have reserved a Case #, leave the "Case No" fields BLANK.

Name of Registrant(s) Continental Telephone Company  
DBA(s) of Registrant(s) TDS Telecom  
Address of Registrant(s) 525 Junction Road, Madison, WI 53717  
Company Web Address www.tdstelecom.com  
Regulatory Contact Person(s) Karen Fehrman  
Regulatory Contact Person's Email Address Karen.fehrman@tdstelecom.com  
Contact Person for Annual Report Bruce Mottern  
Address (if different from above) 10025 Investment Drive, Suite 200, Knoxville, TN 37932  
Consumer Contact Information Bruce Mottern  
Address (if different from above) \_\_\_\_\_

Phone 608-664-4173 Fax 608-830-5519

Phone 865-671-4753

Phone 865-671-4753

Motion for protective order included with filing? ☐ Yes ☐ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☐ No [Note: Waivers may toll any automatic timeframe.]

**Notes:**

Section I and II are Pursuant to Chapter 4901:1-6 OAC.

Section III – Carrier to Carrier is Pursuant to 4901:1-7 OAC, and Wireless is Pursuant to 4901:1-6-24 OAC.

Section IV – Attestation.

(1) Indicate the Carrier Type and the reason for submitting this form by checking the boxes below.

(2) For requirements for various applications, see the identified section of Ohio Administrative Code Section 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the Commission may be obtained from the Commission's web site at [www.puco.ohio.gov](http://www.puco.ohio.gov) under the docketing information system section, by calling the docketing division at 614-466-4095, or by visiting the docketing division at the offices of the Commission.

(4) An Incumbent Local Exchange Carrier (ILEC) offering basic local exchange service (BLES) outside its traditional service area should choose CLEC designation when proposing to offer BLES outside its traditional service area or when proposing to make changes to that service.

**All Filings that result in a change to one or more tariff pages require, at a minimum, the following exhibits.**

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s)
B	The Tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

## Section I – Part I - Common Filings

<b>Carrier Type</b> <input type="checkbox"/> <b>Other</b> (explain below)	<input type="checkbox"/> <b>For Profit ILEC</b>	<input type="checkbox"/> <b>Not For Profit ILEC</b>	<input type="checkbox"/> <b>CLEC</b>
Change terms & conditions of existing BLES	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce non-recurring charge, surcharge, or fee to BLES			<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce or Increase Late Payment	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Revisions to BLES Cap.	<input type="checkbox"/> ZTA <u>1-6-14(F)</u> (0 day Notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	
Change BLES Rates	<input type="checkbox"/> TRF <u>1-6-14(F)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(F)(4)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(G)</u> (0 day Notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS <u>1-6-14</u> <u>(C)(1)(c)</u> (Auto 30 days)		
Change in boundary	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF <u>1-6-08(G)(0 day)</u>
BLES withdrawal			<input type="checkbox"/> ZTA <u>1-6-25(B)</u> (0 day Notice)
<b>Other*</b> (explain) _____			

## Section I – Part II – Customer Notification Offerings Pursuant to Chapter 4901:1-6-7 OAC

Type of Notice	Direct Mail	Bill Insert	Bill Notation	Electronic Mail
<input type="checkbox"/> 15-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> 30-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Date Notice Sent:</b>				

## Section I – Part III –IOS Offerings Pursuant to Chapter 4901:1-6-22 OAC

IOS	Introduce New	Tariff Change	Price Change	Withdraw
<input type="checkbox"/> IOS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section II – Part I – Carrier Certification - Pursuant to Chapter 4901:1-6-08, 09 & 10 OAC

Certification	ILEC (Out of Territory)	CLEC	Telecommunications Service Provider Not Offering Local	CESTC	CETC
* See Supplemental form	<input type="checkbox"/> ACE <u>1-6-08</u> * (Auto 30- day)	<input type="checkbox"/> ACE <u>1-6-08</u> *(Auto 30 day)	<input type="checkbox"/> ACE <u>1-6-08</u> *(Auto 30 day)	<input type="checkbox"/> ACE <u>1-6-10</u> (Auto 30 day)	<input type="checkbox"/> UNC <u>1-6-09</u> *(Non-Auto)

\*Supplemental Certification forms can be found on the Commission Web Page.

