

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Wide Voice, LLC)	WC Docket No. 19-___
)	
FCC Tariff No. 3, Transmittal No. 14)	

**WIDE VOICE, LLC'S RESPONSE TO
PETITION OF VERIZON AND AT&T TO SUSPEND OR REJECT
WIDE VOICE'S REVISED TARIFF**

Wide Voice, LLC ("Wide Voice") pursuant to 47 C.F.R. § 1.773(b)(1)(iii), hereby responds to the Petition ("Joint Petition") of Verizon and AT&T ("Petitioners")¹ filed on December 19, 2019. The Joint Petition presents no credible basis to request the suspension or rejection of Wide Voice's FCC Tariff No. 3 (the "Tariff"), Transmittal No. 14 (the "Transmittal") filed December 13, 2019. Accordingly, the Commission should summarily reject the Petition.

SUMMARY OF ARGUMENT

The Commission should reject the Petition for two reasons.² First, Petitioners fatally fail to satisfy the four-part test set forth in 47 C.F.R. § 1.773(a)(ii). Petitioners made no effort to prove any of these elements. Failing to prove one element mandates rejection of the Petition. For this reason alone, the Commission is obligated to reject the Petition.

¹ Here, and elsewhere in the Reply, references to "Petitioners" include the various Verizon and AT&T price cap ILECs.

² Wide Voice submits that the Commission should reject the Petition for failing to comply with the service rules set forth in 47 C.F.R. §1773(a)(4). Petitioners, as in their last petition against a Wide Voice filing, neither served the company contacts provided for in the tariff transmittal nor Wide Voice's Washington, DC agent for service of process, available on the FCC's website. Rather Petitioners for unknown reasons transmitted their petition to an attorney who is not representing Wide Voice in this matter. *In the Matter of License Renewal Application of Central Illinois Broadcasting Co.*, 10 FCC Rcd. 1617 3 (1995) (returning a petition for reconsideration on grounds that service on the wrong attorney made ineffective).

Second, each of the Petitioners' three reasons Wide Voice's tariff filing is purportedly unlawful fails. The Transmittal revises Wide Voice's access tariff consistent with the rate benchmarking requirements of the *Wide Voice Order*.³ To avoid any doubt about whether Wide Voice's revised tariff complies with the benchmarking requirements, it straightforwardly and unambiguously mirrors the tariffed ILEC step down provisions of the price cap ILECs to whom Wide Voice must benchmark. The Petitioners raise various other issues -- but denying Wide Voice the ability to charge the same rates as the Petitioners' ILEC entities for the same services is, undoubtedly, the primary intention of this petition. Petitioners simply rehash old, and rejected, arguments and move the goalpost on others. Petitioners would do well to read their own ILECs' (and, in some cases, CLEC affiliates') tariffs before wasting the Commission's time with yet another tariff protest.

ARGUMENT

I. THE PETITIONERS FAIL TO MEET THEIR BURDEN UNDER SECTION 1.773(a)(1)(ii)

Petitioners acknowledge their burden to satisfy the factors in § 1.773(a)(1)(ii) for tariff challenges (Petition at 1), yet they failed to do even a cursory analysis of them. Section 1.773(a)(1)(ii) requires a tariff challenger to make the following showing:⁴

- (A) That there is a high probability the tariff would be found unlawful after investigation;
- (B) That the harm alleged to competition would be more substantial than the injury to the public arising from the unavailability of the service pursuant to the rates and conditions proposed in the tariff filing;
- (C) That irreparable injury will result if the tariff filing is not suspended; **and**
- (D) That the suspension would not otherwise be contrary to the public interest.

³ Memorandum Opinion and Order, *MCI Commc'ns Servs., Inc. v. Wide Voice, LLC*, Proceeding Number 19-121, Bureau ID Number EB-19-MD-003, FCC 19-115 (rel. Nov. 8, 2019) ("*Wide Voice Order*")

⁴ 47 C.F.R. § 1.773(a)(1)(ii) (emphasis added).

Wide Voice's tariff is "*prima facie* lawful," and the Commission "will not" suspend a tariff filing unless all four prongs are satisfied. *Id.*, *see also* Ameritech Operating Companies Tariff F.C.C. #2 Transmittal No. 1666 et al. FCC 08-42 (Feb. 7, 2008) (denying petitions to reject or suspend tariff transmittals filed by AT&T Inc. and noting that a petitioner must satisfy each and every one of the elements of the four part test).

Petitioners make no effort to satisfy the applicable standards or even to suggest that "irreparable injury will result if the tariff filing is not suspended."⁵ Neither "irreparable injury" nor "irreparable harm" appears in the Petition. Petitioners similarly offer nothing resembling the public interest analysis required by 47 C.F.R. § 1.773(a)(1)(ii)(D). These reasons alone require Commission rejection of the Petitioners' tariff challenge.

To the extent it could be said that Petitioners have attempted to satisfy 47 C.F.R. § 1.773(a)(1)(ii)(A) and (B), Petitioners fail on both counts. As described in the section that follows, Wide Voice demonstrates that its tariff fully complies with the benchmarking requirements of the *Wide Voice Order*.

II. THE TRANSMITTAL BENCHMARKS TO THE ILEC STEP DOWN PROVISIONS BY A STRAIGHTFORWARD MIRRORING OF THOSE PROVISIONS.

Paragraph 16 of the *Wide Voice Order* identifies Wide Voice's benchmarking requirement this way:

Start with the benchmarking rule. That rule (codified in section 61.26(b)(1)) bars Wide Voice from charging rates higher than the competing incumbent LEC for interstate switched exchange access service, including tandem-switched transport service. Or more precisely, "a [competitive LEC] shall not file a tariff for its interstate switched exchange access service that prices those services above the higher of ... [t]he rate charged for such services by the competing [incumbent LEC]...

⁵ 47 C.F.R. § 1.773(a)(1)(ii)(C).

Paragraph 17 then describes the step down requirements of the price cap LECs (emphasis added):

The next logical question is what rate may the competing incumbent LEC charge for tandem-switched transport service. Here, sections 51.907(g)(2) and (h) of our rules provide the answer. The tariffed service described in section 51.907 is “*terminating tandem-switched access service traversing a tandem switch that the terminating carrier or its affiliate owns.*” Under these rules, the maximum rate that a price cap carrier may lawfully charge for this service is \$0.0007 per minute (as of July 29, 2017) and \$0 per minute (as of August 2, 2018). ***Thus, a price cap carrier/tandem owner must step down its tariffed rate for tandem-switched transport traffic that terminates to its own end office.***

Wide Voice’s obligation as a CLEC is to benchmark to what the ILEC has tariffed.⁶ If Wide Voice mirrors the ILEC tariffs then, by definition, it cannot be accused of failing to benchmark to those tariffs. In other words, since Wide Voice mirrors the ILEC tariff provisions, it cannot at the same time be rationally accused of *not* mirroring them.⁷

Importantly, it is not Wide Voice’s obligation to evaluate and navigate all of the apparent nuances of the price cap LEC step down requirements (e.g., the meaning and intent of “*or its affiliates*” in section 51.907(g)(2)) in order to comply. The *Wide Voice Order* affirms that a CLEC complies “when a competitive LEC/tandem owner benchmarks to a price cap carrier subject to sections 51.907(g)(2) and (h)...”.⁸ Wide Voice must simply benchmark to the ILEC tariffs as filed.

