



Mary Ryan Fenlon
General Attorney
AT&T Services, Inc.
150 E. Gay St., Rm. 4-A
Columbus, Ohio 43215

T: 614.223.3302
F: 614.223.5955
mf1842@att.com

April 11, 2012

Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: *In the Matter of the Commission's Investigation into Intrastate Carrier Access Reform Pursuant to S.B. 162*
Case No. 10-2387-TP-COI

Dear Ms. McNeal:

This response is filed in the referenced case on behalf of AT&T Communications of Ohio, Inc. ("AT&T Comm Ohio").

On November 18, 2011, the Federal Communications Commission ("FCC") released its Report and Order and Further Notice of Proposed Rulemaking ("Report and Order") in WC Docket No. 07-135 et al., adopting a transitional intercarrier compensation framework. In its February 29, 2012 Entry, as modified in its March 8 and March 20, 2012 Entries in this proceeding, this Commission directed all incumbent local exchange carriers and certain affected competitive local exchange carriers to file by April 11, 2012 data and calculations in support of their proposed transitional intrastate access and reciprocal compensation rates scheduled to be available July 1, 2012, as mandated by the FCC's Report and Order.

The current intrastate access and reciprocal compensation rates of AT&T Comm Ohio are capped at their respective December 29, 2011 rate levels. The FCC Order prescribes two different algorithms for calculating the reform of access rates (47 CFR § 51.907) and reciprocal compensation rates (47 CFR § 51.705).

With regard to access rates, AT&T Comm Ohio's intrastate rates are already lower than its corresponding interstate access rates, and accordingly no access rate change is applicable at this step in the multi-year process. As displayed in the following table, the sum of the two functionally equivalent intrastate rates, Local Switching and Common Port, is lower than AT&T Comm. Ohio's single blended interstate Local Switching rate. The federal tariff also includes two rate elements, Tandem Switching and Common Multiplexing, for which there is not a corresponding intrastate rate element.

Since AT&T Comm Ohio's intrastate access rates are each equal to or less than the corresponding interstate access rate, the FCC's rules do not require intrastate access rate reductions and no related tariff filings are planned. It is also true that, because *all* of AT&T Comm Ohio's rates are zero or lower than its interstate rate, FY2011 volumes are irrelevant,



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because intrastate revenue is necessarily lower than interstate revenue under all possible volume weightings. See 47 CFR § 51.907(b)(2)(i)-(iii).

AT&T Communications Ohio Switched Access Rates	Intrastate Local Switching	Intrastate Common Port	Interstate Local switching Blended Rate	Tand Trans. Per MOU	Tand Trans. Per MOU Per Mile (Units)	Tand. Switching	Common Multiplexing
Interstate			0.003487	0.000103	0.000013	0.001118	0.000015
Intrastate	0.003142	0.000337		0.000103	0.000013	-	-
Intrastate equal, lower or zero			Lower (0.003479)	Equal	Equal	Zero	Zero

With regard to reciprocal compensation, AT&T Comm Ohio has agreements with three carriers. One of the agreements with AT&T Ohio contains a reciprocal compensation rate of \$0.0007 and the other two agreements specify Bill-and-Keep. Since the agreements contain rates at or below those for the corresponding rates in the interstate access tariff, the FCC's rules do not require changes to AT&T Comm.'s interconnection agreements. With respect to prospective agreements, as of July 1, 2012, AT&T Comm Ohio will offer compliant reciprocal compensation rates to all carriers via the standard Interconnection Agreement publically posted on our web site.

Please contact me if you have any questions. Thank you for your assistance in this matter.

Very truly yours,

/s/ Mary Ryan Fenlon

Attachments

cc: All parties of record

AT&T Communications Ohio

AT&T Communications Ohio Switched Access Rates	Local Switching	Common Port	Local switching Blended Rate	Tand Trans. Per MOU	Tand Trans. Per MOU Per Mile (Units)	Tand. Switching	Common Multiplexing
Interstate			0.003487	0.000103	0.000013	0.001118	0.000015
Intrastate	0.003142	0.000337		0.000103	0.000013	-	-

Sources:

AT&T-C Federal Tariff No. 28 (End of Tariff)

Common Multiplexing	0.000015 Section 17.14
Tandem Switched Transport Termination	0.000103 Section 17.15.1 "A"
Tandem Switched Transport Facility	0.000013 Section 17.15.1 "B"
Tandem Switching	0.001118 Section 17.15.1 "C"
Originating and Terminating Switching	0.003487 Section 17.15.1 "D"

AT&T-C OHIO State Tariff (End of Sect. 17)

Tandem Switched Transport Termination	0.000103 Section 17.15.1 "A"
Tandem Switched Transport Facility	0.000013 Section 17.15.1 "B"
Terminating Switching	0.003142 Section 17.15.2 "B"
Common Trunk Port	0.000337 Section 17.15.4

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail on the parties listed below on this 11th day of April, 2012.

