

Docket Number: TC12-028  
Subject Matter: First Data Request  
Request to: Knology of the Plains  
Request from: South Dakota Public Utilities Commission Staff  
Date of Request: March 29, 2012  
Responses Due: April 12, 2012

1-1) Which approved VoIP tariff this one is modeled after? An SDPUC approved tariff you could refer to is the Verizon tariff:

<http://www.puc.sd.gov/Dockets/Telecom/2011/TC11-093.aspx>

Knology of the Plains tariff was modeled after a tariff in effect in Georgia.

1-2) Please provide an explanation as to why this tariff does not account for a Company PVU factor.

Knology provides a minimum amount of VoIP-PSTN traffic in South Dakota.

1-3) This tariff accounts for the MOU that originates in IP format. What about the MOU that terminates in IP format?

Knology believes that the FCC's order did not include the application of interstate rates to VoIP-PSTN terminating traffic

1-4) This tariff uses a customer default PVU factor of zero. Why was this chosen opposed to defaulting to a company factor?

See 1-2

1-5) The tariff states the company can require the customer to verify their factor up to four times each year. Once a company factor is in place, will the customer be able to have the company verify their factor?

The tariff anticipates that the customer will provide the PVU to Company; the factor will be verified and implemented on a prospective basis based on when the approved factor was received.

1-6) Will Knology agree to retroactively apply, to January 1, 2012, any initial PVU factors submitted within 30 days of the approval of the tariff revisions?

Application of a Customer provided PVU on a retroactive basis will result in retroactive rate making, which Knology does not believe is the intent the of the FCC's order.