In the Matter of
Petition for Declaratory Ruling to Clarify
The Applicability of the IntraMTA Rule to
LEC-IXC Traffic and Confirm that Related
IXC Conduct Is Inconsistent with the
Communications Act of 1934, as Amended
And the Commission’s Implementing Rules
And Policies

WC Docket No. 14-228

REPLY COMMENTS OF IOWA NETWORK SERVICES, INC.

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SUMMARY

In these Reply Comments, Iowa Network Services, Inc. (“INS”) urges the Commission to grant the declaratory ruling sought in the LEC Petition at issue in this proceeding, as it is well founded in law, policy and considerations of equity. Furthermore, in granting that ruling, the Commission should include a parallel ruling applicable to intraMTA traffic delivered to or received from interexchange carriers (“IXCs”) by Centralized Equal Access (“CEA”) providers such as INS. Because CEA providers incur significant costs and provide substantial benefits in providing CEA service to IXCs for intraMTA traffic, it would be arbitrary and capricious, and bad policy, for the Commission to rule that LECs may collect access charges in this context while CEA providers may not receive any compensation for CEA service. Specifically, the Commission should declare that in the absence of an agreement providing otherwise, intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA service facilities, is subject to the access charge obligations established in the CEA provider’s tariff.

The declaratory ruling sought in the LEC Petition should be granted, as it is well supported by Commission precedent, and years of unchallenged industry practice. As noted in the Petition and supporting comments, when the Commission created the intraMTA rule in its Local Competition First Report and Order, it mandated that intraMTA traffic between LECs and CMRS providers is subject to reciprocal compensation pricing “unless it is carried by an IXC.” That is, the access charge regime applies to IXC-transported intraMTA traffic. This principle was reaffirmed in the TSR Wireless Order. That core regulatory approach was not revised when the Commission again addressed the intraMTA rule in the 2011 USF/ICC Transformation Order. The Order maintains the distinctions in the compensation available under the reciprocal compensation regime and compensation owed under the access regime during the ICC transition. Parties opposing the Petition, such as Sprint, Level 3 and Verizon, primarily rely on one paragraph and two footnotes in that Order, but the records shows that their reliance on these citations is misplaced.

Up until last year, IXCs paid access charges billed on intraMTA traffic without dispute. This long-standing industry practice which the IXCs did not dispute for 18 years is powerful evidence that those IXCs agreed that under applicable Commission law, this traffic is subject to access charges. While Sprint, Verizon and Level 3 have apparently changed their minds, they have provided no explanation for this sudden revelation regarding the law, nor why carriers with such extensive and sophisticated legal resources were previously unaware of their alleged right to pay only reciprocal compensation.

The manner in which the IXCs have delivered the intraMTA traffic have made it practically impossible for LECs to apply reciprocal compensation to such traffic, even if that were mandated by Commission law. The IXCs typically fail to notify the affected LECs that intraMTA traffic is intermingled with other interexchange traffic, or of the amount of the traffic that is intraMTA, and thus the LECs have no way of determining whether or what amount of that traffic is intraMTA. Under these circumstances, it cannot be considered equitable to require LECs to pay reciprocal compensation to IXCs for this traffic.
In granting the ruling sought in the Petition, the Commission should also include a parallel ruling that, in the absence of an agreement that provides otherwise, intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA facilities, is subject to CEA tariffed access charges. IXCs are using CEA tariffed service to exchange traffic via the CEA network, with CEA providers incurring significant costs and providing substantial benefits in providing rural consumers with an equal access choice of using their preferred IXC for intraMTA traffic by simply dialing 1+. Accordingly, it would be arbitrary and capricious for the Commission to rule that LECs may collect access charges in this context while CEA providers may not receive compensation at the CEA tariff rates. In addition, a definitive ruling on this would serve the public interest by preventing the uncertainty created by certain IXCs regarding appropriate compensation to LECs for such traffic, from spreading to the context of CEA providers.

