

Response of Ionex Communications North, Inc. dba Birch Communications
South Dakota Data Request No. 1
Docket TC12-106

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

Response: The Company's interstate tariff can be found on the FCC website at <https://apps.fcc.gov/etfs/public/tariff.action?idTariff=622>.

- 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.

Ionex Communications North, Inc. dba Birch Communications 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: The Company bills on a composite basis by type of minute (whether the minute is direct-trunked or tandem routed). By taking the simple average of the intrastate and interstate rates, a reduction in intrastate rates equal to 50% of the difference between the intrastate and interstate rates is effected.

The interstate rate for direct-trunked minutes is \$0.00243 and the intrastate rate is \$0.0517110. The simple average of these two rates is \$0.0270705, which is the rate that appears in the proposed tariff. The interstate rate for tandem-routed minutes is \$0.0063130 and the intrastate rate is \$0.0599. The simple average of these two rates is \$0.0331065, which is the rate that appears in the proposed tariff.

(Actual MOU demand is inconsequential given the structure of the company's rates and the manner in which the rates were calculated.)

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

Response: See response to 1-3.