



ANDREW O. ISAR

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Via EFile

April 16, 2014

Ms. Renee J. Jenkins
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

RE: Preferred Long Distance, Inc., Case No. 14-0687-TP-ATA

Dear Ms. Jenkins:

Pursuant to the Federal Communications Commission's ("FCC") *Report and Order and Further Notice of Proposed Rulemaking*, in Docket Nos. WC Docket No. 10-90, *et al.*, FCC 11-161 (the "*USF/ICC Transformation Order*"), Section 51.911 of the FCC's rules, 47 C.F.R. §51.911, and the Public Utilities Commission of Ohio's ("Commission") March 26, 2014 *Entry* in Case No. 10-2387-TP-COI,¹ attached for submission to the Commission are amended Sheets 2 and 45 to Preferred Long Distance, Inc.'s ("Preferred") Ohio switched exchange access tariff, P.U.C.O. Tariff No. 2, and a *Telecommunications Filing Form*.

With this submission, Preferred complies with the above referenced orders and rules by adopting as its own applicable non-recurring terminating tandem switched, local switching, and common trunk port rate element per minute switched exchange access rates contained in Ameritech Operating Companies Tariff FCC No. 2, Section 6 by reference.

Thank you for your attention to this matter. Questions concerning this filing may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

Andrew O. Isar

Regulatory Consultants to
Preferred Long Distance, Inc.

Enclosures

¹ *In the Matter of the Commission's Investigation into Intrastate Carrier Access Reform Pursuant to Sub S.B. 162*, Case No. 10-2387-TP-COI, *Entry* (March 26, 2014).

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 Preferred Long Distance,)
Inc. to Incorporate Amendments to its Switched Exchange)
Access Tariff in Ohio)
)

TRF Docket No. 90-_____

Case No. 14 - 0687 - **TP** - ATA

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

Name of Registrant(s) Preferred Long Distance, Inc.

DBA(s) of Registrant(s) Inapplicable

Address of Registrant(s) 16830 Ventura Blvd., Ste. 350, Encino, CA 91436

Company Web Address http://www.preferredld.com/

Regulatory Contact Person(s) Andrew Isar

Phone 253.851.6700

Fax 866.474.3630

Regulatory Contact Person's Email Address aisar@millerisar.com

Contact Person for Annual Report Keith Nussbaum

Phone 818.380.9090

Address (if different from above) _____

Consumer Contact Information _____

Phone _____

Address (if different from above) _____

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 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

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

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 1-6-08 * (Auto 30- day)	<input type="checkbox"/> ACE 1-6-08 * (Auto 30 day)	<input type="checkbox"/> ACE 1-6-08 * (Auto 30 day)	<input type="checkbox"/> ACE 1-6-10 (Auto 30 day)	<input type="checkbox"/> UNC 1-6-09 * (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 1-6-26 (Auto 30 days)	<input type="checkbox"/> ABN 1-6-26 (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> ACO 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Merger *	<input type="checkbox"/> AMT 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> AMT 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATR 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (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 1-7-07 (Auto 90 day)	<input type="checkbox"/> NAG 1-7-07 (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)
Introduce or change c-t-c service tariffs,	<input type="checkbox"/> ATA 1-7-14 (Auto 30 day)	<input checked="" type="checkbox"/> ATA 1-7-14 (Auto 30 day)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC 1-7-04 or 05 (Non-Auto)	
Changes in rates, terms & conditions to Pole Attachment, Conduit Occupancy and Rights- of-Way.	<input type="checkbox"/> UNC 1-7-23(B) (Non-Auto)	
Wireless Providers See 4901:1-6-24	<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.

AFFIDAVIT
Compliance with Commission Rules

I am an agent of the applicant corporation, Preferred Long Distance, Inc., and am authorized to make this statement on its behalf.
(Name)

Please Check ALL that apply:

X 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) April 16, 2014 at (Location) Gig Harbor, WA

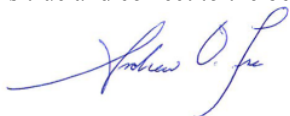


*(Signature and Title) President, Miller Isar, Inc. (Date) April 16, 2014

- *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.*

VERIFICATION

I, Andrew O. Isar 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) President, Miller Isar, Inc. (Date) April 16, 2014

**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.*

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

The tariff pages subject to the proposed change(s) as they exist before the change(s)

CHECK SHEET

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

Sheet No.	Sheet Version	Sheet No.	Sheet Version	Sheet No.	Sheet Version
1	Original	31	Original		
2	Original	32	Original		
3	Original	33	Original		
4	Original	34	Original		
5	Original	35	Original		
6	Original	36	Original		
7	Original	37	Original		
8	Original	38	Original		
9	Original	39	Original		
10	Original	40	Original		
11	Original	41	Original		
12	Original	42	Original		
13	Original	43	Original		
14	Original	44	Original		
15	Original	45	Original		
16	Original				
17	Original				
18	Original				
19	Original				
20	Original				
21	Original				
22	Original				
23	Original				
24	Original				
25	Original				
26	Original				
27	Original				
28	Original				
29	Original				
30	Original				

Issued:

Issued By:

Jerome Nussbaum, President
16830 Ventura Blvd., Suite 350
Encino, CA 91436

Effective:

RATES**4.1 ACCESS SERVICE, AT&T Ohio**

Company intrastate terminating rates are set at parity with its interstate rates as follows.

