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August 20, 2007

Ms. Beth W. Salak, Director
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Ms. Salak:

Attached are revised tariff pages filed to become part of the Verizon Florida LLC Facilities for Intrastate Access Tariff.

FACILITIES FOR INTRASTATE ACCESS

6. SWITCHED ACCESS Fifth Revised Page 27.1
 First Revised Page 27.2
 First Revised Page 27.3
 First Revised Page 27.4

The purpose of this filing is to establish a NO-CPN delivery floor for terminating SWA usage, append language regarding jurisdictional report factor variance, and revise language for state Entrance Facility and Direct-Trunked Transport PIU.

If you require additional information, please call Carlton Ball at (813) 483-2529.

Sincerely,
David M. Christian
Vice President
Regulatory Affairs Florida

DMC:rt

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements

(A) Jurisdictional Reports

(1) Percent Interstate Usage (PIU)

(M)

- (a) When the Company receives sufficient call detail to permit it to determine the jurisdiction of some or all originating and terminating access minutes of use, the Company will use that call detail to render bills for those minutes of use and will not use customer reported Percent Interstate Usage (PIU) factors to determine the jurisdiction of those minutes of use. (T)

The Company will apply the PIU factor, either provided by the customer or as set forth in sections (1)(a) or (1)(b), only to minutes of use for which the Company does not have sufficient call detail to determine jurisdiction. The customer-provided PIU factor will be used until the customer provides an updated PIU factor, as set forth in (A)(3) following. No prorating or back billing will be done based on the updated report. (C)

There may be some portion of terminating minutes where it is not possible to know, and therefore to send, the needed originating number information. Access minutes lacking originating information on terminating calls will be set at 7.00 percent (%) (the "floor"), for all switched access customers. (N)

- (1) When the percentage of terminating traffic without sufficient call detail to determine jurisdiction does not exceed the sum of the floor plus a 2.00 percent (%) grace threshold or 9.00 percent (%), the Company will apply the PIU factor, either provided by the customer or as set forth in section (1)(b).

- (2) When the percentage is greater than 9.00 percent (%), the Company will assess rates from this tariff on all minutes exceeding the floor. For example, if 30 percent (%) of a customer's terminating minutes sent to the Company do not contain sufficient originating information to allow the Company to determine the originating location, then the Company would apply the provisions of this tariff to those minutes exceeding the "floor", or 23.00 percent (%) in this example.

The Company may recalculate the overall customer average "floor" quarterly. In addition, subsequent reviews or audits of specific customer usage may result in a new "floor" for that customer.

In the event that the Company applies rates to terminating calls without originating number information as provided in this tariff, customers will have the opportunity to request backup documentation of the Company's basis for such application, and further request that the Company change the application of the intrastate access rate upon a showing of why the intrastate rate should not be applied. (N)

(D)

(D)

(M) Material relocated to pages 27.2 and 27.3.

(N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements (Continued)

(A) Jurisdictional Reports (Continued)

(1) Percent Interstate Usage (PIU) (Continued)

(b) When the customer initially orders Switched Access Service(s), the customer will state in the order (Access Service Request) a Percent Interstate Usage factor. This factor will be used by the Company as the customer-provided PIU factor until the customer provides updated PIU factors, as required in (A)(3) following. For each service listed below, the customer may provide separate PIU factors, in accordance with (a) and (b) preceding. (T)

- Feature Group A (FGA) Switched Access Service Notes 1, 2
- Feature Group B (FGB) Switched Access Service Notes 1, 2
- Feature Group C (FGC) Switched Access Service Notes 1, 2
- Feature Group D (FGD) Switched Access Service Notes 1, 2
- Basic Serving Arrangement A (BSA-A) Notes 1, 2, 3
- Basic Serving Arrangement B (BSA-B) Notes 1, 2, 3
- Basic Serving Arrangement C (BSA-C) Notes 1, 2, 3
- Basic Serving Arrangement D (BSA-D) Notes 1, 2, 3
- 500 Access Services Notes 1, 2
- 700 Access Services Notes 1, 2
- Toll Free Services Notes 1, 2, 4
- 900 Access Services Notes 1, 2

When a customer submits an order for Switched Access services, the customer must state the PIU factor on a statewide, LATA, billing account number (BAN) or end office level. (C)

When the customer provides PIU factors, the Company will subtract the developed PIU from 100, and the difference is the percent intrastate usage. The sum of the interstate and intrastate percentages will equal 100 percent. The customer may only provide a PIU factor that is a whole number (a number from 0 to 100).

