

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

Transmittal No. 12

Issued: June 18, 2018

Effective: July 3, 2018

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. 12 on behalf of the issuing carrier(s) listed above for the filing made on June 18, 2018 effective on July 3, 2018. Transmittal No. 12 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 decreases the Access Recovery Charge (ARC) to the maximum allowable on July 3, 2018.
2. Pursuant to 47 C.F.R. §51.909(e) this transmittal reduces the capped terminating switched access rates to \$0.002133 on July 3, 2018.
3. Pursuant to the Rate-of-Return Reform Order (released March 30, 2016) this transmittal reduces the rate-of-return for Special Access rates to 10.5%.

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 decreases, 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 schedules promulgated by the Orders: 2018 Annual Filing RoR CAF-BLS 3.12.18.xls, 2018 61.39 ILEC Special Access Reallocation 4.20.18.xlsx, 2018 RoR ILEC ICC data 3.8.18.xlsx; 2018 Rate Ceiling CAF RoR ILEC 3.8.18.xls; 2018 Tariff Rate Comp CAF RoR ILEC 4.20.18.xls; 2018 True Up RoR ILEC 3.23.18.xls; and 2018 RoR ILEC Summary 3.24.18.xlsx in a "NOT for Public Inspection" filing and .pdf versions of the schedules in the "For Public Inspection" filing.

The 61.39 ILEC Special Access Reallocation worksheet calculated the "Maximum CBOL Rate" at \$63.81 in the worksheet.

The information included in the schedules constitutes the data necessary to establish the issuing carriers ARC rates, CBOL maximum rate, 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.
- Pursuant to §54.318(b) – Certification that the carrier has complied with specified local urban rate floor.