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June 1, 2012

Via EFS

Secretary of the Commission  
Indiana Utility Regulatory Commission  
101 West Washington Street  
Suite 1500 E  
Indianapolis, Indiana 46204

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Re: Transitional Intrastate Access Services – 30 Day Filing (Pursuant to 170 IAC 1-6) and Explanation of Compliance with FCC Requirements  
**FCC Option #1**

Dear Secretary:

Enclosed with this letter is a tariff revision for AT&T Communications of Indiana, GP, (AT&T) and TCG Indianapolis (TCG). The enclosed pages for each company show a reduction in each company's terminating access rates as required by the decision of the Federal Communications Commission in its Report and Order and Further Notice of Proposed Rulemaking ("Report and Order") in WC Docket No. 07-135 et al., FCC Release No. 11-161 (Nov. 18, 2011) (FCC Order). The FCC Order adopts a transitional intercarrier compensation framework that reduces terminating intrastate access charges to parity with interstate access rates by July 2013. The instant filing represents the first step in this transitional process and reduces access rates to be equal to 1/2 of the difference between the Interstate and Intrastate Rates in effect in 2011.

This filing is being made under 170 IAC 1-6 Thirty-Day Administrative Filing Procedures and Guidelines, and is, *inter alia*, allowable per section 3(5) "Changes to rates and charges so long as the change ... results in an overall decrease in revenues..." 170 IAC 1-6-3(5). These revisions do not apply to nor affect any AT&T or TCG retail customers.

Attached are worksheets provided by IURC staff in letter dated May 24, 2012 to all Indiana Local Exchange Carriers entitled "Calculation Worksheets for Transitional Intrastate Access Service, as defined in 47 C.F.R. 51.903(j)". These worksheets have been populated with access rates and actual demand data for AT&T Communications of Indiana, GP and TCG Indianapolis. The sources of the rate and demand data are shown on the Attachment labeled Source Documentation.

In accordance with 170 IAC 1-6-6(b), a notice has been published in the Indianapolis Star on May 30, 2012, its circulation covering the majority of affected AT&T and TCG customers.



A copy of the notice is enclosed and may also be accessed at <http://www2.indystar.com/webcat/classified/adshow?category=Public+Notices&claname=Legal&page=8> Please see affidavit enclosed. *Note: Page number changes as additional ads are published at the above link.*

AT&T and TCG are unable to address (6)(a)(1)(A) as they no longer have a public local customer service office in Indiana. However, the proposed pages may be found on the companies' website per (6)(a)(1)(B) at [www.att.com](http://www.att.com) by clicking on About AT&T, then Service Publications, then Indiana and selecting the State Tariffs for each company.

**Links to the pending tariff pages are:**

**AT&T Communications of Indiana, GP**

IURC No. T-3                      Part I Price List                      2nd Revised Page 22  
<http://serviceguide.att.com/tariff/business/ext/files/IN-12-00112.pdf>

**TCG Indianapolis**

IURC No. 2                      Price List                      First Revised Sheet 11  
   Price List                      First Revised Sheet 12  
<http://serviceguide.att.com/tariff/business/ext/files/IN-12-05051.pdf>

Contact information for this filing is Candice Glover, 225 W. Randolph St., 27C500, Chicago, IL 60606. I can be reached at 312-727-0127 and at [candice.glover@att.com](mailto:candice.glover@att.com).

Please call me with any questions you may have.

Sincerely,

/s/Candice Glover  
Area Manager

Enclosures

Copy to: Indiana Office of Utility Consumer Counselor

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AT&T COMMUNICATIONS OF INDIANA, GP

TARIFF I.U.R.C. NO. T-3

ACCESS SERVICES AND NETWORK INTERCONNECTION SERVICES

EFFECTIVE:  
DISTRICT MANAGER  
DALLAS, TEXAS

PART I  
PRICE LIST  
2ND REVISED PAGE 22  
CANCELS 1ST REVISED PAGE 22

15. AT&T DIGITAL LINK ACCESS SERVICE RATES

15.1 Tandem-Switched Transport

A. Tandem-Switched Transport Termination

	<u>Rate</u>	
ORIG.- Per Access Minute	\$0.000144	(T)
TERM.- Per Access Minute	\$0.000124	(N)