Another reason to apply CEA tariffed rates to CEA service provided for intraMTA IXC traffic is the difficulty of complying with reciprocal compensation requirements when the necessary information is not made available to the CEA provider. With no requirement for IXCs or CMRS operators to provide this information to the CEA provider, it would be arbitrary and capricious, as well as bad policy, to impose a reciprocal compensation obligation on the CEA provider. Furthermore, because intraMTA wireless and wireline interexchange traffic are typically intermingled on the same common trunks between IXCs and CEA providers, it would be additionally arbitrary and capricious, as well as bad policy, to prevent CEA providers from recovering their costs through CEA tariff rates, when a large percentage of such traffic is landline interexchange or interMTA wireless and thus clearly subject to CEA tariff rates.

INS is mindful of the Eighth Circuit’s decision in Iowa Network Services, Inc. v. Qwest Corp., 466 F.3d 109 (2006) (“Qwest”). INS respectfully submits that the Qwest decision was wrongly decided by the Eighth Circuit. The Court's improper holding that the Iowa Utilities Board (“IUB”) could require reciprocal compensation between INS and Qwest without violation of federal law or the FCC’s rules, contradicts the Court’s correct statement that “[b]ecause intermediary carriers, like Qwest and INS, by definition, neither originate nor terminate calls, they do not fit into the "reciprocal" relationship contemplated in the Act and defined in the FCC's rules.” However, that case need not determine the Commission’s action in this proceeding. In the Qwest case, the court noted that it was upholding a decision of the IUB in favor of reciprocal compensation where, according to the IUB and the Court, there was no clear FCC precedent. While INS asserts that this premise is inaccurate, there is an opportunity in this proceeding for the Commission to provide a clarifying and definitive statement. Specifically, the Commission should declare that in the absence of an agreement providing otherwise, intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA service facilities, is subject to the access charge obligations established in the CEA provider’s tariff.
In the Matter of)

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REPLY COMMENTS OF IOWA NETWORK SERVICES, INC.

Iowa Network Services, Inc. (“INS”) hereby submits these Reply Comments, pursuant to the Commission’s Public Notice in the above-captioned proceeding.1 INS urges the Commission to grant the declaratory ruling sought in the Petition at issue herein,2 as it is well founded in law, policy and considerations of equity. Furthermore, in granting that ruling, the Commission should include a parallel ruling applicable to intraMTA traffic delivered to or received from interexchange carriers (“IXCs”) by Centralized Equal Access (“CEA”) providers such as INS. Because CEA providers incur significant costs and provide substantial benefits in providing CEA service to IXCs for intraMTA traffic, it would be arbitrary and capricious, and bad policy, for the Commission to rule that LECs may collect access charges in this context while CEA providers may not receive any compensation for CEA service. In support thereof, the following is shown.


2 Petition for Waiver of Bright House Networks LLC, the CenturyLink LECs, Consolidated Communications, Inc., Cox Communications, Inc., FairPoint Communications, Inc., Frontier Communications Corporation, LICT Corporation, Time Warner Cable Inc., Windstream Corporation, the Iowa RLEC Group, and the Missouri RLEC Group, WC Docket No. 14-228 (filed Nov. 10, 2014) (“Petition”).
I. Introduction

INS has long been a provider of CEA service. The Commission granted Iowa Network Services a Section 214 Certificate in 1988 for the purpose of improving telecommunications services for consumers in rural America. INS was authorized by the Commission and the Iowa Utilities Board ("IUB") to construct and operate a CEA network to aggregate rural traffic, centralize the provisioning of expensive features and functionalities, and help bring the benefits of advanced communications services and competition to rural areas. The INS fiber optic network provides a bridge between the exchanges of rural local exchange carriers ("LECs") and the full range of IXC, commercial mobile radio service ("CMRS") providers, internet protocol television ("IPTV") service providers, and broadband internet service providers that want to provide service to rural communities. INS' fiber CEA network connects the facilities of these communications and information service providers to more than 300 exchanges operated by more than 140 rural LECs. The INS network consists of state-of-the-art, bi-directional fiber rings employing SS7 signaling. INS operates 5 diversely routed bi-directional fiber rings traversing over 2,700 route miles of fiber. This redundancy creates a durable and reliable network.

