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February 17, 2012

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: *VoIP-PSTN Revisions to Intrastate Access Tariffs*

Windstream Companies (Docket Nos. R-2011-2279738; R-2011-2279743; R-2011-2279763; R-2011-2279769; R-2011-2280166; R-2011-2280802)
Frontier Companies (Docket Nos. R-2011-2278283; R-2011-2278290)
XO Communications Services, Inc. (Docket Nos. R-2012-2285252; R-2012-2285795)
Pennsylvania Telephone Association (Docket No. R-2012-2282660)
Armstrong Telecommunications, Inc. (Docket No. R-2012-2285812)
Metropolitan Telecommunications Corp of PA (Docket No. R-2011-2279479)
Core Communications, Inc. (Docket No. R-2012-2282908)

Dear Secretary Chiavetta:

On November 18, 2011, the Federal Communications Commission ("FCC") issued a Report and Order reforming the universal service and intercarrier compensation systems on a nationwide basis (the "FCC Order").¹ This order and its accompanying regulations require that, in the absence of an agreement between carriers, the default intercarrier compensation rates for non-local VoIP-PSTN traffic will be equal to interstate access rates. (See, e.g., FCC Order at ¶ 933).

Many local exchange carriers in Pennsylvania have proposed changes to their intrastate switched access tariffs to implement the FCC's new "VoIP-PSTN" intercarrier compensation regime by establishing a process to identify the traffic that must be subject to interstate rather than intrastate switched access rates. As this Commission observed, "[w]hile the majority of the filings bear some resemblance to each other, many of the filings follow a more unique approach," necessitating individual Staff review including

¹ *Connect America Fund*, WC Docket No. 01-90, et al., Report and Order and Further Notice of Proposed Rulemaking (November 18, 2011); 47 C.F.R. § 51.913(a).

“a series of data requests tailored to each individual filing.” (1/31/12 Secretarial Letter at Docket R-2011-2276346). Some of these tariff revisions have already taken effect – including Verizon’s – while others continue to undergo staff review.²

The majority of the tariff revisions are reasonable and consistent with the FCC Order and regulations and Verizon does not address those filings in this letter.³ Some of the filings, however, are inadequate, contain errors or are contrary to the FCC’s Order in certain respects. While Verizon does not oppose allowing VoIP-PSTN tariff revisions to take effect, since each local exchange carrier has the obligation to comply with the FCC’s new VoIP-PSTN regime, Verizon is filing this letter to detail the tariffs and specific provisions that require Commission attention. These tariffs should be revised in order to ensure that wholesale customers receive the full benefit of the FCC’s new rules to which they are entitled and to avoid piecemeal disputes in the future. Verizon recognizes that Staff is still reviewing many of these tariffs and may already be correcting some or all of these errors.

1. Failure to apply VoIP-PSTN compensation for originating access where traffic terminates in IP

While most of the tariffs propose an adequate methodology for identifying and applying interstate terminating access rates to traffic originated in IP on the wholesale customer’s network, a number of the filed revisions are inadequate in that they fail to apply the VoIP-PSTN rate for originating access on traffic that is terminated in IP. The omission of IP-terminated traffic from the VoIP-PSTN rate is inconsistent with the FCC’s rule, which this Commission has recognized “defines VoIP-PSTN traffic as ‘traffic exchanged over PSTN facilities that *originates and/or terminates* in IP [Internet protocol] format.’”⁴ These tariffs fail to apply that standard.

The FCC explicitly “declin[ed] to adopt an asymmetric approach that would apply VoIP-specific rates for only IP-originated or only IP-terminated traffic.” (FCC Order, ¶ 942; *see also* ¶ 948). The FCC cited arbitrage concerns relating to asymmetric payments on VoIP traffic, concluding that “[a]n approach that addressed only IP-originated traffic would perpetuate—and expand—such concerns.” (*Id.*) This failure to apply the VoIP-PSTN rate for originating access on IP-terminated traffic would allow these carriers to charge intrastate originating access rates on this VoIP-PSTN traffic while enjoying the benefit of paying lower interstate rates when they buy originating access from Verizon and other carriers that have properly complied with the FCC order.

² The revisions filed by Verizon Pennsylvania Inc., Verizon North LLC and MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (“Verizon”) each took effect on January 31, 2012 at Dockets R-2011-2276346, R-2011-2276357 and R-2011-2277245.

³ Additionally certain tariffs filed by Level 3 Communications, LLC and its affiliates have been withdrawn and Verizon does not address them here, although they did suffer from some of the errors identified in this letter.