B. Tandem-Switched Transport Facility

ORIG.- Per Access Minute per mile	0.000022	(T)
TERM.- Per Access Minute per mile	0.000018	(N)

15.2 Switching Charge

A. Originating Switching Charge

Per Access Minute	0.004796
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B. Terminating Switching Charge

Per Access Minute	0.004142	(R)
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Calculations Worksheet for Transitional Intrastate Access Service, as defined in 47 C.F.R. 51.903(j)

Company Name: AT&T Communication of Indiana GP

Terminating Switched Access Service (Transitional Intrastate Access Service)

Current Intrastate Rates

Intrastate Rate Elements in Effect on Dec. 29, 2011	Intrastate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue
End Office Local Switching (per MOU)	\$ 0.004796	1,573,589	\$7,547
Tandem Transport Termination (per MOU)	\$ 0.000144	1,556,554	\$224
Tandem Transport Facility (per MOU per Mile)	\$ 0.000022	463,182	\$10
			\$0
			\$0
			\$0
<b>Total</b>			<b>\$7,781</b>

Interstate Rates Applied to Intrastate Usage

Interstate Rate Elements in Effect on Dec. 29, 2011	Interstate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue	
End Office Local Switching (per MOU)	\$ 0.003487	1,573,589	\$5,487	
Tandem Transport Termination (per MOU)	\$ 0.000103	1,556,554	\$160	
Tandem Transport Facility (per MOU per Mile)	\$ 0.000013	463,182	\$6	
Tandem Switching	\$ 0.001118	-	\$0	
Common Multiplexing	\$ 0.000015	1,556,554	\$23	
			\$0	<b>Revenue Differential</b>
<b>Total</b>			<b>\$5,677</b>	<b>\$2,104</b>
<b>Step 1 Access Revenue Reduction (= 50% of revenue differential (E25))</b>				<b>\$1,052</b>

Proposed Intrastate Rates effective July 1, 2012

Intrastate Rate Elements in Effect on Dec. 29, 2011	Proposed Intrastate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue	
End Office Local Switching (per MOU)	\$ 0.004142	1,573,589	\$6,518	
Tandem Transport Termination (per MOU)	\$ 0.000018	1,556,554	\$28	
Tandem Transport Facility (per MOU per Mile)	\$ 0.000124	463,182	\$57	
			\$0	
			\$0	
			\$0	<b>Revenue Change</b>
<b>Total</b>			<b>\$6,603</b>	<b>-\$1,178</b>

Maximum Allowable Revenue from the Proposed Intrastate Rates (D37<=E39) **\$6,729**

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Calculations Worksheet for Transitional Intrastate Access Service, as defined in 47 C.F.R. 51.903(j)

Company Name: TCG Indianapolis

**Terminating Switched Access Service (Transitional Intrastate Access Service)**

**Current Intrastate Rates**

Intrastate Rate Elements in Effect on Dec. 29, 2011	Intrastate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue
End Office Local Switching (per MOU)	\$ 0.007489	2,461,634	\$18,435
Tandem Transport Termination (per MOU)	\$ 0.000244	1,028,139	\$251
Tandem Transport Facility (per MOU per Mile)	\$ 0.000044	5,140,693	\$226
			\$0
			\$0
			\$0
<b>Total</b>			<b>\$18,912</b>

**Interstate Rates Applied to Intrastate Usage**

Interstate Rate Elements in Effect on Dec. 29, 2011	Interstate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue	
End Office Local Switching (per MOU)	\$ 0.003487	2,461,634	\$8,584	
Tandem Transport Termination (per MOU)	\$ 0.000103	1,028,139	\$106	
Tandem Transport Facility (per MOU per Mile)	\$ 0.000013	5,140,693	\$67	
Tandem Switching	\$ 0.001118	-	\$0	
Common Multiplexing	\$ 0.000015	1,028,139	\$15	
			\$0	<b>Revenue Differential</b>
<b>Total</b>			<b>\$8,772</b>	<b>\$10,140</b>
<b>Step 1 Access Revenue Reduction (= 50% of revenue differential (E25))</b>				<b>\$5,070</b>

