


# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** February 6, 2012  
**AT (OFFICE):** NHPUC

**FROM:** Matthew Fossum – Staff Attorney 

**SUBJECT:** DT 12-037, TDS Telecommunications, Inc. – Tariff Revisions  
Establishing Charges for VoIP/PSTN Traffic for Wilton Telephone  
Company, Hollis Telephone Company, Merrimack County Telephone  
Company and Kearsarge Telephone Company

**TO:** Commissioners  
Debra Howland, Executive Director  
Kate Bailey, Director, Telecommunications Division  
Michael Ladam, Assistant Director, Telecommunications Division



On February 3, 2012, TDS Telecommunications, Inc., submitted tariff filings to establish a process for identifying and rating VoIP/PSTN access traffic for its operating companies, Wilton Telephone Company, Hollis Telephone Company, Merrimack County Telephone Company and Kearsarge Telephone Company.

The proposed revisions, which are essentially identical for each of the operating companies, address new requirements by the Federal Communications Commission (FCC) regarding VoIP traffic charges. The proposed revisions include provisions requiring the operating companies' wholesale customers to furnish percentages of VoIP traffic in their overall minutes of use, and provisions setting a default percentage in the event a customer does not provide the percentages. The revisions also call upon the operating companies to apply the customer-supplied percentages to the dedicated facilities between the individual companies and their customers.

Based upon Staff's initial review of the proposed tariff revisions, it is not clear that the proposed revisions are entirely consistent with the FCC's requirements. Among other things, it is not clear that the proposed tariff provisions setting the default percentage at zero if a customer does not supply the required percentages are in accord with the FCC's requirements. Accordingly, to afford sufficient time to investigate the proposed tariff revisions, Staff recommends that the Commission extend the period of review for up to an additional 30 days, pursuant to RSA 378:6, IV.