## Section II – Part II – Certificate Status & Procedural

Certificate Status	ILEC	CLEC	Telecommunications Service Provider Not Offering Local
Abandon all Services		<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)	<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Merger *	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)

\* Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR and CIO applications see the 4901:1-6-29 Filing Requirements on the Commission's Web Page for a complete list of exhibits.

## Section III – Carrier to Carrier (Pursuant to 4901:1-7), and Wireless (Pursuant to 4901:1-6-24)

Carrier to Carrier	ILEC	CLEC
Interconnection agreement, or amendment to an approved agreement	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)
Introduce or change c-t-c service tariffs,	<input checked="" type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 day)	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 day)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <u>1-7-04 or 05</u> (Non-Auto)	
Changes in rates, terms & conditions to Pole Attachment, Conduit Occupancy and Rights- of-Way.	<input type="checkbox"/> UNC <u>1-7-23(B)</u> (Non-Auto)	
<b>Wireless Providers</b> See <u>4901:1-6-24</u>	<input type="checkbox"/> RCC [Registration & Change in Operations]	<input type="checkbox"/> NAG [Interconnection Agreement or

**Section IV. – Attestation**

**Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.**

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**AFFIDAVIT**  
***Compliance with Commission Rules***

I am an officer/agent of the applicant corporation, Continental Telephone Company, and am authorized to make this statement on its behalf.  
(Name)

Please Check ALL that apply:

☒ I attest that these tariffs comply with all applicable rules for the state of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

☐ I attest that customer notices accompanying this filing form were sent to affected customers, as specified in Section II, in accordance with Rule 4901:1-6-7, Ohio Administrative Code.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on (Date) 03/26/12 at (Location) Madison, Wisconsin

\*(Signature and Title) /s/ Karen Fehrman,  
Manager Regulatory Compliance & Tariffs

(Date) March 26,  
2012

- *This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

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**VERIFICATION**

I, Karen Fehrman verify that I have utilized the Telecommunications Filing Form for most proceedings provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

\*(Signature and Title) /s/Karen Fehrman, Manager-Regulatory Compliance & Tariffs

(Date) March 26, 2012

*\*Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

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***Send your completed Application Form, including all required attachments as well as the required number of copies, to:***

**Public Utilities Commission of Ohio**  
**Attention: Docketing Division**  
**180 East Broad Street, Columbus, OH 43215-3793**  
**Or**

***Make such filing electronically as directed in Case No 06-900-AU-WVR***

**EXHIBIT A**  
**EXISTING SCHEDULE SHEETS**

P.U.C.O. NO. 1

**INTRASTATE  
ACCESS SERVICE TARIFF**

**APPROVED**  
**ALLIANCE**

<u>SECTION</u>	<u>REVISION</u>	<u>SHEET</u>
Intrastate Access Service	Original	Title Sheet
Intrastate Access Service	Third Revised	1
Intrastate Access Service	Third Revised*	2
Intrastate Access Service	First Revised	3
Intrastate Access Service	Original	3.1
Intrastate Access Service	Original	4
Intrastate Access Service	Original	5
Intrastate Access Service	Original	6
Intrastate Access Service	Third Revised*	7
Intrastate Access Service	First Revised	8
Intrastate Access Service	First Revised	9
Intrastate Access Service	Original	10
Intrastate Access Service	Original	11
Intrastate Access Service	Original	12
Intrastate Access Service	Original	13
Intrastate Access Service	Original	14
Intrastate Access Service	Original	15
Intrastate Access Service	Original	16
Intrastate Access Service	Original	17
Intrastate Access Service	Original	18
Intrastate Access Service	Original	19
Intrastate Access Service	Original	20
Intrastate Access Service	Original	21

NOTE: Future revisions to these original tariff pages shall include an updated Check Sheet. Such Check Sheet shall include an (\*) beside the applicable page number and the caption "Revision".