⁶ This specific question was posed to FCC Staff (telephone conversation between Carey Roesel, Al Lewis, and Robin Cohn) on December 10, 2019, while reviewing the draft compliance filing. The question from Mr. Roesel was “do CLECs have to benchmark to what ILECs *do* (from a billing perspective) or what they *tariff*?” The immediate response from Staff was “what they tariff”.

⁷ Similarly, the question was posed to FCC Staff (telephone conversation between Carey Roesel, Al Lewis and Robin Cohn) if the FCC would accept, as compliant, a Wide Voice tariff that mirrored the ILEC provisions exactly. FCC Staff responded that they would.

⁸ *Wide Voice Order*; paragraph 18

For the purpose of this compliance filing, Wide Voice looked primarily to the step down tariffing approach of the Verizon ILECs.⁹ Verizon made it simple. Verizon codified its entire step down approach by adding step down rates to each of its tariffs and identifying them as “Terminating to Telephone Company End Offices”. The non-step down rates were identified as “Terminating to Third Party”. The “Telephone Company” in each of the Verizon ILEC tariffs is defined as the specific ILEC issuer of the tariff in question – no other parties or entities, especially affiliates, are included as “Telephone Company”. The step down provisions filed by Verizon ILECs in tariffs FCC 1, FCC 11, FCC 14, and FCC 16 are attached.

It is indisputable that the Wide Voice filing includes the exact same headings and rate designations as the Verizon tariffs. Strangely, Petitioners complain that Wide Voice’s filing does not including the word “affiliate” (while they are alleging that Wide Voice did not benchmark properly to the ILECs’ tariffs).¹⁰ However, Petitioners’ own ILEC filings also do not use the word “affiliate”. Additionally, FCC Staff, when reviewing an earlier draft of the Wide Voice compliance filing that contained that term, questioned why, if Wide Voice’s intent was to mirror Verizon, it included the term “affiliate” since Verizon’s tariff does not include that term.¹¹

Two points are worth including here. First, the *Wide Voice Order* includes an odd reference to how Verizon CLEC affiliates “step down their rates”¹². These are essentially end office entities, and the issue is not what *they* have tariffed, but what Verizon the price cap LEC has tariffed to provide tandem and transport to terminate *to* these entities. That is what is relevant to Wide Voice’s functions as a benchmarking tandem provider. As a plain reading of Verizon’s tariff shows, these

⁹ Inasmuch as the various price cap ILECs’ tariffed step down provisions use different wording, Wide Voice can only assume – until one is challenged and deemed to have been non-compliant – that they all equally satisfy the demands of 51.907(g)(2). Therefore, it is unnecessary for Wide Voice to use the exact wording found in each price cap ILEC’s tariff to ensure that Wide Voice is appropriately benchmarking.

¹⁰ Petition at 8; “Indeed, the word “affiliate” appears nowhere in the tariff filing.”

¹¹ Telephone conversation between Carey Roesel, Al Lewis and Robin Cohn on December 10, 2019.

¹² *Wide Voice Order* footnote 55

entities are not “Telephone Company” end offices and are thus treated as “Third Party” (i.e., non-step down) terminations. Second, now that AT&T is hitching its wagon to Verizon’s arguments regarding affiliates (at least for this Petition), it should be noted that AT&T’s CLEC affiliate Teleport Communications Group has no provisions for a rate step down in its tariff *at all* (relevant tariff pages attached). If footnote 55 of the *Wide Voice Order* is supposed to show how Wide Voice should have stepped down because of the Verizon CLEC tariffing examples, what do the AT&T examples – which do the exact opposite – show? In both cases, the price cap ILECs have tariffed such that the step downs **do not apply** for tandem and transport traffic terminating to their affiliate CLECs.

Regarding Section 3.6.4, it simply provides examples of Third Party termination – the way the AT&T ILECs do in their federal tariffs. AT&T ILEC step down tariff provisions include rate headings very similar to those added by Verizon – “Terminating to Telephone Company’s Own End Office” and “Terminating to non-Telephone Company 3rd Party Locations”. And, again similar to Verizon, the AT&T ILEC tariffs all define “Telephone Company” as the specific ILEC issuer of the tariff in question (e.g., former BellSouth FCC tariff No. 1 uses “Telephone Company” to refer just to BellSouth). In addition to these rate headings, AT&T elaborated further in the rate description section with language like this for the impacted rate elements (emphasis added):

BellSouth Telecommunications, Tariff FCC No. 1; Section 6.1.3(A)(2)(b)(3):

Access Tandem Switching charges are billed as Originating, Terminating to Telephone Company’s *own end office* and Terminating to *non-Telephone Company 3rd party locations* based on call recordings. Non-Telephone Company 3rd party locations are all offices or other locations not owned by the Telephone Company. *Examples of 3rd party locations include terminations to other local exchange and wireless carriers.*

Petitioners' ILEC tariffs make it completely clear that examples of "3rd party locations" include termination to any entity that is not the *specific* ILEC that is the issuer of *that* tariff. In precisely the same way, Wide Voice's examples of 3rd parties include any entity that is not the CLEC that is the issuer of the tariff – i.e., Wide Voice, LLC.

Wide Voice has mirrored the ILEC tariff language regarding application of step down rates. Any suggestion that Wide Voice's tariff fails to adhere to benchmarking requirements by appealing to any standard other than whether the tariff actually mimics the ILEC provisions and rates is misplaced.

III. THE TRANSMITTAL INCLUDES LAWFUL, UPDATED DISPUTE PROVISIONS THAT CONSIDER RECENT FCC DECISIONS, EXCEED WHAT WAS REQUIRED UNDER THE *WIDE VOICE ORDER*, AND ARE SUPERIOR TO THE PROVISIONS FOUND IN PETITIONERS' AFFILIATE CLECS' TARIFFS.

Petitioners attempt to move the goal post and resurrect an earlier, failed argument. Petitioners raised an earlier version of its argument regarding Wide Voice's Section 2.10.4.A. in their petitions against the Wide Voice tariff filed on July 3, 2019. At that time, Petitioners objected to the "reasonable time" provision:¹³

Wide Voice, LLC Tariff FCC No. 3, effective July 18, 2019:

"All bills are presumed accurate and shall be binding on the Customer unless written notice of a good faith dispute is received by the Company. For the purposes of this Section, "notice of a good faith dispute" is defined as written notice to the Company's contact *within a reasonable period of time...*"

The Commission took no action in response to those arguments. The *Wide Voice Order* did not raise any issues with regard to Wide Voice's dispute provision, but when the Standard Tandem

¹³ Petition of Verizon and AT&T to Suspend or Reject Wide Voice's Tariff FCC No.3, Transmittal No. 13; filed July 9, 2019 ("Petition").

initial tariff was rejected,¹⁴ the Order did include concerns about use of the “reasonable time” limitation. In an abundance of caution, then, Wide Voice included modifications to its dispute provisions consistent with that Order and consistent with Petitioners’ earlier objections.

