



May 22, 2015

Dear Indiana Local Exchange Carrier:

The Indiana Utility Regulatory Commission's (Commission) Communications Division has received several inquiries regarding procedures for filing 2015 intrastate access tariffs. The Federal Communications Commission's (FCC) Universal Service Fund/Intercarrier Compensation Transformation Order (USF/ICC Transformation Order) established procedures for local exchange carriers (LECs) to make filings each year, starting in 2012. These filings are needed in order to transition certain interstate and intrastate switched access rates to bill-and-keep and (for companies without an applicable interconnection agreement in place on December 29, 2011) to file initial intrastate tariffs for non-access reciprocal compensation rates. A discussion of selected FCC and IURC requirements appears below. Below are instructions on how to complete the fourth step of the process outlined in the USF/ICC Order.

FCC "Step Four" Requirements for Incumbent LECs (ILEC)

Beginning July 1, 2015, each ILEC shall implement the FCC's "Step Four" requirements for Transitional Intrastate Access Service (either directly or through mirroring, concurring in, or adopting another carrier's applicable switched access tariff):

- Price cap carriers shall implement the requirements set forth at 47 CFR 51.907(e), and as further described in the FCC's USF/ICC Transformation Order and related orders.
- Rate-of-Return carriers shall implement the requirements set forth at 47 CFR 51.909(e), and as further described in the FCC's USF/ICC Transformation Order and related orders.

Selected FCC Requirements for CLECs

As of July 1, 2013, CLEC Access Reciprocal Compensation rates for both originating and terminating switched exchange access services were capped at the rates of the competing ILEC, "in accordance with the same procedures specified in [47 CFR § 61.26.]"

- "The benchmark rate for a CLEC's switched exchange access services will be the rate charged for similar services by the competing ILEC. If an ILEC to which a CLEC benchmarks its rates, pursuant to this section, lowers the rate to which a CLEC benchmarks, the CLEC must revise its rates to the lower level within 15 days of the effective date of the lowered ILEC rate."

Misc. FCC Filing Requirements

- Intrastate tariff filings for new or revised rates, charges, terms, and/or conditions for switched access services not included in the definition of the term "Transitional Intrastate Access Service" will be governed by the Commission's 30-day filing rules or, in the alternative, by the Commission's instant mirroring procedures.
- LEC intrastate tariffed rates and charges for transport and termination on IntraMTA calls between LECs and commercial mobile radio service providers shall be pursuant to bill-and-keep arrangements, consistent with 47 CFR §§ 51.701(b)(2), 51.705(a), and 51.713.

- As of July 1, 2013, tariffed (default) transitional intrastate Non-Access Reciprocal Compensation rates shall not “exceed that carrier’s tariffed interstate access rate in effect in [Indiana] on January 1 of that same year, for equivalent functionality” and shall comply with all applicable federal and state laws.

IURC Filing Requirements

When submitting a tariff to the Commission, all hyperlinks located within the cover letter or the tariff, itself, must be functional, accurate, and current. Hyperlinks must take the reader directly to the relevant tariff and/or web page(s) referenced, without requiring the reader to click through any other tariff and/or web page(s) as a prerequisite.

NEW IN 2015: All Indiana rural LECs currently concurring in the CCI intrastate access (CCI Tariff IURC No. 5) should **not** file letters or statements to concur in the CCI No. 5 until receiving further instructions from the Commission. Commission staff is working closely with both TDS Telecom and the Indiana Exchange Carrier Association to develop a list of filing requirements and instructions specifically applicable to rural LECs concurring in the CCI intrastate access tariff.

Instant Mirroring Filings

- The subject line for instant mirroring filing notices should be:
Re: Intrastate Switched Access Service –2015 Instant Mirroring Filing and Explanation of Compliance with FCC and IURC Requirements
- Notices should identify which (and whose) tariff the filing company will be mirroring, concurring in, or adopting.
- Intrastate access tariff change filings that mirror, concur in, or adopt changes to an interstate or intrastate access tariff are subject to the Commission’s instant mirroring requirements, which are explained in the Commission’s Order in Cause No. 44004, issued July 13, 2011.
- Unless otherwise stated by the Commission or Staff, or unless otherwise requested by the filing party, Instant mirroring filings will have an effective date of one business day after the effective date of the applicable access rates, charges, terms, and/or conditions.

30-Day Filings

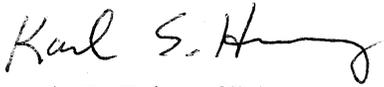
- The subject line for 30-day filing notices should be:
Re: 30-Day Filing (Pursuant to 170 IAC 1-6) and Explanation of Compliance with FCC Requirements
- Please leave the effective date blank on any 30-day filings. The effective date will be stamped by the Commission after it has approved the tariff changes, as described in 170 IAC 1-6-8.
- Intrastate access tariffs and tariff changes that do not mirror, concur in, or adopt an interstate tariff or another carrier’s intrastate access tariff remain subject to the Commission’s 30-day filing rules.
- The company or entity filing an intrastate access 30-day tariff filing with the Commission must attach a cover letter that includes or explains the following:
 - the purpose of the filing;
 - a statement that the filing is being made pursuant to 170 IAC 1-6;
 - the intrastate exceptions (i.e., the deviation from applicable FCC requirements);
 - tariff sheet(s); and
 - contact information for the filing company or entity regarding this filing, including the following for each person to be contacted: name, telephone number, mailing address, and either an email address or a fax number.
- If a filing contains any intrastate exceptions, the filing will be treated as a 30-day filing, even if the remainder of the filing would otherwise be treated as an instant mirroring filing.

All filings and notices addressed in this letter should be sent to:

Indiana Utility Regulatory Commission - Communications Division
Attn: Kim Layton - Tariff Administrator
101 W. Washington Street, Suite 1500E
Indianapolis, IN 46204
(317) 232-5559
klayton@urc.in.gov

Please contact Karl Henry at (317) 232-5585 or khenry@urc.in.gov if you have questions regarding the guidance provided in this letter.

Sincerely,



for Pamela D. Taber, CPA
Director Communications
Indiana Utility Regulatory Commission