



June 24, 2014

## Transmittal Letter No. 14-01

#### VIA E-FILING

Ms. Beth Salak, Director
Division of Competitive Markets and Enforcement
Florida Public Service Commission
Attn: Tariff Section
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: <u>Verizon Access Transmission Services: Price List No. 1</u>
Reduce Terminating Access Rates Pursuant to Federal Communications
Commission *Connect America Fund Order* (FCC 11-161)

Dear Ms. Salak:

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") is filing with your office revisions to its F.P.S.C. Price List No. 1. The effective date of this filing is July 1, 2014, in accordance with the Federal Communications Commission's ("FCC") 2011 *Connect America Fund Order*, 26 FCC Rcd 17663.

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The Connect America Fund Order requires that Verizon Access reduce its default terminating switched access rates – both interstate and intrastate –effective July 1, 2014, as part of a multi-step transition towards "bill and keep" rates. See, Connect America Fund Order at Figure 9, summarizing the steps in the transition. Competitive LECs ("CLECs") such as Verizon Access are subject to the FCC's "benchmarking rule" for their interstate access charges. Para. 807 of the Connect America Fund Order states:

For interstate switched access rates, competitive LECs are permitted to tariff interstate access charges at a level no higher than the tariffed rate for such services offered by the incumbent LEC serving the same geographic area (the benchmarking rule).

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The Connect America Fund Order also adopted rule §51.911, which states in pertinent part:

(c) Effective July 1, 2013, notwithstanding any other provision of the Commission's rules, all Competitive Local Exchange Carrier Access Reciprocal Compensation rates for switched exchange access services subject to this subpart shall be no higher than the Access Reciprocal Compensation rates charged by the competing incumbent local exchange carrier, in accordance with the same procedures specified in §61.26 of this chapter.

The "benchmarking rule," FCC Rule 61.26, states:

c) 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.

These requirements differ from those applicable to the incumbent LECs. Whereas the ILECs' access rates are calculated in accordance with prescriptive rules adopted by the FCC, the benchmark rule for CLECs is reactive, based on the competing ILEC's rates. The effect of this benchmark rule means that Verizon Access will not have data to calculate its new default terminating switched access rates until mid-June when the ILECs file their interstate rates with the FCC.

For this reason and for administrative simplicity, Verizon Access' tariff amendments contained herein make express reference to its interstate tariff for terminating switched access rates. Verizon Access will revise its default terminating interstate rates in accordance with 47 C.F.R. 61.26 when the relevant ILEC rates become available, and at that time, the Verizon Access intrastate tariff will likewise reference those new rates.

Verizon Access's interstate rates are located in MCImetro Access Transmission Services LLC Tariff FCC No. 1, Section E.4.3, and may be viewed at the following web address: <a href="http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496">http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496</a>.

If you have questions regarding this filing, please contact me either at (888) 215-5680 or <a href="mailto:sandy.chandler@verizon.com">sandy.chandler@verizon.com</a>.

Respectively submitted,

Sandy Chandler Tariff Manager Verizon Business

Enclosure

### **ACCESS SERVICES**

### **CHECK SHEET**

The Title Sheet and Sheets 1 - 66 inclusive of this price list are effective as of the date shown. Original and revised sheets, as named below, comprise all changes from the original price list in effect on the date indicated.

Sheet	Revision
1	1 23
2	23 16
3 4 5	Original
5	
6	3
6.1	2 3 2 1
7	
8	Original
9	Original
10	1
11	Original
12	Original
13	1
14 15	original
16	Original
17	Original
18	Original
19	Original
20	Original
21	1
22	Original
23	2
23.1	2
24	3
24.1	2 2 3 5
24.2	1
24.3 24.4	original
25	2
26	Original
27	Original
28	3
28.1	Original
29	4
29.1	1
29.2	Original
30	2
31	
32	1

\*Issued

## ACCESS SERVICES

# CHECK SHEET (Cont.)

Sheet	Revision
Sheet  33 33.1 33.2 34 35 36 36.1 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65	Revision  1 Original Original 1 Original 1 Original 1 Original 1 1 1 Original 3 Original Original Original Original Original Original Original Original Original 1 1 1 1 1 6 6 5 1 Original 1 Original
66	2

\*Issued

#### Access Services

### 7. SWITCHED ACCESS RATES (Cont.)

### 7.4 Rates and Charges (Cont.)

### 7.4.4 Switched Access

#### 7.4.4.1 <u>Direct Connect Charges</u>:

Facility Charge:

Per DS1

Charges for DS1 are determined on an Individual Case Basis.

Per DS3

Charges for DS3 are determined on an Individual Case Basis.

## Per Access Minute Of Use:

Zone 1*	Originating: Terminating	\$0.029156 **	T/N/R
Zone 2*	Originating: Terminating	\$0.029156 **	T/N/R
Zone 3*	Originating: Terminating	\$0.029156 **	T/N/R

N/R N/R

Zones defined in Section 5.2.3.2.

<sup>\*</sup> For terminating rates, refer to MCImetro Access Transmission Services LLC Tariff FCC No. 1, Section E.4.3, which may be viewed at the following web address: <a href="http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496">http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496</a>.

#### Access Services

# 7. <u>SWITCHED ACCESS RATES (Cont.)</u>

## 7.4 Rates and Charges (Cont.)

# 7.4.4 Switched Access (Cont.)

## 7.4.4.2 <u>Tandem Connect Charges</u>

Per Access Minute of Use:

Terminating

Tandem Connect - Without Tandem Switching				
<u>Zone 1</u> *	Originating: Terminating	\$0.029156 **	T/N/R	
Zone 2*	Originating: Terminating	\$0.029156 **	T/N/R	
Zone 3*	Originating: Terminating	\$0.029156 **	T/N/R	
Tandem Connect – With Tandem Switching				
Zone 1*	Originating: Terminating	\$0.029156 **	T/N/R	
Zone 2*	Originating: Terminating	\$0.029156 **	T/N/R	
Zone 3*	Originating:	\$0.029156		

N/R N/R

T/N/R

Zones defined in Section 5.2.3.2.

<sup>\*\*</sup> For terminating rates, refer to MCImetro Access Transmission Services LLC Tariff FCC No. 1, Section E.4.3, which may be viewed at the following web address: <a href="http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496">http://www.verizon.com/tariffs/PDFViewer.aspx?doc=174496</a>.