Wide Voice, LLC Tariff FCC No. 3, as proposed under Transmittal 14:

“All bills are presumed accurate and shall be binding on the Customer unless written notice of a good faith dispute is received by the Company. A good faith dispute requires the Customer to provide a written claim to the Company.”

Petitioners, however, are apparently not satisfied even when the provision is revised according to their earlier demands. They create new demands and, as illustrated earlier, seem oblivious to the fact that their own tariffs – in this case, their CLEC affiliates’ tariffs -- include not only the language Petitioners now find objectionable with the Wide Voice tariff, but language that was found to be unlawful *years ago*.¹⁵

XO COMMUNICATIONS, LLC; Tariff FCC No. 1¹⁶; Section 2.5.2 G (emphasis added):

Customer Must Dispute Bills or Rates Charged Within 30 Days of Invoice: If a Customer does not give the Company written notice of a billing or rate dispute within thirty (30) days from the date the invoice was rendered, such invoice and the charges levied shall be deemed to be reasonable, correct and binding.

¹⁴ Order, *Standard Tandem LLC, October 3, 2019 Access Charge Tariff Filing*, WCB/Pricing File No. 19-02, DA 19-1045 (rel. Oct. 17, 2019) (“*Standard Tandem Order*”). It should be noted this tariff mirrored the Wide Voice tariff exactly with the exception of the provision that allowed Wide Voice to charge non-step down tandem and transport rates to its own end offices. The Wide Voice tariff was allowed to go into effect on July 18, 2019 in spite of Petitioners’ objections to just the “Wide Voice to Wide Voice” scenario. Even though the Standard Tandem tariff excluded the very route which troubled Petitioners, the Standard Tandem tariff was inexplicably rejected even though there had been no objections publicly voiced by any party.

¹⁵ Memorandum Opinion and Order, *Sprint Commc’ns Co. v. N. Valley Commc’ns, LLC*, 26 FCC Rcd 10780, ¶ 14 (2011) (“*Northern Valley Order*”)

¹⁶ Tariff can be found at https://apps.fcc.gov/etfs/public/view_176564_pdf.action?id=176564

Teleport Communications Group Operating Companies;¹⁷ Tariff FCC No. 2; Section 2.5.4 (emphasis added):

In the event of a billing dispute, the Customer may dispute a bill only by written notice delivered to the Company within 45 days of receipt of each invoice and must include sufficient documentation consistent with the requirements as specified in this Section 2.5.4. The billing dispute date is the date the Customer presents sufficient written documentation to the Company to support its claim for incorrect billing. Unless such notice and documentation are received in the timely fashion indicated above, the bill statement shall be deemed to be correct and payable in full by Customer.

In the event that the Customer dispute all or part of the billed amount and if the Company sustains the disputed charges after investigating the dispute, the applicable Late Payment Charge will apply to any unpaid charges and shall be deemed correct and binding on the Customer. If, alternatively, the Company credits the charges after investigating the dispute, the Late Payment Charge will not apply.

Petitioners concoct two pages of elaborate arguments about why this industry-standard language should now be considered unlawful. Perhaps Petitioners should review their tariffs before wasting the Commission's resources on the holidays complaining about up-to-date tariff language which reflects the latest Commission orders and guidance.

IV. PETITIONERS REVIVE PREVIOUSLY REJECTED ARGUMENTS IN CONNECTION WITH WIDE VOICE'S DEDICATED TANDEM TRUNK PORT PROVISIONS AND ATTORNEYS' FEES PROVISIONS.

Petitioners attempt to resurrect earlier, failed arguments. Petitioners raised these same arguments in their petitions against the Wide Voice tariff filed on July 3, 2019. The Commission took no action in response to those arguments. The *Wide Voice Order* did not raise any issues with regard to these provisions. The Standard Tandem initial tariff included these provisions as well, but neither issue was cited as having anything to do with the Commission's rejection of that filing. Wide Voice understands that Petitioners have been emboldened by these recent Orders, but that

¹⁷ Tariff can be found at https://apps.fcc.gov/etfs/public/view_174264_pdf.action?id=174264

should not give them any reason to think these arguments have become more persuasive since they first raised them six months ago. (For a detailed response see Wide Voice's Response to Petition of Verizon and ATT to Suspend or Reject Wide Voice's Revised Tariff; filed July 16, 2019.)

CONCLUSION

If the Commission accepts the Petition even though it was improperly noticed, the Commission should reject the Petition for two reasons. Petitioners fail to attempt to satisfy the four-part test set forth in 47 C.F.R. § 1.773(a)(ii). Failing to prove any one of the elements mandates rejection of the Petition. For this reason alone, the Commission is obligated to reject the Petition.

Second, each of the Petitioners' three reasons Wide Voice's tariff filing is purportedly unlawful fails. The AT&T-Verizon petition is part of an ongoing competitive campaign by these parties to deny Wide Voice the ability to tariff, consistent with the Benchmark Rule, what Petitioners' ILECs have tariffed. Petitioners have not even attempted to explain why the tariff wording *they* have used in *their* tariffs is unacceptable for a benchmarking CLEC. Instead, they make demands of the Wide Voice tariff that demonstrate ignorance of their own ILEC tariffs. Wide Voice does not need to explain or debate (in the context of a tariff filing) ILEC step down issues and policies – it simply needs to mirror/benchmark to tariffed ILEC step down provisions. By mirroring the ILECs' tariffed step down provisions, Wide Voice has inarguably benchmarked consistent with the requirements of § 61.26. Petitioners also try to supplement the above effort by rehashing previously rejected arguments as well as moving the goalpost on others. They make demands of the Wide Voice tariff that their CLEC affiliates' tariffs do not even come close to meeting.

The petition should be denied.

Respectfully submitted,

/s/ Carey Roesel

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Consultant to Wide Voice, LLC

December 26, 2019

CERTIFICATE OF SERVICE

I, Carey Roesel, do hereby certify that, on this 26th day of December 2019, the foregoing **RESPONSE OF WIDE VOICE, LLC TO PETITION OF VERIZON AND AT&T TO SUSPEND OR REJECT WIDE VOICE'S REVISED TARIFF** was served on the following parties via email:

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.9 Rates and Charges (Cont'd)

6.9.1 Switched Transport (Cont'd)

(B) Tandem Switched Transport

<u>All Rate Zones</u>	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>
-			<u>Per MOU</u>
Tandem Transport			
- Fixed	\$.000000	\$.000000	\$.000000
Tandem Transport			
- Per Mile	\$.000002	\$.000000	\$.000002
Tandem Switching	\$.001574	\$.000000 (R)	\$.001574
Transport Multiplexing (DS3 to DS1)	\$.000000	\$.000000	\$.000000
Host/Remote-Fixed			
-Per MOU	\$.000000	\$.000000	
- Host/Remote-Per Mile			
-Per MOU	.000000	.000000	
Dedicated Tandem Trunk Port Charge			
	<u>USOC</u>	<u>Monthly</u>	
- per Trunk	PT8NX	<u>Rate</u>	
		\$12.50	

