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June 16, 2016

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attention: Wireline Competition Bureau

Re: Iowa Network Services, Inc. d/b/a Aureon Network Services
FRN: 0002-5807-10
Tariff F.C.C. No. 1
July 1, 2016 Annual Access Charge Tariff Filing

Dear Ms. Dortch:

The accompanying 2016 Annual Access Charge Tariff Filing of Iowa Network Services, Inc. d/b/a Aureon Network Services ("INS"), effective July 1, 2016, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. INS is a dominant carrier, and therefore, it is subject to Section 61.38 of the Commission's rules. As set forth in Subpart E of Part 61, entitled "General Rules for Dominant Carriers," Section 61.38 applies to all dominant carriers, including those such as INS, that are neither incumbent local exchange carriers ("ILECs") nor competitive local exchange carriers ("CLECs"). Accordingly, INS submits its 2016 Annual Access Charge Tariff Filing pursuant to the procedures established by the Commission for dominant carriers.

In 1988, the FCC granted Section 214 authority to INS to provide rural areas with centralized equal access ("CEA") and advanced telecommunications services, and classified INS as a dominant carrier. *Application of Iowa Network Access Division for Authority Pursuant to Section 214 of the Communications Act of 1934 and Section 63.01 of the Commission's Rules and Regulations*, 3 FCC Rcd 1468, 1469 ¶ 10 (1988). It is important to note that although INS is a dominant carrier, INS is not an ILEC. INS is not a Rate-of-Return Carrier (as defined by Section 51.903(g) of the Commission's rules), and INS is not an ILEC (as defined by 47 U.S.C. § 251(h)) as INS has never been a member of NECA and does not provide telephone exchange service. Because INS is not a Rate-of-Return carrier or an ILEC, it is not subject to the pricing parity and rate caps rules for such carriers adopted in the FCC's *Connect America Order*. See *Connect America Fund*, 26 FCC Rcd 17663 ¶¶ 800-01 (2011) ("Connect America Order").

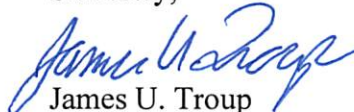
Furthermore, INS is not a CLEC because INS is a dominant carrier. CLEC rates are regulated under Section 61.26 of the Commission's rules, which is contained in Subpart C of Part 61, entitled "General Rules for Nondominant Carriers." CLECs are subject to rate regulations for non-dominant carriers, which permit a CLEC's rates to be set by benchmarks that avoid the burden of preparing cost and traffic usage studies. *Connect America Fund*, 26 FCC Rcd 17663, 17888 ¶ 694 (2011). The FCC has never regulated INS' CEA service rates under the Commission's CLEC rate benchmarking rules, which require competitive carriers to ensure that their switched access services rates are no higher than the competing ILEC. Because INS, as a dominant carrier, is not permitted to use CLEC rate benchmarking, and it is not an ILEC that is subject to the pricing parity and rate caps rules adopted in the *Connect America Order*, INS is calculating its CEA tariff rates on the basis of cost studies and call volume data in compliance with Section 61.38 of the Commission's rules. This practice is consistent with tariff filings that INS has made in the past utilizing procedures for the submission of cost support materials for dominant carriers, and INS' annual tariff filings under the dominant carrier rules have been accepted by the FCC for nearly 30 years.

In light of the foregoing, this 2016 Annual Access Tariff Filing is submitted consistent with the procedures set forth in *July 1, 2016 Annual Access Charge Tariff Filings*, Order, 31 FCC Rcd. 2002, WC Docket No. 16-71, DA 16-274 (Pricing Pol. Div. rel. Mar. 16, 2016) (the "*Procedures Order*") and includes cost support consistent with *Material to be Filed in Support of 2016 Annual Access Tariff Filings*, Order, WC Docket No. 16-71, DA 16-399 (Pricing Pol. Div. rel. Apr. 13, 2016). Pursuant to the attached study for the test period ending June 30, 2017, INS proposes to maintain its existing switched transport rate of \$0.00896 per access minute.

Pursuant to the *Procedures Order*, INS is submitting its 2016 Annual Tariff Review Plan and associated documents electronically, using the Commission's Electronic Tariff Filing System ("ETFS"). Since INS is not proposing any new or revised rates or regulations at this time, no tariff pages are included with this filing. A filing fee is not required to be submitted with this submission, as set forth in Section 61.15(i) of the Commission's rules, 47 C.F.R. § 61.15(i).

All inquiries in connection with this publication should be addressed to INS' counsel, James U. Troup, Fletcher, Heald & Hildreth, 1300 North 17th Street, 11th Floor, Arlington, VA 22209, Telephone: (703) 812-0511; Facsimile: (703) 812-0486.

Sincerely,


James U. Troup

Counsel for Iowa Network Services, Inc. d/b/a
Aureon Network Services

Attachments