In granting INS authority to operate, the Commission and the IUB determined that the benefits of rural traffic concentration, for both originating and terminating traffic, served the public interest by making rural areas more attractive markets from the perspective of competitive service providers such as IXC and CMRS providers. Through this network, communications and

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information service providers are able to indirectly connect to the rural LECs' local network facilities through one or more convenient points of interconnections established with the INS CEA network. Because the CEA network aggregates traffic for many rural telephone lines, communications and information service providers have the choice of reaching thousands of customers in hundreds of rural communities through a single CEA connection. This concentration of traffic, made possible by CEA, has succeeded in providing rural consumers with an attractive choice of several IXCs and has increased the availability of a variety of competitive service offerings. The benefits of the CEA network as recognized by the Commission and the IUB, continue today.

INS’ initial challenge was to provide rural residents with a choice of long distance carriers by centralizing equal access functionality and concentrating rural traffic sufficiently to make rural areas attractive for IXCs to serve. The CEA network succeeded in attracting multiple IXCs to offer their services to rural residents, and still provides efficient and cost effective equal access to rural communities. However, CEA traffic aggregation and single source of network functionality also provide efficiencies and cost savings for all types of communications companies that seek to compete in rural areas, including CMRS providers. These service providers, through utilization of the CEA facilities and tandem services of INS, are able to interconnect with each of the subtending rural LEC networks without having to establish separate direct interconnection arrangements with each of the rural LECs.

II. In the Absence of an Interconnection Agreement Providing Otherwise, IntraMTA Traffic Delivered by or Received From an IXC, Using Tariffed Switched Access Services, is Subject to Access Charges.

The declaratory ruling sought in the Petition should be granted, as it is well supported by Commission precedent, and years of unchallenged industry practice.
A. Commission Precedent and the Communications Act
Support Grant of the Declaratory Ruling.

As noted in the Petition and supporting comments, when the Commission created the
intraMTA rule in its Local Competition First Report and Order, it mandated that intraMTA traffic
between LECs and CMRS providers is subject to reciprocal compensation pricing “unless it is
carried by an IXC.” That is, the access charge regime applies to IXC-transported intraMTA
traffic. This principle was reaffirmed in the TSR Wireless Order.5

That core regulatory approach was not revised when the Commission again addressed the
intraMTA rule in the 2011 USF/ICC Transformation Order. The Order maintains the distinctions
in the compensation available under the reciprocal compensation regime and compensation owed
under the access regime during the ICC transition.6 Parties opposing the Petition, such as Sprint,
Level 3 and Verizon, primarily rely on paragraph 1007 and footnotes 2132 and 2133 in that Order,7
but their reliance on these citations is misplaced.

Paragraph 1007 did state that intraMTA traffic is subject to reciprocal compensation
regardless of whether the two end carriers are directly connected or exchange traffic indirectly via
a transiting carrier.8 But, as noted in the Petition, this language merely reiterates that carriers may
route non-access traffic directly or indirectly using transit service, and did not revise the policy
that the IntraMTA Rule does not affect LEC-IXC compensation for traffic that an IXC routes via
access facilities.9 As demonstrated in the Comments of XO Communications:

4 See In re Implementation of the Local Competition Provision of the Telecomm. Act of 1996, 11
(intraMTA traffic is subject to “access charge rules if carried by an interexchange carrier.”).
Order”).
7 Comments of Verizon at page 2, 8-9; Comments of Sprint Corporation and Level 3 Corporation (“Sprint/Level
3”) at pages 3-4, 10-11, 20, 23.
8 Id. at ¶ 1007.
9 Petition at footnote 39 and page 4.
[t]he Commission was responding to a specific question whether the intraMTA rule applied to outbound landline-originated traffic exchanged indirectly between a LEC and a CMRS provider where the exchange point is outside of the MTA or whether, in such cases, the LEC could impose access charges on the CMRS provider. The Commission was not addressing the question of whether a LEC could impose access charges on an IXC delivering intraMTA traffic to the LEC using tariffed switched access services.10