(Issued under Transmittal No. 1375)

Issued: June 18, 2018

Effective: July 3, 2018

Vice President, Federal Regulatory
 1300 I Street, NW, Washington, D.C. 20005

ACCESS SERVICE

1. Application of Tariff

1.1 This tariff contains regulations, rates and charges applicable to the provision of Carrier Common Line, End User Access, Switched Access, Special Access Services that in each case are subject to Section 203 of the Communications Act (the "Act"), and other miscellaneous services, hereinafter referred to collectively as service(s), provided to customers by the following telephone companies of the Verizon Telephone Companies as issuing carriers: Verizon Pennsylvania LLC, Verizon New Jersey Inc., Verizon Delaware LLC, Verizon Washington, D.C. Inc., Verizon Maryland LLC, and Verizon Virginia LLC, hereinafter referred to (individually and collectively, as applicable) as the Telephone Company. (C)
(C)
(T)
(T)

The Special Access Service regulations, rates and charges located in this tariff are for Non-Competitive End User Channel Terminations (and associated optional features and functions).¹ In some instances, this tariff refers to Special Access Services in general terms, including references to competitive Special Access Services such as transport and channel terminations other than Non-Competitive End User Channel Terminations that are provided outside this tariff. Any references to Special Access Services provided outside of this tariff are solely to assist in understanding the manner in which the Telephone Company offers such services in connection with tariffed services and shall not be construed to mean that such services are offered under this tariff or are subject to Section 203 of the Act. (N)
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(N)

1.2 The provision of such services by the Telephone Company as set forth in this tariff does not constitute a joint undertaking with the customer for the furnishing of any service.

1.3 The operating territory of the Telephone Company is the entire state of Delaware and the locations set forth in Section 14 following for the states of Maryland, New Jersey, Pennsylvania, Virginia, and the District of Columbia. (T)

1.4 References in this tariff to local general services tariffs constitute the referencing of any state jurisdiction tariff approved by a state regulatory commission, or its equivalent (e.g., product guide), for any of the issuing carriers mentioned in 1.1 above. (C)
(C)

¹ Special Access Services not subject to Section 203 of the Act, including services detariffed in compliance with FCC Orders 17-43 (released April 28, 2017) and 19-66 (released July 12, 2019), are provided outside this tariff and are governed by agreements, contracts and other documents including the Business Data Services Product Guide and associated terms that are available at verizon.com/productguides or other designated location. (N)
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(N)

Certain material previously found on this page can now be found on Original Page 1-2.

(Issued under Transmittal No. 1400)

Issued: December 2, 2019

Effective: December 17, 2019

Vice President, Federal Regulatory
 1300 I Street, NW, Washington, D.C. 20005

ACCESS SERVICE

31. The Verizon Telephone Companies Rates and Charges (Cont'd)

31.6 Switched Access Service (Cont'd)

31.6.1 Local Transport (Cont'd)

(B) Tandem Switched Transport and Host/Remote Switched Transport

	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>	(C)
<u>All States</u>				
<u>All Pricing Zones</u>				
(1) <u>Local Transport Termination</u> Per minute of use	\$.000000	\$.000000	\$.000000	
(2) <u>Local Transport Facility</u> - Per mile, per minute	\$.000002	\$.000000 (R)	\$.000002	(C)

(TR 1347)

Issued: June 16, 2017

Effective: July 1, 2017

Vice President, Federal Regulatory
 1300 I Street, NW, Washington, D.C. 20005

ACCESS SERVICE

31. The Verizon Telephone Companies Rates and Charges (Cont'd)31.6 Switched Access Service (Cont'd)31.6.1 Local Transport (Cont'd)(B) Tandem Switched Transport and Host/Remote Switched Transport
(Cont'd)

	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>
<u>All States</u>			
<u>All Pricing Zones</u>			
(3) <u>Tandem Switching</u> - Per Minute of Use	\$.001574	\$.000000 (R)	\$.001574
(4) <u>Transport Multiplexing</u> (DS3 to DS1) - Per Minute of Use	\$.000000	\$.000000	\$.000000

(TR 1375)

Issued: June 18, 2018

Effective: July 3, 2018

Vice President, Federal Regulatory
1300 I Street, NW, Washington, D.C. 20005

ACCESS SERVICE

31. The Verizon Telephone Companies Rates and Charges (Cont'd)

31.6 Switched Access Service (Cont'd)

31.6.1 Local Transport (Cont'd)

(B) Tandem Switched Transport and Host/Remote Switched Transport
 (Cont'd)

	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>	(C)
<u>All States</u>				
<u>All Pricing Zones</u>				
(5) <u>Host/Remote Transport Termination</u> - Per Minute of Use	\$.000000	\$.000000		
(6) <u>Host Remote Transport Facility</u> - Per Mile, Per Minute	\$.000000	\$.000000		
				(C)

(TR 1347)

Issued: June 16, 2017

Effective: July 1, 2017

Vice President, Federal Regulatory
 1300 I Street, NW, Washington, D.C. 20005

ACCESS SERVICE

1. Application of Tariff

1.1 This tariff contains regulations, rates and charges applicable to the provision of Carrier Common Line Access, End User Access, Switched Access, Special Access that in each case are subject to Section 203 of the Communications Act (the "Act"), Lifeline Assistance, Universal Service Fund and other miscellaneous services, hereinafter referred to collectively as service(s), provided by Verizon New England Inc. and Verizon New York Inc., hereinafter referred to (individually and collectively, as applicable) as the Telephone Company, to customers. (C)
(C)
(T)
(T)

The Special Access Service regulations, rates and charges located in this tariff are for Non-Competitive End User Channel Terminations (and associated optional features and functions).¹ In some instances, this tariff refers to Special Access Services in general terms, including references to competitive Special Access Services such as transport and channel terminations other than Non-Competitive End User Channel Terminations that are provided outside this tariff. Any references to Special Access Services provided outside of this tariff are solely to assist in understanding the manner in which the Telephone Company offers such services in connection with tariffed services and shall not be construed to mean that such services are offered under this tariff or are subject to Section 203 of the Act. (N)
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(N)

In addition, this tariff is applicable to the following service not utilizing Telephone Company end office switches: service which is physically interstate but within the same LATA. Such service is subject to the regulations, rates and charges for Special Access Services except as provided in 2.4.8 and 2.4.9 following. (D)
(D)

1.2 The provision of such services by the Telephone Company as set forth in this tariff does not constitute a joint undertaking with the customer for the furnishing of any service.

1.3 The operating territory of THE VERIZON TELEPHONE COMPANIES encompasses the following locations.

1.3.1 The operating territory of Verizon New England Inc. is the entire state of Rhode Island and the locations set forth in Section 15. following for Massachusetts.