Where the customer provides access services to other carriers, the customer will develop its projected PIU factor based upon a weighted average of the PIUs of its own and of the other carriers' end user traffic, in accordance with the procedures described below.

(c) For purposes of developing the projected interstate percentage for Feature Group C (or BSA-C) and Feature Group D (or BSA-D), the customer shall consider every call, that originates from a calling party in one state and terminates to a called party in a different state, to be interstate communications. The customer shall consider every call that terminates to a called party within the same state as the state where the calling party is located, to be intrastate communications. The manner in which a call is routed through the telecommunications network does not affect the jurisdiction of a call; i.e., a call between two points within the same state is an intrastate call even if it is routed through another state. (M)(T)
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 (M)

Note 1: The PIU factors will apply to all associated elements and services, e.g., Carrier Common Line, End Office Switching, Information Surcharge, Interconnection Charge, and, if applicable, Tandem Switched Transport and Tandem Switching minutes of use. (C)

Note 2: The PIU for Switched Access services must be provided by the customer of record when used in conjunction with Collocation Service as described in Section 19 or when used in conjunction with Tandem Switch Signaling.

Note 3: When determining the jurisdiction of Switched Access traffic provided via a BSA or Basic Service Element (BSE) and the intrastate equivalent of the BSA or BSE is only available on a bundled feature group basis, intrastate usage will be prorated to the bundled intrastate feature group equivalent of the BSA.

Note 4: "Toll Free" service includes any access service which utilizes the following NPAs: 800, 888, 877, 866, 855, 844, 833, and 822 (as they become available to the industry).

(M) Material relocated from page 27.1. (N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements (Continued)

(A) Jurisdictional Reports (Continued)

(1) Percent Interstate Usage (PIU) (Continued)

(c) (Continued)

For Feature Group A (or BSA-A) and Feature Group B (or BSA-B), pursuant to Federal Communications Commission order FCC 85-145 adopted April 16, 1985, interstate usage is to be developed as though every call, that enters a customer network at a point within the same state as that in which the called station is situated, is an intrastate communication and every call, that enters a customer's network at a point in a state other than that where the called station is situated, is an interstate communication.

(M)
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(T)
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(M)

(2) Entrance Facilities and Direct-Trunked Transport Facilities

The Company will develop a PIU factor to apply to Entrance Facility and Direct-Trunked Transport rate elements when sufficient call detail exists. The Company will apply the PIU factor provided by the customer as set forth in 6.3.3 (A)(1)(b) only when the Company does not have sufficient data to develop a PIU factor.

(N)
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(N)

A customer may provide a separate PIU factor for each rate element (Entrance Facility, Direct-Trunked Transport) at a Billing Account Number or higher reporting level reflecting the originating and terminating traffic of all Switched Access services that use such facilities. A consolidated PIU factor for all Entrance Facility and Direct-Trunked Transport rate elements may be provided at the option of the customer, if such PIU factor is representative of the actual intrastate use of the service.

(C)
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(C)

(D)
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(D)

(3) Jurisdictional Report Updates

The customer may update the interstate and intrastate jurisdictional reports on a quarterly basis. The reports will be based on the prior three months and will be due within fifteen days after the end of the quarter, beginning with the completion of the first full quarter of service. In the event that the Company does not have sufficient data to rely on actual call detail or to develop a PIU factor, these factors will be applied to activity dated on or after the first day of the next calendar month, which begins at least 15 business days after the day on which the revised report or letter is received.

(C)
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(C)
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(C)

If the revised factors represent what the Company considers to be a substantial deviation (a deviation of 5 (five) percentage points or more for the preceding twelve calendar months is a substantial deviation) from the customer's previously reported factors and cannot be attributed to seasonal changes or other identifiable reasons, the Company will request a Jurisdictional Report Verification of the factors as set forth in 6.3.3 (C) following.

(N)
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(N)

When the Telephone Company does not have sufficient data to rely on actual call detail or to develop a PIU factor, the revised report or letter will serve as the basis for the next three months' billing and will be effective on the bill date for that service. If the customer does not supply an updated quarterly report or letter, the Company will assume the customer-provided PIU factors to be the same as those provided in the last quarterly report or letter accepted by the Company.

(C)
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(C)

For those cases in which a quarterly report or letter has never been received from the customer, the Company will assume the customer-provided PIU factors to be the same as provided in the order for service.

A customer may file jurisdictional reports aggregating usage at a statewide, LATA, billing account number (BAN) or end office level.

(M) Material relocated from page 27.1.

