

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

In the Matter of

Ameritech Operating Companies  
Tariff F.C.C. No. 2

Transmittal No. 1918

BellSouth Telecommunication, LLC  
Tariff F.C.C. No. 1

Transmittal No. 190

Nevada Bell Telephone Company, LLC  
Tariff F.C.C. No. 1

Transmittal No. 6

Pacific Bell Telephone Company  
Tariff F.C.C. No. 1

Transmittal No. 602

Southwestern Bell Telephone Company, LLC  
Tariff F.C.C. No. 1

Transmittal No. 6

**SUPPLEMENT TO PETITION OF  
BANDWIDTH INC. AND BANDWIDTH.COM CLEC, LLC  
TO REJECT OR SUSPEND AND INVESTIGATE**

In response to the Wireline Competition Bureau's request that Bandwidth address whether shared use and ratcheting are required, Bandwidth provides additional information as a Supplement to its Petitions to Reject or Suspend and Investigate the following tariffs filed by affiliates of AT&T: Ameritech Operating Companies Transmittal No. 1918 - Tariff F.C.C. No. 2, BellSouth Telecommunication, LLC Transmittal No. 190 - Tariff F.C.C. No. 1, Nevada Bell Telephone Company, LLC Transmittal No. 6 - Tariff F.C.C. No. 1, Pacific Bell Telephone

Company Transmittal No. 602 - Tariff F.C.C. No. 1 and Southwestern Bell Telephone Company, LLC Transmittal No. 6 - Tariff F.C.C. No. 1.

The FCC, since the break-up of the Bell System, has mandated that ILEC's allow customers to share the use of ILEC facilities between switched access and special access and to use "ratcheting" for apportioning the rates the ILEC charges to its customer for such shared use.<sup>1</sup> The FCC continued to endorse ratcheting for shared use of facilities between special access and switched access, explaining that ratcheting arrangements are "reasonable means of permitting customers flexibility in structuring their leased networks, and allowing the ILEC's to engineer their networks efficiently."<sup>2</sup> The FCC further concluded that "when a customer uses a given facility for both special access and switched transport traffic, it should pay a mix of the rates from the special access and transport tariffs for facilities at that level of capacity."<sup>3</sup>

Respectfully submitted,

By: /s/ Greg Rogers  
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Dated: September 6, 2024

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<sup>1</sup> See *Expanded Interconnection with Local Telephone Company Facilities*, Report and Order and Notice of Proposed Rulemaking, 7 FCC Rcd 7369, 7463, n 461 (1992) ("The Commission mandated that the LECs continue to offer ratcheting.") citing *Investigation of Access and Divestiture Related Tariffs*, 97 FCC 2d 1082, 1984 WL 251254 \*1225, 1282 (1984).

<sup>2</sup> *Transport Rate Structure and Pricing*, First Memorandum Opinion and Order on Reconsideration, 8 FCC Rcd 5370, 5380, para. 57 (1993).

<sup>3</sup> *Id.*

## **CERTIFICATE OF SERVICE**

I, Greg Rogers, certify that on the 6th day of September, 2024, I caused a copy of the foregoing Supplement to the Petitions of Bandwidth Inc. and Bandwidth.com CLEC, LLC to Reject or Suspend and Investigate to be served on the following parties as noted below:

<p>Trent Harkrader, Chief Wireline Competition Bureau Federal Communications Commission 45 L Street NE Washington, DC 20554 <a href="mailto:trent.harkrader@fcc.gov">trent.harkrader@fcc.gov</a> <b><u>(Via Electronic and U.S. First Class Mail)</u></b></p>	<p>Victoria Goldberg, Chief Pricing Policy Division Wireline Competition Bureau Federal Communications Commission 45 L Street NE Washington, DC 20554 <a href="mailto:victoria.goldberg@fcc.gov">victoria.goldberg@fcc.gov</a> <b><u>(Via Electronic and U.S. First Class Mail)</u></b></p>
<p>Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 45 L Street NE Washington, DC 20554 <b><u>(Via U.S. First Class Mail)</u></b></p>	<p>Brenda Hutchinson Area Manager – Regulatory Relations Ameritech Operating Companies Southwestern Bell Telephone Company, LLC 5815 Highway 18 S Jackson, Mississippi 39209 <b><u>(Via Facsimile (214) 486-8175 and U.S. First Class Mail)</u></b></p>
<p>Tracey Moore Lead Regulatory Relations BellSouth Telecommunication, LLC 311 S. Akard St. Dallas, TX 75202 <b><u>(Via Facsimile (214) 486-8175 and U.S. First Class Mail)</u></b></p>	<p>Felicia Martin Lead Regulatory Relations Nevada Bell Telephone Company 311 S. Akard St. Dallas, TX 75202 <b><u>(Via Facsimile (214) 486-8175 and U.S. First Class Mail)</u></b></p>

/s/ Greg Rogers

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Greg Rogers