July 16, 2013

3-1)   Pursuant to ARSD 20:10:27:02.01 please do a side by side comparison of all the Switched Access intrastate originating and terminating rates to the Switched Access originating and terminating rates of the Incumbent Local Exchange Carrier, CenturyLink. Also pursuant to 20:10:29:16.05, Interconnection is classified as a Switched Access Charge. Please note that some of the CenturyLink rates have changed and were approved per docket TC13-047 and were effective 7/2/13.

RESPONSE: See **Exhibit A attached hereto, which consists of a table comparing OrbitCom's intrastate originating and terminating rates to those of CenturyLink/Qwest Corporation. The originating and terminating rates for CenturyLink/Qwest Corporation were taken from those tariff pages submitted in connection with and ultimately approved in Commission Docket TC13-047.**

OrbitCom's proposed intrastate revisions are consistent with A.R.S.D. 20:10:27:02.01, which rule requires that a "competitive local exchange carrier shall charge intrastate switched access rates that do not exceed the intrastate switched access rate of the Regional Bell Operating Company operating in the state." Furthermore, the proposed revisions are consistent with the FCC's Second Order on Reconsideration which clarifies that the charges associated with various rate elements need not be identical to the RBOC rate so long as the total rate charged does not exceed the RBOC rate.

As the Commission is aware, OrbitCom operates in 14 different states. Because OrbitCom submits invoices to the same IXCs for all of the states in which it operates, it is imperative for OrbitCom to maintain consistency in its rate elements and charges. OrbitCom's proposed rates in this matter are consistent with those proposed and accepted in the other states in which it operates. Moreover, OrbitCom's interstate rate is consistent with its interstate tariff which has been filed with and approved by the Federal Communications Commission, as well as the tariffs which it has filed in ten other states in which it operates. Not all of the states in which OrbitCom operates require the filing of a tariff, but all of the state regulatory agencies to which OrbitCom has submitted its proposed revisions, which are identical to those reflected in this filing, have accepted the same.

Side-by-Side Comparison of Rates

Originating	CenturyLink	OrbitCom
Local Switching	$0.008557	$0.008610
CCL	$0.038420	$0.038420
Switched Transport[1]	********	$0.000000
Tandem Switching	$0.007664	$0.007700

Tandem Transport
   0-8 Miles
   Over 8-25 Miles
   Over 26-50 Miles
   Over 50 Miles
	Per Min/Per Mile
	$0.000237/0.000015
	$0.000273/0.000018
	$0.000308/0.000019
	$0.000311/0.000020
		Per Min/Per Mile
		$0.000237/0.000015
		$0.000273/0.000018
		$0.000308/0.000019
		$0.000311/0.000020

Common Transport Multiplexing[2]	$0.000036	********
Interconnection Charge	$0.004681	$0.004681
Common/Shared Trunk Port	$0.000747	$0.000000

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[1] OrbitCom was unable to locate any specific rate element for switched transport in the Qwest Corporation Access Service Tariff.

[2] OrbitCom's proposed Access Service Tariff does not contain a rate element for Common Transport Multiplexing.

Side-by-Side Comparison of Rates

Terminating	CenturyLink	OrbitCom
Local Switching	$0.001974	$0.006000
CCL	$0.000000	$0.000000
Switched Transport	*********	$0.000000
Tandem Switching	$0.002252	$0.000000
Tandem Transport	Per Min/Per Mile	Per Min/Per Mile
0-8 Miles	$0.000240/0.000030	$0.000000/0.000000
Over 8-25 Miles	$0.000240/0.000030	$0.000000/0.000000
Over 26-50 Miles	$0.000240/0.000030	$0.000000/0.000000
Over 50 Miles	$0.000240/0.000030	$0.000000/0.000000
Common Transport Multiplexing	$0.000036	*********
Interconnection Charge	$0.000000	$0.000000
Common/Shared Trunk Port	$0.000747	$0.000000