(N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)6.3.3 Jurisdictional Report Requirements (Continued)(B) Maintenance of Customer Records

The customer shall retain, for a minimum of twelve months, call detail records that substantiate the interstate percent provided to the Company (as set forth in (A) preceding) for switched access service. Such records shall consist of (1) and (2) following, if applicable:

- (1) All call detail records (such as work papers and/or backup documentation including paper, magnetic tapes or any other form of records for billed customer traffic); call information (including call originating and terminating address [i.e., calling, called number], the call duration, all originating and terminating trunk groups or access lines over which the call is routed); and the point at which the call enters the customer's network, and (C)
- (2) If the customer has a mechanized system in place that calculates the PIU factor, then a description of that system and the methodology used to calculate the PIU factor must be furnished as well as any other pertinent information (such as, but not limited to: flowcharts, source code, etc.) relating to such system must also be made available. (C)

(C) Jurisdictional Reports Verification

The Company may request the customer to verify their jurisdictional reports. The customer shall keep records of call detail from which the percentage of interstate and intrastate use can be ascertained. The Company will request the customer to provide the records of call detail and other information (as specified in (B) preceding) that the customer used to determine the percentage of interstate and intrastate use. No more than one verification request will be made per year.

- (1) If the PIU factors filed by the customer cannot be validated by the data provided, and the data provided by the customer is sufficient to calculate a PIU factor different than the customer's reported PIU factor, the Company will use these records to:
 - (a) Revise the customer's PIU factor.
 - (b) Calculate the interstate and intrastate access charges that should have been billed to the customer for the prior period (as specified in (B) preceding), and debit or credit the customer for the difference between the charges that should have been billed with the revised PIU and the charges that were billed.

The customer shall supply the data to the Company within 30 days of the Company request. The Company will request data for the four prior quarters unless a shorter period is requested by the customer and agreed to by the Company.

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements

(A) Jurisdictional Reports

(1) Percent Interstate Usage (PIU)

~~(a) For purposes of developing the projected interstate percentage for Feature Group C (or BSA C) and Feature Group D (or BSA D), the customer shall consider every call, that originates from a calling party in one state and terminates to a called party in a different state, to be interstate communications. The customer shall consider every call, that terminates to a called party within the same state as the state where the calling party is located, to be intrastate communications. The manner in which a call is routed through the telecommunications network does not affect the jurisdiction of a call; i.e., a call between two points within the same state is an intrastate call even if it is routed through another state.~~ (M)

~~For Feature Group A (or BSA A) and Feature Group B (or BSA B), pursuant to Federal Communications Commission order FCC 85-145 adopted April 16, 1985, interstate usage is to be developed as though every call, that enters a customer network at a point within the same state as that in which the called station is situated, is an intrastate communication and every call, that enters a customer's network at a point in a state other than that where the called station is situated, is an interstate communication.~~

~~(b) a~~ When the Company receives sufficient call detail to permit it to determine the jurisdiction of some or all originating and terminating access minutes of use, the Company will use that call detail to render bills for those minutes of use and will not use customer reported Percent Interstate Usage (PIU) factors to determine the jurisdiction of those minutes of use. (T)

The Company will apply the PIU factor, either provided by the customer or as set forth in sections ~~(1)(ea) or (1)(b) as otherwise determined in accordance with this tariff,~~ only to minutes of use for which the Company does not have sufficient call detail to determine jurisdiction. The customer ~~reported~~ provided PIU factor will be used until the customer provides an updated PIU factor, as set forth in (A)(3) following. No prorating or back billing will be done based on the updated report. (C)

~~There may be some portion of terminating minutes where it is not possible to know, and therefore to send, the needed originating number information. Access minutes lacking originating information on terminating calls will be set at 7.00 percent (%) (the "floor"), for all switched access customers.~~ (N)

~~(1) When the percentage of terminating traffic without sufficient call detail to determine jurisdiction does not exceed the sum of the floor plus a 2.00 percent (%) grace threshold or 9.00 percent (%), the Company will apply the PIU factor, either provided by the customer or as set forth in section (1)(b).~~

~~(2) When the percentage is greater than 9.00 percent (%), the Company will assess rates from this tariff on all minutes exceeding the floor. For example, if 30 percent (%) of a customer's terminating minutes sent to the Company do not contain sufficient originating information to allow the Company to determine the originating location, then the Company would apply the provisions of this tariff to those minutes exceeding the "floor", or 23.00 percent (%) in this example.~~

~~The Company may recalculate the overall customer average "floor" quarterly. In addition, subsequent reviews or audits of specific customer usage may result in a new "floor" for that customer.~~

