

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

In the Matter of )  
 ) CCB/CPD 01-23  
December 17, 2001 )  
MAG ACCESS CHARGE TARIFF FILINGS )

**RESPONSE OF SOUTHERN KANSAS TELEPHONE COMPANY TO PETITION OF  
AT&T CORP.**

**Background**

Southern Kansas Telephone Company (SKTC), pursuant to the Commission's November 26, 2001 order in the above-captioned proceeding, filed a revised interstate traffic sensitive access charge tariff on December 17, 2001. This tariff filing implemented the Commission's decisions in the MAG Order<sup>1</sup>. On December 24, 2001, AT&T Corp. (AT&T) filed a petition to suspend and investigate SKTC's tariff filing on grounds that SKTC did not provide sufficient data to determine whether the revised rates comply with the MAG Order<sup>2</sup>. Following is SKTC's response to AT&T's petition.

**Argument**

SKTC submitted with its original tariff filing information that it felt was sufficient to support the proposed traffic sensitive access rate changes. AT&T disagrees, and stated in their petition that SKTC failed to provide "*LSS amounts or sufficient data to determine whether those amounts*

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<sup>1</sup> Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, CC Docket No. 00-256, *Second Report and Order and Further Notice of Proposed Rulemaking*, FCC 01-304 (rel. Nov. 8, 2001) ("MAG Order")

<sup>2</sup> AT&T Petition at I.B. (page 5)

*were properly removed from the revenue requirement before computing line port costs, or even workpapers that show how local switching rates were developed.”*<sup>3</sup>

In order to alleviate AT&T's concerns, and to allow the Commission to act upon SKTC's tariff filing in an expeditious manner, SKTC provides the attached additional supporting documentation. This documentation shows the calculation of the local switching line port cost transferred to the common line rate element and the allocation of the transport interconnection charge (TIC) revenue requirement to common line and other transport rate elements. It is important to note that, in order to comply with the Commission's requirement that shifts in revenue requirement to the NECA common line pool from an ILEC's individual traffic sensitive tariff should reflect equivalent adjustments to the underlying revenue requirements<sup>4</sup>, SKTC utilized information received from NECA regarding shifts from traffic sensitive revenue requirement to the common line revenue requirement.

SKTC notes that the attached supporting documentation demonstrates that the originally-filed revised rates comply with the Commission's MAG Order. The TIC reallocation shown on the attached documentation does not include local switching support<sup>5</sup> and does not include total TIC revenues for the period ended June 30, 2001<sup>6</sup>.

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<sup>3</sup> AT&T Petition, page 5

<sup>4</sup> November 26, 2001 Order regarding December 17, 2001 MAG Access Charge Tariff Filings (CCB/CPD 01-23), at paragraph 3.

<sup>5</sup> 47 CFR 69.415(c)(1)

<sup>6</sup> 47 CFR 69.415(c)(3)

### **Conclusion**

Based on the above discussion and attached addition supporting information, SKTC requests the Commission find that its December 17, 2001 access tariff filing is in compliance with the MAG Order, and the rates contained therein should therefore become effective on January 1, 2002.

Respectfully Submitted,

Southern Kansas Telephone Company

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