

September 10, 2014

Electronically Filed

Advice Letter No. 10

Ms. Joan Grindleland
Oregon Public Utility Commission
3930 Fairview Industrial Drive SE
Salem, Oregon 97308

Dear Ms. Grindleland:

Please find the following revisions to Canby Telephone Association's Tariff PUC Or. No. 3, Access Services. The original and two copies, along with the tracking email from the Filing Center, will be sent via Federal Express to you today.

<u>Revised Tariff Sheets</u>	<u>Total Number of Sheets</u>
2nd Revised Sheet No. 1	
1st Revised Sheet Nos. 33,35,36,37	5

These filing revisions are made in compliance with the Federal Communication Commission's Title 47: Telecommunication; Part 51-Interconnection; Subpart J-Transitional Access Service Pricing; §51.913(a)(2) Transition for originating VoIP-PSTN traffic where the Companies get an originating PUV factor after July 1, 2014. The terminating VoIP traffic is no longer an issue now that the terminating intrastate and interstate rates are in parity.

Other than noted above, this filing will not increase any rate or charge, cause the withdrawal of service, or conflict with other schedules.

It is requested that this filing become effective October 9, 2014.

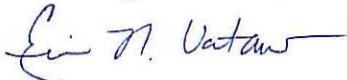
Please date stamp a copy of this transmittal and return it to us for our records.

MOSS ADAMS LLP

Oregon Public Utility Commission
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Please call me at 209.955.6103 or email lorrie.bernstein@mossadams.com or Eric Votaw at 209.955.6116 or Eric.Votaw@mossadams.com if you have any questions about the content, or Carol Bonell at 209.955.6194 for questions on the PDF filing.

Sincerely,



Eric Votaw, Senior Manager
For Moss Adams LLP

EV:cb

Enclosures

cc/encs: Mr. Roger White (Via E-mail)
Mr. Armando Fimbres (Via E-mail)
Mr. Terry Simms (Via E-mail)
Mrs. Rusti Lattin (Via E-mail)
Mrs. Sharon Adams (Via E-mail)

Mr. Nate Brentano (Via E-mail)
Ms. Theresa Wilson (Via E-mail)
Mr. Mark Martell (Via E-mail)
Mrs. Debbie Hogan (Via E-mail)

ACCESS SERVICES

Check Sheet

This Check Sheet contains the following sheets that are effective as of the date shown on each sheet. Original and revised sheets as named below contain all changes from the original tariff that are in effect on the date hereof.

<u>Sheet</u>	<u>Revision Number</u>	<u>Sheet</u>	<u>Revision Number</u>
Title	Original	22	Original
1	2nd Revised*	23	Original
2	Original	24	Original
3	Original	25	Original
4	Original	26	Original
5	1 st Revised	27	Original
6	1 st Revised	28	Original
7	Original	29	Original
8	Original	30	Original
9	Original	31	Original
10	Original	32	Original
11	Original	33	1st Revised*
12	Original	34	Original
13	Original	35	1st Revised*
14	Original	36	1st Revised*
15	Original	37	1st Revised*
16	Original	38	Original
17	Original	39	Original
18	Original	40	Original
19	Original	41	Original
20	Original	42	Original
21	Original	43	Original

* Indicates whether new or revised sheet is filed with each Advice Letter Number.

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ISSUED BY: Canby Telephone Association

BY: Paul Hauer

TITLE: President

ADVICE NO. 10

ACCESS SERVICES

2. **GENERAL REGULATIONS** (Continued)

2.3 **Obligations of the Customer** (Continued)

2.3.9 **Jurisdictional Report Requirements** (Continued)

(D) If a billing dispute arises concerning the projected Intrastate percentage, the Telephone Company will ask the customer to provide the data the customer uses to determine the projected Intrastate percentage. The Telephone Company will not request such data more than once a year. The customer shall supply the data within thirty (30) days of the Telephone Company request. If the customer does not provide sufficient data which can be used to determine the Intrastate percentage, the Telephone Company retains the right to establish an estimated percentage until sufficient data is provided and agreed upon between both parties.