~~In the event that the Company applies rates to terminating calls without originating number information as provided in this tariff, customers will have the opportunity to request backup documentation of the Company's basis for such application, and further request that the Company change the application of the intrastate access rate upon a showing of why the intrastate rate should not be applied.~~ (N)

~~(M¹) Material previously appeared on Page 27.~~ (D)

~~(M²) Material has been moved to Page 27.6.~~ (D)

~~(M) Material relocated to pages 27.2 and 27.3.~~ (N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements (Continued)

(A) Jurisdictional Reports (Continued)

(1) Percent Interstate Usage (PIU) (Continued)

(e.b) When the customer initially orders Switched Access Service(s), the customer will state in the order (Access Service Request) a Percent Interstate Usage factor. This factor will be used by the Company as the customer-provided PIU factor until the customer provides updated PIU factors, as required in (A)(3) following. For each service listed below, the customer may provide separate PIU factors, in accordance with (a) and (b) preceding. (T)

- Feature Group A (FGA) Switched Access Service Notes 1, 2
- Feature Group B (FGB) Switched Access Service Notes 1, 2
- Feature Group C (FGC) Switched Access Service Notes 1, 2
- Feature Group D (FGD) Switched Access Service Notes 1, 2
- Basic Serving Arrangement A (BSA-A) Notes 1, 2, 3
- Basic Serving Arrangement B (BSA-B) Notes 1, 2, 3
- Basic Serving Arrangement C (BSA-C) Notes 1, 2, 3
- Basic Serving Arrangement D (BSA-D) Notes 1, 2, 3
- 500 Access Services Notes 1, 2
- 700 Access Services Notes 1, 2
- Toll Free Services Notes 1, 2, 4
- 900 Access Services Notes 1, 2

When a customer submits an order for Switched Access services, the customer must state the Percentage of Interstate Usage (PIU) factor on a statewide, LATA, billing account number (BAN) or end office level. (C)

When the customer provides PIU factors, the Company will subtract the developed PIU from 100, and the difference is the percent intrastate usage. The sum of the interstate and intrastate percentages will equal 100 percent. The customer may only provide a PIU factor that is a whole number (a number from 0 to 100).

Where the customer provides access services to other carriers, the customer will develop its projected PIU factor based upon a weighted average of the PIUs of its own and of the other carriers' end user traffic, in accordance with the procedures described below.

(a-c) For purposes of developing the projected interstate percentage for Feature Group C (or BSA-C) and Feature Group D (or BSA-D), the customer shall consider every call that originates from a calling party in one state and terminates to a called party in a different state, to be interstate communications. The customer shall consider every call that terminates to a called party within the same state as the state where the calling party is located, to be intrastate communications. The manner in which a call is routed through the telecommunications network does not affect the jurisdiction of a call; i.e., a call between two points within the same state is an intrastate call even if it is routed through another state. (M)(T)

Note 1: The PIU factors will be applied to all associated elements and services, e.g. the appropriate Carrier Common Line, End Office Switching, Information Surcharge, Interconnection Charge, and, if applicable, Tandem Switched Transport and Tandem Switching minutes of use. (C)

Note 2: The PIU for Switched Access services must be provided by the customer of record when used in conjunction with Collocation Service as described in Section 19 or when used in conjunction with Tandem Switch Signaling.

Note 3: When determining the jurisdiction of Switched Access traffic provided via a BSA or Basic Service Element (BSE) and the intrastate equivalent of the BSA or BSE is only available on a bundled feature group basis, intrastate usage will be prorated to the bundled intrastate feature group equivalent of the BSA.

Note 4: "Toll Free" service includes any access service which utilizes the following NPAs: 800, 888, 877, 866, 855, 844, 833, and 822 (as they become available to the industry).

(M) Material relocated from page 27.1.

(N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)

6.3.3 Jurisdictional Report Requirements (Continued)

(A) Jurisdictional Reports (Continued)

(1) Percent Interstate Usage (PIU) (Continued)

(a-c) (Continued)

For Feature Group A (or BSA-A) and Feature Group B (or BSA-B), pursuant to Federal Communications Commission order FCC 85-145 adopted April 16, 1985, interstate usage is to be developed as though every call, that enters a customer network at a point within the same state as that in which the called station is situated, is an intrastate communication and every call, that enters a customer's network at a point in a state other than that where the called station is situated, is an interstate communication.

(2) Entrance Facilities and Direct-Trunked Transport Facilities

The Company will develop a PIU factor to apply to Entrance Facility and Direct-Trunked Transport rate elements when sufficient call detail exists. The Company will apply the PIU factor provided by the customer as set forth in 6.3.3 (A)(1)(b) only when the Company does not have sufficient data to develop a PIU factor.