¹ Special Access Services not subject to Section 203 of the Act, including services detariffed in compliance with FCC Orders 17-43 (released April 28, 2017) and 19-66 (released July 12, 2019), are provided outside this tariff and are governed by agreements, contracts and other documents including the Business Data Services Product Guide and associated terms that are available at verizon.com/productguides or other designated location. (N)
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(N)

Certain material previously found on this page can now be found on Original Page 1-2.

(TR 1400)

Issued: December 2, 2019

Effective: December 17, 2019

Vice President, Federal Regulatory
1300 I Street, NW, Washington, DC 20005

Issued: December 2, 2019

FACILITIES FOR INTERSTATE ACCESS

1. APPLICATION OF TARIFF

1.1 This tariff contains regulations, rates and charges applicable to Carrier Common Line, Switched Access, Special Access, End User Access, Lifeline Assistance, Universal Service Fund, Expanded Interconnection Service, Advanced Communications Networks, Optical Networking Access Service or, in combination, as Facilities for Interstate Access, hereinafter referred to as FIA, that in each case are subject to Section 203 of the Communications Act (the "Act"), provided by the issuing carriers of this tariff, hereinafter referred to (individually and collectively, as applicable) as the Telephone Company to customers. This tariff further provides for Ancillary and Miscellaneous Services. This tariff does not apply to other services offered by the Telephone Company. (C)

The Special Access Service regulations, rates and charges located in this tariff are for Non-Competitive End User Channel Terminations (and associated Supplemental Features).¹ In some instances, this tariff refers to Special Access Services in general terms, including references to competitive Special Access Services such as transport and channel terminations other than Non-Competitive End User Channel Terminations that are provided outside this tariff. Any references to Special Access Services provided outside of this tariff are solely to assist in understanding the manner in which the Telephone Company offers such services in connection with tariffed services and shall not be construed to mean that such services are offered under this tariff or are subject to Section 203 of the Act. (N)

1.2 Regulations, rates and charges as specified in this tariff apply to FIA and shall not serve as a substitute for IC tariff offerings of services to end users. The provision of such FIA by the Telephone Company as set forth in this tariff does not constitute a joint undertaking with an IC for the furnishing of any service.

1.3 References in this tariff to a Special Construction Tariff refers to the following tariff as effective in its respective territories:

TARIFF F.C.C. NO. 21 for Verizon North LLC and Verizon South Inc.

¹ Special Access Services not subject to Section 203 of the Act, including services detariffed in compliance with FCC Orders 17-43 (released April 28, 2017) and 19-66 (released July 12, 2019), are provided outside this tariff and are governed by agreements, contracts and other documents including the Business Data Services Product Guide and associated terms that are available at verizon.com/productguides or other designated location. (N)

(This page filed under Transmittal No. 1400.)

Vice President, Federal Regulatory
1300 I Street NW, Washington, DC 20005

Issued: March 17, 2016

FACILITIES FOR INTERSTATE ACCESS

ISSUING CARRIERS

Verizon North LLC
For the State of: Pennsylvania

(D)
(D)

(D)
(D)

Verizon South Inc.
For the State of: Virginia

(D)
(D)

The original effective date for the Verizon Telephone Companies Tariff FCC No. 14 is May 2, 2001.

(This page filed under Transmittal No. 1330.)

Vice President, Federal Regulatory
1300 I Street NW, Washington, DC 20005

Issued: June 16, 2017

FACILITIES FOR INTERSTATE ACCESS

4. SWITCHED ACCESS (Cont'd)

4.6 Rates and Charges (Cont'd)

4.6.2 Switched Transport (Cont'd)

(A) Tandem-Switched Transport – Facility

	<u>Tandem-Switched Transport – Facility</u>			
	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>	(C)
<u>All Rate Zones</u>				
<u>Per Airline Mile</u>			<u>Per Access Minute</u>	
Pennsylvania	\$.000002	\$.000000 (R)	\$.000002	
Virginia	.000002	.000000 (R)	.000002	(C)

(This page filed under Transmittal No. 1347.)

Vice President, Federal Regulatory
 1300 I Street NW, Washington, DC 20005

ACCESS SERVICE

1. Application of Tariff

1.1 This tariff contains regulations, rates and charges applicable to the provision of Carrier Common Line, End User Access, Lifeline Assistance, Universal Service Fund, Switched Access, Special Access Services, Expanded Interconnection Service, that in each case are subject to Section 203 of the Communications Act (the "Act"), and (C) other miscellaneous services, hereinafter referred to collectively as service(s), provided by the Issuing Carriers of this tariff, hereinafter referred to (individually and collectively, as applicable) as the Telephone Company, to customers. (C)

The Special Access Service regulations, rates and charges located in this tariff are for Non-Competitive End User Circuit Terminations (and associated optional features and functions).¹ In some instances, this tariff refers to Special Access Services in general terms, including references to competitive Special Access Services such as transport and circuit terminations other than Non-Competitive End User Circuit Terminations that are provided outside this tariff. Any references to Special Access Services provided outside of this tariff are solely to assist in understanding the manner in which the Telephone Company offers such services in connection with tarified services and shall not be construed to mean that such services are offered under this tariff or are subject to Section 203 of the Act. (N)

1.2 The provision of such services by the Telephone Company as set forth in this tariff does not constitute a joint undertaking with the customer for the furnishing of any service.

1.3 References in this tariff to a Special Construction Tariff refers to the following tariff as effective in its respective territories:

TARIFF F.C.C. NO. 21

for Verizon North LLC and Verizon South Inc.

¹ Special Access Services not subject to Section 203 of the Act, including services detariffed in compliance with FCC Orders 17-43 (released April 28, 2017) and 19-66 (released July 12, 2019), are provided outside this tariff and are governed by agreements, contracts and other documents including the Business Data Services Product Guide and associated terms that are available at verizon.com/productguides or other designated location. (N)

VERIZON TELEPHONE COMPANIES

Vice President - Federal Regulatory
1300 I Street NW
Washington, DC 20005
Issued: March 17, 2016

TARIFF FCC NO. 16
6th Revised Title Page 2
Cancels 5th Revised Title Page 2

Effective: April 1, 2016

ACCESS SERVICE

ISSUING CARRIERS

- I. All Regulations, Rates and Charges presented in this tariff are applicable to the following Issuing Carriers. Wire center locations for these Issuing Carriers are located in National Exchange Carrier Association Tariff FCC No. 4.

Verizon North LLC
For the State of: Pennsylvania

Verizon South Inc.
For the States of: North Carolina
Virginia

(D)
(D)
(D)

(D)
(D)

The original effective date for The Verizon Telephone Companies Tariff F.C.C. No. 16 is May 1, 2001.