**Proposed Intrastate Rates effective July 1, 2012**

Intrastate Rate Elements in Effect on Dec. 29, 2011	Proposed Intrastate Rate	Oct. 2010 - Sept. 2011 Intrastate Demand	Revenue	
End Office Local Switching (per MOU)	\$ 0.005488	2,461,634	\$13,509	
Tandem Transport Termination (per MOU)	\$ 0.000174	1,028,139	\$179	
Tandem Transport Facility (per MOU per Mile)	\$ 0.000029	5,140,693	\$149	
			\$0	
			\$0	
			\$0	<b>Revenue Change</b>
<b>Total</b>			<b>\$13,837</b>	<b>-\$5,075</b>

**Maximum Allowable Revenue from the Proposed Intrastate Rates (D37<=E39)** **\$13,842**

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**SOURCE DOCUMENTATION**

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**Sources for AT&T COM data:**

**Demand:**

- Actual volumes from all intrastate access bills for the period Oct 2010 through Sep 2011.

**Access Rates:**

**INTERSTATE ACCESS RATES**

**AT&T-C Federal Tariff No. 28**

Terminating Switching	0.003487 Section 17.15.1 D
Tandem Switched Transport Termination	0.000103 Section 17.15.1 A
Tandem Switched Transport Facility	0.000013 Section 17.15.1 B
Tandem Switching	0.001118 Section 17.15.1 C
Common Multiplexing	0.000015 Section 17.14

**INTRASTATE ACCESS RATES**

**AT&T COMMUNICATIONS OF INDIANA GP TARIFF I.U.R.C NO. T-3**

Terminating Switching	0.004796 PART I P22 15.2 B
Tandem Switched Transport Termination	0.000144 PART I P22 15.1 A
Tandem Switched Transport Facility	0.000022 PART I P22 15.1 B

**Sources for TCG's data:**

**Demand:**

- Actual volumes from all intrastate access bills for the period Oct 2010 through Sep 2011.

**Access Rates:**

**INTERSTATE ACCESS RATES**

**TCG Federal Tariff No. 2**

Terminating Switching	0.003487 Section 5.4.K
Tandem Switched Transport Termination	0.000103 Section 5.4.K
Tandem Switched Transport Facility	0.000013 Section 5.4.K
Tandem Switching	0.001118 Section 5.4.K
Common Multiplexing	0.000015 Section 5.4.K

**INTRASTATE ACCESS RATES**

**TCG INDIANPOLIS TARIFF I.U.R.C NO. 2**

Terminating Switching	0.007489 SHEET 12 4.3
Tandem Switched Transport Termination	0.000244 SHEET 11 4.2
Tandem Switched Transport Facility	0.000044 SHEET 11 4.2



PUBLIC NOTICE On November 18, 2011, the Federal Communications Commission ("FCC") released its Report and Order and Further Notice of Proposed Rulemaking ("Report and Order") in WC Docket No. 07-135 et al., adopting a transitional intercarrier compensation framework. In the order, carriers are required to submit to state regulatory commission's data regarding their FY2011 intrastate switched access MOU and rates, broken down into categories and subcategories, and the FCC expects states to monitor implementation of the recovery mechanism and related intrastate tariff filings necessitated by the access reductions. Carriers were ordered to file data and calculations in support of their proposed transitional intrastate access rates scheduled to be available July 1, 2012, as mandated by the FCC's Report and Order. Any wholesale local service provider or interexchange carrier that delivers a call to AT&T Communications of Indiana, GP ("AT&T") and TCG Indianapolis ("TCG") End Users for termination, which originates and terminates within the state (Intrastate calling), will experience a reduction in their current terminating access charges billed by AT&T and TCG. These reductions will be equal to ½ of the difference between the Interstate and Intrastate Rates in effect in Fiscal Year 2011, calculated in accordance with FCC rules. AT&T and TCG's data and calculations and associated tariff sheets will be filed at the Indiana Utility Regulatory Commission ("IURC"), per the FCC Report and Order, on or before May 31, 2012. These tariff revisions will become effective upon the approval of the IURC, but no earlier than July 3, 2012. Any customer may contact the IURC or the Office of Utility Consumer Counselor (OUCC) with a written statement objecting to these applications. Such objections should be sent to: Secretary of the Commission Indiana Utility Regulatory Commission 101 West Washington Street, Suite 1500 E Indianapolis, Indiana 46204 or: Indiana Office of Utility Consumer Counselor PNC Center 115 West Washington Street, Suite 1500 South Indianapolis, Indiana 46204. (S - 5/30/12 - 5955102)

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