4.1.1. Tandem Switched Facility

Tandem-Switched Termination, Per Terminating Access Minute	
Tandem-Switched Termination, Per Originating Access Minute	\$0.00103
Tandem Switching Facility, Per Terminating Access Minute, per Mile	
Tandem Switching Facility, Per Originating Access Minute, per Mile	\$0.000013
Tandem Switching, Per Terminating Access Minute	
Tandem Switching, Per, Originating Access Minute	\$0.001084
Host-Remote Transport Termination, Per Terminating Access Minute	
Host-Remote Transport Termination, Per, Originating Access Minute	\$0.000410
Host-Remote Transport Facility, Per Terminating Access Minute, per mile	
Host-Remote Transport Facility, Per, Originating Access Minute, per mile	\$0.000021
Multiplexing, Per Terminating Access Minute, Per Mile	
Multiplexing, Per Originating Access Minute, Per Mile	\$0.000015

4.1.2. Local Switching

Per Terminating Access Minute	
Per Originating Access Minute	\$0.003116

4.1.3. Common Trunk Port

Common Trunk Port, Per Terminating Access Minute	
Common Trunk Port, Per Originating Access Minute	\$0.000371

4.1.4. Toll Free Data Base Access Service

800 Call Routing Query Charge, Per query	\$0.002304
800 Carrier Only ID Charge, Per Query	\$0.001108
800 Routing Options Charge, Per Query with Options	\$0.000199

Issued:
Issued By:

Jerome Nussbaum, President
16830 Ventura Blvd., Suite 350
Encino, CA 91436

Effective:

Exhibit B

The Tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.

Issued:
Issued By:

Jerome Nussbaum, President
16830 Ventura Blvd., Suite 350
Encino, CA 91436

Effective:

CHECK SHEET

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

Sheet No.	Sheet Version	Sheet No.	Sheet Version	Sheet No.	Sheet Version
1	Original	31	Original		
2	First*	32	Original		
3	Original	33	Original		
4	Original	34	Original		
5	Original	35	Original		
6	Original	36	Original		
7	Original	37	Original		
8	Original	38	Original		
9	Original	39	Original		
10	Original	40	Original		
11	Original	41	Original		
12	Original	42	Original		
13	Original	43	Original		
14	Original	44	Original		
15	Original	45	First*		
16	Original				
17	Original				
18	Original				
19	Original				
20	Original				
21	Original				
22	Original				
23	Original				
24	Original				
25	Original				
26	Original				
27	Original				
28	Original				
29	Original				
30	Original				

RATES**4.2 ACCESS SERVICE, AT&T Ohio****4.1.2. Originating Access****1. Tandem Switched**

Tandem-Switched Termination, Per Originating Access Minute	\$0.001030
Tandem Switching Facility, Per Originating Access Minute, per Mile	\$0.000013
Tandem Switching, Per, Originating Access Minute	\$0.001084
Host-Remote Transport Termination, Per, Originating Access Minute	\$0.000410
Host-Remote Transport Facility, Per, Originating Access Minute, per mile	\$0.000021
Multiplexing, Per Originating Access Minute, Per Mile	\$0.000015

2. Local Switching

Per Originating Access Minute	\$0.003116
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3. Common Trunk Port

Common Trunk Port, Per Originating Access Minute	\$0.000371
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4.1.2. Terminating Access

Company adopts as its own the corresponding non-recurring terminating tandem switched facility, local switching, and common trunk port per minute switched exchange access rates contained in [Ameritech Operating Companies Tariff FCC No. 2](#), Section 6.

4.1.3. Toll Free Data Base Access Service

800 Call Routing Query Charge, Per query	\$0.002304
800 Carrier Only ID Charge, Per Query	\$0.001108
800 Routing Options Charge, Per Query with Options	\$0.000199

(D)
(D)
(T)

(T)

(N)(R)

(N)(R)

(T)

Exhibit C

A short description of the nature of the change(s), the intent of the change(s), and the customers affected.

With this filing, Preferred complies with the Federal Communications Commission's ("FCC") Report and Order and Further Notice of Proposed Rulemaking, in Docket Nos. WC Docket No. 10-90, et al., FCC 11-161 (*USF/ICC Transformation Order*) and Commission March 26, 2014 Entry in Case No. 10-2387-TP-COI by adopting as its own applicable non-recurring terminating tandem switched, local switching, and common trunk port rate element per minute switched exchange access rates contained in Ameritech Operating Companies Tariff FCC No. 2, Section 6 by reference.

Exhibit D

A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

This tariff amendment complies with the FCC's Report and Order and Further Notice of Proposed Rulemaking in Docket Nos. WC Docket No. 10-90, et al., FCC 11-161 (*USF/ICC Transformation Order*), Section 51.911 of the FCC's rules, and the Commission's March 26, 2014 *Entry* in Docket No. in Case No. 10-2387-TP-COI by reducing terminating switched exchange access rates in accordance with benchmarked incumbent local exchange carrier in whose operating territory the Company also operates.

The FCC's *USF/ICC Transformation Order* and Commission's *Entry* universally apply to all interconnecting carriers in Ohio, and have an obligation to be aware of the FCC's and Commission's regulations, accordingly. Though the importance of interconnecting carrier notification regarding switched exchange access services is understood, the unique nature of these FCC-mandated amendments is an exception, as the FCC's *USF/ICC Transformation Order* and Commission *Entry* have effectively served as notice; indeed the Company has received no carrier notice of implementation of VoIP-PSTN Traffic provisions for Ohio or any other state despite the fact they have been widely implemented by the industry.

This filing also constitutes an administrative amendment to the Company's switched access tariff. There is no end user customer impact associated with this administrative amendment. No customer notice is required, or provided, accordingly.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/16/2014 12:10:40 PM

in

Case No(s). 14-0687-TP-ATA

Summary: Tariff In the Matter of the Application of Preferred Long Distance, Inc. to
Incorporate Amendments to its Switched Exchange Access Tariff in Ohio
electronically filed by Mr. Andrew O. Isar on behalf of Preferred Long Distance, inc.