⁴ January 31, 2012 Secretarial Letter at Docket R-2011-2276346 at 2) (citing FCC Order ¶940, at 342-343) (emphasis added). *See also* 47 C.F.R. § 51.913(a).

Verizon understands that some of these carriers may have mistakenly confused the FCC's statement that it was not addressing originating access rates with regard to its rules for ordinary non-IP traffic with the FCC's *different* rules for VoIP-PSTN traffic. But the FCC's specific intercarrier compensation framework for VoIP-PSTN traffic is distinct from its plan for reforming intercarrier compensation for traditional traffic. Section XIV of the FCC Order, "Inter-carrier Compensation for VoIP Traffic," as well as new Rule 51.913 leave no doubt that the FCC's VoIP-PSTN compensation regime applies to *all* VoIP-PSTN traffic, including traffic terminating in VoIP, and that the pre-existing intrastate access regime does *not* apply to any VoIP-PSTN traffic. *See* FCC Order, ¶ 941 (explicitly including "VoIP services that are originated or terminated on the PSTN, such as 'one-way' services that allow end-users either to place calls to, or receive calls from, the PSTN"); ¶ 956 n. 1952 (referring to "IP-originated or IP-terminated VoIP traffic"); ¶ 961 ("toll VoIP-PSTN traffic will be subject to charges not more than originating and terminating interstate access rates"); ¶ 963 (observing that "information the terminating LEC has about VoIP customers it is serving can be used to identify traffic subject to the VoIP-PSTN compensation regime"); ¶ 969 (the VoIP-PSTN framework includes "origination and termination charges").

The tariffs submitted by the Windstream family of companies suffer from this flaw.⁵ The Windstream tariffs require the carrier access customer to determine originating and terminating percent-VoIP-usage (PVU) factors, but each factor would be based only on traffic that is "originated . . . in IP format" by the customer or by Windstream. (*See, e.g.,* Windstream PA §§ 2.3.14(C), (C)(1), (C)(2)). In other words, the tariffs contemplate PVUs for (and, thus, the application of interstate rates to) traffic that a customer *originates* in IP format and terminates to Windstream (or traffic that is originated in IP on Windstream's network to the extent it can be identified), but not traffic that originates in TDM on Windstream's network and *terminates* in IP format on another carrier's network. These tariffs also purport to require the *customer* to determine Windstream's own originating IP usage (*e.g.,* Windstream PA § 2.3.13(C)(1)), when only Windstream has that information and should determine its own factor for traffic that it originates and terminates on its network in IP format. (*See* FCC Order ¶ 963).

Similarly, the tariffs submitted by the Frontier companies incorrectly apply the interstate rate only to terminating VoIP-PSTN access minutes by leaving IP-terminating VoIP-PSTN traffic out of the determination of the percent-VoIP-usage ("PVU") factor.⁶

⁵ Windstream Pennsylvania LLC Supp No 4 to PA PUC No 8 (Docket No. R-2011-2279738); Windstream D&E Systems, Inc. Supp No 1 to PA PUC No 6 (Docket No. R-2011-2279743); Windstream Conestoga Supp No 1 to PA PUC No 13 (Docket No. R-2011-2279763); Windstream Buffalo Valley Inc. Supp No 1 to PA PUC No 10 (Docket No. R-2011-2279769); Talk America Inc Supp No 5 to PA PUC No 4 (Docket No. R-2011-2280166); Cavalier Telephone Mid-Atlantic LLC Supp No 11 to PA PUC No 4 (R-2011-2280802).

⁶ Frontier Communications of PA Supp No 18 to PA PUC No 15 (Docket No. R-2011-2278283), § 2.3.17(C), (C)(1) and (C)(2)); Frontier Commonwealth Telephone Co. Supp No 5 to PA PUC No 26 (Docket No. R-2011-2278290), § 2.3.17(C), (C)(1) and (C)(2).

Other tariffs containing the same error include XO⁷ and the Pennsylvania Telephone Association.⁸

2. Failure to allow for rebuttal of default factor

A number of the tariff revisions rely on the FCC's default VoIP percentage based on statewide data, but erroneously fail to allow access customers the ability to rebut the default percentage as required by the FCC. Paragraph 963 of the FCC Order allows a local exchange carrier "as an alternative" means of identifying VoIP-PSTN traffic, "to specify in its intrastate tariff that the default percentage of traffic subject to the VoIP-PSTN framework is equal to the percentage of VoIP subscribers in the state based on the Local Competition Report, as released periodically, *unless rebutted by the other carrier.*" (emphasis supplied.) Accordingly, those tariffs that allow for use of the default percentage must also provide a process for the default percentage to be rebutted.

