

Kiesling Associates, LLP (FRN 0009-0701-11) – Tariff F.C.C. No. 3

Transmittal No. 8

Issued: June 16, 2015

Effective: July 1, 2015

Issuing Carrier(s): Columbus Communications Services, LLC (FRN 0003-7341-67)

DESCRIPTION AND JUSTIFICATION

Kiesling Associates LLP (Kiesling) hereby provides the following description and justification (D&J) for Kiesling Transmittal No. 8 on behalf of the issuing carrier(s) listed above for the filing made on June 16, 2015 effective on July 1, 2015. Transmittal No. 8 makes mandatory rate changes pursuant to 47 C.F.R. §51.917(e), 47 C.F.R. 51.909(e) and 47 C.F.R. 61.39 for the issuing carrier in the Kiesling Associates LLP F.C.C. Tariff. All rates, terms and conditions of service remain unchanged, excluding the following mandated changes to be in compliance with 47 C.F.R. §51.917(e) and 47 C.F.R. 51.909(e):

1. Pursuant to 47 C.F.R. §51.917(e) this transmittal increases the Access Recovery Charge (ARC) to the maximum allowable on July 1, 2015.
2. Pursuant to 47 C.F.R. 51.909(e) this transmittal reduces the capped terminating switched access rates by an additional one third of the amount necessary to reach \$0.005 by July 1, 2016.
3. Pursuant to 47 C.F.R. 61.39 this transmittal is updating Common Line and Special Access rates, as is required by the Commission's rules, to be effective July 1, 2015.

Pursuant to 47 C.F.R. §51.909(a)(1), all originating rate elements contained in the definition of End Office Service, Tandem Switched Service, and Dedicated Transport Access Service (as well as all other interstate switched access service rate elements) were capped at December 29, 2011 levels. Accordingly, the issuing carrier is not adjusting those rates in this tariff filing.

The issuing carrier included material supporting the terminating access rate reductions and the ARC increases, pursuant to the Wireline Competition Bureau's Orders (Orders) in WC Docket No. 14-58, dated March 25, 2014 (DA 14-404) and dated April 14, 2014 (DA 14-494). The issuing carrier has included the Tariff Review Plant (TRP) schedules promulgated by the Orders, 2015 Rate Ceiling CAF for FCC, ROR-ILEC-ICC, and 2015 Tariff Rate Comp CAF.

The information included in the TRP schedules constitutes the data necessary to establish the issuing carriers ARC rates and the carrier's eligibility for CAF ICC funding during the upcoming funding period, as required by 47 C.F.R. §54.304(d)(1) and pursuant to 47 C.F.R. §51.917.

The issuing carrier has also provided the following required certifications:

- 47 C.F.R. §51.917(f)(3) – Certification that it has complied with paragraphs (d) and (e) and in doing so is eligible for CAF ICC support requested pursuant to paragraph (f) of this section.
- 47 C.F.R. §51.917(d)(vii) – Certification that the carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism and is providing said certification to the Commission and to the appropriate state commission.
- Pursuant to DA 13-789 – Certification that the historical and forecast data used in the tariff filing is accurate.