VERIZON TELEPHONE COMPANIES

Vice President, Federal Regulatory
 1300 I Street NW
 Washington, DC 20005
 Issued: June 18, 2018

TARIFF FCC NO. 16

11th Revised Page 6-208
 Cancels 10th Revised Page 6-208

Effective: July 3, 2018

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.6 Switched Access Rates and Charges (Cont'd)

6.6.6 North Carolina (Cont'd)

	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>
(L) <u>Tandem-Switched Transport – Facility</u>			<u>Per Access</u>
- <u>Minute, Per Airline Mile</u>			
	\$.000002	\$.000000	\$.000002
(M) <u>Tandem-Switched Transport – Termination</u>			<u>Per Access</u>
- <u>Minute, Per Termination</u>			
	\$.000000	\$.000000	\$.000000
(N) <u>Tandem Switching Rate</u>			<u>Per Access</u>
- <u>Minute</u>			
(USOC)	\$.001574	\$.000000 (R)	\$.001574

ACCESS SERVICE

6.	<u>Switched Access Service</u> (Cont'd)			
6.6	<u>Switched Access Rates and Charges</u> (Cont'd)			
6.6.7	<u>Pennsylvania</u> (Cont'd)	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>
(L)	<u>Tandem-Switched Transport - Facility</u> - Per Access Minute, Per Airline Mile			
		\$.000002	\$.000000	\$.000002
(M)	<u>Tandem-Switched Transport - Termination</u> - Per Access Minute, Per Termination			
		\$.000000	\$.000000	\$.000000
(N)	<u>Tandem Switching Rate</u> - Per Access Minute (USOC)			
		\$.001574	\$.000000 (R)	\$.001574

VERIZON TELEPHONE COMPANIES

Vice President, Federal Regulatory
1300 I Street NW
Washington, DC 20005
Issued: June 18, 2018

TARIFF FCC NO. 16
14th Revised Page 6-240
Cancels 13th Revised Page 6-240

Effective: July 3, 2018

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.6 Switched Access Rates and Charges (Cont'd)

6.6.10 Virginia (Cont'd)

	<u>Originating</u>	<u>Terminating To Telephone Company End Offices</u>	<u>Terminating to Third Party</u>
(L) <u>Tandem-Switched Transport - Facility</u> - <u>Per Access Minute,</u> <u>Per Airline Mile</u>	\$.000002	\$.000000	\$.000002
(M) <u>Tandem-Switched Transport - Termination</u> - <u>Per Access Minute,</u> <u>Per Termination</u>	\$.000000	\$.000000	\$.000000
(N) <u>Tandem Switching Rate</u> - <u>Per Access Minute</u> <u>(USOC)</u>	\$.001574	\$.000000 (R)	\$.001574

SECTION 5 - RATES (Cont'd.)5.53 Common Multiplexing

	State	Serving Area	Originating	Terminating
AL	Alabama	ATT/SE	0.000380	0.000380
AR	Arkansas	ATT/SW	0.000047	0.000047
AZ	Arizona	Qwest	0.000036	0.000036
CA	California	ATT/CA	0.000049	0.000049
CA	California	Verizon-GTE	0.000000	0.000000
CO	Colorado	Qwest	0.000036	0.000036
CT	Connecticut	Frontier	0.000082	0.000082
CT	Connecticut	Verizon-N	0.000000	0.000000
DC	District of Columbia	Verizon-S	0.000000	0.000000
DE	Delaware	Verizon-S	0.000000	0.000000
FL	Florida	ATT/SE	0.000380	0.000380
FL	Florida	Embarq	0.000327	0.000327
FL	Florida	Verizon-GTE	0.000000	0.000000
GA	Georgia	ATT/SE	0.000380	0.000380
HI	Hawaii	Verizon-GTE	0.000000	0.000000
IA	Iowa	Qwest	0.000036	0.000036
ID	Idaho	Frontier	0.000000	0.000000
ID	Idaho	Qwest	0.000036	0.000036
IL	Illinois	Frontier	0.000000	0.000000
IL	Illinois	ATT/MW	0.000015	0.000015
IN	Indiana	Frontier	0.000000	0.000000
IN	Indiana	ATT/MW	0.000015	0.000015
KS	Kansas	ATT/SW	0.000047	0.000047
KY	Kentucky	ATT/SE	0.000380	0.000380
LA	Louisiana	ATT/SE	0.000380	0.000380
MA	Massachusetts	Verizon-N	0.000000	0.000000
MD	Maryland	Verizon-S	0.000000	0.000000
ME	Maine	Fairpoint	0.000000	0.000000
MI	Michigan	Frontier	0.000000	0.000000
MI	Michigan	ATT/MW	0.000015	0.000015
MN	Minnesota	Qwest	0.000036	0.000036
MO	Missouri	ATT/SW	0.000047	0.000047
MS	Mississippi	ATT/SE	0.000380	0.000380
MT	Montana	Qwest	0.000036	0.000036
NC	North Carolina	ATT/SE	0.000380	0.000380
NC	North Carolina	Embarq	0.000755	0.000755
NC	North Carolina	Frontier	0.000000	0.000000
ND	North Dakota	Qwest	0.000036	0.000036
NE	Nebraska	Qwest	0.000036	0.000036

(T)

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.53 Common Multiplexing (Cont'd)

NH	New Hampshire	Fairpoint	0.000000	0.000000
NJ	New Jersey	Embarq	0.000469	0.000469
NJ	New Jersey	Verizon-S	0.000000	0.000000
NM	New Mexico	Qwest	0.000036	0.000036
NV	Nevada	Embarq	0.000092	0.000092
NV	Nevada	ATT/NV	0.000018	0.000018
NY	New York	Verizon-N	0.000000	0.000000
OH	Ohio	Cincinnati Bell	0.000240	0.000240
OH	Ohio	Frontier	0.000000	0.000000
OH	Ohio	ATT/MW	0.000015	0.000015
OK	Oklahoma	ATT/SW	0.000047	0.000047
OR	Oregon	Frontier	0.000000	0.000000
OR	Oregon	Qwest	0.000036	0.000036
PA	Pennsylvania	Embarq	0.000469	0.000469
PA	Pennsylvania	Verizon-S	0.000000	0.000000
RI	Rhode Island	Verizon-N	0.000000	0.000000
SC	South Carolina	ATT/SE	0.000380	0.000380
SC	South Carolina	Frontier	0.000000	0.000000
SD	South Dakota	Qwest	0.000036	0.000036
TN	Tennessee	ATT/SE	0.000380	0.000380
TX	Texas	ATT/SW	0.000047	0.000047
TX	Texas	Verizon-GTE	0.000000	0.000000
TX	Texas	Embarq	0.000218	0.000218
UT	Utah	Qwest	0.000036	0.000036
VA	Virginia	Embarq	0.000254	0.000254
VA	Virginia	Verizon-S	0.000000	0.000000
VT	Vermont	Fairpoint	0.000000	0.000000
WA	Washington	Frontier	0.000000	0.000000
WA	Washington	Qwest	0.000036	0.000036
WI	Wisconsin	ATT/MW	0.000015	0.000015
WV	West Virginia	Frontier	0.000000	0.000000
WY	Wyoming	Qwest	0.000036	0.000036

(C)

(C)

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.54 Tandem Termination (Per Minute)

