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Bradford Hines
Assistant General Counsel
Indiana Utility Regulatory Commission
101 W. Washington Street, Suite 1500 E
Indianapolis, IN 46204

RE: IURC's Draft Proposed Rule #22-04 Amending 170 IAC 1-6

Dear Assistant General Counsel Hines:

I represent Indiana Exchange Carrier Association, Inc. d/b/a Indiana Rural Broadband Association ("INRBA"), an Indiana corporation consisting of 24 local cooperative and small commercial telecommunications companies, which are all rural local exchange carriers. Its members also serve approximately 135,000 broadband customers. On behalf of INRBA, we appreciate the opportunity to comment on the Commission's draft proposed rules, IURC Rulemaking #22-04.

Overall, the draft proposed rules are reasonable, however, we offer a limited number of proposed amendments to provide clarification.

We would like to highlight for the Commission that, under the proposed rule, 170 IAC 1-6-5(4) allows communications service provider ("CSP") intrastate access tariffs to be filed under the rule. However, the rule has not been amended to make intrastate access tariffs an allowable filing under 170 IAC 1-6-3, meaning that the intrastate access tariff would need to fit another category of allowable filing under 170 IAC 1-6-3 in order to be filed as a 30 Day Filing. We urge the Commission to amend 170 IAC 1-6-3 to expressly allow intrastate access tariffs to be filed as 30 Day Filings.

We would also emphasize the broadness of the amendment to 170 IAC 1-6-8(e). Currently, tariffs filed by CSPs are effective upon filing without post-filing review except those filed under IC 8-1-2-88.6. With the revised rule, it appears all tariffs filed CSPs are subject to post-filing review for reasonableness under IC 8-1-2-88.6. Therefore, we urge the Commission to include

language in the finalized rule to clearly identify which filings are subject to post-filing review by the Commission and to limit these filings to those filed under IC 8-1-2-88.6.

Thank you very much for this opportunity. I have attached INRBAs' annotated proposed edits and look forward to the issuance of the final rule. Please feel free to contact me with any questions.

Respectfully,



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On behalf of Indiana Exchange Carrier
Association, Inc. d/b/a Indiana Rural
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