December 15, 2014

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Reform – Mobility Fund, WT Docket No. 10-208

Dear Ms. Dortch:

On December 11, 2014, USTelecom, ERTA and ITTA submitted an ex parte notice to the Federal Communications Commission (Commission) in the above referenced proceedings.[1] The proposal addressed the significant access revenue reductions for many local exchange carriers resulting from the requirement to change the switched access rates applicable to intrastate originating VoIP-PSTN traffic resulting from an FCC rule change which became effective July 1, 2014 (*see* FCC Rules, Section 51.913(a)(2)).

As part of our submission, we attached a Microsoft Excel spreadsheet that included a comprehensive example to show how these calculations might work with proxy local exchange carrier data. During transmission of the filing through the Commission's Electronic Comment Filing System, the Microsoft Excel spreadsheet was truncated, resulting in portions of the example being deleted. The attached filing includes an updated attachment that includes the entirety of our earlier submission. All remaining information in our earlier ex parte notice remains unchanged.

[1] *See*, Notice of Ex Parte, from Dave Cohen (USTelecom), Micah Caldwell (ITTA) and Jerry Weikle (ERTA), to Marlene Dortch, WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 03-109; WT Docket No. 10-208 (dated December 11, 2014).

Please contact the undersigned should you have any questions.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

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/S/

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cc: Deena Shetler
Victoria Goldberg

Filing Date (enter w/leading '): 6/15/2015
Holding Company
Filing Name:

Study Area (USAC Study Area Code):

Originating VoIP Assumptions:

*Recovery for FY 2014 will occur with recovery for FY 2015
*To simplify annual VoIP demand increases, an annual state incremental percent will be derived from FCC Local Telephone Competition Status Report as released each December 31. Each study area within the state will use the incremental increase percent.
*Baseline MOU will be established using the 6 months - July 2014 - December 2014

ACCESS REDUCTION TRP (ACCREDTRP)

Revenue Impact from Rate Reductions	At Intrastate Rates	At Interstate Rates	2014 Rate Reduction Impact
Orig VoIP End Office Revenue	$ 38,090	$ 24,960	$ 13,130

Tariff Section Interstate	Tariff Section Intrastate	USOC	Rate Element	6/30/2014 Intrastate Originating Rates (A) = Input	6/30/2014 Interstate Originating Rates (B) = Input	July '14 - Dec '14 Intrastate Orig VoIP Demand (C) = Input	Intrastate PriceOut at Intrastate Rates (D) = (A) * (C)	Intrastate PriceOut at Interstate Rate (E) = (B) * (C)	Total Annualized Difference (F)= (E) - (D) * 2
			BASKET 1 - COMMON LIINE						
		1030	Carrier Common Line - Originating Premium	$ 0.015500	$ 0.015500	-	$ -	$ -	$ -
			BASKET 2 - TRAFFIC SENSITIVE						
			**** LOCAL SWITCHING SERVICE CATEGORY ****						
17.2.3.A	17.2.3.A	1140	Local Switching Premium	$0.005171	$0.002563	1,125,386	$ 5,819	$ 2,884	$ (5,869)
17.2.3.A	17.2.3.A	1145	Local Switching Non-Premium		$ -	-	$ -	$ -	$ -
			**** INFORMATION SERVICE CATEGORY ****						
17.2.3.B	17.2.3.B	1150	Information Surcharge - Premium	$ -	$ -	28,229	$ -	$ -	$ -
17.2.3.B	17.2.3.B	1155	Information Surcharge - NonPremium		$ -	-	$ -	$ -	$ -
			**** LOCAL SWITCHING TRUNK PORT CATEGORY ****						
17.2.3.C	17.2.3.C	0230+0234	Local (Sw) - Shared Trunk Port	$ 0.010275	$ 0.009275	835,000	$ 8,580	$ 7,745	$ (1,670)
17.2.2.B	17.2.2.B	PT8HX	Local (Sw) - Dedicated Trunk Port - Voice Grade	$ 55.50	$ 55.50		$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8JX	Local (Sw) -Dedicated Trunk Port - DS1	$ 1.97	$ 1.97		$ -	$ -	$ -
17.2.2.B	17.2.2.B		Local (Sw) - DS1 To VG MUX - Analog End Office	$ -	$ -		$ -	$ -	$ -
			BASKET 3 - TRUNKING						
			**** TANDEM SWITCHED TRANSPORT SERVICE CATEGORY ****						
17.2.2	17.2.2	1102	Tandem-Switched Transport Termination	$0.000296	$0.000053	900,156	$ 266	$ 48	$ (437)
17.2.2	17.2.2	1112	Tandem-Switched Transport Facility (PM)	$0.000032	$0.000003	9,000,125	$ 288	$ 27	$ (522)
17.2.2	17.2.2	1130	Tandem Switching	$0.001645	$0.000288	1,515,000	$ 2,492	$ 436	$ (4,112)
			DS0 Tandem Trunk Ports	$ 1.60	$ 1.34	1,000	$ 1,600	$ 1,340	$ (520)
17.2.2.C	17.2.2.C	0140	Tandem MUX DS3 to DS1 Common (Restructure)	$ 0.000247	$ 0.000247	-	$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8KX	Tandem Dedicated Trunk Port - Voice Grade	$ 16.77	$ 16.77	-	$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8LX	Tandem Dedicated Trunk Port - DS1	$ 7.89	$ 7.89	-	$ -	$ -	$ -
							$ 19,045	$ 12,480	$ (13,130)
			End Office Revenue				$ 14,398	$ 10,629	$ (7,539)
			Tandem Switched Revenue				$ 4,647	$ 1,851	$ (5,591)
			Dedicated Switched Revenue				$ -	$ -	$ -
							$ 19,045	$ 12,480	$ (13,130)

Filing Date (enter w/leading '): 6/15/2015
Holding Company

Filing Name:

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Originating VoIP Assumptions:

*Recovery for FY 2014 will occur with recovery for FY 2015

*To simplify annual VoIP demand increases, an annual state incremental percent will be derived from FCC Local Telephone Competition Status Report as released each December 31. Each study area within the state will use the incremental increase percent.