/s/ Mary R. Fenlon

Mary R. Fenlon

Ohio Consumers' Counsel

Terry Etter
Office of the Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
etter@occ.state.oh.us

Cincinnati Bell

Douglas E. Hart
Cincinnati Bell Telephone Company LLC
441 Vine Street, Suite 4192
Cincinnati, OH 45202
dhart@douglasshart.com

Ohio Cable Telecommunications
Association

Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, OH 43215
smhoward@vorys.com

Benita A. Kahn
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street, P.O. Box 1008
Columbus, OH 43215-1008
bakahn@vorys.com

Verizon

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927
barthroyer@aol.com

David Haga, Assistant General Counsel
Verizon
1320 North Courthouse Road
Arlington, VA 22201
david.haga@verizon.com

Charles Carrathers
Verizon
600 Hidden Ridge HQE03H51
Irving, TX 75308
chuck.carrathers@verizon.com

CenturyLink

Zsuzsanna E. Benedek
CenturyLink
240 North Third Street, Suite 300
Harrisburg, PA 17101
sue.benedek@centurylink.com

Gary Baki
Century Link
50 West Broad Street, Suite 3600
Columbus, OH 43215
gary.s.baki@embarq.com

T-Mobile USA, Inc.

Garnet Hanly
T-Mobile USA, Inc.
401 Ninth Street, NW, Suite 550
Washington, DC 20004
Garnet.Hanly@T-Mobile.com

Access Point, Inc.

Kate Dutton
100 Crescent Green, Suite 109
Cary, NC 27518
kate.dutton@accesspointinc.com

ICORE

Gary M. Zingaretti
253 South Franklin Street
Wilkes-Barre, PA 18701
gzing@icoreinc.com

ONVOY, INC.

Mary T. Buley
300 South Highway 169, Suite 700
Minneapolis, MN 55426
mary.buley@onvoy.com

Technologies Management, Inc.

Laura McGrath
Technologies Management, Inc.
2600 Maitland Center Parkway
Maitland, FL 32751
lmcgrath@tminc.com

Impact Network Solutions, Inc.

Nancy L. Myers
Impact Network Solutions, Inc.
429 Trenton Avenue
Findlay, OH 45840
myersn@impactnetwork.com

First Communications, Inc.

Mary Cegelski
First Communications, Inc.
15278 Neo Parkway
Garfield Heights, OH 44128
MCEGELSKI@firstcomm.com

Frontier Communications

Rachel G. Winder
Ohio Government and Regulatory Affairs
17 South High Street, Suite 610
Columbus, OH 43215
Rachel.winder@ftr.com

Carolyn S. Flahive
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, OH 43215-6101
carolyn.flahive@thompsonhine.com

Kevin Saville, Associate General Counsel
Frontier Communications
2378 Wilshire Blvd.
Mound, MN 55364
Kevin.Saville@FTR.com

Windstream

Williams Adams
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215-3422
William.Adams@baileycavalieri.com

Small Local Exchange Carriers Group
Association

Norman J. Kenard
Regina L. Matz
Thomas, Long, Nielsen & Kennard
P.O. Box 9500
Harrisburg, PA 17108
rmatz@thomaslonglaw.com
nkennard@thomaslonglaw.com

The MACC Coalition

Thomas J. O'Brien
Bricker & Eckler, LLP
100 South Third Street
Columbus, OH 43215-4291
tobrien@bricker.com

Sprint Nextel

Diane C. Browning, Counsel
State Regulatory Affairs
Sprint Nextel
6450 Sprint Parkway
Mailstop KSOPHN0314-3A459
Overland Park, KS 66251
diane.c.browning@sprint.com

Staff of the Public Utilities Commission of
Ohio

William Wright
Assistant Attorney General
Chief, PUCO Section
180 E. Broad Street
Columbus, OH 43215
bill.wright@puc.state.oh.us

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Summary: Correspondence reporting on compliance with the FCC intercarrier compensation order and rules electronically filed by Jon F Kelly on behalf of AT&T Communications of Ohio, Inc.