



April 11, 2013  
Via Web Filing

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

**RE: Spectrotel of Pennsylvania, LLC  
Initial Local, CLEC Switched Access and Long Distance Tariffs - Docket Numbers A-2012-2331882, A-2012-2331884, A-2012-2331886, A-2012-2331888, A-2012-2331889, A-2012-2331890, A-2012-2331891, A-2012-2331894, A-2012-2331972**

Dear Ms. Chiavetta:

Pursuant to the Order issued January 10, 2013, in the above referenced Docket Numbers, approving Spectrotel of Pennsylvania, LLC's Application, enclosed please find the Company's initial Local (PA PUC No. 1), CLEC Switched Access (PA PUC No. 2) and Long Distance (PA PUC No. 3) tariffs.

Changes as outlined in Appendix A of the Order have been incorporated as described attached.

The Company respectfully requests these tariffs to become effective on April 12, 2013.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to Spectrotel of Pennsylvania, LLC

cc: Ross Artale (Email Only) - Spectrotel  
Joe Mullin (Email Only) - Spectrotel  
Service List  
file: Spectrotel - Pennsylvania - Local  
Spectrotel - Pennsylvania - Access  
Spectrotel - Pennsylvania - IXC

tms: PA11202e

Enclosures  
ST/im

Spectrotel of Pennsylvania, LLC  
 d/b/a One Touch Communications d/b/a Surfstone  
 d/b/a Touch Base Communications  
 Docket Nos. A-2012-2331882; A-2012-2331884; A-2012-2331886; A-2012-2331888; A-20122331889;  
 A-2012-2331890; A-2012-2331891; A-2012-2331894; A-2012-2331972

Proposed tariffs for Reseller of Interexchange Carrier Services and  
 Competitive Local Exchange Carrier Service

The proposed tariffs contain certain deficiencies that must be addressed by the Applicant. The Applicant must submit a copy of this Appendix with its revised compliance tariffs. On that copy, please note the page/sheet of the compliance tariffs where the required revision is located for each item below.

**Tariff deficiencies noted - IXC Reseller (A-2012-2331882), Tariff No. 3**

1. Add to the Title:

COMPANY NAME  
 RESELLER INTEREXCHANGE TOLL CARRIER  
 Regulations and Schedule of Charges

*Title Page. Added the above scripted Title.*

2. All Pages: Enter issued and effective dates as per ordering paragraph.

*All Pages. Entered Issue and Effective dates.*

3. Original Pages 7-9, Remove the following words and definitions since they are not used in this tariff: Automatic Number Identification, Bandwidth, Dedicated Access Lines, Dedicated Inbound Calls and Dedicated Outbound Calls.

*Pages 7 - 9. Obsolete definitions have been removed.*

4. Original Page 11, Section 2.1.3.D, Remove this language as the Commission does not empower parties to collect their collection fees from other parties.

*Original Page 11. Section 2.1.3.D. has been deleted. Subsequent sections have been renumbered.*

5. Original Pages 13-16, Remove or revise any portion of this section that does not fit within the scope of 52 Pa. Code §69.87 and the Commission Order under Docket No. M-00981209.

See <http://www.pabulletin.com/secure/data/voI29/29-17/659.html>.

*Pages 13 - 14. This Section has been revised to incorporate Commission approved language.*

6. Original Page 15, Section 2.1.4.H, Remove this language as the Commission does not empower parties to collect their collection fees from other parties.

