

**STATE OF NEW HAMPSHIRE**

## Inter-Department Communication

DATE: March 12, 2014

AT (OFFICE): NHPUC

ML

FROM: Michael Ladam, Assistant Director of Telecommunications

SUBJECT: DT 14-050: TDS Telecom VoIP Access Tariff NHPUC 12MAR1409:50

TO: Commissioners  
Debra Howland, Executive Director

On February 14, 2014, the five New Hampshire telephone companies owned and operated by TDS Telecom (Merrimack County Telephone Company, Wilton Telephone Company, Hollis Telephone Company, Union Telephone Company, and Chichester, Kearsarge and Meriden Telephone Companies, collectively the TDS Companies) submitted tariff filings to revise their method for rating Voice over Internet Protocol (VoIP) access charges. (All five companies use the same methodology.)

This revision is triggered by an FCC order that requires intrastate terminating VoIP access charges to be no higher than interstate access charges as of July 2, 2013. The TDS Companies do not distinguish between originating and terminating VoIP minutes in their current tariffs. The revision specifies a methodology for splitting VoIP access minutes into originating and terminating classes, and applies the interstate rate to terminating minutes.

Staff has reviewed the tariff with particular attention to three concerns: does the methodology conform to the FCC's "safe harbor" for classifying VoIP traffic; do the tariffs provide wholesale customers a realistic opportunity to submit traffic mix ratios to the TDS Companies; and do the tariffs adopt a reasonable default value if no such ratios are provided?

With respect to the first question, the TDS Companies methodology does conform to the FCC's safe harbor. With respect to the second question, the tariffs allow wholesale customers to submit the new information expected of them (the originating Percent VoIP Usage – Customer or "originating PVUC") by April 15, 2014. In Staff's assessment this is a reasonable window. With respect to the third question, the TDS Companies apply their own traffic mix ratio when none is provided by the customer. In Staff's assessment, this is a reasonable default.

In Staff's assessment, these tariff revisions are consistent with FCC requirements and provide a reasonable process for identifying and rating the traffic involved. Staff therefore recommends that these five tariff filings be allowed to go into effect by operation of law as submitted.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.