The Windstream companies' tariffs⁹ are flawed in this regard because they state that "[i]n the absence of an interconnection agreement, at no time will the Telephone Company allow an OPVU or TPVU factor greater than the applicable State percentage as identified in Paragraph 963 of the FCC Order." They provide no opportunity to rebut the default percentage. (*See, e.g.,* Windstream PA § 2.3.14.(C)(5); Cavalier § 2.3.4(C)(5)).

Similarly, the tariff submitted by Armstrong Telecommunications, Inc.¹⁰ states that "[t]he PVU Factor shall be, which is an amount equal to the total number of

⁷ XO Communications Services, Inc. (Supp No 11 to PA PUC No 11 (Docket No. R-2012-2285252); XO Communications Services, Inc. Supp No 10 to PA PUC No 13 (Docket No. R-2012-2285795). *See* XO Tariff 13 at § 2.20.9.C and Tariff 11 at § 2.3.4.C ("The Company will determine the number of intrastate Toll VoIP-PSTN Traffic minutes of use . . . to which interstate switched access rates will be applied . . . by applying a [PVU] factor to the total *terminating* intrastate access MOU received by the Company from the Customer."); § 2.20.9.C.1 and § 2.3.4.C.1 ("The Customer will calculate and furnish to the Company a factor . . . representing the percentage of the total intrastate and interstate switched access MOU that the Customer terminates to the Company in the state . . ."), and § 2.20.9.C.4 and § 2.3.4.C.4 ("The Company will apply the PVU factor to the total intrastate access MOU received from the Customer . . .").

⁸ Pennsylvania Telephone Association Supp No 13 to PA PUC No 11 (R-2012-2282660), § 2.3.13.C (The PVU factor is "to be applied to the total terminating intrastate access MOU terminated by the Customer to the Telephone Company's end user"); *id.* at § 2.3.12.C.1 (PVU represents "the percentage of the total intrastate and interstate access MOU that the Customer terminates to the Telephone Company in Pennsylvania that originated from an end-user customer using a service that requires Internet protocol-compatible customer premises equipment.")

⁹ Windstream Pennsylvania LLC Supp No 4 to PA PUC No 8 (Docket No. R-2011-2279738); Windstream D&E Systems, Inc. Supp No 1 to PA PUC No 6 (Docket No. R-2011-2279743); Windstream Conestoga Supp No 1 to PA PUC No 13 (Docket No. R-2011-2279763); Windstream Buffalo Valley Inc. Supp No 1 to PA PUC No 10 (Docket No. R-2011-2279769); Talk America Inc Supp No 5 to PA PUC No 4 (Docket No. R-2011-2280166); Cavalier Telephone Mid-Atlantic LLC Supp No 11 to PA PUC No 4 (R-2011-2280802).

¹⁰ Armstrong Telecommunications, Inc. Supp No 3 to PA PUC No 5 (R-2012-2285812). There also seems to be language missing in the first sentence of this provision, between the words "shall be," and "which."

incumbent LEC and non-incumbent LEC VoIP subscriptions in a state divided by the sum of those reported VoIP subscriptions plus incumbent LEC and non-incumbent LEC switched access lines as set forth in the FCC Wireline Competition Bureau Local Telephone Competition Report, the most current version of which was released October 2011 and will be adjusted biannually with each new Local Telephone Competition Report released by the FCC Wireline Competition Bureau.” (Armstrong § 2.3.4.C.2). While Armstrong provides a so-called alternative, it only allows the customer to “request that [Armstrong] negotiate an agreement specifying alternative compensation for VoIP-PSTN Traffic,” which presumably Armstrong may decline, and does not provide the customer with the right to rebut the statewide factor as required by the FCC. (Armstrong No. 5, § 2.3.4.D.2).

3. Failure to account for IP traffic on the tariffing carrier’s network

The tariffs submitted by Frontier¹¹ and the Pennsylvania Telephone Association¹² are inadequate because they do not contemplate the determination of any PVU factor for the tariffing carrier itself, and, therefore, do not take into account traffic that the carrier may originate or terminate on its own network in IP format. It may be that some of these carriers do not currently provide VoIP services on their own networks, but if that is the case they should be required to certify that fact explicitly. In any event, the tariffs should be revised to provide for separate company and customer factors so that if and when companies begin providing VoIP-based end-user services the tariff process will allow it to be accounted for without additional tariff revisions. This is the approach that was taken in the tariffs that were filed by Verizon and a number of other carriers.