A customer may provide a separate PIU factor may be provided for each rate element (Entrance Facility, Direct-Trunked Transport) at a Billing Account Number or higher reporting level and a separate PIU may be provided for each Direct-Trunked Transport facility, reflecting the originating and terminating traffic of all Switched Access services that use such facilities. When a customer orders the same type of Entrance Facility and Direct-Trunked Transport (i.e., DSO, DS1 or DS3) from the CDL to the first point of switching or Company hub, the customer may submit one PIU to be applied to both the Entrance Facility and the Direct-Trunked Transport. A consolidated PIU factor for all Entrance Facility and Direct-Trunked Transport rate elements may be provided at the option of the customer, if such PIU factor is representative of the actual interstate-intrastate use of the service.

In those situations where a PIU for Entrance Facility or Direct-Trunked Transport charges has not been provided with a quarterly update and is therefore not available, the Company will apply a current PIU from its Jurisdictional Factors Database. The first available factor from the following sequence will be selected: Feature Group D first, Feature Group B second and Feature Group C third.

(3) Jurisdictional Report Updates

The customer shall may update the interstate and intrastate jurisdictional reports on a quarterly basis. The reports will be based on the prior three months and will be due within fifteen days after the end of the quarter, beginning with the completion of the first full quarter of service. In the event that the Company does not have sufficient data to rely on actual call detail or to develop a PIU factor, these factors will be applied to activity dated on or after the first day of the next calendar month, which begins at least 15 business days after the day on which the revised report or letter is received.

If the revised factors represent what the Company considers to be a substantial deviation (a deviation of 5 (five) percentage points or more for the preceding twelve calendar months is a substantial deviation) from the customer's previously reported factors and cannot be attributed to seasonal changes or other identifiable reasons, the Company will request a Jurisdictional Report Verification of the factors as set forth in 6.3.3 (C) following.

When the Telephone Company does not have sufficient data to rely on actual call detail or to develop a PIU factor, the revised report or letter will serve as the basis for the next three months' billing and will be effective on the bill date for that service, first day of the next monthly billing period which begins at least 15 business days after the day on which the customer reports the revised jurisdictional information to the Company. If the customer does not supply an updated quarterly report or letter, the Company will assume the customer-provided PIU factors to be the same as those provided in the last quarterly report or letter accepted by the Company.

For those cases in which a quarterly report or letter has never been received from the customer, the Company will assume the customer-provided PIU factors to be the same as provided in the order for service.

A customer may file jurisdictional reports aggregating usage at a statewide, LATA, billing account number (BAN) or end office level.

(M) Material relocated from page 27.1.

(M)
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 (N)

6. SWITCHED ACCESS

6.3 Obligations of the Customer (Continued)6.3.3 Jurisdictional Report Requirements (Continued)(B) Maintenance of Customer Records

The customer shall retain, for a minimum of twelve months, call detail records that substantiate the interstate percent provided to the Company (as set forth in (A) preceding) for switched access service. Such records shall consist of (1) and (2) following, if applicable:

- (1) All call detail records (such as work papers and/or backup documentation including paper, magnetic tapes or any other form of records for billed customer traffic); call information (including call originating and terminating (C) address [i.e., calling, called number], the call duration, all originating and terminating trunk groups or access (C) lines over which the call is routed); and the point at which the call enters the customer's network, and
- (2) If the customer has a mechanized system in place that calculates the PIU factor, then a description of that (C) system and the methodology used to calculate the PIU factor must be furnished as well as any other (C) pertinent information (such as, but not limited to: flowcharts, source code, etc.) relating to such system must also be made available.

(C) Jurisdictional Reports Verification

The Company may request the customer to verify their jurisdictional reports. The customer shall keep records of call detail from which the percentage of interstate and intrastate use can be ascertained. The Company will request the customer to provide the records of call detail and other information (as specified in (B) preceding) that the customer used to determine the percentage of interstate and intrastate use. No more than one verification request will be made per year.

- (1) If the PIU factors filed by the customer cannot be validated by the data provided, and the data provided by the customer is sufficient to calculate a PIU factor different than the customer's reported PIU factor, the Company will use these records to:
 - (a) Revise the customer's PIU factor.
 - (b) Calculate the interstate and intrastate access charges that should have been billed to the customer for the prior period (as specified in (B) preceding), and debit or credit the customer for the difference between the charges that should have been billed with the revised PIU and the charges that were billed.

The customer shall supply the data to the Company within 30 days of the Company request. The Company will request data for the four prior quarters unless a shorter period is requested by the customer and agreed to by the Company.