*See response to Item 5.*

7. Original Page 22, Section 2.3.1.D Revise the reference to Section 2.3.9.C to a valid area in the tariff.  
**Page 20. Section reference has been corrected to Section 2.3.1.C.**
8. Original Page 42, Section 2.7.2.G, Remove this item.  
**Page 40. Section 2.7.2.G has been removed. Subsequent sections have been renumbered.**
9. Original Page 43, Section 8.1, Review or remove this section as the tariff does not contain term plans.  
**Page 41. Section 2.8.1. has been removed.**
10. Original Page 54 & 55, Sections 4.4.1 & 4.5.1, Remove "The Company may impose...."  
**Original Pages 52 and 53. Statement "The Company may impose....." has been removed from both pages.**
11. Original Page 56, Section 4.7, Remove or revise this section to add the rates that are applicable.  
**Section 4.7 - Resale Discount has been removed.**
12. Original Page 58, Section 5.1, Remove or revise this section to add the rates that are applicable.  
Page 55. This section has been removed.
13. Original Page 63, Section 5.4, Revise, the customer has 30 days to change their PICC.  
**Page 61. A statement that the Company has 30 days to change their PICC has been added to the paragraph.**
14. Original Page 66, Section 6.1.3.C., Revise the items that refer to Section 13.1.3.B to something that is contained in this tariff.  
**Page 64. Section references 13.1.3.B have been corrected to 6.1.3.B.**

**Additional change made to the IXC Tariff not noted as a deficiency.**

**Page 27. Section 2.5.2.E. Interest on Deposits has been changed from 9% to 6%.**

**Tariff deficiencies noted - CLEC Local Tariff (A-2012-2331884; A-2012-2331886; A-20122331888; A-2012-2331889; A-2012-2331890; A-2012-2331891; A-2012-2331894; A-20122331972), Tariff No. 1**

1. All Pages: Enter issued and effective dates per consummation of name change.

All Pages. Entered Issue and Effective dates.

2. All Pages: Add Competitive Local Exchange Services to the top of all pages. Currently states Local Exchange Services Tariff.

All Pages - Added.

3. Original Page 8, Remove concurring carriers, connecting carriers and other participating carriers.

Concurring, etc Carriers have been removed.

4. Original Pages 10-15, Remove the following words and definitions since they are not used in this tariff: Account Codes, Automatic Number Identification (ANI), Bandwidth, Bit, Call Hold, Call Park, Call Pickup, Communication Services, Dial Pulse, Digital Signal Level, Direct Outward Dial, DXS 1- Panel, Dual Multi-Frequency (DTMF), Duplex Service, In-Only, Kbps, Last Number Redial, Multi-Frequency (MF), Shared Inbound Calls, Shared Outbound Calls and Subscriber-Provided Equipment.

Pages 10 - 15. Obsolete definitions have been removed

5. Original Pages 19-34, Remove or revise any portion of this section that does not fit within the scope of 52 Pa. Code §69.87 and the Commission Order under Docket No. M-00981209.

See <http://www.pabulletin.com/secure/data/vol29/29-17/659.html>.

Pages 19 - 20. Revised Liability of the Company description with Commission approved language.

6. Original Page 38, Section 2.5.2.A, Revise to comply with 52 Pa. Code § 64.35.

Page 33. Revised description to comply with 52 Pa. Code § 64.35.

7. Original Page 44, Section 2.6.7.A, Remove or clarify this section.

Page 39. Section 2.6.7.A has been removed.

8. Original Page 45, Section 2.6.9.B.3, Add language to describe the late payment charge or add the rate in this section.

Page 40. Late Payment Charge has been added to Section 2.6.9.B.3.

9. Original Page 47, Section 2.6.9.D.2, Add language to the last sentence on the page that the PUC has primary jurisdiction over all customer complaints.

Page 42. Added statement that PUC has primary jurisdiction over all customer complaints.

10. Original Page 48, Section 2.7.1.C, Revise to comply with 52 Pa. Code § 65.52.

Page 43. Credit for Interruptions Allowances has been changed to comply with 52 Pa. Code § 65.52.

11. Original Page 50, Section 2.7.3, Remove not applicable.

Page 45 - Section 2.7.3 has been removed.

12. Original Page 51, Section 2.8, Remove "Customers terminating services without providing any notification to the Company will not receive a prorated refund of fixed or recurring / monthly charges which are billed in advance."

Page 46. Removed language.

13. Original Page 52, Section 2.9.2, Remove this section.

Renumbered to Page 47 - Removed Section 2.9.2.