ISSUED: September 19, 2005

EFFECTIVE: November 4, 2005

IN ACCORDANCE WITH CASE NO. 05-1150-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: PAUL E. PEDERSON, VICE PRESIDENT  
CONTINENTAL, OHIO

P.U.C.O. NO. 1

INTRASTATE  
ACCESS SERVICE TARIFF

APPROVED

REGULATIONS, RATES AND CHARGES

The Continental Telephone Company hereby adopts for Intrastate Access Service the Tariffs filed with the Federal Communications Commission by the National Exchange Carrier Association set forth below as they now exist and as they may be subsequently modified. The effectiveness of Section 4, End User Charges, as applied to intrastate customers, has been suspended by the Public Utilities Commission of Ohio.

(T)

(T)

(T)

Tariff F.C.C. No. 5

Section 1	Application of Tariff	
Section 2	General Regulations	
Section 3	Not adopted.	(T)
Section 4	End User Charges (not adopted)	
Section 5	Ordering Options for Switched and Special Access Service	
Section 6	Switched Access Service	
	Except that local switched access rates applied to the intrastate jurisdiction shall remain at the levels existing on December 31, 1997.	
Section 7	Special Access Service	

ISSUED: October 9, 2003

EFFECTIVE: November 21, 2003

IN ACCORDANCE WITH CASE NO. 03-2054-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: PAUL E. PEDERSON, VICE PRESIDENT  
CONTINENTAL, OHIO



**EXHIBIT B**  
**PROPOSED SCHEDULE SHEETS**

P.U.C.O. NO. 1

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**INTRASTATE  
ACCESS SERVICE TARIFF**

<u>SECTION</u>	<u>REVISION</u>	<u>SHEET</u>
Intrastate Access Service	Original	Title Sheet
Intrastate Access Service	Fourth Revised*	1
Intrastate Access Service	Third Revised	2
Intrastate Access Service	First Revised	3
Intrastate Access Service	Original	3.1
Intrastate Access Service	Original	4
Intrastate Access Service	Original	5
Intrastate Access Service	Original	6
Intrastate Access Service	Third Revised	7
Intrastate Access Service	First Revised	8
Intrastate Access Service	First Revised	9
Intrastate Access Service	Original	10
Intrastate Access Service	Original	11
Intrastate Access Service	Original	12
Intrastate Access Service	Original	13
Intrastate Access Service	Original	14
Intrastate Access Service	Original	15
Intrastate Access Service	Original	16
Intrastate Access Service	Original	17
Intrastate Access Service	Original	18
Intrastate Access Service	Original	19
Intrastate Access Service	Original	20
Intrastate Access Service	Original	21
Intrastate Access Service	Original*	22
Intrastate Access Service	Original*	23
Intrastate Access Service	Original*	24
Intrastate Access Service	Original*	25
Intrastate Access Service	Original*	26
Intrastate Access Service	Original*	27
Intrastate Access Service	Original*	28
Intrastate Access Service	Original*	29

NOTE: Future revisions to these original tariff pages shall include an updated Check Sheet. Such Check Sheet shall include an (\*) beside the applicable page number and the caption "Revision".

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ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

P.U.C.O. NO. 1

INTRASTATE  
ACCESS SERVICE TARIFF

REGULATIONS, RATES AND CHARGES

The Continental Telephone Company hereby adopts for Intrastate Access Service the Tariffs filed with the Federal Communications Commission by the National Exchange Carrier Association set forth below as they now exist and as they may be subsequently modified. The effectiveness of Section 4, End User Charges, as applied to intrastate customers, has been suspended by the Public Utilities Commission of Ohio.

Tariff F.C.C. No. 5

Section 1	Application of Tariff	
Section 2	General Regulations	
	a) Except Intrastate Toll 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 specified in the Telephone Company's applicable federal access tariff.	(N)
	b) Except: Definitions related to Toll VoIP PSTN Traffic as specified in this section.	(N)
Section 3	Not adopted.	
Section 4	End User Charges (not adopted)	
Section 5	Ordering Options for Switched and Special Access Service	
Section 6	Switched Access Service	
	a) Except: Call Signaling related to Toll VoIP-PSTN Traffic as noted in this section.	(N)
	b) Except that local switched access rates applied to the intrastate jurisdiction shall remain at the levels existing on December 31, 1997.	(N) (T)
Section 7	Special Access Service	

ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

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

---

IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC

(N)

(1) Scope

This section governs the identification of Toll VoIP-PSTN Traffic that is required to be compensated at interstate access rates (unless the parties have agreed otherwise) as mandated by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 on 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 such traffic can be billed in accordance with the FCC Order.