	State	Serving Area	Originating	Terminating
AL	Alabama	ATT/SE	0.000168	0.000168
AR	Arkansas	ATT/SW	0.000053	0.000053
AZ	Arizona	Qwest	0.000240	0.000240
CA	California	ATT/CA	0.000075	0.000075
CA	California	Verizon-GTE	0.000000	0.000000
CO	Colorado	Qwest	0.000240	0.000240
CT	Connecticut	Frontier	0.000063	0.000063
CT	Connecticut	Verizon-N	0.000000	0.000000
DC	District of Columbia	Verizon-S	0.000000	0.000000
DE	Delaware	Verizon-S	0.000000	0.000000
FL	Florida	ATT/SE	0.000168	0.000168
FL	Florida	Embarq	0.000365	0.000365
FL	Florida	Verizon-GTE	0.000000	0.000000
GA	Georgia	ATT/SE	0.000168	0.000168
HI	Hawaii	Verizon-GTE	0.000000	0.000000
IA	Iowa	Qwest	0.000240	0.000240
ID	Idaho	Frontier	0.000000	0.000000
ID	Idaho	Qwest	0.000240	0.000240
IL	Illinois	Frontier	0.000000	0.000000
IL	Illinois	ATT/MW	0.000103	0.000103
IN	Indiana	Frontier	0.000000	0.000000
IN	Indiana	ATT/MW	0.000103	0.000103
KS	Kansas	ATT/SW	0.000053	0.000053
KY	Kentucky	ATT/SE	0.000168	0.000168
LA	Louisiana	ATT/SE	0.000168	0.000168
MA	Massachusetts	Verizon-N	0.000000	0.000000
MD	Maryland	Verizon-S	0.000000	0.000000
ME	Maine	Fairpoint	0.000000	0.000000
MI	Michigan	Frontier	0.000000	0.000000
MI	Michigan	ATT/MW	0.000103	0.000103
MN	Minnesota	Qwest	0.000240	0.000240
MO	Missouri	ATT/SW	0.000053	0.000053
MS	Mississippi	ATT/SE	0.000168	0.000168

(T)

Material on this page previously appeared on pages 99, 110, 125, 137, 149, 161, 174.1, 187, 199, 212.2, 226 and 228.

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.54 Tandem Termination (Per Minute) (Cont'd)

(N)

MT	Montana	Qwest	0.000240	0.000240
NC	North Carolina	ATT/SE	0.000168	0.000168
NC	North Carolina	Embarq	0.000226	0.000226
NC	North Carolina	Frontier	0.000000	0.000000
ND	North Dakota	Qwest	0.000240	0.000240
NE	Nebraska	Qwest	0.000240	0.000240
NH	New Hampshire	Fairpoint	0.000000	0.000000
NJ	New Jersey	Embarq	0.000449	0.000449
NJ	New Jersey	Verizon-S	0.000000	0.000000
NM	New Mexico	Qwest	0.000240	0.000240
NV	Nevada	Embarq	0.000324	0.000324
NV	Nevada	ATT/NV	0.000120	0.000120
NY	New York	Verizon-N	0.000000	0.000000
OH	Ohio	Cincinnati Bell	0.000600	0.000600
OH	Ohio	Frontier	0.000000	0.000000
OH	Ohio	ATT/MW	0.000103	0.000103
OK	Oklahoma	ATT/SW	0.000053	0.000053
OR	Oregon	Frontier	0.000000	0.000000
OR	Oregon	Qwest	0.000240	0.000240
PA	Pennsylvania	Embarq	0.000449	0.000449
PA	Pennsylvania	Verizon-S	0.000000	0.000000
RI	Rhode Island	Verizon-N	0.000000	0.000000
SC	South Carolina	ATT/SE	0.000168	0.000168
SC	South Carolina	Frontier	0.000000	0.000000
SD	South Dakota	Qwest	0.000240	0.000240
TN	Tennessee	ATT/SE	0.000168	0.000168
TX	Texas	ATT/SW	0.000053	0.000053
TX	Texas	Verizon-GTE	0.000000	0.000000
TX	Texas	Embarq	0.000218	0.000218
UT	Utah	Qwest	0.000240	0.000240
VA	Virginia	Embarq	0.000252	0.000252
VA	Virginia	Verizon-S	0.000000	0.000000
VT	Vermont	Fairpoint	0.000000	0.000000
WA	Washington	Frontier	0.000000	0.000000
WA	Washington	Qwest	0.000240	0.000240
WI	Wisconsin	ATT/MW	0.000103	0.000103
WV	West Virginia	Frontier	0.000000	0.000000
WY	Wyoming	Qwest	0.000240	0.000240

(N)

Material on this page previously appeared on pages 99, 110, 125, 137, 149, 161, 174.1, 187, 199, 212.2, 226 and 228.

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.55 Tandem Transport Facility Per Minute, Per Mile

	State	Serving Area	Originating	Terminating
AL	Alabama	ATT/SE	0.000020	0.000020
AR	Arkansas	ATT/SW	0.000003	0.000003
AZ	Arizona	Qwest	0.000030	0.000030
CA	California	ATT/CA	0.000015	0.000015
CA	California	Verizon-GTE	0.000002	0.000002
CO	Colorado	Qwest	0.000030	0.000030
CT	Connecticut	Frontier	0.000003	0.000003
CT	Connecticut	Verizon-N	0.000002	0.000002
DC	District of Columbia	Verizon-S	0.000002	0.000002
DE	Delaware	Verizon-S	0.000002	0.000002
FL	Florida	ATT/SE	0.000020	0.000020
FL	Florida	Embarq	0.000035	0.000035
FL	Florida	Verizon-GTE	0.000002	0.000002
GA	Georgia	ATT/SE	0.000020	0.000020
HI	Hawaii	Verizon-GTE	0.000002	0.000002
IA	Iowa	Qwest	0.000030	0.000030
ID	Idaho	Frontier	0.000002	0.000002
ID	Idaho	Qwest	0.000030	0.000030
IL	Illinois	Frontier	0.000002	0.000002
IL	Illinois	ATT/MW	0.000013	0.000013
IN	Indiana	Frontier	0.000002	0.000002
IN	Indiana	ATT/MW	0.000013	0.000013
KS	Kansas	ATT/SW	0.000003	0.000003
KY	Kentucky	ATT/SE	0.000020	0.000020
LA	Louisiana	ATT/SE	0.000020	0.000020
MA	Massechuetts	Verizon-N	0.000002	0.000002
MD	Maryland	Verizon-S	0.000002	0.000002
ME	Maine	Fairpoint	0.000003	0.000003
MI	Michigan	Frontier	0.000002	0.000002
MI	Michigan	ATT/MW	0.000013	0.000013
MN	Minnesota	Qwest	0.000030	0.000030
MO	Missouri	ATT/SW	0.000003	0.000003
MS	Mississippi	ATT/SE	0.000020	0.000020
MT	Montana	Qwest	0.000030	0.000030
NC	North Carolina	ATT/SE	0.000020	0.000020
NC	North Carolina	Embarq	0.000026	0.000026
NC	North Carolina	Frontier	0.000002	0.000002

(T)

Material on this page previously appeared on pages 99, 110, 125, 137, 149, 161, 174.1, 187, 199, 212.2, 226 and 228.

