NATIONAL EXCHANGE CARRIER ASSOCIATION, INC.
ACCESS TARIFF REVISIONS
TARIFF F.C.C. NO. 5
Transmittal No. 1309
DESCRIPTION AND JUSTIFICATION

1. INTRODUCTION

The National Exchange Carrier Association, Inc. (NECA) proposes to modify its Tariff F.C.C. No. 5 to expand its existing Internet Protocol Gateway (IPG) Access Service from a one-way terminating only packet transport service to a two-way originating and terminating packet transport service.

These revisions are being made to provide additional transport options for interexchange carriers and IP voice service providers seeking to interconnect their IP-based networks with the Telephone Company's switched network using IPG and Feature Group D (FGD) Switched Access Service.

This filing also revises existing provisions in Sections 5 (Access Ordering) and 6 (Switched Access Service) to reflect the availability of IPG with both originating and terminating FGD Switched Access Service.

2. PROPOSED TARIFF REVISIONS

With the proposed revisions IPG will become a two-way packet transport access service enabling a customer to interconnect its IP-based network with the Telephone Company's switched network at the Telephone Company's IP gateway serving wire center location designated in Tariff F.C.C. No. 4. IPG will provide the customer with the ability to deliver interexchange voice traffic originated on or transported across its IP-based network for termination to the Telephone Company's local exchange service subscribers, and to accept interexchange voice traffic originated on or transported across the Telephone Company's network.

IPG is an optional service. It is provided using a combination of IPG Transport and IPG Ports and must be used in conjunction with FGD Switched Access Service. The existing IPG transport data speed options and rate structure will remain unchanged, except the speed options and rate structure will now support two-way service with this filing. The IPG customer and the Telephone Company will provide each other with accurate call signaling data for traffic originated on or transported across their respective networks.

3. REVENUE, COST AND DEMAND SUPPORT

NECA anticipates demand will develop for IPG over time. NECA expects no projected incremental demand or cost impacts for the two months remaining in the current tariff test period as a result of the expansion of IPG to a two-way service. NECA is not proposing any changes to the currently effective rates for IPG Transport and IPG Ports.

The unit costs for this service were initially developed as described in the filing which introduced IPG.[1] The unit costs underlying the effective tariff rates for the current IPG one-way terminating service are unchanged by modifying the service arrangement to accommodate two-way IPG service.[2]

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1 See National Exchange Carrier Association, Inc., Tariff F.C.C. No. 5, Transmittal No. 1257 filed November 13, 2009.

2 See National Exchange Carrier Association, Inc., Tariff F.C.C. No. 5, Transmittal No. 1278 filed June 16, 2010. Unit costs for High Capacity Special Access Channel Mileage Termination are displayed in Volume 5, Exhibit 6, Workpaper 3. Unit costs for Multiplexing are displayed in Volume 5, Exhibit 5, Workpaper 1. Unit Costs for Channel Termination, Channel Mileage Termination, and Channel Mileage Facility are displayed in Volume 5, Exhibit 6, Workpapers 2 through 4. And, Nonrecurring Costs are displayed in Volume 5, Exhibit 3, Workpaper 3.