Footnote 2132 states that “many incumbent LECs have already, pursuant to state commission and appellate court decisions, extended reciprocal compensation arrangements with CMRS providers to intraMTA traffic without regard to whether a call is routed through interexchange carriers.” But as XO notes, “[t]his statement reveals that the Commission understands such an extension is not automatic but is voluntary or, as the cases cited reveal, otherwise contained in an interconnection agreement between the LEC and CMRS provider ….”11

Parties such as Sprint and Verizon also seek support in the appellate cases cited in Footnote 2133 of the USF/ICC Transformation Order.12 However, as demonstrated in the Petition (at page 22), those cases are inapplicable in the context of intraMTA traffic exchanged between an IXC and a LEC. This was reaffirmed by the U.S. District Court for the Northern District of Iowa, in its referral to the Commission.13

Lastly, as shown by the Multistate Small LECs, Section 252 of the Communications Act negates the argument that intraMTA traffic delivered by an IXC to a LEC or received by an IXC from a LEC is automatically subject to reciprocal compensation.14 Specifically, Section

10 Comments of XO Communications, LLC (“XO”), at page 12. See also, Comments of Multistate Small Local Exchange Carrier Litigants (“Multistate Small LECs”), at pages 10-11 (noting the focus of the Commission’s analysis in paragraph 1007 is on traffic “exchanged between a LEC and a CMRS provider …” [emphasis in Comments]).
11 Comments of XO at page 13.
12 Comments of Verizon at page 2, 9; Comments of Sprint/Level 3 at page 11.
13 Sprint Comm. Co. v. Butler-Bremer Mut. Tel. Co., U.S. Dist. LEXIS 141758 (N.D. Iowa, Oct. 6, 2014) at *11 (“… the federal appellate decisions on which Sprint relies also do not involve interpretation or policy analysis of FCC regulations regarding payment arrangements between LECs and IXCs.)(emphasis in original). See also, Comments of XO at pages 13-17.
14 Comments of Multistate Small LECs at page 12.
252(d)(2)(A)(i) makes clear that the rate setting requirements for reciprocal compensation are “associated with the transport and termination on each carrier’s network facilities of calls that originate on the network facilities of the other carrier.” (emphasis added). In the case of intraMTA wireless traffic, IXC\s are not originating or terminating traffic, and thus this traffic is not subject to reciprocal compensation (unless such compensation is part of a voluntary interconnection agreement between the LEC and the IXC).

B. Historical Industry Practice Supports the Declaratory Ruling.

The record is clear that for 18 years, IXC\s have paid access charges without complaint on intraMTA traffic exchanged with a LEC. AT&T is well-positioned to describe this history, which it does succinctly in its Comments:

For many years and continuing today, when IXC\s handle intraMTA traffic, they typically route such traffic over access trunks ordered from LEC\s’ access tariffs. The intraMTA traffic is thus usually commingled with IXC\s’ long distance traffic. As the Commission recognized in both its 1996 and 2011 orders, in these circumstances, it may be difficult or impossible for the LEC, using its own information, to identify intraMTA traffic that is routed over the access trunks. Moreover, neither IXC\s nor wireless carriers have typically provided LEC\s with timely, accurate and verifiable data (or factors) that would allow LEC\s to determine or estimate the level of intraMTA traffic delivered over access trunks. Accordingly, for years, in the absence of a specific interconnection agreement that governs the exchange of and compensation for intraMTA traffic, LEC\s have billed IXC\s switched access charges on both the IXC long distance traffic and the commingled intraMTA traffic routed over access trunks. For years, up until last year, IXC\s paid those access charges billed on intraMTA traffic without dispute.\(^\text{15}\)

This long-standing industry practice which the IXC\s did not dispute for 18 years is powerful evidence that those IXC\s agreed that under applicable Commission law, this traffic is subject to access charges. While Sprint, Verizon and Level 3 have apparently changed their minds, they have provided no explanation for this sudden revelation regarding the law, nor why carriers with such

\(^{15}\) Comments of AT&T Services, Inc. (“AT&T”) at pages 3-4. See also, Comments of the Concerned Rural LECs at page 6; Comments of XO at page 2; Comments of Multistate Small LECs at page 8; Comments of ITTA at page 3.
extensive and sophisticated legal resources were previously unaware of their alleged right to pay only reciprocal compensation.