14. Original Page 58, Section 2.14.1, Add language stating that any rate changes would be filed with the Commission.

Page 53. Added statement that all rate changes are filed with and subject to Commission approval.

15. Original Pages 148-232, Rates Section, Review any rates located in this tariff. The rates listed here look as if the company was trying to mirror Verizon's complicated rate structure. Confirm that these are the rates currently being charged to customers.

The Company has made some modifications to the rate structure to mirror Verizon Pennsylvania and Verizon North's current rate structure. No changes are made to the rate structure of the Frontier territories. Certain rate changes have been made to ensure that all rates are at or below the ILEC's rates.

16. Original Page 148-150, Section 5.4, Revise these rates so they are either at or lower than the ILEC's. If the company would like their rates to be higher they must submit cost justification.

See response to Item 15.

17. Original Page 152, Section 5.5.5.A, The rates listed here are under a business exchange services. The rates for residential customers should also be located on this page.

Page 159. The Company does not offer basic stand-alone residential service in the Verizon Pennsylvania territory. The Company does, however, offer the Home Free Residential Local Exchange and Residential Let's Talk Service bundled packages.

18. Original Page 154, Section 5.5.6.A.2, Revise and define calling areas 1-3.

Page 149. Measured Usage Rates have been deleted.

19. Original Page 155, Section 5.5.6.C.1, Remove or revise the Dial Tone Line Cells to be in line with Verizon North LLC instead of Verizon Pennsylvania LLC.

Renumbered to Page 150. The Dial Tone Line Cells are copied verbatim from the Verizon North Tariff (see page attached).

20. Original Page 158, Section 5.5.6.C, The company lists prices by the number of lines in a specific area. How does the company propose to get this information?

Page 153. The Number of Lines are removed from the Rate Group Definitions Table. It was the Company's understanding that this table was to mirror the ILEC's definition.

21. Original Page 164, Section 5.6, Clarify the first sentence here that states residential customers will choose between two calling plans. If there are only two calling plans for residential customers why are there rates for services that don't fall under these plans?

Please explain.

Page 159. Section 5.6.1 lists the two Plans - "Home Free Local Plus" and "Home Free Complete". These are the only two "Home Free" calling plans available to Customers in the Verizon Pennsylvania service areas.

22. Original Page 164, Section 5.6.2.3, Remove Lifeline language, company does not offer these services.

LifeLine Section has been removed.

23. Original Page 167, Section 5.7.1.D.1, Revise to correct the reference to the Company's Long Distance Tariff.

Page 162. Corrected tariff reference.

24. Original Page 171, Remove language at the bottom of the page stating material found on this page has moved. These pages are original pages therefore no material has been moved.

Page 164. Text has been deleted.

25. Original Page 221, Section 8.1.2.D, Remove. These costs should be built into rates.

Page 172. Renumbered Section to 7 and deleted the reference to costs.

26. Original Page 221, Add language that the company must provide a quote to the customer before commencing any work.

Page 172. A sentence has been added to state..."The Company will provide a quote to the Customer prior to commencing any work."

**Tariff deficiencies noted - CLEC Switched Access Tariff (A-2012-2331884; A-2012-2331886; A-20122331888; A-2012-2331889; A-2012-2331890; A-2012-2331891; A-2012-2331894; A-20122331972), Tariff No. 2**

1. Correct the Title to read:

COMPANY NAME  
COMPETITIVE LOCAL EXCHANGE CARRIER  
SWITCHED ACCESS TARIFF  
Regulations and Schedule of Charges

Added.

2. Mirror the text of the Title Page for your CLEC Tariff.

Added.

3. All Pages: Enter issued and effective dates as per ordering paragraph.

Added on all pages.

4. Original Pages 3 - 4, Update Table of Contents to be consistent with changes made to the Tariff.

Pages 3 - 4. Table of Contents has been updated.

5. Original Page 9 (5?), Revise "all points within the Commonwealth of Pennsylvania" and add all certificated areas the Company is allowed to do business.

Page 5. All territory references have been added.