(2) Rate of Toll VoIP-PSTN Traffic

The Toll 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 specified in the Telephone Company's applicable federal access tariff.

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

- (a) 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 (2), preceding, by applying a terminating PVU factor to the total intrastate access MOU terminated by a customer to the Telephone Company's end user.
- (b) The Telephone Company will determine the portion of dedicated facilities to which interstate rates will be applied under (2), preceding, by applying a PVU factor for dedicated switched access facilities to the dedicated facilities between the Telephone Company and the Customer.
- (c) The Customer will calculate and furnish to the Telephone Company a terminating PVUC factor (along with the supporting documentation as specified in (C)(3)(g) 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.
- (d) If applicable, the Telephone Company will calculate and periodically update a terminating PVUT factor representing the percentage (as a whole number) of total intrastate terminating access MOU that the Company receives from the Customer that terminates in IP format at the end user's premises.

(N)

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ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

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

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IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC (Continued)

(N)

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

- (e) The Company will develop a total terminating Percent VoIP Usage ("PVU") factor combining the Customer's terminating PVUC factor with the Company's terminating PVUT factor.

- 1) The PVU calculation below is applied when the Company does not bill based on actual call detail records for the Company's intrastate IP traffic at interstate rates.

$PVU = PVUC + [PVUT \times (1 - PVUC)]$  applied to the Company's end user's total intrastate terminating MOU.

Example: The Customer reported that their PVUC as 40%. The Company's PVUT is 10%.

This results in the following:  $PVU = 40\% \text{ plus } (10\% \text{ times } (1 - 40\%)) = 46\%$   
This means that 46% of the Intrastate terminating MOU exchanged between the Customer and the Company's end users will be rated at Interstate rates.

- 2) The PVU calculation below is applied when the Company bills are based on the actual call detail records for the Company's intrastate IP traffic at interstate rates.

The formula for usage will be as follows:

$PVU = PVUC \times (1 - PVUT)$  applied to the Company's TDM end user's total intrastate terminating MOU.

Example: The Company has identified that there was 10,500 intrastate terminating MOU that were identified and exchanged between the Customer and the Company's IP end users. The Customer reported that their PVUC as 40%. The Company's PVUT is 10%.

This results in the following:  $PVU = 40\% \text{ times } (1 - 10\%) = 36\%$   
This means that 36% of the Intrastate terminating MOU exchanged between the Customer and the Company's TDM end users will be rated at interstate rates and the intrastate 10,500 MOU will also be rated at interstate rates.

(N)

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ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

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

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IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC (Continued)

(N)

- (3) Calculation and Application of Percent-VoIP-Usage Factor (Cont.)
  - (f) The Customer shall not modify their reported PIU factor to account for VoIP - PSTN Traffic.
  - (g) The Customer provided terminating PVUC factor shall be based on information such as the number of the customer's retail VoIP subscriptions in the state (e.g. as reported on F.C.C. Form 477), traffic studies, actual call detail or other relevant and verifiable information.
  - (h) The Customer shall retain the call detail, work papers, and information used to develop the PVUC factor for a minimum of 12 months.
  - (i) If the Customer does not furnish the Telephone Company with the above PVUC factor, the Telephone Company will utilize a PVU factor equal to the Telephone Company supplied PVUT.
- (4) Initial PVU Factor
  - (a) If the Customer provides the terminating PVUC factor to the Telephone Company by April 15, 2012, the Telephone Company will retroactively adjust the Customer's bills to reflect the PVUC factor as of December 29, 2011. If the Customer does not provide PVUC factor by April 15, 2012, the Telephone Company will set the calculated PVU factor equal to the Telephone Company supplied PVUT.
  - (b) If the PVU factor cannot be implemented in the Telephone Company's billing system by December 29, 2011, once the factor can be implemented, the Telephone Company will adjust the Customer's bills retroactively to reflect the calculated PVU factor that includes the PVUC factor provided by the customer to the Telephone Company prior to April 15, 2012.
  - (c) The Telephone Company shall provide credits based on the calculated PVU factor on a Quarterly basis until such time as billing system modifications can be implemented.

