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April 24, 2012

VIA Electronic Filing

Docketing Division
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, Ohio 43215-3793

RE: TelCove Operations, LLC – Revisions to P.U.C.O. Tariff No. 2
Case No: 12-1051-TP-ATA; 90-9071-TP-TRF

The following final pages are submitted for filing with your Commission on behalf of TelCove Operations, LLC. These final pages are being filed pursuant to the Memorandum of April 23, 2012 stating the approval of the revisions and requesting the filing of final pages.

In specific the filing includes the following revised pages:

| | |
|---------------------|---------------------|
| 8th Revised Page 1 | Original Page 28.1 |
| 1st Revised Page 8 | Original Page 28.2 |
| 1st Revised Page 11 | Original Page 28.3 |
| 1st Revised Page 28 | 1st Revised Page 29 |

If you have any questions or concerns regarding this filing, you may contact me at 724-743-9719 or at karen.hyde@Level3.com.

Sincerely,

A handwritten signature in black ink that reads "Karen M. Hyde".

Karen M. Hyde
Legal Department

Enclosure

CHECK SHEET

The pages of this tariff are effective as of the date shown. The original and revised pages named below contain all changes from the original tariff and are in effect on the date shown.

| <u>Page</u> | <u>Revision</u> | <u>Page</u> | <u>Revision</u> | <u>Page</u> | <u>Revision</u> |
|-------------|-------------------------|-------------|-------------------------|-------------|-------------------------|
| 1* | 8th Revised | 28.3* | Original | 57 | Original |
| 2 | 7th Revised | 29* | 1 st Revised | 58 | Original |
| 3 | Original | 30 | Original | 59 | Original |
| 4 | Original | 31 | Original | 60 | Original |
| 5 | Original | 32 | Original | 61 | Original |
| 6 | Original | 33 | Original | 62 | Original |
| 7 | Original | 34 | Original | 63 | Original |
| 8* | 1 st Revised | 35 | Original | 64 | Original |
| 9 | Original | 36 | Original | 65 | Original |
| 10 | Original | 37 | Original | 66 | 1 st Revised |
| 11* | 1 st Revised | 38 | Original | 67 | 1 st Revised |
| 12 | Original | 39 | Original | 68 | 1 st Revised |
| 13 | Original | 40 | Original | 69 | Original |
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| 18 | Original | 45 | Original | 74 | Original |
| 19 | Original | 46 | Original | 75 | 1 st Revised |
| 20 | Original | 47 | Original | 76 | Original |
| 21 | Original | 48 | Original | 77 | 1 st Revised |
| 22 | Original | 49 | Original | 78 | 1 st Revised |
| 23 | Original | 50 | Original | 79 | 1 st Revised |
| 24 | Original | 51 | Original | 80 | 2nd Revised |
| 25 | Original | 52 | Original | 81 | 1 st Revised |
| 26 | Original | 53 | Original | 82 | 3rd Revised |
| 27 | Original | 54 | Original | 83 | 1 st Revised |
| 28* | 1 st Revised | 55 | Original | 84 | 2nd Revised |
| 28.1* | Original | 56 | 1 st Revised | | |
| 28.2* | Original | | | | |

*Pages included with this filing

Issued: April 24, 2012

Effective: April 24, 2012

Issued By: Director – Regulatory Affairs
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Case No. 12-1051-TP-ATA

DEFINITIONS (cont'd)Company Calling Card

A telephone calling card issued by the Company at the Customer's request, which enables the Customer or User(s) authorized by the Customer to place calls over the Network and to have the charges for such calls billed to the Customer's account.

Credit Card

A Credit Card is an accepted credit card, which is defined as a credit card that the cardholder has requested or applied for and received, or has signed, used or authorized another person to use to obtain credit. Any credit card issued as a renewal or substitute in accordance with this paragraph is an accepted credit card when received by the cardholder.

Customer

The person, firm or corporation which orders service and is responsible for the payment of charges and compliance with the Company's regulations.

End Office

The term "End Office" denotes the switching system office or serving wire center (or functionally equivalent or analogous facilities) from which End Users receive exchange service. By way of example, system(s) or facility (ies) in a carrier's network which host telephone numbers listed in the database of the Number Portability Administration Center as assigned to the carrier, constitute an "End Office."

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End User or User

Any person or entity that obtains the Company's services provided under this Tariff, regardless of whether such person or entity is so authorized by the Customer.

Exchange Telephone Company

Denotes any individual, partnership, association, joint-stock company, trust, or corporation engaged in providing switched communication within an exchange.