2.3.10 **Identification and Rating of VoIP-PSTN Traffic**

(A) VoIP-PSTN Traffic is defined as traffic exchanged between a Company end user and the customer in Time Division Multiplexing (TDM) format that originates and/or terminates in Internet Protocol (IP) format. VoIP-PSTN traffic originates and/or terminates in IP format if it originates or terminates to an end-user customer of a service that requires Internet protocol-compatible customer premises equipment. This section governs the identification of 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 VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that such VoIP-PSTN Traffic can be billed in accordance with the F.C.C. Order.

(C)
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(C)

In the absence of an interconnection agreement between the Telephone Company and the customer specifying the treatment of VoIP-PSTN Traffic, VoIP-PSTN Traffic identified in accordance with this tariff section will be billed at rates equal to the Telephone Company's applicable tariffed interstate originating switched access rates as set forth in the National Exchange Carrier Association, Inc. Tariff F.C.C. No. 5.

(C)
(D)
(D)

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2. **GENERAL REGULATIONS** (Continued)

2.3 Obligations of the Customer (Continued)

2.3.10 Identification and Rating of VoIP-PSTN Traffic (Continued)

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

(5) The Company will develop a total originating Percent VoIP Usage ("PVU") factor combining the Customer's terminating PVUC factor with the Company's terminating PVUT factor. (C)

a) The PVU calculation below is applied when the Company does not bill based on actual call detail records for the Company's intrastate IP traffic at interstate rates.

$PVU = PVUC + [PVUT \times (1 - PVUC)]$ applied to the Company's end user's total intrastate originating MOU. (C)

Example: The Customer reported that their PVUC as 40%. The Company's PVUT is 10%. This results in the following:

$PVU = 40\% \text{ plus } (10\% \text{ times } (1 - 40\%)) = 46\%$
This means that 46% of the Intrastate originating MOU exchanged between the Customer and the Company's end users will be rated at Interstate rates. (C)

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ACCESS SERVICES

2. **GENERAL REGULATIONS** (Continued)

2.3 **Obligations of the Customer** (Continued)

2.3.10 **Identification and Rating of VoIP-PSTN Traffic** (Continued)

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

(5) (Continued)

- b) The PVU calculation below is applied when the Company bills are based on the actual call detail records for the Company's intrastate IP traffic at interstate rates.

The formula for usage will be as follows:

$PVU = PVUC \times (1 - PVUT)$ applied to the Company's TDM end user's total intrastate originating MOU. (C)

Example: The Company has identified that there was 10,500 intrastate originating MOU that were identified and exchanged between the Customer and the Company's IP end users. The Customer reported that their PVUC as 40%. The Company's PVUT is 10%. (C)

This results in the following:

$PVU = 40\% \text{ times } (1 - 10\%) = 36\%$

This means that 36% of the Intrastate originating MOU exchanged between the Customer and the Company's TDM end users will be rated at interstate rates and the intrastate 10,500 MOU will also be rated at interstate rates. (C)

- (6) The Customer shall not modify their reported PIU factor to account for VoIP - PSTN Traffic.

- (7) The Customer provided originating PVUC factor shall be based on information such as the number of the customer'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 shall be provided to the Telephone Company upon request. The customer must identify whether the PVU is based only on the customer's own data or is based on another source. If another source is used, the customer will identify the data source. If anything other than the customer's own data is used, the Telephone Company will use the PVUC provided by the customer as the PVU and will not perform the calculation in (4) and (5), above. (C)

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ACCESS SERVICES

2. **GENERAL REGULATIONS** (Continued)

2.3 Obligations of the Customer (Continued)

2.3.10 Identification and Rating of VoIP-PSTN Traffic (Continued)

(B) Calculation and Application of Percent-VoIP-Usage Factor

- (8) The Customer shall retain the call detail, work papers, and information used to develop the PVUC factor for a minimum of one year following the date on which they are furnished to the Telephone Company.
- (9) If the Customer does not furnish the Telephone Company with the above PVUC factor, the Telephone Company will utilize a PVUC equal to zero.

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(D)

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