(N)

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ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

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

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IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC (Continued)

(N)

(5) PVU Factor Updates

The Customer or the Telephone Company may update their provided factors quarterly using the method set forth in subsection (3)(c) or (3)(d), preceding. Any updated factor shall be forwarded to the other Party no later than 15 days after the first day of January, April, July and/or October of each year. The revised PVUC or PVUT factor shall be based on data for the prior three months, ending the last day of December, March, June and September, respectively. The revised (calculated) PVU factor will serve as the basis for future billing, and will be effective on the bill date of each such month, and shall serve as the basis for subsequent monthly billing until superseded by a new PVU factor. No prorating or back billing will be done based on the updated PVU factor.

(6) PVUC or PVUT Factor Verification

(a) Not more than twice in any year, the Telephone Company or the Customer may request from the other Party an overview of the process used to determine the other Party's factor, the call detail records, description of the method for determining how the end user originates calls in IP format, and other information used to determine the Party's factor that was furnished in order to validate the factor supplied. Both Parties shall comply and shall reasonably supply the requested data and information within 30 days of the request.

(b) Either Party may dispute the other Party's factor in writing based upon:

- A review of the requested data and information provided by the other Party,
- Reasonable review of other market information, F.C.C. reports on VoIP lines, such as F.C.C. Form 477 or state level results based on the F.C.C. Local Competition Report or other relevant data.
- A change in a reported factor by more than five percentage points from the preceding submitted factor.

(c) If after review of the data and information, the Customer and the Telephone Company establish a revised PVU factor, the Telephone Company may apply the revised PVU factor retroactively to the beginning of the quarter.

(N)

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ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO

INTRASTATE ACCESS SERVICE TARIFF  
P.U.C.O. NO. 1IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC (Continued)

(N)

## (6) PVUC or PVUT Factor Verification (Continued)

- (d) If the dispute is unresolved, the Telephone Company or the Customer may initiate an audit. Audits shall be limited to no more than twice per year. Either Party may request that the audit be conducted by an independent auditor. In such cases the associated auditing expenses will be paid by the Party requesting the audit. Both Parties' shall respond to the audit request within 30 days of the request.
- In the event that the either Party fails to provide adequate records to enable the other Party or an independent auditor to conduct an audit verifying the factor supplied, the usage for all contested periods will be billed using the most recent undisputed PVU factor. The PVU factor will remain in effect until the audit can be completed.
  - The Telephone Company will adjust the Customer's PVUC factor or its own PVUT factor based on the results of the audit, and will implement the newly calculated PVU factor in the next billing period or quarterly report date, whichever is first. The newly calculated PVU factor will apply for the next two quarters before new PVUC factor can be submitted by the Customer.
  - If the audit supports the contested factor, the usage for the contested periods will be retroactively adjusted to reflect the audited factor in the calculation of the PVU factor.

(N)

ISSUED: March 26, 2012

EFFECTIVE: April 25, 2012

IN ACCORDANCE WITH CASE NO. 12-0952-TP-ATA  
ISSUED BY THE PUBLIC UTILITIES COMMISSION OF OHIO  
BY: JOEL DOHMEIER, VICE PRESIDENT  
CONTINENTAL, OHIO



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

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DEFINITIONS

Automatic Number Identification (ANI)

The term "Automatic Number Identification" denotes the Multi-Frequency (MF) signaling parameter that identifies the billing number of the calling party.

Calling Party Number (CPN)

The term "Calling Party Number" denotes the SS7 out of band signaling parameter and the MF or other in band signaling parameters that identifies the subscriber line number or directory number of the calling party.

Charge Number (CN)

The term "Charge Number" denotes the SS7 out band signaling parameter and the MF or other in band signaling parameters that identifies the billing telephone number of the calling party.