4. Improper delay in applying FCC-mandated VoIP-PSTN rate

Some of the tariffs improperly delay the implementation of the FCC’s rate regime for VoIP-PSTN traffic. In contrast to the tariffs filed by Verizon and numerous other carriers, which allow the customer a reasonable time to submit an initial customer PVU factor but then apply that factor retroactively so that interstate rates are charged on VoIP traffic from the effective date of the FCC rules, some of the tariffs contain provisions that unfairly delay the application of interstate rates to VoIP-PSTN traffic to some date after the FCC’s new compensation regime took effect, thereby allowing these carriers to charge intrastate rates on VoIP-PSTN traffic longer than the FCC rules allow.

¹¹ Frontier Communications of PA Supp No 18 to PA PUC No 15 (Docket No. R-2011-2278283); Frontier Commonwealth Telephone Co. Supp No 5 to PA PUC No 26 (Docket No. R-2011-2278290).

¹² Pennsylvania Telephone Association Supp No 13 to PA PUC No 11 (R-2012-2282660).

The Windstream companies' tariffs¹³ refuse to put the customer's OPVU/TPVU factors into effect until they have been "verified" by the Windstream companies, by providing for "verification audits," and generally make the factors apply prospectively only, and only once all such verification and auditing procedures have been completed. These provisions would delay implementation of the FCC's regime while disputes over the factors are being resolved — whether or not the disputes are meritorious — and thus undermine the FCC's clear intention to put that regime into effect as of January 1, 2012. Moreover, the Windstream companies' tariffs require initial factors to be submitted within fifteen days of the tariffs' effective date, or else they will be set at zero (resulting in *all* VoIP-PSTN traffic being billed at intrastate access rates). This unfairly deprives access customers of sufficient time to implement the new VoIP-PSTN traffic identification process that is required by the FCC's VoIP-PSTN regime and penalizes the customer by charging improper rates if they do not meet Windstream's unreasonable deadline. (*See, e.g.*, Windstream PA No 8, § 2.3.14(C)(4), (D) and (E)). The Windstream companies should be required to give customers a reasonable time to submit initial factors, and must make those factors applicable retroactively to January 1, 2012 once any disputes are resolved.

MetTel¹⁴ improperly penalizes the customer if MetTel's own billing systems cannot implement the VoIP rate on its effective date, stating that "[i]f the PVU factor is not available and/or cannot be implemented in MetTel's billing systems by January 1, 2012, MetTel will set the initial PVU equal to the PVU-M, as specified in subsection (C)(5), above." (MetTel No. 3, § 2.10.9(D)). Armstrong¹⁵ and PTA¹⁶ propose to delay application of the FCC-required rate until their tariffs take effect. These provisions that improperly delay and thwart the ability of wholesale customers to obtain the legally required rate on VoIP-PSTN traffic from the effective date of the FCC's rules violate the FCC Order, are unjust and unreasonable and should be rejected by the Commission. The more reasonable course is to make the rate retroactive to the effective date of the FCC's rules, as Verizon has done in its tariffs that took effect on January 31, 2012.

¹³ Windstream Pennsylvania LLC Supp No 4 to PA PUC No 8 (Docket No. R-2011-2279738); Windstream D&E Systems, Inc. Supp No 1 to PA PUC No 6 (Docket No. R-2011-2279743); Windstream Conestoga Supp No 1 to PA PUC No 13 (Docket No. R-2011-2279763); Windstream Buffalo Valley Inc. Supp No 1 to PA PUC No 10 (Docket No. R-2011-2279769); Talk America Inc Supp No 5 to PA PUC No 4 (Docket No. R-2011-2280166); Cavalier Telephone Mid-Atlantic LLC Supp No 11 to PA PUC No 4 (R-2011-2280802).

¹⁴ Metropolitan Telecommunications Corp of PA Supp No 6 to PA PUC No 3 (R-2011-2279479).

¹⁵ Armstrong Telecommunications, Inc. Supp No 3 to PA PUC No 5 (R-2012-2285812), § 2.3.4.E ("[i]f the PVU factor cannot be implemented in the Telephone Company's billing systems upon the effective date of this tariff provision, the Telephone Company will adjust the Customer's bills to reflect the PVU retroactively to the effective date of this tariff provision.").

¹⁶ Pennsylvania Telephone Association Supp No 13 to PA PUC No 11 (R-2012-2282660) PTA § 2.3.13.G ("[i]f a PVU factor calculated and submitted in accordance with the terms of this tariff is provided by the Customer, but cannot be implemented in the Telephone Company's billing systems upon the effective date of this tariff provision, the Telephone Company will adjust the Customer's bills to reflect the PVU retroactively to the effective date of this tariff provision.")

