

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: June 21, 2012

AT (OFFICE): NHPUC

FROM: ^{ML} Michael Ladam, Assistant Director of Telecommunications

SUBJECT: DT 12-122, Comcast and Intrastate Access Service Reform

TO: Commissioners
Debra Howland, Executive Director
Kate Bailey, Director, Telecommunications



On May 14, 2012, Comcast Phone of New Hampshire, LLC (Comcast) submitted a letter to the Commission stating that its access rates are published on its web site as the "New Hampshire Access Service Guide" (ASG) and already conform to the requirements of the Federal Communications Commission (FCC) in its order, Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011). According to Comcast, its rates were updated as of December 29, 2011, and its intrastate rates are already at interstate levels.

Staff reviewed the ASG rate schedule and confirmed that Comcast access rates conform to the FCC's requirements.

However, publishing these rates on the carrier's own web site does not appear to meet the letter or the spirit of Commission rules, which require such rates to be filed with the Commission. Especially in the case of access rates, which are assessed on in-bound calls and which the originating carrier cannot avoid, transparency and accessibility should be maintained.

N.H. Code Admin. R. Puc 431.06 specifies that a CLEC such as Comcast is to have a rate schedule on file with the Commission, and under Puc 449.10 that rate schedule is to include information on each service offered by the CLEC. The services in the New Hampshire ASG appear to fit these definitions.

Staff recommends that the Commission direct Comcast to file the information in its ASG as a component of its New Hampshire rate schedule.