

Response of Broadvox-CLEC, LLC  
South Dakota Data Request No. 1  
Docket TC13-069

- 1-1) The last 3 Terminating rates for Tandem Switched Transport-Termination appear to have been reduced by referencing the FCC tariff and it is marked as (I), increase. Please verify this change. If it is indeed a reduction please make the appropriate changes on the tariff sheet.

You are correct – the last three mileage bands were marked as an increase for this element, but it is a reduction. A revised tariff page is attached.

- 1-2) Pursuant to ARDS 20:10:27:02.01, please do a side by side comparison of the calculation steps for the composite rate of Broadvox-CLEC to that of the ILEC, CenturLink/Qwest for both originating and terminating switched access rates.

Attached is an analysis that shows Broadvox rates compared to the ILEC rates both at an elemental level, and based on the tariffed composites.

Broadvox mirrored CenturyLink Qwest rates at the time the tariff was initially filed for both interstate and intrastate rates. CenturyLink/West made originating revisions last month which increased (established) some elements – CMUX and CTP, while slightly decreasing two elements – Local Switching and Tandem Switching. In the identified scenarios, only one superficially fails to meet the requirements of ARDS 20:10:27:02.01, but upon closer examination the ILEC's Interconnection Charge makes even that scenario compliant. Below is an excerpt from the CenturLink/Qwest tariff that shows it would be applied in the scenario #5 (as well many of the others):

<b>Qwest Corporation</b> Access Service Tariff	SECTION 6 Page 30.1 Release 1 Effective: 7-2-2013
State of South Dakota Issued: 5-31-2013	

**6. SWITCHED ACCESS SERVICE**

**6.1 GENERAL**

**6.1.2 RATE CATEGORIES**

**B. Local Switching (Cont'd)**

**5. End Office Dedicated Trunk Port**

The End Office Dedicated Trunk Port rate provides for termination of a trunk to a dedicated trunk port in an end office. The rate is assessed per month for each FG trunk in service (excludes FGA) directly routed (via DTT) between the SWC and the end office. The rate is not assessed to trunks directly routed to a DA location.

(N)

(N)

**C. Interconnection**

The Interconnection Charge (IC) rate element is assessed to all customers who connect with the Company switched access network. This charge is applied to originating intrastate Switched Access minutes of use.

(M)

(C)(M)

**SECTION 3 - SWITCHED ACCESS SERVICE, (CONT'D)**

**3.11 Other Access Service Rates and Charges**

**3.11.1 Qwest/CenturyLink Areas**

(A)	Dedicated Trunk Port Per DS1	Note 1	(C)
(B)	Dedicated Tandem Trunk Port Per DS1	Note 1	
(C)	Tandem Switching Per minute of use, originating Per minute of use, terminating	\$0.007700 Note 1 (R)	
(D)	Tandem Switched Transport - Termination Originating Per minute of use, over 0 to 8 miles Per minute of use, over 8 to 25 miles Per minute of use, over 25 to 50 miles Per minute of use, over 50 miles  Terminating Per minute of use, over 0 to 8 miles Per minute of use, over 8 to 25 miles Per minute of use, over 25 to 50 miles Per minute of use, over 50 miles	\$0.000237 \$0.000273 \$0.000308 \$0.000311   Note 1 (I) Note 1 (R) Note 1 (R) Note 1 (R)	
(E)	Tandem Switched Transport – Facility Originating Per minute of use per mile, over 0 to 8 miles Per minute of use per mile, over 8 to 25 miles Per minute of use per mile, over 25 to 50 miles Per minute of use per mile, over 50 miles  Terminating Per minute of use per mile, over 0 to 8 miles Per minute of use per mile, over 8 to 25 miles Per minute of use per mile, over 25 to 50 miles Per minute of use per mile, over 50 miles	\$0.000015 \$0.000018 \$0.000019 \$0.000020   Note 1 (I) Note 1 (I) Note 1 (I) Note 1 (I)	

Note 1: See the Company's Access Services Tariff FCC No. 1 at the following link <http://fjallfoss.fcc.gov/cgi-bin/ws.exe/prod/ccb/etfs/mainmenu.hts> (N)  
 (N)

