



May 28, 2014

IOWA UTILITIES BOARD

May 28, 2014

Via Electronic Filing System (EFS)

Ms. Joan Conrad, Executive Secretary
Iowa Utilities Board
1375 E. Court Ave, Rm. 69
Des Moines, IA 50319-0069

**Re: Iowa Telecommunications Association Access Service Tariff No. 1.
REVISIONS – Originating Intrastate VoIP-PSTN Traffic**

Executive Secretary Conrad:

On June 21, 2012, the Iowa Telecommunications Association (ITA) filed revisions to ITA Intrastate Access Tariff No. 1, implementing access rates for intrastate terminating toll VoIP-PSTN traffic at parity with interstate terminating rates per the FCC's Second Order on Reconsideration released on April 25, 2012. In connection with that filing, ITA indicated that access rates for intrastate originating toll VoIP-PSTN traffic would transition to parity with interstate originating rates, not later than July 1, 2014.

Enclosed for filing are revisions to sheets 9 and 9.1 of the ITA Access Tariff No. 1, implementing the required transition for access rates applied to intrastate originating toll VoIP-PSTN traffic. The revisions include a process for deriving and applying a percent VoIP usage factor ("PVU") to identify the percentage of intrastate originating traffic that will be treated as intrastate originating toll VoIP-PSTN traffic. Assuming these revisions are approved, access rates applied to such traffic will be at parity with interstate originating rates.

We request an effective date of July 1, 2014 for these revisions.

If there are any questions concerning this letter, please contact me at 515-867-2091 or via email at dduncan@IACommunicationsAll.com.

Sincerely,

IOWA COMMUNICATIONS ALLIANCE

Dave Duncan, CEO

1. ACCESS SERVICE (continued)

1.3 Notice on Discontinuance of Service to an Interexchange Carrier (IXC)

In connection with the discontinuance of access service to an interexchange carrier under NECA Tariff #5 section 2.1.8(A), company shall provide the required 30 calendar day notice to the interexchange carrier of a pending disconnection of service so the interexchange carrier can notify its End User Customers and allow them to make other arrangements for such services. Company shall notify the Iowa Utilities Board using its Electronic Filing System on the day service is discontinued.

1.4 Identification of Toll VOIP-PSTN Traffic

This section establishes the method of separating Toll VoIP-PSTN Traffic from the customer's traditional intrastate access traffic, so that Toll VoIP-PSTN Traffic can be billed in accordance with the Federal Communications Commission's (FCC) order in Connect America Fund, et al., WC Docket No. 10-90, et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011), as it may hereafter be amended, clarified or otherwise changed or abrogated by the FCC or a court or a regulatory body of competent jurisdiction (the "FCC Order"). In accordance with the FCC Order toll VoIP-PSTN Traffic identified in accordance with the following tariff sections will be billed at rates equal to the Telephone Company's applicable tariffed interstate switched access rates. In the event the FCC Order's requirement that intrastate Toll VoIP-PSTN traffic be billed at interstate rates is reversed by a final order of the FCC or a court of competent jurisdiction, the Telephone Company reserves the right to revise its billings to the customer at intrastate access rates back to January 1, 2012, for terminating access and July 1, 2014, for originating access.

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

The Telephone Company will determine the number of Relevant originating and terminating VoIP-PSTN Traffic minutes of use ("MOU") to which interstate rates will be applied by applying a Percent VoIP Usage ("PVU") factor to the originating and terminating intrastate access MOU exchanged between The Telephone Company end user and the customer. A terminating PVU factor will not be necessary as long as the Telephone Company's intrastate terminating local switched access rates are at parity with its interstate terminating switched access rates. When required, originating and terminating PVUs will be derived and applied as follows:

