Data Request 1
Docket TC-12-105
BullsEye Telecom, Inc.

1-1) Please provide BullsEye Telecom, Inc.'s interstate access tariff as it is currently filed with the FCC.

Response:

Pursuant to further Staff instructions, Bullseye's December 29, 2011 rate page associated with the computations of intrastate SD access is provided in Exhibit I, attached.

1-2) Please submit requests for waiver of ARSD 20:10:29:10, ARSD 20:10:29:12, and ARSD 20:10:29:16, as the amended tariff calls for unequal originating and terminating charges.

Response:

Bullseye Telecom, Inc. respectfully requests a waiver of the above-referenced rules to the extent necessary to support terminating rates for Carrier Common Line, Local Switching and Transport rate elements that are lower than the corresponding originating rate elements. A waiver of these rules is necessary to allow the company to comply with the FCC ICC Reform order without a reduction of revenues beyond that dictated by the FCC Order. The FCC is undertaking a further investigation of originating access charges and any additional reductions to originating access should take into account the FCC's finding when that investigation is complete.

1-3) Please provide any work papers and calculations used to arrive at these new rates, including which methodology was chosen to comply with the FCC order.

Response:

Bullseye chose to use Option 1 to comply with the FCC order - reducing intrastate rates within the current intrastate rate structure. The workpapers are attached as Exhibit II.

1-4) To the extent BullsEye relied on any estimates in its calculations, please provide justification for those estimates.

Response:

Reliable demand data by rate element is not available for FY2011. Where an individual intrastate rate element was already lower than the corresponding interstate rate element, the company left that rate element unchanged. Where the interstate rate element did not have an intrastate equivalent (e.g. Common Trunk Port, Common Multiplexing), the element was NOT added to the intrastate rates. For all other rate elements, the company reduced the intrastate rate by half the difference between the interstate and intrastate rate. These three reduction "rules" result in a lower intrastate rate than would otherwise be allowed under the FCC Order. In addition to the actual computation spreadsheet, enclosed is a hypothetical demand spreadsheet showing a lesser reduction required where actual revenue is utilized.