**Broadvox -- SD Intrastate Access**

<u>Rate Element</u>	<u>Broadvox Tariff</u>	<u>ILEC Tariff</u>
Dedicated Trunk Port	\$ 144.00	\$ 144.00
Dedicated Tandem Trunk Port	\$ 144.00	\$ 144.00
Tandem Switching		
Originating	\$ 0.007700	\$ 0.0076640
Terminating	\$ 0.002252	\$ 0.0022520
Tandem Switched Transport - Termination		
Originating, Mileage Band 1	\$ 0.000237	\$ 0.0002370
Originating, Mileage Band 2	\$ 0.000273	\$ 0.0002730
Originating, Mileage Band 3	\$ 0.000308	\$ 0.0003080
Originating, Mileage Band 4	\$ 0.000311	\$ 0.0003110
Terminating, Mileage Band 1	\$ 0.000240	\$ 0.0002400
Terminating, Mileage Band 2	\$ 0.000240	\$ 0.0002400
Terminating, Mileage Band 3	\$ 0.000240	\$ 0.0002400
Terminating, Mileage Band 4	\$ 0.000240	\$ 0.0002400
Tandem Switched Transport - Facility		
Originating, Mileage Band 1	\$ 0.000015	\$ 0.0000150
Originating, Mileage Band 2	\$ 0.000018	\$ 0.0000180
Originating, Mileage Band 3	\$ 0.000019	\$ 0.0000190
Originating, Mileage Band 4	\$ 0.000020	\$ 0.0000200
Terminating, Mileage Band 1	\$ 0.000030	\$ 0.0000300
Terminating, Mileage Band 2	\$ 0.000030	\$ 0.0000300
Terminating, Mileage Band 3	\$ 0.000030	\$ 0.0000300
Terminating, Mileage Band 4	\$ 0.000030	\$ 0.0000300
Common Transport Multiplexing		
Originating	\$ -	\$ 0.0000360
Terminating	\$ 0.000036	\$ 0.0000360
Common Trunk Port		
Originating	\$ -	\$ 0.0007470
Terminating	\$ 0.000747	\$ 0.0007470
Local Switching		
Originating	\$ 0.008610	\$ 0.0085570
Terminating	\$ 0.001974	\$ 0.0019740
Carrier Common Line		
Originating	\$ 0.038420	\$ 0.0384200
Terminating	\$ -	\$ -
Interconnection Charge		
Originating	\$ -	\$ 0.004618
Terminating	\$ -	\$ -

**Tariffed Call Scenarios - MOU Charges (5 miles, dedicated components omitted since they are 100% ILEC mirror)**

Scenario 1 - Originating:			
	(LS, CTP, CMUX, TST-T, TST-F) \$	0.008922	\$ 0.009652
Scenario 1 - Terminating:			
	(LS, CTP, CMUX, TST-T, TST-F) \$	0.003147	\$ 0.003147
Scenario 2 - Originating:			
	(LS, CTP, CMUX, TS, TST-T, TST-F) \$	0.016622	\$ 0.017316
Scenario 2 - Terminating:			
	(LS, CTP, CMUX, TS, TST-T, TST-F) \$	0.005399	\$ 0.005399
Scenario 3 - Originating:			
	(CTP, CMUX, TS, TST-T, TST-F) \$	0.008012	\$ 0.008759
Scenario 3 - Terminating:			
	(CTP, CMUX, TS, TST-T, TST-F) \$	0.003425	\$ 0.003425
Scenario 4 - Terminating:			
	(LS, CTP, CMUX, TST-T, TST-F) \$	0.003147	\$ 0.003147
Scenario 5 - Originating:			
	(LS) \$	0.008610	\$ 0.008557
Scenario 5 - Terminating:			
	(LS) \$	0.001974	\$ 0.001974
Scenario 6 - Originating:			
	(LS, CTP, CMUX, TS, TST-T, TST-F) \$	0.016622	\$ 0.017316
Scenario 6 - Terminating:			
	(LS, TS, TST-T, TST-F) \$	0.004616	\$ 0.004616
Scenario 7 - Originating:			
	(CMUX, TS, TST-T, TST-F) \$	0.008012	\$ 0.008012
Scenario 7 - Terminating:			
	(CMUX, TS, TST-T, TST-F) \$	0.002678	\$ 0.002678