Issued: April 24, 2012

Effective: April 24, 2012

Issued By: Director of Regulatory Affairs
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DEFINITIONS (cont'd)Signaling System 7 (SS7)

The term "Signaling System 7 (SS7)" denotes the layered protocol used for standardized common channel signaling in the United States and Puerto Rico.

Signal Transfer Point (STP)

The term "Signal Transfer Point (STP)" denotes a packet switch which provides access to the Exchange Telephone Company's SS7 network and performs SS7 message signal routing and screening.

Signal Transfer Point (STP) Port

The term "Signal Transfer Point (STP) Port" denotes the point of termination and interconnection to the STP.

Toll Free

A term to describe an inbound communications service which permits a call to be completed at a location without charge to the calling party. Access to the service is gained by dialing a ten (10) digit telephone number (e.g. NPA is 800, 888, etc.).

Universal Emergency Telephone Number (911) Service

Wherever feasible, the Company will provide a universal Central Office number "911" for the use of Public Safety Agencies having the responsibility to protect the safety and property of the general public. It is intended that use of 911 Service will provide the public with a means of simple and direct telephone access to a Public Safety Answering Point.

Toll VoIP-PSTN Traffic

The term Toll VoIP-PSTN Traffic as used in this tariff denotes a customer's interexchange toll voice traffic exchanged with the Telephone Company in Time Division Multiplexing format over PSTN facilities, which originates and/or terminates in Internet Protocol (IP) format. 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 premises equipment.

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Wire Center

A building in which one or more central offices, used for the provision of exchange services, are located.

Issued: April 24, 2012

Effective: April 24, 2012

Issued By: Director of Regulatory Affairs
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REGULATIONS (cont'd)2.3 Obligations of the Customer (cont'd)2.3.3 Jurisdictional Report Requirements (cont'd)

- G) The Customer shall keep sufficient detail from which the percentage of interstate use can be ascertained and upon request of the Company make the records available for inspection. Such a request will be initiated by the Company no more than once per year. The Customer shall supply the data within 30 calendar days of the Company request.
- H) The Customer may provide an additional percentage of interstate use for Entrance Facility and Direct Trunked Transport subject to the reporting requirements previously listed in this section. The percentage of interstate use may be provided per individual facility or at the billing account level. Should the Customer not provide a percentage of interstate use, the Company will use the reported Feature Group B or Feature Group D aggregated percentage of interstate use.

I) Identification and Rating of Toll VoIP-PSTN Traffic

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 by the F.C.C. in its Report and Order in WC Dockets Nos. 10-90, etc., F.C.C. Release No. 11-161 (November 18, 2011) (F.C.C. 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 F.C.C. Order. Toll VoIP-PSTN Traffic identified in accordance with this tariff section will be billed at rates equal to the Company's applicable tariffed interstate switched access rates as set forth in the Company's Tariff F.C.C. No. 2. 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. Rates, term and conditions governing compensation for toll VoIP-PSTN traffic in this tariff apply prospectively unless specifically stated in this tariff.

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Certain material previously appearing on this page now appears on 1st Revised Page 29.

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Effective: April 24, 2012

Issued By: Director of Regulatory Affairs
1025 Eldorado Boulevard
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REGULATIONS (cont'd)2.3 Obligations of the Customer (cont'd)

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2.3.3 Jurisdictional Report Requirements (cont'd)

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

Calculation and Application of Percent-VoIP-Usage Factor

The Company will determine the number of Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied 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:

- a. The Customer will calculate and furnish to the Company a factor (PVU-A) representing the whole number percentage of the total intrastate access MOU that the Customer exchanges with the Company in the State that (i) is sent to the Company that originated in IP format or (ii) is received from the Company and terminated in IP format.
- b. The Company will calculate a factor (PVU-B) representing the whole number percentage of the Customer's total intrastate access MOU in the State that originates or terminates in IP format.
- c. The Company will use the PVU-A and PVU-B factors to calculate a PVU factor that represents the percentage of total intrastate access MOU exchanged between a Company end user and the Customer that is originated or terminated in IP format, whether at the Company's end, at the customer's end or at both ends. The PVU will be the sum of (i) the PVU-A factor and (ii) the PVU-B factor times (1 minus the PVU-A factor). The Company will apply the PVU factor to the total intrastate access MOU exchanged with the Customer to determine the number of Toll VoIP-PSTN Traffic MOUs.