6. Original Pages 6 - 9, Remove the following words and definitions since they are not used in this Tariff; Access Code, Answer Supervisor, Communications System, Dual Tone MultiFrequency (DTMF), End Office Switch, Entry Switch, Interstate Communications, Local Calling Area, On-Hook, Serving Wire Center, Special Access Circuit and VoIP Service.

Pages 6 - 9. The obsolete definitions have been removed.

7. Original Page 11, Section 2.4, Revise the reference to 2.11 ICB, this reference is not valid.

Page 11. The reference to Section 2.11 was incorrect and has been removed.

8. Original Page 12, Section 2.2.3, Revise to be compliant with interest on residential deposits is to be calculated pursuant to 52 Pa. Code § 64.41 (currently equates to 6%).

Page 12. Deposits description has been change to be compliance with 52 Pa. Code § 64.41.

9. Original Page 15, Section 2.8.5, Revise to comply with 52 Pa Code §64.16.

Pages 15 and 16. Payment for Service has been changed to mirror the CLEC tariff.

10. Original Page 15, Section 2.8.6, Revise to comply with 18 PA C.S. 4105(e)(3) Part II, Article C, Chapter 4105.

See Response to Item 9.

11. Original Page 17, Section 2.10.2.A. Remove this language as the Commission does not empower parties to collect their collection fees from other parties.

Page 17. Section 2.10.2.A has been removed.

12. Original Page 18, Section 2.10.4. Verify this is the same rate used in the CLEC tariff if it isn't change the rate so that they are the same in both tariffs.

Page 18. The Restoration of Service Charge has been changed to mirror the business charge listed in the Company's CLEC tariff. Switched access services are not provided to residential Customers.

13. Original Pages 20 - 23, Remove or revise any portion of this section that does not fit within the scope of 52 Pa. Code §69.87 and the Commission Order under Docket No. M-00981209.

See <http://www.pabulletin.com/secure/data/voI29/29-17/659.html>.

Page 19 - 20. Revised Liability of the Company description with Commission approved language.

14. Original Page 20, Section 2.14.1 & 2, Remove this language as the Commission does not empower parties to collect their collection fees from other parties.

See response to Item 13.

15. Original Page 23, Section 2.14.14, Remove this language as the Commission does not empower parties to collect their attorney's fees from other parties.

See response to Item 13.

16. Original Page 24, Section 2.17, Remove this language as the Commission does not empower parties to collect their attorney's fees from other parties.

Page 21. Removed collection fees from other parties language.

17. Original Page 25, Sections 2.19-21, Remove these items as they are not appropriate language for an access tariff.

Removed original Sections 2.19 - 2.21.

18. Original Page 26, Sections 2.22-24, Remove these items as they are not appropriate language for an access tariff.

Removed original Sections 2.22 - 2.24.

19. Original Page 29, Section 2.26.2-3, Revise these sections. The Company cannot simply adjust rates without a tariff change or a change in contract.

Page 25. Original Section 2.26.3 has been deleted. Section 2.26.2 includes the phrase "allowed by law" such that any charge imposed would have to reflect PA law and rules.

20. Original Page 48, Section 3.6.3, Remove or revise this section to compliant with 52. Pa. Code and any rules/regulations.

Page 44. Original Section 3.6.3 has been removed.

21. Original Page 51, Section 4.1, Remove this section. Reciprocal compensation is subject to an Interconnection Agreement. The tariff may not be used to circumvent negotiations with other carriers.

Reciprocal compensation has been removed.

ATTACHMENT A

**Tariff deficiencies noted - CLEC Local Tariff (A-2012-2331884; A-2012-2331886; A-20122331888; A-2012-2331889; A-2012-2331890; A-2012-2331891; A-2012-2331894; A-20122331972), Tariff No. 1**

19. Original Page 155, Section 5.5.6.C.1, Remove or revise the Dial Tone Line Cells to be in line with Verizon North LLC instead of Verizon Pennsylvania LLC.

