



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
www.inteserra.com

November 23, 2021

**Via ETFS Filing**

**This material is filed on 15 days' notice  
under Section 204(a)(3) of the Communications Act**

Core Communications, Inc.  
213 South Main Street  
Anderson, SC 29624

FRN: 0017-11-8795  
TRANSMITTAL No. 22

Secretary, Federal Communications Commission  
Washington, DC 20554  
ATTN: Wireline Competition Bureau

The accompanying tariff material, issued by Core Communications, Inc., et al. and bearing Tariff FCC No. 3, effective December 8, 2021, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. This filing is intended to address years-long campaigns of carriers refusing to pay tariff charges through self-help schemes. Core's tariff articulates the conditions for payment to Core. Despite its deemed-lawful tariffs, some carriers systematically withhold payment on the entirety of Core's traffic based on allegations that some of Core's traffic is "non-compensable." The tariffed switched access compensation regime does not allow carriers to make empty allegations about the compensability of an unspecified portion of a provider's traffic and refuse to pay for all of that provider's traffic.

Today's tariff filing addresses the circumstances under which traffic is non-compensable and makes expressly clear that carriers may only deem Core's traffic to be non-compensable under those well-established and demonstrable circumstances. Core's filing is consistent with the current rules of compensable traffic, requiring carriers to follow those rules. If Core's submission inadvertently fails to include an express Commission rule or order which provides that certain traffic is non-compensable, Core will withdraw this filing to incorporate such a circumstance. Should carriers believe other circumstances should exist where traffic is non-compensable, advocacy and requests for rulemaking are available avenues.

Finally, there should be no mistake about Core's intentions with this filing. Core is fully committed to fighting robocalls. Core has worked with long distance carriers (AT&T and Lumen) to provide voluntary refunds or credits where unwanted robocalls were identified. Core has also willingly disconnected customers, traffic originators, whose commitment to traffic integrity did not meet Core's standards. Core's daily operations embrace STIR/SHAKEN in addition to its independent, in-house blocking algorithms based on standard caller-id signaling information and IP packet information. Core will continue to implement these measures and work collaboratively with long distance carriers to stop unwanted robocalling. Core, however, must be paid for all compensable call traffic.

November 23, 2021

Core Communications, Inc.  
FRN: 0017-11-8795  
TRANSMITTAL No. 22  
Page 2

The material contained in this filing consists of tariff pages indicated by the check sheet listed below:

FCC Tariff No.3 – 21<sup>st</sup> Revised Page 3

This transmittal letter and associated attachments are being filed electronically today via the Federal Communications Commission's Electronic Tariff Filing System (ETFS). Payment in the amount of \$960.00 has been electronically transmitted to the U.S. Bank in St. Louis, Missouri in accordance with the fee program procedures.

Supporting material is not required with this filing. Petitions pertaining to this filing may be sent to:

Chief Regulatory Counsel  
Core Communications, Inc.  
213 South Main Street  
Anderson, South Carolina 29624  
Telephone: 410-216-9865  
[ralph@gleatonlaw.com](mailto:ralph@gleatonlaw.com)

Carey Roesel  
Inteserra Consulting Group  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3006  
Facsimile: 407-740-0613  
Email: [croesel@inteserra.com](mailto:croesel@inteserra.com)

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to [croesel@inteserra.com](mailto:croesel@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel  
Consultant

cc: R. Gleaton- CoreTel (Via Email)  
B. Mingo – CoreTel (via Email)  
tms: Transmittal 22  
CR/sp