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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.

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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  
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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

## CHECK SHEET

Supplement No. 1 and pages of this tariff, as indicated below, are effective as of the date shown at the bottom of the respective pages. Original and revised pages, as named below, comprise all changes from the original tariff and are currently in effect as of the date on the bottom of this page.

PAGE	REVISION	PAGE	REVISION	PAGE	REVISION
1	Original	29.4	5 <sup>th</sup> Revised	54	6 <sup>th</sup> Revised
2	Original	29.5	5 <sup>th</sup> Revised	54.1	Original
3	<b>21<sup>st</sup> Revised</b> *	29.6	5 <sup>th</sup> Revised	55	6 <sup>th</sup> Revised
3.1	Original	29.7	5 <sup>th</sup> Revised	55.1	Original
4	Original	29.8	5 <sup>th</sup> Revised	56	6 <sup>th</sup> Revised
5	1 <sup>st</sup> Revised	29.9	5 <sup>th</sup> Revised	57	10 <sup>th</sup> Revised
6	Original	29.10	5 <sup>th</sup> Revised	58	10 <sup>th</sup> Revised
7	1 <sup>st</sup> Revised	29.11	5 <sup>th</sup> Revised	58.1	Original
8	6 <sup>th</sup> Revised	30	1 <sup>st</sup> Revised	58.2	Original
9	1 <sup>st</sup> Revised	31	Original	59	14 <sup>th</sup> Revised
10	1 <sup>st</sup> Revised	32	Original	59.1	3 <sup>rd</sup> Revised
11	1 <sup>st</sup> Revised	33	4 <sup>th</sup> Revised	59.2	Original
12	1 <sup>st</sup> Revised	34	Original	60	13 <sup>th</sup> Revised
13	6 <sup>th</sup> Revised	35	Original	60.1	Original
14	1 <sup>st</sup> Revised	36	1 <sup>st</sup> Revised	60.2	Original
15	Original	37	Original	61	10 <sup>th</sup> Revised
16	Original	38	Original	61.1	Original
17	Original	39	Original	61.2	Original
18	1 <sup>st</sup> Revised	40	4 <sup>th</sup> Revised	62	14 <sup>th</sup> Revised
19	Original	41	1 <sup>st</sup> Revised	62.1	Original
20	Original	42	1 <sup>st</sup> Revised	62.2	Original
21	Original	43	2 <sup>nd</sup> Revised	63	10 <sup>th</sup> Revised
22	Original	43.1	2 <sup>nd</sup> Revised	63.1	Original
23	1 <sup>st</sup> Revised	44	Original	63.2	Original
24	Original	45	Original	64	14 <sup>th</sup> Revised
25	Original	46	Original	64.1	Original
26	Original	47	1 <sup>st</sup> Revised	64.2	Original
27	Original	48	Original	65	13 <sup>th</sup> Revised
28	11 <sup>th</sup> Revised	49	1 <sup>st</sup> Revised	65.1	Original
<b>28.1</b>	<b>1<sup>st</sup> Revised</b> *	50	1 <sup>st</sup> Revised	65.2	Original
29	4 <sup>th</sup> Revised	51	2 <sup>nd</sup> Revised	66	14 <sup>th</sup> Revised
29.1	5 <sup>th</sup> Revised	52	Original	66.1	Original
29.2	5 <sup>th</sup> Revised	53	10 <sup>th</sup> Revised	66.2	Original
29.3	5 <sup>th</sup> Revised				

Transmittal No. 22

Issued: November 23, 2021

Effective: December 8, 2021

Issued By:  
Chief Regulatory Counsel  
213 South Main Street  
Anderson, South Carolina 29624

## 2.10 Billing and Payment For Service (Cont'd.)

- C. If the dispute is resolved in favor of the Company and the Customer has withheld the disputed amount, any payments withheld pending resolution of the disputed amount shall be subject to the late payment penalty as set forth in 2.10.5.
- D. If the dispute is resolved in favor of the Company and the Customer has paid the disputed amount on or before the payment due date, no interest credit or penalties will apply.
- E. In the event that the Company pursues a claim in Court or before any regulatory body arising out of a Customer's refusal to make payment pursuant to this Tariff, including refusal to pay for services originating from or terminating to any Company End User, and the Company prevails on all or a substantial part of its claim, Customer shall be liable for the payment of the Company's reasonable attorneys' fees expended in collecting those unpaid amounts.
- F. Traffic delivered by the Company to the Customer is compensable unless the traffic is demonstrably non-compensable based on the following criteria:
  - 1) The traffic is actionable in a court of law or at the FCC as a product or result of a fraud by the Company such that the calls at issue were made with the intention to deceive and secure an unlawful gain;
  - 2) The traffic is a type formally identified by the FCC as non-compensable switched access traffic;
  - 3) The traffic is not covered by 1) or 2) above, but the Customer and Company agree, in writing, is non-compensable (e.g., illegal robocalls or other traffic that the Customer agrees to refund or otherwise not bill its end-users).

Customers may dispute, and seek credits or refunds for billing based on a good faith dispute that the identified traffic is non-compensable as defined herein. Billing disputes, and associated withholding of disputed amounts, based on mere allegations that the traffic sent to the Customer is suspect, fraudulent, illegal, or otherwise non-compensable which are not supported as described in this Section will not be considered good faith disputes.

(N) ————— (N)