**VERIZON NORTH LLC DIAL TONE CELL DEFINITION**

LOCAL EXCHANGE SERVICE

C. RATES

1. Exchange Service Rate Components

a. Dial Tone Line Rates

The Dial Tone Line rate for customers with Foreign Exchange Service or Foreign Central Office Service is the same as for the central office designation associated with the customer's local serving office.

b. Local Usage Option Rates

Residence customers choose one of the following usage options:

- Local Area Unlimited Usage Option
- Usage Sensitive Service (USS) Measured Usage Option
- Usage Sensitive Service (USS) Metered Usage Option

Business customers choose one of the following options:

- Local Area Unlimited Usage Option
- Usage Sensitive Service (USS) Measured Usage Option

2. Dial Tone Line Cell Classification\*

For the purposes of determining an Exchange Area Dial Tone Line monthly rate, the Exchange Areas are classified into one of the four (4) Dial Tone Line Cells. The Cell classifications are determined by the following criteria:

<u>Dial Tone Line Cell</u>	<u>Classification Criteria</u>
1	All Philadelphia and Pittsburgh City Exchange Areas or Zones with working pairs per square mile greater than nine thousand (9,000).
2	All Philadelphia and Pittsburgh City remaining Exchange Areas or Zones.
3	All Philadelphia and Pittsburgh Suburban Exchange Areas or Exchanges with more than five hundred (500) working pairs per square mile.
4	All remaining Exchange Areas.

3. Dial Tone Line Reclassification

When an annual review indicates that the number of working pairs per square mile of an Exchange Area or Zone has exceeded or fallen below the above Dial Tone Line Cell criteria for two (2) consecutive study periods, the Exchange Area will be reclassified. Notice of the reclassification of the Exchange Area Dial Tone Line Cell shall be given by filing revised tariffs with the Commission.

\* Excludes grandfathered 2 and 4 Party service, see rates in C.5.b for Residence and C.5.d for Business.

These rates, terms and conditions are effective June 30, 2002.

(C)

(C) Indicates Change

Issued: June 9, 1997

Effective: July 17, 1997

LOCAL EXCHANGE SERVICE

B. EXCHANGE SERVICE (Cont'd.)

3. Dial Tone Line Cell Classification

For the purposes of determining an Exchange Area Dial Tone Line monthly rate, the Exchange Areas are classified into one of the four (4) Dial Tone Line Cells. The Cell classifications are determined by the following criteria:

<u>Dial Tone Line Cell</u>	<u>Classification Criteria</u>
1	All Philadelphia and Pittsburgh City Exchange Areas or Zones with working pairs per square mile greater than 9,000.
2	All remaining Philadelphia and Pittsburgh City Exchange Areas or Zones.
3	All Philadelphia and Pittsburgh Suburban Exchange Areas or Zones with more than 500 working pairs per square mile.
4	All remaining Exchange Areas.

4. Dial Tone Line Reclassification

When an annual review indicates that the number of working pairs per square mile of an Exchange Area or Zone has exceeded or fallen below the above Dial Tone Line Cell criteria for two (2) consecutive study periods, the Exchange Area will be reclassified. Notice of the reclassification of the Exchange Area Dial Tone Line Cell shall be given by filing revised tariffs with the Commission.

5. Exchange Rate Classifications

The Local Area Unlimited Usage Package for Residence and Business lines are classified into Usage Rate Groups on the basis of the number of lines in the Local Area Unlimited Usage Package local calling area adjusted by weighting factors which reflect distance.

a. Lines

The number of lines for each exchange is the sum of the total number of residence and business lines.

b. Weighting Factors

- For the exchange itself, each line is counted as "1".
- For each other exchange which may be called on a local basis, the number of lines is multiplied by a factor based on the rate center to rate center distance, as follows:

<u>Mileage Bands</u>	<u>1 – 10</u>	<u>11 – 16</u>	<u>17 – 22</u>	<u>23 – 30</u>
<u>Distance Factors</u>	1.0	1.5	2.0	2.5

These rates, terms and conditions are effective June 30, 2002.

(C)