



August 22, 2012
Via Web Filing

Ms. Betty McCauley, Commission Secretary
Ohio Public Utilities Commission
180 East Broad Street
Columbus, OH 43215

RE: tw telecom of ohio llc
P.U.C.O. Tariff No. 13-Access
Case No. 12-2097-TP-ATA

Dear Ms. McCauley:

Attached for filing, per Staff's August 17, 2012 email, are **tw telecom of ohio llc's** approved final access tariff revision pages under Case No. 12-2097-TP-ATA, Docket No. 90-9011-CT-ATA. Also per Staff's request the issue date has been changed to July 17, 2012 and the effective date to August 17, 2012. The following tariff pages are included with this filing:

4 th Revised Page 1	Updates Check Sheet
2 nd Revised Page 36	Revises VoIP-PSTN language
1 st Revised Page 36.1	Revises VoIP-PSTN language
1 st Revised Page 36.2	Revises VoIP-PSTN language
1 st Revised Page 45.1	Revises Application of Access Charges to Toll VoIP-PSTN traffic text

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwrightman@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Connie Wightman

Connie Wightman
Consultant

cc: Tammy Chatfield - tw telecom
file: tw telecom - Ohio - Access
tms: OHa1204b

Enclosures

CW/bc

SWITCHED ACCESS SERVICE

CHECK SHEET

Pages of this tariff, as indicated below, are effective as of the date shown at the bottom of the respective pages. Original and revised pages, as named below, comprise all changes from the original tariff and are currently in effect as of the date on the bottom of this page.

PAGE	REVISION		PAGE	REVISION		PAGE	REVISION
Title	Original		28	Original		51	Original
1	4 th Revised	*	29	Original		52	Original
2	Original		30	Original		53	Original
3	1 st Revised		31	Original		54	1 st Revised
4	Original		32	Original		55	1 st Revised
5	Original		33	Original		56	Original
6	Original		34	Original		57	1 st Revised
7	Original		35	1 st Revised		58	1 st Revised
8	1 st Revised		36	2 nd Revised	*	59	Original
9	Original		36.1	1 st Revised	*	60	Original
10	Original		36.2	1 st Revised	*	61	Original
11	1 st Revised		36.3	1 st Revised		62	Original
12	Original		37	1 st Revised		63	Original
13	Original		37.1	1 st Revised		64	Original
14	1 st Revised		38	Original		65	Original
15	Original		39	Original			
16	Original		40	Original			
17	Original		41	Original			
18	Original		42	Original			
19	Original		43	Original			
20	Original		44	Original			
21	Original		45	Original			
22	Original		45.1	1 st Revised	*		
23	Original		46	Original			
24	Original		47	Original			
25	Original		48	Original			
26	Original		49	Original			
27	Original		50	Original			

* - indicates those pages included with this filing

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10475 Park Meadows Drive
Littleton, CO 80124

OHa1204b

SWITCHED ACCESS SERVICE

SECTION 2 - TERMS AND CONDITIONS, (CONT'D.)

2.17 Jurisdictional Reporting and Identification of Toll VoIP-PSTN Traffic, (Cont'd.)

2.17.2 IntraLATA Toll Usage, (Cont'd.)

To the extent that sufficient call detail is unavailable and the Customer has failed to provide its projected PLU, the Company shall allocate unidentifiable minutes subject to the PLU as 50 percent IntraLATA Toll Usage traffic and 50 percent local traffic.

Based on distribution of traffic (identifiable, Customer based PLU, Default PLU), the Company may derive an aggregated factor.

2.17.3 Identification of Toll VoIP-PSTN Traffic

This section governs the identification of Toll VoIP-PSTN Traffic that is required by the F.C.C. in its Report and Order in WC Dockets Nos. 10-90, etc., F.C.C. No. 11-161 (November 18, 2011) (F.C.C. Order) and Second Order on Reconsideration FCC 12-47 (April 25, 2012) ("Second Order") to be compensated at interstate access rates, unless the parties have agreed otherwise. 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 and Second Order. (T)

This section does not preclude carriers from negotiating different rates, terms and conditions governing compensation for Toll VoIP-PSTN traffic. (T)

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 applies prospectively, however application of this tariff retrospectively is allowable with mutual consent with the Customer.

A. Calculation and Application of Percent-VoIP-PSTN-Usage Factors

The Company will determine the number of Toll VoIP-PSTN Traffic minutes of use ("MOU") to which interstate rates will be applied under Section 3.1.4, by applying a Percent VoIP Usage ("PVU") factor to the total intrastate access MOU (however determined – either based on call detail information, access lines or PIU) exchanged between the Company and the Customer, until August 18, 2012 and after July 1, 2014. From August 18, 2012 through June 30, 2014, the PVU will be applied only to terminating intrastate access MOU. The PVU will be derived and applied as follows: (T)

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SWITCHED ACCESS SERVICE

SECTION 2 - TERMS AND CONDITIONS, (CONT'D.)