5. Unnecessary and improper call signaling provisions

The XO tariffs¹⁷ include call signaling provisions that require customers exchanging traffic with XO to transmit certain signaling information on calls that are originated by the customer's end users and are handed off to XO. (See XO No. 11 § 2.20 and No. 13 § 2.3.5). Although these provisions appear to be based on the FCC's new signaling rules,¹⁸ the FCC did not contemplate state tariffing of such rules (as it did for implementation of the VoIP-PSTN intercarrier compensation regime), so Verizon submits that such tariffing is inappropriate. In any event, XO's call signaling provisions omit explicit exceptions to the FCC's rules that address situations in which delivery of signaling information may be technically infeasible, including calls originated from payphones or from certain PBX or Centrex systems.¹⁹ Moreover, AT&T, CenturyLink and Verizon have petitioned the FCC for a limited waiver of the call signaling rules based on additional technical issues,²⁰ and Verizon has filed a petition for reconsideration raising similar issues.²¹ To the extent that XO's tariffs impose signaling requirements that would override the carefully crafted exceptions that the FCC has already adopted — or those exceptions or waivers that it may adopt in the future — they should be rejected. Although one solution would be to limit the tariff to simply requiring compliance with the FCC's rules, as they may change or be waived from time to time, such a tariff provision is clearly unnecessary, since the FCC's rules are independently enforceable.

6. Failure to explain how carrier will implement VoIP-PSTN rule

Almost all of the local exchange carriers that filed tariff revisions to implement the FCC's VoIP-PSTN requirements explain in those tariffs how they will identify and separate the relevant VoIP-PSTN traffic from traditional intrastate access traffic, so that such VoIP-PSTN traffic can be billed in accordance with the FCC Order, consistent with the FCC's expectations. Verizon's tariff revisions, for example, detail a process to develop and apply a Percent VoIP Usage ("PVU") factor to identify and properly rate the relevant VoIP-PSTN traffic. Many other carriers' tariffs use a substantially similar process.

The tariff revisions filed by Core Communications, Inc. in its Supp No 2 to PA PUC No 4 (R-2012-2282908) do not contain any explanation whatsoever of how Core will implement the FCC Order. Core's tariff simply repeats the FCC's requirement that, absent an agreement between carriers, Core will charge interstate rates for any traffic that falls within the scope of "toll VoIP-PSTN traffic," as that term is defined in the FCC

¹⁷ XO Communications Services, Inc. (Supp No 11 to PA PUC No 11 (Docket No. R-2012-2285252) and XO Communications Services, Inc. Supp No 10 to PA PUC No 13 (Docket No. R-2012-2285795).

¹⁸ See 47 C.F.R. § 64.1601(a)(1), as amended by the FCC Order.

¹⁹ See *id.* § 64.1601(d).

²⁰ Petitions available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021752200> (AT&T); <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021755097> (CenturyLink); and <https://prodnet.www.neca.org/publicationsdocs/wwpdf/21312verizon.pdf> (Verizon)..


²¹ Petition available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021752225>.

Order. But Core does not even attempt to address how it will identify VoIP-PSTN traffic. It offers no clue as to how (or whether) Core will identify its own VoIP usage, let alone how it expects to identify the VoIP usage of other carriers with which it exchanges traffic. There is no mention of any methodology for assuring that VoIP-PSTN traffic will be properly rated. This approach is inadequate. The very purpose of the tariffing process is to establish some reasonably clear, uniform provisions for implementing the regulatory mandate, not simply to echo that mandate. Core therefore should be required to revise its tariff to explain how it will comply with FCC Order.²²

Conclusion

Verizon would like to thank the Commission and its Staff for their thorough review of the VoIP-PSTN tariff revisions submitted by the industry in Pennsylvania and for their attention to the matters raised in this letter.

Sincerely



Suzan D. Paiva

cc: Janet Tuzinski, TUS
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Bryan Mahla, TUS
Andrew Showers, TUS
Joseph Spandra, TUS
Derek Vogelsong, TUS
Attached Certificate of Service

²² Core's last sentence of its Section 5.5 also appears to suffer from a typographical error in stating that "Customer shall be entitled to assess and collect Switched Access Charges for toll VoIP-PSTN traffic from Customer," when Core, not the Customer, would be the entity trying to assess charges under the tariff.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of Verizon's Letter, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 17th day of February, 2012

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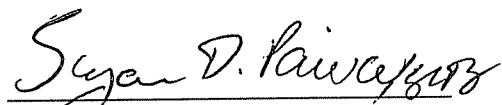
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