Customer (s)

The term "Customer(s)" denotes any individual, partnership, association, joint-stock company, trust, corporation, or governmental entity or other entity which subscribes to the services offered under this tariff, including but not limited to End- Users, Interexchange Carriers (IC's), Toll Providers, local exchange providers, and other telecommunications carriers or providers of originating or terminating toll VoIP-PSTN traffic.

Internet Protocol (IP) Signaling

The term "Internet (IP) Signaling" denotes a packet data-oriented protocol used for communicating call signaling information.

Multi-Frequency (MF) Signaling

The term "Multi-Frequency (MF) Signaling" denotes an in-band signaling method in which call signaling information is transmitted between network switches using the same voice band channel used for voice.

Originating Direction – revise "an IC Premises" to "Customer's Premise".

The term "Originating Direction" denotes the use of Access Service for the origination of calls from an End User Premises to a Customer's Premises.

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(N)

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DEFINITIONS (Continued)

Remote Switching Modules/Systems – revise “direct trunks to an IC” to just “direct trunks”.

The term “Remote Switching Modules/Systems” denotes small, remotely controlled electronic end office switches which obtain their call processing capability from an electronic Host Central Office. The Remote Switching Modules/Systems cannot accommodate direct trunks.

Terminating Direction – revise “from an IC premises to a Customer’s Premises”

The term “Originating Direction” denotes the use of Access Service for the origination of calls from a Customer’s Premises to an End User Premises.

Toll VoIP-PSTN Traffic

The term “Toll VoIP-PSTN Traffic” denotes a customer’s interexchange voice traffic exchanged with the Telephone Company in Time Division Multiplexing (TDM) format over PSTN facilities, which originates and or terminates in Internet Protocol (IP) format. “Toll VoIP-PSTN Traffic” originates and/or terminates in IP format when it originates from and/or terminates to an end user customer of a service that requires IP-compatible customer premise equipment.

(N)

(N)

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6. SWITCHED ACCESS SERVICES

(N)

6.1 General

The following provision applies to the treatment of Toll VoIP-PSTN Traffic pursuant to the F.C.C.'s Part 51 Interconnection Rules and in compliance with the F.C.C.'s Report and Order and Further Notice of Proposed Rulemaking in CC Docket Nos. 96-45 and 01-92; GN Docket No. 09-51; WC Docket Nos. 03-109, 05-337, 07-135 and 10-90, and WT Docket No. 10-208, adopted October 27, 2011 and released November 18, 2011 (FCC 11-161). In the absence of an interconnection agreement between the Telephone Company and the customer specifying the treatment of Toll VoIP-PSTN Traffic, the Telephone Company will bill the customer the Interstate switched access rates on all jurisdictionally Intrastate voice traffic identified as Toll VoIP-PSTN Traffic.

6.3 Obligations of the Customer (Cont.)

6.3.5 Call Signaling

Depending on the signaling system used by the customer in its network, the customer's facilities shall transmit the following call signaling information to the Telephone Company on traffic the customer's end users originate which is handed off for termination on the Telephone Company's network.

(A) Signaling System 7 (SS7) Signaling

When the customer uses SS7 signaling, it will transmit the Calling Party Number (CPN) or, if different from the CPN, the Charge Number (CN) information in the SS7 signaling stream.

(B) Multi-Frequency (MF) Signaling

When the customer uses MF signaling, it will transmit the number of the calling party or, if different from the number of the calling party, the Charge Number (CN) information in the MF Automatic Number Identification (ANI) field.

(C) Internet Protocol (IP) Signaling

When the customer uses IP signaling, it will transmit the telephone number of the calling party or, if different from the telephone number, the billing number of the calling party contained in the SIP header field.

(N)

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## EXHIBIT C

The Applicant, **Continental Telephone Company**, hereby 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 11-161 (Released Nov. 18, 2011) with respect to intercarrier compensation.

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

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**Case No(s). 90-5016-TP-TRF**

Summary: Tariff Add Toll VoIP-PSTN Provisions electronically filed by Mrs. Karen J Fehrman  
on behalf of Continental Telephone Company