

5055 North Point Parkway Alpharetta, GA 30022

State Government Affairs

July 15, 2014

NHPR JUL 1714 AND 144

Transmittal Letter No. 14-03

VIA FEDERAL EXPRESS

Ms. Jeannette McArthur Tariff Administrator New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, New Hampshire 03301-2429

RE: <u>Verizon Access Transmission Services: New Hampshire Rate Schedule</u>
Reduce Terminating Access Rates Pursuant to Federal Communications
Commission *Connect America Fund Order* (FCC 11-161)

Dear Ms. McArthur:

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") is filing with your office an original of revisions to its New Hampshire Rate Schedule. The effective date of this filing is July 31, 2014, in accordance with the Federal Communications Commission's ("FCC") 2011 *Connect America Fund Order*, 26 FCC Rcd 17663, and Mr. Michael Ladam's email dated June 3, 2014.

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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.

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 has revised its default terminating interstate rates, to become effective July 31, 2014, in accordance with 47 C.F.R. 61.26, and the Verizon Access intrastate tariff references those new rates.

Verizon Access's interstate rates are located in MCImetro Access Transmission Services LLC Tariff FCC No. 1, Section E.4.3.1, 4.3.2.1, and 4.3.2.2, and may be viewed at the following web address: http://www.verizon.com/tariffs/PDFViewer.aspx?doc=169129.

Please date stamp and return the extra copy of this cover letter in the enclosed self-addressed stamped envelope, indicating receipt. If you have questions regarding this filing, please contact me either at (888) 215-5680 or sandy.chandler@verizon.com.

Respectively submitted

Sandy Chandler

Tariff/Manager

Verizon

Enclosure



NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION 21 S. FRUIT ST., STE 10 CONCORD, NH 03301-2429 603-271-2431 www.puc.nh.gov

NHPUC Form CLEC-25 Rate Schedule Cover Sheet Puc 449.10 Rev. 12/06/04

CLEC RATE SCHEDULE COVER SHEET

| 1. General Information | |
|---|--|
| Federal Identification Number | 52-2102063 |
| CLEC Authorization Number | DT020-97 OR Date of Application |
| Legal Name | MCImetro Access Transmission Services LLC |
| Trade Name (d/b/a) in New Hampshire | Verizon Access Transmission Services |
| Regulatory Contact | Sandy Chandler |
| • | 5055 North Point Parkway, 2nd FL |
| Address | Alpharetta, GA 30022 |
| Phone Number | 888-215-5680 |
| Fax Number | 678-259-5084 |
| E-mail Address | Sandy.Chandler@verizon.com |
| 2. Attachments | |
| | ervice is offered; and |
| Any rate schedule of more than 3. Signature | ten pages shall include a table of contents and numbered pages. |
| I certify that the information on for making unsworn false statem | this form is true and correct to the best of my knowledge and belief subject to the penalty nents under RSA 641.3. |
| Authorized Representative Signature | Title Tariff Manager |
| Printed Name Sa | hdy/Chandler Date 7/15/14 |
| | |

If you have any questions, please call the New Hampshire Public Utilities Commission at 603-271-2431. Please mail any documents to the above address.