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

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

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

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Issued: April 24, 2012

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REGULATIONS (cont'd)2.3 Obligations of the Customer (cont'd)2.3.3 Jurisdictional Report Requirements (cont'd)

- l) Identification and Rating of Toll VoIP-PSTN Traffic (cont'd)
- d. The Customer shall not modify its reported PIU factor to account for VoIP-PSTN Traffic.
- e. Both the PVU-A and the PVU-B factors shall be based on information such as the number of each party'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 which will be provided to the Company upon request.
- f. The Customer shall retain the call detail, work papers, and information used to develop the PVU-A factor for a minimum of one year.
- g. The Company shall use a default PVU factor until such time as Customer supplies a PVU-A factor. For this purpose, Company will utilize a PVU equal to the percentage of VoIP subscribers in the state based on the Local Competition Report, as released periodically. Under the Local Competition Report methodology, the PVU will be the total number of incumbent LEC and non-incumbent LEC VoIP subscriptions in a state divided by the sum of those reported VoIP subscriptions plus incumbent LEC and non-incumbent LEC switched access lines.

The preceding section will be applied to the billing of switched access charges to a Customer that is a local exchange carrier only to the extent that the Customer has also implemented billing of interstate access charges for VoIP-PSTN Traffic in accordance with FCC orders, rules and regulations.

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Issued: April 24, 2012

Effective: April 24, 2012

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REGULATIONS (cont'd)2.3 Obligations of the Customer (cont'd)

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2.3.3 Jurisdictional Report Requirements (cont'd)

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

Initial Implementation of PVU Factors

- a. If the PVU factor cannot be implemented in the Company's billing systems by December 29, 2011, once the factor can be implemented the Company will adjust the Customer's bills to reflect the applicable PVU factor retroactively to December 29, 2011. If the Company receives a PVU-A from the Customer prior to April 15, 2012, it will apply that PVU-A pursuant to the formula contained herein retroactive to December 29, 2011. If the Company does not receive a PVU-A within 30 days from the effective date of this tariff, it will apply the default PVU retroactive to December 29, 2011 and will apply the PVU-A beginning on the next billing period following the Company's receipt of the PVU-A.
- b. The Company shall provide credits based on the reported PVU factors on a quarterly basis until such time as the billing system modifications can be implemented.

PVU Factor Update

The Customer may update the PVU-A factor quarterly using the method set forth herein. If the Customer chooses to submit such updates, it shall forward to the Company, no later than 15 days after the first day of January, April, July and/or October of each year, a revised PVU-A factor based on data for the prior three months, ending the last day of December, March, June and September, respectively. The revised PVU-A 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 new PVU-A factors.

PVU Factor Verification

Not more than twice in any year, the Company may ask the Customer to verify the PVU-A factor furnished to the Company, and the Customer may ask the Company to verify the PVU-B factor, and the respective calculations thereof. The party so requested shall comply, and shall reasonably provide the records and other information used to determine the applicable PVU-A and PVU-B factors. Notwithstanding the prior sentence, if the Customer updates its PVU-A more than twice in a year, the Company may seek to verify the PVU-A factor each time it is updated. In the event that the Customer fails to provide adequate records to enable the Company or an independent auditor to verify the Customer's PVU-A factor, the Company will continue using the most recent undisputed PVU-A factor reported by the Customer or, if no PVU-A has been provided, the default PVU.

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Issued: April 24, 2012

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REGULATIONS (cont'd)2.4 Customer Equipment and Channels

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2.4.1 Interconnection of Facilities

- A) In order to protect the Company's facilities and personnel and the services furnished to other Customers by the Company from potentially harmful effects, the signals applied to the Company's service shall be such as not to cause damage to the facilities of the Company. Any special interface equipment necessary to achieve the compatibility between facilities of the Company and the channels or facilities of others shall be provided at the Customer's expense.

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2.4.2 Inspections

- A) The Company may, upon notification to the Customer, at a reasonable time, make such tests and inspections as may be necessary to determine that the requirements regarding the equipment and interconnections are being complied with in respect to the installation, operation and maintenance of Customer-provided equipment and in the wiring of the connection of Customer channels to Company-owned facilities.
- B) If the protective requirements in connections with Customer-provided equipment are not being complied with, the Company may take such action as necessary to protect its facilities and personnel and will promptly notify the Customer by registered mail in writing of the need for protective action. In the event that the Customer fails to advise the Company within 10 days after such notice is received or within the time specified in the notice that corrective action has been taken, the Company may take whatever additional action is deemed necessary, including canceling service, to protect its facilities and personnel from harm. The Company will upon request 24 hours in advance provide Customer with a statement of technical parameters that the Customer's equipment must meet.

Certain material now appearing on this page previously appeared on Original Page 28.

Issued: April 24, 2012

Effective: April 24, 2012

Issued By: Director of Regulatory Affairs
1025 Eldorado Boulevard
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/24/2012 4:58:52 PM

in

Case No(s). 12-1051-TP-ATA

Summary: Tariff Final tariff pages electronically filed by Karen M Hyde on behalf of TelCove Operations, LLC