



525 JUNCTION RD.  
Madison, WI 53717

March 5, 2014

By Electronic Filing

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

RE: In the matter of the Application of Continental Telephone Company to Modify its Intrastate Access Service  
Tariff. PUCO Case No. 14-0208-TP-ATA

Dear Ms. McCauley:

Enclosed are several replacement tariff sheets to be filed in connection with the above referenced matter on behalf of Continental Telephone Company. Please replace the tariff sheets that were originally filed on February 12, 2014 with the amended tariff sheets enclosed.

The TRF Number for Continental is 90-5016-TP-TRF.

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

Regards,

/s/ Rachelle A. Ladwig  
TDS Telecom  
Sr. Administrator - Tariffs  
Phone: (608)664-4169  
Fax: (608)830-5519  
Email: [rachelle.ladwig@tdstelecom.com](mailto:rachelle.ladwig@tdstelecom.com)

Enclosure

## **EXHIBIT B**

### **Proposed/Replacement Tariff Sheets**

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

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**IDENTIFICATION AND RATING OF TOLL VoIP - PSTN TRAFFIC**

(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") and the FCC's Second Order of Reconsideration (12-47) released April 25, 2012. 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.

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(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 Section 17 of the National Exchange Carrier Association Tariff F.C.C. No. 5.

(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 that represents the total intrastate access MOU that is originated by the Customer's end user in IP format and delivered to the Telephone Company and the total intrastate access MOU originated by the Customer end-user and terminated by the Telephone Company in IP format to the total intrastate access MOU

(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 Telephone Company will determine the number of originating intrastate Toll VoIP-PSTN Traffic minutes of use (MOU) to which interstate rates will be applied under (2), preceding, by applying an originating Percent VoIP Usage (PVU) factor to the total intrastate access MOU originated by a Telephone Company end user and delivered to the customer.

(N)  
|  
(N)

(d) The Customer will calculate and furnish to the Telephone Company a terminating PVUC factor (along with the supporting documentation as specified in (3)(j) 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.

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(M)  
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(M)-Material now appears on Sheet 22.1 of this Section.

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ISSUED: February 12, 2014

EFFECTIVE: March 15, 2014

IN ACCORDANCE WITH CASE NO. 14-0208-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)

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

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|-----|--|---------------------|
| (e) | 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.  | (T) (M)<br> <br>(M) |
| (f) | The customer will calculate and furnish to the Telephone Company an originating PVUC factor (along with the supporting documentation as specified in (3)(j) below) representing the whole number percentage of the customer's total originating intrastate access MOU that the customer receives from the Telephone Company and that is terminated in IP format and that would be billed by the Telephone Company as intrastate originating access MOU, until June 30, 2014. On July 1, 2014, these MOU will be billed as interstate originating access MOU. | (N)<br>             |
| (g) | If applicable, the Telephone Company will calculate and periodically update an originating PVUT factor representing the percentage (as a whole number) of total originating access MOU that the telephone company originated in IP format at the end user's premises, and that is sent to the customer.  | (N)                 |

(M)-Material previously appeared on Sheet 22 of this Section.

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

(5) PVU Factor Updates – Originating<sup>1</sup>

(T)

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 – Originating<sup>2</sup>

(T)

(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 Party's 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.

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<sup>1</sup> The terminating PVU factor is no longer being accepted due to intrastate terminating switched access rate parity with interstate rates beginning July 2, 2013.

<sup>2</sup> Terminating PVU Factor Verification is no longer applicable due to intrastate terminating switched access rate parity with interstate rates beginning July 2, 2013.

(N)

(N)

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

(6) PVUC or PVUT Factor Verification – Originating<sup>1</sup> (Continued)

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- (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.

<sup>1</sup> Terminating PVU Factor Verification is no longer applicable due to intrastate terminating switched access rate parity with interstate rates beginning July 2, 2013.

(N)  
(N)

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**Case No(s). 14-0208-TP-ATA, 90-5016-TP-TRF**

Summary: Amended Application Amend Filing to Modify the Intrastate Access Service Tariff electronically filed by Ms. Rachelle A Ladwig on behalf of Continental Telephone Company