C. Considerations of Equity Support Grant of the Declaratory Ruling.

As discussed in the Petition, the manner in which the IXCs have delivered the intraMTA traffic have made it practically impossible for LECs to apply reciprocal compensation to such traffic, even if that were mandated by Commission law. The IXCs typically fail to notify the affected LECs that intraMTA traffic is intermingled with other interexchange traffic, or of the amount of the traffic that is intraMTA, and thus the LECs have no way of determining whether or what amount of that traffic is intraMTA. Petition at page 19. The Comments of NTCA, WTA, the Eastern Rural Telecom Association, and the National Exchange Carrier Association similarly note that:

“since 1996, the implementation of digital technology and wireless-wireless and wireline-wireless number portability have made it virtually impossible for a LEC to determine by itself and without the cooperation of the other carriers involved: (a) whether the other party to its customer’s call is a wireless or wireline user; (b) if the call is exchanged indirectly via an IXC or another transiting carrier, the identity of the LEC or CMRS carrier on the other end of the call; and (c) whether a call involving a wireless user is originating or terminating at a location inside or outside the relevant MTA.”

Under these circumstances, it cannot be considered equitable to require LECs to pay reciprocal compensation to IXCs for this traffic, when the IXCs typically make it practically impossible for LECs to properly identify which traffic is intraMTA, and to properly calculate the amount of such compensation.

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16 Comments of NTCA, WTA, the Eastern Rural Telecom Association, and the National Exchange Carrier Association (hereinafter, “Comments of NTCA et al.”) at page 9.
III. The Commission Should Also Rule That IntraMTA Traffic Delivered to or Received From an IXC by a CEA Provider is Subject to Tariffed Access Charges.

INS urges the Commission to grant the declaratory ruling sought in the Petition as applied to LECs, as it is well founded in law, policy and equity. Furthermore, in granting that ruling, the Commission should also include a parallel ruling that, in the absence of an agreement that provides otherwise, intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA facilities, is subject to CEA tariffed access charges. IXCs are using CEA tariffed service to exchange traffic via the CEA network, with CEA providers incurring significant costs and providing substantial benefits in providing rural consumers with an equal access choice of using their preferred IXC for intraMTA traffic by simply dialing 1+. Accordingly, it would be arbitrary and capricious for the Commission to rule that LECs may collect access charges in this context while CEA providers may not receive compensation at the CEA tariff rates. In addition, a definitive ruling on this would serve the public interest by preventing the uncertainty created by certain IXCs regarding appropriate compensation to LECs for such traffic, from spreading to the context of CEA providers.

IXCs can place access service requests (“ASRs”) with INS that include requests to exchange intraMTA traffic with INS via purchase of tariffed CEA service.17 The INS Tariff provides that in addition to other services described therein, terms and conditions are established governing the “use of Iowa Network’s facilities in the transport of calls from a subscriber of a Commercial Mobile Radio Service (CMRS) provider to a subscriber of a Routing Exchange Carrier and from a subscriber of a Routing Exchange Carrier to a subscriber of a CMRS provider.”

17 See Iowa Network Access Division Tariff F.C.C. No. 1 -- Centralized Equal Access Service (“INS Tariff”). INS also exchanges IntraMTA traffic with some carriers pursuant to transit agreements entered into with those carriers.
The rate charged for this service is INS’ standard rate for Switched Transport Service under the Tariff.