*Baseline MOU will be established using the 6 months - July 2014 - December 2014

ACCESS REDUCTION TRP (ACCREDTRP)

Revenue Impact from Rate Reductions	Intrastate	Interstate	2015 Rate Reduction Impact
Orig VoIP End Office Revenue	$ 40,013	$ 26,220	$ 13,793

VoIP Incremental Annual Increase Percent	5%	(J)

Tariff Section Interstate	Tariff Section Intrastate	USOC	Rate Element	6/30/2014 Intrastate Originating Rates (A) = Input	6/30/2014 Interstate Originating Rates (B) = Input	July '14 - Dec '14 Intrastate Orig VoIP Demand (C) = Input	Jul-15 Incremental VoIP Demand Increase * (D) = (C) * (1+(J)	Intrastate PriceOut at Intrastate Rates (E) = (A) * (D)	Intrastate PriceOut at Interstate Rate (F) = (B) * (D)	Total Annualized Difference (G)= ((F) - (E)) * 2
			BASKET 1 - COMMON LIINE							
		1030	Carrier Common Line - Originating Premium	$ 0.015500	$ 0.015500	-	-	$ -	$ -	$ -
			BASKET 2 - TRAFFIC SENSITIVE							
			**** LOCAL SWITCHING SERVICE CATEGORY ****							
17.2.3.A	17.2.3.A	1140	Local Switching Premium	$0.005171	$0.002563	1,125,386	1,182,191	$ 6,113	$ 3,030	$ (6,165)
17.2.3.A	17.2.3.A	1145	Local Switching Non-Premium		$ -	-	-	$ -	$ -	$ -
			**** INFORMATION SERVICE CATEGORY ****							
17.2.3.B	17.2.3.B	1150	Information Surcharge - Premium	$ -	$ -	28,229	29,654	$ -	$ -	$ -
17.2.3.B	17.2.3.B	1155	Information Surcharge - NonPremium		$ -	-	-	$ -	$ -	$ -
			**** LOCAL SWITCHING TRUNK PORT CATEGORY ****							
17.2.3.C	17.2.3.C	0230+0234	Local (Sw) - Shared Trunk Port	$ 0.010275	$ 0.009275	835,000	877,147	$ 9,013	$ 8,136	$ (1,754)
17.2.2.B	17.2.2.B	PT8HX	Local (Sw) - Dedicated Trunk Port - Voice Grade	$ 55.50	$ 55.50		-	$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8JX	Local (Sw) -Dedicated Trunk Port - DS1	$ 1.97	$ 1.97		-	$ -	$ -	$ -
17.2.2.B	17.2.2.B		Local (Sw) - DS1 To VG MUX - Analog End Office	$ -	$ -		-	$ -	$ -	$ -
			BASKET 3 - TRUNKING							
			**** TANDEM SWITCHED TRANSPORT SERVICE CATEGORY ****							
17.2.2	17.2.2	1102	Tandem-Switched Transport Termination	$0.000296	$0.000053	900,156	945,592	$ 280	$ 50	$ (460)
17.2.2	17.2.2	1112	Tandem-Switched Transport Facility (PM)	$0.000032	$0.000003	9,000,125	9,454,414	$ 303	$ 28	$ (548)
17.2.2	17.2.2	1130	Tandem Switching	$0.001645	$0.000288	1,515,000	1,591,471	$ 2,618	$ 458	$ (4,319)
			DS0 Tandem Trunk Ports	$ 1.60	$ 1.34	1,000	1,050	$ 1,681	$ 1,408	$ (546)
17.2.2.C	17.2.2.C	0140	Tandem MUX DS3 to DS1 Common (Restructure)	$ 0.000247	$ 0.000247	-	-	$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8KX	Tandem Dedicated Trunk Port - Voice Grade	$ 16.77	$ 16.77	-	-	$ -	$ -	$ -
17.2.2.B	17.2.2.B	PT8LX	Tandem Dedicated Trunk Port - DS1	$ 7.89	$ 7.89	-	-	$ -	$ -	$ -
								$ 20,006	$ 13,110	$ (13,793)
			End Office Revenue					$ 15,125	$ 11,165	$ (7,919)
			Tandem Switched Revenue					$ 4,881	$ 1,944	$ (5,873)
			Dedicated Switched Revenue					$ -	$ -	$ -
								$ 20,006	$ 13,110	$ (13,793)

	VoIP Subs	RetailSwSubs	Total
Dec-10	31,768	117,884	149,652
Dec-11	36,670	106,649	143,319
	26%		
Dec-12	42,457	96,138	138,595
	31%		