PUBLIC UTILITY COMMISSION OF OREGON INTEROFFICE CORRESPONDENCE

DATE: June 10, 2021

TO: File through Roger White

FROM: Laurel Anderson

SUBJECT: St. Paul Telephone Cooperative, Docket No ADV 1276/Advice Letter No. 10 Revises tariff PUC Or. No. 3 Access Services as required by FCC Order No. 11-161 and subsequent orders.

I have reviewed this filing and recommend that an acknowledgement letter be sent. The filing was submitted on May 24, 2021 and will go into effect on July 1, 2021.

This filing revises St. Paul Telephone Cooperative's Tariff PUC Or. No 1, Access Services, as required by FCC Order No. 20-143; Part 51 – Interconnection; Subpart M – 8YY Transition; \$51.909 Transition of rate-of-return carrier access charges; Step 2.

The FCC Order establishes separate rate elements for interstate and intrastate toll free originating end office access service and non-toll free originating end office access service. Intrastate toll free originating end office access service rates shall be in parity with its interstate toll free originating end office access service rates. Currently, St. Paul's intrastate originating access service rates are greater than interstate rates. Therefore, in this filing the company proposes rate reductions to bring the composite rate levels into parity.

The FCC Order further establishes a three-step glide path reduction to a uniform, national wide toll free database query rate. Step one requires all toll free database query rates be no higher than \$0.004248. St. Paul's current toll free database rates exceed that limit and propose reductions to the required rate level.

Other than noted above, this filing will not increase any rate or charge, cause the withdrawal of service, or conflict with other schedules. This filing is revenue neutral for these Companies.

It is requested that this filing become effective July 1, 2021.