- (1) The customer will calculate and furnish to the Telephone Company originating and terminating PVU factors, representing the percentage of the total intrastate and interstate originating or terminating access MOU that the customer exchanges with the Telephone Company in the State, that (a) is sent to the Telephone Company and that originated in IP format; or (b) is received from the Telephone Company and terminated in IP format. Originating and terminating PVU factors shall be based on information such as traffic studies, actual call detail, or other relevant and verifiable information.
- (2) The customer will submit with the factor an overview of the process used to determine the PVU factor and the calculations used to determine the PVU factor. The customer shall retain the call detail, work papers, and information used to develop the PVU factors for a minimum of one year from the date of first use of the factor.
- (3) The Telephone Company will apply the PVU factor to the total intrastate originating or terminating access MOU (as applicable) exchanged with the customer to determine the number of Relevant originating or terminating VoIP-PSTN Traffic MOUs.
- (4) If the customer does not furnish the Telephone Company with a valid originating or terminating PVU pursuant to the preceding paragraph 1, the Telephone Company will utilize a PVU equal to zero.

(B) Initial PVU Factor

- (1) If the terminating PVU factor is not available and/or cannot be implemented in the Telephone Company's billing systems by December 29, 2011 once the factor is available and can be implemented the Telephone Company will adjust the customer's bills to reflect the terminating PVU retroactively to December 29, 2011. This retroactive adjustment will be made to December 29, 2011, provided that the customer provides the factor to the Telephone Company no later than April 15, 2012; otherwise, it will set the initial PVU equal to zero, as specified in subsection (A)(4), above.

1.4 Identification of Toll VOIP-PSTN Traffic (Cont'd)

(B) Initial PVU Factor (Cont'd)

- (2) If the originating PVU factor is not available and/or cannot be implemented in the Telephone Company's billing systems by July 1, 2014, once the factor is available and can be implemented the Telephone Company will adjust the customer's bills to reflect the PVU retroactively to July 1, 2014. This retroactive adjustment will be made to July 1, 2014, provided that the customer provides the factor to the Telephone Company no later than August 15, 2014; otherwise, it will set the initial PVU equal to zero, as specified in subsection (A)(4), above. (C)

(C) PVU Factor Updates

The customer may update the originating or terminating PVU factor quarterly using the method set forth in subsection (A)(1) and (2), above. If the customer chooses to submit such updates, it shall provide to the Telephone Company, no later than 15 days after the first day of January, April, July and/or October of each year, a revised PVU factor based on data for the prior three months, ending the last day of December, March, June and September, respectively. The revised originating or terminating PVU factor will apply prospectively and serve as the basis for billing until superseded by a new originating or terminating PVU. (C)

(D) PVU Factor Verification

Not more than four times in any year, the Telephone Company may ask the customer to verify the PVU factors furnished to the Telephone Company. The customer shall comply, and shall reasonably provide the records and other information used to determine the PVU factors. (T)

The Company may dispute the Customer's PVU factors based upon (a) a review of the data and information provided by the customer; (b) the Company's reasonable review of other market information, including state level results based on the F.C.C. Local Competition Reports or other relevant data; or (c) a change in the reported PVU factor by more than five percentage points from the preceding quarter.

Any changes in a PVU factor determined after a verification review shall relate back to the date upon which the PVU factor subject to verification was first applied and the customer bills will be adjusted retroactively to reflect the changed PVU. (T)

- (E) Any disputes unresolved by the Telephone Company and the customer may be subject to a complaint before the Board.

2. SPECIAL CONSTRUCTION

2.1 Application of Tariff

This tariff contains regulations, rates, charges and liabilities applicable for the special construction of facilities provided by the Local Exchange Utility, hereinafter referred to as the Company, to Intrastate Customers, hereinafter referred to as I C' s, are the same as those filed in Exchange Carrier Association Tariff F.C.C. No.3 with the exceptions listed herein.

2.1.1 Whenever reference is made within the Exchange Carrier Association Tariff F.C.C. No.3 to interstate services, unless context requires otherwise, interstate shall mean intrastate.

2.2. Exceptions to Exchange Carrier Association Tariff F.C.C. No.3

2.2.1 Regulations

Exceptions to filing of charges 2.1

- (A) Rates, charges and liabilities for special construction will be handled on an Individual Case Basis. Sections 3, 4, and 5 are not applicable.