



Candice L. Glover
Regulatory Manager
Indiana, Michigan, Ohio

AT&T, Inc.
225 West Randolph Street/27C
Chicago, Illinois 60606

T: 312.727-0127
F: 281.664-9892
clglover@att.com
www.att.com

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Via Email

Secretary of the Commission
Indiana Utility Regulatory Commission
101 West Washington Street
Suite 1500 E
Indianapolis, Indiana 46204

Dear Secretary:

Enclosed with this letter is a tariff revision for AT&T Indiana, AT&T Communications of Indiana, GP, and TCG Indianapolis (AT&T). The enclosed pages for each company adds language implementing the decision by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (Nov. 18, 2011) (FCC Order).

Per discussions with staff this filing is being made under 170 IAC 1-6 Thirty-Day Administrative Filing Procedures and Guidelines and meets all applicable requirements. In accordance with Section 6 the following notice which meets the requirements of subsection (b) will be published in the Indianapolis Star March 9, 2012, its circulation covering the majority of affected AT&T customers.

This notice applies to a tariff filing describing VoIP-PSTN traffic exchanged between TCG Indianapolis, AT&T Communications of Indiana, GP, and Indiana Bell Telephone Company, Incorporated, and their wholesale carrier customers in time division multiplexing format that originates and/or terminates in Internet protocol ("IP") format. VoIP-PSTN traffic originates and/or terminates in IP format if it originates from and/or terminates to a carrier's end-user customer of a service that requires Internet protocol compatible customer premises equipment. The transitional Intercarrier Compensation framework for VoIP-PSTN traffic adopted by the Federal Communications Commission in its Report and Order, Release No. 11-161 (Nov. 18, 2011) directed that this intrastate VoIP-PSTN traffic be billed employing interstate rates.



The proposed pages effective April 9, 2012 may be accessed on the AT&T website as follows:

AT&T Indiana	IURC No. 20	AT&T Service Publications - Indiana Tariff 20
		Part 21 Sec. 1 2 nd Revised Sheet 3
AT&T Communications of Indiana, GP	IURC No. T-3	Indiana AT&T and TCG - Pending Projects
		Part 1 Sec. 2 1 st Revised Page 1 Original Pages 1.1-1.6
TCG Indianapolis	IURC No. 2	Indiana AT&T and TCG - Pending Projects
		Sec. 2 Original Pages 26.1-26.5

Questions regarding this filing should be made to me preferably via email. My contact information is in the letterhead on page 1 of this letter.

Sincerely,

Candice Glover

Exception Statements

Preface

The following exception statements correspond to Indiana Bell's FCC #2 Check Sheet Access Tariff and identify FCC tariff pages where an exception exists for the purpose of clarifying those services offered in the Indiana Jurisdiction. Exceptions are given by section and describe those services or areas of the FCC No. 2 tariff that either do not apply to Indiana Jurisdiction or differ such that a statement explaining Indiana-specific regulations is required.

In some cases, entire FCC No. 2 pages will be replaced by an appropriate statement or page detailing the appropriate application of the service, administrative process, etc. in question to the Indiana Jurisdiction. Additionally, sections may include tariff exception pages applicable to Indiana Jurisdiction only.

When reference is made to a particular section's exceptions and a specific exception statement is not given, general exception statements of that section apply. General exception statements have been provided for the Preface and Sections 6 and 7 where the same exception applies throughout the section or tariff, in the case of the Preface.

General Tariff No. 2 Exceptions

1. Unless otherwise indicated read intra where inter is stated with the exception of Percent Interstate Use (PIU) where interstate should be read as interstate.
2. The terms International Boundary Point and Foreign Communications do not apply to Indiana Jurisdiction.
3. Service that is interstate only in nature does not apply to Indiana Jurisdiction. Service that applies specifically to any other Ameritech Operating Company, does not apply to Indiana Jurisdiction unless otherwise stated.
4. VoIP-PSTN Traffic

(N)

This section applies to VoIP-PSTN traffic exchanged between the Telephone Company and the customer in time division multiplexing ("TDM") format that originates and/or terminates in Internet protocol ("IP") format. VoIP-PSTN traffic originates and/or terminates in IP format if it originates from and/or terminates to an end-user customer of a service that requires Internet protocol-compatible customer premises equipment. The transitional Intercarrier Compensation framework for VoIP-PSTN traffic adopted by the Federal Communications Commission in its Report and Order, Release No. 11-161 (Nov. 18, 2011) ("FCC Order") directed that this intrastate VoIP-PSTN traffic be billed employing interstate rates.⁽¹⁾

The intrastate switched access rates in this tariff are the same as the interstate rates for Switched Access rate elements. Thus, no modifications to the rates and/or billing are necessary as a result of the VoIP-PSTN provisions of the FCC Order.

⁽¹⁾ Although the Telephone Company has taken the position that this tariff, by its own terms, already applies to VoIP-PSTN traffic, as defined herein, the Telephone Company has included this Section in the tariff out of an abundance of caution to prevent any claim that it does not so apply, and to implement the decision by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (Nov. 18, 2011) ("FCC Order") that VoIP-PSTN access traffic should be exchanged at interstate access rates (unless the parties have agreed otherwise). By its terms, the FCC Order is prospective only, and does not address preexisting law with regard to the applicability of intercarrier compensation or the enhanced service providers ("ESP") exemption to VoIP-PSTN Traffic. Including this section in the tariff in no way alters or otherwise affects the applicability of this tariff to VoIP-PSTN Traffic before the effective date of the FCC Order.

(N)