2.17 Jurisdictional Reporting and Identification of Toll VoIP-PSTN Traffic, (Cont'd.)

2.17.3 Identification of Toll VoIP-PSTN Traffic, (Cont'd.)

A. Calculation and Application of Percent-VoIP-PSTN-Usage Factors, (Cont'd.)

1. The Customer will calculate and furnish to the Company a factor (the "PVU-A") representing the percentage of the total Customer VoIP lines or intrastate access MOU that the Customer exchanges with the Company in the State, that (a) is terminating access sent to the Company and that originates in IP format; or (b) is originating access received from the Company and terminates in IP format until August 18, 2012 and after June 30, 2014. 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. (T)
| (T)
2. Company will, likewise, calculate a factor (the "PVU-B") representing the percentage of the Company's total Customer VoIP lines or intrastate access MOU that the Customer exchanges with the Company in the State, that (a) is sent to the Company and that originates in IP format; or (b) is received from the Company and terminates in IP format. From August 18, 2012 through June 30, 2014, the PVU-B will represent only terminating access MOU. This PVU-B shall be based on information such as the number of the 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. (T)
| (T)
3. The Company will use the PVU-A and PVU-B factors to calculate an effective PVU factor that represents the percentage of total intrastate access MOU exchanged between the Company and the Customer that is originated and/or terminated in IP format, whether at the Company's end, at the Customer's end, or at both ends. From August 18, 2012 through June 30, 2014, the PVU will represent only terminating intrastate access MOU. The effective 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). (T)
| (T)

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SWITCHED ACCESS SERVICE

SECTION 2 - TERMS AND CONDITIONS, (CONT'D.)

2.17 Jurisdictional Reporting and Identification of Toll VoIP-PSTN Traffic, (Cont'd.)

2.17.3 Identification of Toll VoIP-PSTN Traffic, (Cont'd.)

A. Calculation and Application of Percent-VoIP-PSTN-Usage Factors, (Cont'd.)

4. The Company will apply the effective PVU factor to the applicable intrastate access MOU exchanged with the Customer, as described above, to determine the number of relevant Toll VoIP-PSTN Traffic MOUs. (T)
(T)

Example 1: The PVU-B is 5% and the PVU-A is 10%. The effective PVU factor is equal to $14.5\% \text{ PVU-A} + (\text{PVU-B} \times (1 - \text{PVU-A})) = \text{PVU}\%$. The Company will bill 14.5% of the Customer's applicable intrastate access MOU in accordance with the Company's interstate switched access tariff. (T)
(T)

Example 2: The PVU-B is 0% and the PVU-A is 10%. The effective PVU factor is $10\% \text{ PVU-A} + (\text{PVU-B} \times (1 - \text{PVU-A})) = \text{PVU}\%$. The Company will bill 10% of the Customer's applicable intrastate access MOU in accordance with the Company's interstate switched access tariff. (T)
(T)

Example 3: The PVU-A is 100%. No matter what the PVU-B factor is, the effective PVU is 100%. The Company will bill 100% of the Customer's applicable intrastate access MOU in accordance with the Company's interstate switched access tariff. (T)
(T)

5. If the Customer does not furnish the Company with a PVU-A pursuant to the preceding paragraph 1, the Company will utilize a PVU equal to the PVU-B. For example, if the PVU-B factor is 0%, the Company will utilize a PVU equal to zero.
6. The Customer shall not modify their reported PIU factor to account for Toll VoIP-PSTN Traffic.
7. The Customer shall retain the call detail, work papers, and information used to develop the PVU factors for a minimum of one year.

SWITCHED ACCESS SERVICE

SECTION 3 - SWITCHED ACCESS SERVICE, (CONT'D.)

3.1 General, (Cont'd.)

3.1.4 Application of Access Charges to Toll VoIP-PSTN Traffic

- A. Toll VoIP-PSTN Traffic identified in accordance with this tariff section will be billed at rates equal to the Company's applicable Interstate Switched Access Tariff rates. Current and pending interstate access rates for the Company located at <http://fjallfoss.fcc.gov/cgi-bin/ws.exe/prod/ccb/etfs/mainmenu.hts>. Intrastate originating Toll VoIP-PSTN usage that falls within the exclusion period described in 2.17.3 will be billed at rates specified in Section 4.1 of this tariff.
- B. The Company shall assess and collect switched access rate elements under this tariff for access services, 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 VoIP service that does not itself seek to collect switched access charges for the same traffic. The Company will not charge for functions not performed by the Company, its affiliated or unaffiliated provider of VoIP service. For purposes of this provision, functions provided by the Company as part of transmitting telecommunications between designated points using, in whole or in part, technology other than TDM transmission in a manner that is comparable to a service offered by a local exchange carrier constitutes the functional equivalent of carrier access service.

(T)
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(T)

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Summary: Tariff Approved tariff revision filed on behalf of tw telecom of ohio llc, P.U.C.O. Tariff No. 13 - Access with cover letter. electronically filed by Mrs. Barbara E. del Castillo on behalf of tw telecom of ohio llc