CEA providers like INS provide the same service to IXCs, use the same facilities, and generate the same costs when exchanging intraMTA traffic with IXCs, as they do when exchanging all other traffic with IXCs. CEA providers should be allowed to continue to recover these costs. For the Commission to allow LECs to recover their costs, while denying compensation to CEA providers would be arbitrary and capricious.

Another reason to apply CEA tariff rates to CEA service provided for intraMTA IXC traffic is the difficulty of complying with reciprocal compensation requirements when the necessary information is not made available to the CEA provider. For a CEA provider like INS, it is practically impossible to determine by itself and without the cooperation of the other carriers involved: (a) whether the other party to its customer’s call is a wireless or wireline user; (b) if the call is exchanged indirectly via an IXC or another transiting carrier, the identity of the LEC or CMRS carrier on the other end of the call; and (c) whether a call involving a wireless user is originating or terminating at a location inside or outside the relevant MTA. With no requirement for IXCs or CMRS operators to provide this information to the CEA provider, it would be arbitrary and capricious, as well as bad policy, to impose a reciprocal compensation obligation on the CEA provider. Furthermore, because intraMTA wireless and wireline interexchange traffic are typically intermingled on the same common trunks between IXCs and CEA providers, it would be additionally arbitrary and capricious, as well as bad policy, to prevent CEA providers from recovering their costs through CEA tariff rates, when a large percentage of such traffic is landline interexchange or interMTA wireless and thus clearly subject to CEA tariff rates.
Failure to grant the ruling requested regarding traffic exchanged with CEA providers could lead to wasteful arbitrage. Compensating LECs but not CEA providers could drive intraMTA traffic to one class of carrier rather than the other. This artificial impact on the market is inefficient, and contrary to the goals that have driven Commission policy on intercarrier compensation for years.

INS is mindful of the Eighth Circuit’s decision in *Iowa Network Services, Inc. v. Qwest Corp.*, 466 F.3d 109 (2006) (“Qwest”). INS respectfully submits that the *Qwest* decision was wrongly decided by the Eighth Circuit. The Court’s improper holding that the IUB could require reciprocal compensation between INS and Qwest without violation of federal law or the FCC’s rules, contradicts the Court’s correct statement that “[b]ecause intermediary carriers, like Qwest and INS, by definition, neither originate nor terminate calls, they do not fit into the "reciprocal" relationship contemplated in the Act and defined in the FCC’s rules.”

Id. at 1095. However, that case need not determine the Commission’s action in this proceeding. In the *Qwest* case, the court noted that it was upholding a decision of the IUB in favor of reciprocal compensation where, according to the IUB and the Court, there was no clear FCC precedent:

In the absence of a clear mandate from the FCC or Congress stating how charges for this type of traffic should be determined, or what type of arrangement between carriers should exist, the Act has left it to the state commissions to make the decision, as long as it does not violate federal law and until the FCC rules otherwise. . . . As the IUB acted within its power under statute, we find no error.

*Qwest*, 466 F.3d at 1097. While INS asserts that this premise is inaccurate, there is an opportunity in this proceeding for the Commission to provide a clarifying and definitive statement.

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18 This finding by the Court is consistent with the provisions of Section 252(d)(2)(A)(i) of the Communications Act, which provide that the rate setting requirements for reciprocal compensation are “associated with the transport and termination on each carrier’s network facilities of calls that originate on the network facilities of the other carrier.” (emphasis added). In the case of the intraMTA traffic at issue here, neither the CEA provider nor the IXC are originating traffic.
Specifically, the Commission should declare that in the absence of an agreement providing otherwise, intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA service facilities, is subject to the access charge obligations established in the CEA provider’s tariff.

IV. Conclusion

The Commission should grant the Petition as applied to LECs, as it is well founded in law, policy and equity. Additionally, it would be inequitable, arbitrary and capricious to allow LECs to recover their costs associated with intraMTA traffic, while denying compensation to CEA providers. Accordingly, in granting the Petition, the Commission should also include a parallel ruling that intraMTA traffic delivered to or received from IXCs by CEA providers through tariffed CEA facilities is subject to the access charge obligations established by CEA tariffs.

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