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.55 Tandem Transport Facility Per Minute, Per Mile (Cont'd)

ND	North Dakota	Qwest	0.000030	0.000030
NE	Nebraska	Qwest	0.000030	0.000030
NH	New Hampshire	Fairpoint	0.000003	0.000003
NJ	New Jersey	Embarq	0.000022	0.000022
NJ	New Jersey	Verizon-S	0.000002	0.000002
NM	New Mexico	Qwest	0.000030	0.000030
NV	Nevada	Embarq	0.000015	0.000015
NV	Nevada	ATT/NV	0.000008	0.000008
NY	New York	Verizon-N	0.000002	0.000002
OH	Ohio	Cincinnati Bell	0.000117	0.000117
OH	Ohio	Frontier	0.000002	0.000002
OH	Ohio	ATT/MW	0.000013	0.000013
OK	Oklahoma	ATT/SW	0.000003	0.000003
OR	Oregon	Frontier	0.000002	0.000002
OR	Oregon	Qwest	0.000030	0.000030
PA	Pennsylvania	Embarq	0.000022	0.000022
PA	Pennsylvania	Verizon-S	0.000002	0.000002
RI	Rhode Island	Verizon-N	0.000002	0.000002
SC	South Carolina	ATT/SE	0.000020	0.000020
SC	South Carolina	Frontier	0.000002	0.000002
SD	South Dakota	Qwest	0.000030	0.000030
TN	Tennessee	ATT/SE	0.000020	0.000020
TX	Texas	ATT/SW	0.000003	0.000003
TX	Texas	Verizon-GTE	0.000002	0.000002
TX	Texas	Embarq	0.000020	0.000020
UT	Utah	Qwest	0.000030	0.000030
VA	Virginia	Embarq	0.000030	0.000030
VA	Virginia	Verizon-S	0.000002	0.000002
VT	Vermont	Fairpoint	0.000003	0.000003
WA	Washington	Frontier	0.000002	0.000002
WA	Washington	Qwest	0.000030	0.000030
WI	Wisconsin	ATT/MW	0.000013	0.000013
WV	West Virginia	Frontier	0.000002	0.000002
WY	Wyoming	Qwest	0.000030	0.000030

(N)

(N)

Material on this page previously appeared on pages 99, 110, 125, 137, 149, 161, 174.1, 187, 199, 212.2, 226 and 228. (T)
(T)

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Linda Guay, Tariff Administrator
208 S. Akard Street
Dallas, TX 78202

SECTION 5 - RATES (Cont'd.)5.56 Tandem Switching (Per Minute) (Cont'd)

	State	Serving Area	Originating	Terminating
AL	Alabama	ATT/SE	0.001145	0.001145
AR	Arkansas	ATT/SW	0.000288	0.000288
AZ	Arizona	Qwest	0.002252	0.002252
CA	California	ATT/CA	0.000512	0.000512
CA	California	Verizon-GTE	0.001574	0.001574
CO	Colorado	Qwest	0.002252	0.002252
CT	Connecticut	Frontier	0.000634	0.000634
CT	Connecticut	Verizon-N	0.001574	0.001574
DC	District of Columbia	Verizon-S	0.001574	0.001574
DE	Delaware	Verizon-S	0.001574	0.001574
FL	Florida	ATT/SE	0.001145	0.001145
FL	Florida	Embarq	0.001197	0.001197
FL	Florida	Verizon-GTE	0.001574	0.001574
GA	Georgia	ATT/SE	0.001145	0.001145
HI	Hawaii	Verizon-GTE	0.001200	0.001200
IA	Iowa	Qwest	0.002252	0.002252
ID	Idaho	Frontier	0.002400	0.002400
ID	Idaho	Qwest	0.002252	0.002252
IL	Illinois	Frontier	0.001845	0.001845
IL	Illinois	ATT/MW	0.001118	0.001118
IN	Indiana	Frontier	0.002400	0.002400
IN	Indiana	ATT/MW	0.001118	0.001118
KS	Kansas	ATT/SW	0.000288	0.000288
KY	Kentucky	ATT/SE	0.001145	0.001145
LA	Louisiana	ATT/SE	0.001145	0.001145
MA	Massachusetts	Verizon-N	0.001574	0.001574
MD	Maryland	Verizon-S	0.001574	0.001574
ME	Maine	Fairpoint	0.001600	0.001600
MI	Michigan	Frontier	0.003000	0.003000
MI	Michigan	ATT/MW	0.001118	0.001118
MN	Minnesota	Qwest	0.002252	0.002252
MO	Missouri	ATT/SW	0.000288	0.000288
MS	Mississippi	ATT/SE	0.001145	0.001145
MT	Montana	Qwest	0.002252	0.002252
NC	North Carolina	ATT/SE	0.001145	0.001145
NC	North Carolina	Embarq	0.000639	0.000639
NC	North Carolina	Frontier	0.001649	0.001649

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Material on this page previously appeared on pages 99, 110, 125, 137, 149, 161, 174.1, 187, 199, 212.2, 226 and 228.

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SECTION 5 - RATES (Cont'd.)5.56 Tandem Switching (Per Minute (Cont'd)

ND	North Dakota	Qwest	0.002252	0.002252
NE	Nebraska	Qwest	0.002252	0.002252
NH	New Hampshire	Fairpoint	0.001600	0.001600
NJ	New Jersey	Embarq	0.001438	0.001438
NJ	New Jersey	Verizon-S	0.001574	0.001574
NM	New Mexico	Qwest	0.002252	0.002252
NV	Nevada	Embarq	0.002052	0.002052
NV	Nevada	ATT/NV	0.001062	0.001062
NY	New York	Verizon-N	0.001574	0.001574
OH	Ohio	Cincinnati Bell	0.002001	0.002001
OH	Ohio	Frontier	0.002400	0.002400
OH	Ohio	ATT/MW	0.001118	0.001118
OK	Oklahoma	ATT/SW	0.000288	0.000288
OR	Oregon	Frontier	0.004332	0.004332
OR	Oregon	Qwest	0.002252	0.002252
PA	Pennsylvania	Embarq	0.001438	0.001438
PA	Pennsylvania	Verizon-S	0.001574	0.001574
RI	Rhode Island	Verizon-N	0.001574	0.001574
SC	South Carolina	ATT/SE	0.001145	0.001145
SC	South Carolina	Frontier	0.002400	0.002400
SD	South Dakota	Qwest	0.002252	0.002252
TN	Tennessee	ATT/SE	0.001145	0.001145
TX	Texas	ATT/SW	0.000288	0.000288
TX	Texas	Verizon-GTE	0.001574	0.001574
TX	Texas	Embarq	0.000331	0.000331
UT	Utah	Qwest	0.002252	0.002252
VA	Virginia	Embarq	0.000879	0.000879
VA	Virginia	Verizon-S	0.001574	0.001574
VT	Vermont	Fairpoint	0.001600	0.001600
WA	Washington	Frontier	0.003664	0.003664
WA	Washington	Qwest	0.002252	0.002252
WI	Wisconsin	ATT/MW	0.001118	0.001118
WV	West Virginia	Frontier	0.001684	0.001684
WY	Wyoming	Qwest	0.002252	0.002252

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