



April 28, 2014

U 1001 C
Advice Letter No. 43497

Public Utilities Commission of the State of California

We attach for filing this Tier II advice letter to make the following changes in tariff sheets:

SCHEDULE CAL.P.U.C. NO. 175-T

3rd Revised Sheet	20-C
3rd " "	20-D
Original Sheet	20-D-1
2nd Revised Sheet	20-E
2nd " "	20-F
Original Sheet	20-F-1
2nd Revised Sheet	20-G
2nd " "	20-H

This filing revises Schedule Cal.P.U.C. No. 175-T Access Service, Section 2. General Regulations, 2.3 Obligations of the Customer, in accordance with FCC regulations (47 CFR 51.913(a)). For the period of July 2012 through June 2014 the Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

In compliance with General Order 96-B, we are serving a copy of this advice letter and related tariff sheets to interested parties who have requested. This advice letter with attachments may be viewed on AT&T California's Web-Site at <https://ebiznet.att.com/calreg/>. If there are any questions regarding the distribution of this advice letter, call 415.778.1299.

This filing will not increase any rate or charge, cause the withdrawal of service, nor conflict with other schedules or rules.

Anyone may object to this advice letter, which was filed April 28, 2014, by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Avenue, 3rd Floor, San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to Eric Batongbacal, 525 Market Street, #1944, San Francisco, CA 94105 (fax number 415.543.3766). If this advice letter was served via e-mail, the protest must be served to AT&T California via e-mail at regtss@att.com. To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site (www.cpuc.ca.gov) and look for document links to General Order 96-B.

AT&T CALIFORNIA

We request this filing become effective June 1, 2014.

Yours truly,

AT&T California

A handwritten signature in black ink, appearing to read "L. Potamfal". The signature is written in a cursive, slightly slanted style.

Director-Regulatory

Attachments

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(B) Rating of VoIP-PSTN Traffic*

The Relevant VoIP-PSTN Traffic exchanged between the customer and the Telephone Company or another provider and facility rate elements identified in accordance with this tariff section will be billed at rates comparable to the Telephone Company's applicable tariffed interstate switched access rates as specified in Pacific Bell Telephone Company Tariff FCC No. 1, unless the corresponding intrastate rate is lower. If the intrastate rate is lower then that rate will be used for billing. Hereafter, these billed rates will be referred to in this tariff as the relevant "VoIP Rates".

(C)
(C)
(D)
|
(D)

* For the period of January 2012 through June 2013 Intrastate VoIP terminating usage and facilities charges are required to be at the Interstate rates and rate structure and as such a credit will be employed to achieve this. Because the Intrastate rates and rate structure are currently not at parity, the credit associated with VoIP terminating usage will be based on a calculation of the difference between the Intrastate revenue utilizing intrastate rates and Intrastate demand versus the intrastate revenue utilizing applicable Interstate rates and rate structure and intrastate demand. This process is also being applied to VoIP originating usage for the period of January 2012 through July 13, 2012.

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (N)

The Telephone Company will determine the number of Relevant VoIP-PSTN Traffic originating MOU and the originating facility rate elements effective July 1, 2014, to which VoIP rates will be applied under subsection (B), above, by applying the Percent VoIP Usage ("PVU") factor to the intrastate access originating MOU and the facilities between the Telephone Company and the customer. The PVU factors will be derived and applied as follows:

- (1) The customer will calculate and furnish to the Telephone Company a factor (the "PVUC"), on an ACNA basis which would aggregate traffic from all Carrier Identification Codes ("CICs") or Operating Company Numbers ("OCNs"), associated with the ACNA. This PVUC represents the percentage (whole number) of the originating intrastate access MOU that the customer receives from the Telephone Company end users in the state which is sent from the Telephone Company that is terminated in IP format at the customer's end user. This PVUC shall be based on information such as the number of the customer's retail VoIP subscriptions in the state (e.g., as reported on FCC Form 477), traffic studies, actual call detail, or other relevant and verifiable information satisfactory to the Telephone Company.

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

Material omitted now located on Sheet 20-D-1

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (Cont'd) (N)

The Telephone Company will determine the number of Relevant VoIP-PSTN Traffic originating MOU and the originating facility rate elements effective July 1, 2014, to which VoIP rates will be applied under subsection (B), above, by applying the Percent VoIP Usage ("PVU") factor to the intrastate access originating MOU exchanged and the facilities between the Telephone Company and the customer. The PVU factors will be derived and applied as follows: (Cont'd)

(2) The Telephone Company will calculate and periodically update a (the "PVUT") VoIP usage factor for the Telephone Company. This factor (percentage) is calculated on an individual basis: the intrastate originating minutes delivered to the customer which were originated in IP format by the Telephone Company's end users divided by the total intrastate originating access MOU that the Company delivered to the customer's end users. This PVUT shall be based on information such as the number of the customer's retail VoIP subscriptions in the state (e.g., as reported on FCC Form 477), traffic studies, actual call detail, or other relevant and verifiable information.

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

(L) Material formerly located on Sheet 20-D

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (N)
(Cont'd)

The Telephone Company will determine the number of Relevant VoIP-PSTN Traffic originating MOU and the originating facility rate elements effective July 1, 2014, to which VoIP rates will be applied under subsection (B), above, by applying the Percent VoIP Usage ("PVU") factor to the intrastate access originating MOU exchanged and the facilities between the Telephone Company and the customer. The PVU factors will be derived and applied as follows: (Cont'd)

(3) The Telephone Company will develop a customer Percent VoIP Usage ("PVU") factor combining the customer's PVUC factor with the Telephone Company's PVUT factor.

a) The PVU calculation below is applied when the Telephone Company does not bill based on actual call detail records for the Telephone Company's intrastate IP traffic at VoIP rates.

$PVU = PVUC + [PVUT \times (1 - PVUC)]$ is applied to the Telephone Company's end user's originating intrastate MOU and facility rate elements.

Example: The customer reported their PVUC as 40%. The Telephone Company's PVUT is 10%. This results in the following:

$PVU = 40\% \text{ plus } (10\% \text{ times } (1 - 40\%)) = 46\%$

This means that 46% of the originating Intrastate MOU exchanged between the Telephone Company's end users and the customer will be rated at VoIP rates.

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (N)
(Cont'd)

The Telephone Company will determine the number of Relevant VoIP-PSTN Traffic originating MOU and the originating facility rate elements effective July 1, 2014, to which VoIP rates will be applied under subsection (B), above, by applying the Percent VoIP Usage ("PVU") factor to the intrastate access originating MOU exchanged and the facilities between the Telephone Company and the customer. The PVU factors will be derived and applied as follows: (Cont'd)

(3) The Telephone Company will develop a customer Percent VoIP Usage ("PVU") factor combining the customer's PVUC factor with the Telephone Company's PVUT factor. (Cont'd)

(b) The PVU calculation below is applied when the Telephone Company bills are based on the actual originating call detail records for the Telephone Company's intrastate IP traffic at VoIP rates.

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

(L) Material omitted now located on Sheet 20-F-1

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (N)
(Cont'd)

(3) (Cont'd)

(b) (Cont'd)

The formulas for usage and facility rate elements will be as follows: (L)

PVU = PVUC x (1-PVUT) applied to the Telephone Company's TDM end user's originating intrastate MOU. (C)

PVU = PVUC + [PVUT x (1-PVUC)] applied to the facility rate elements.

Example: The Telephone Company has identified that there were 10,500 originating intrastate MOU from the Telephone Company's IP end users and delivered to the customer's end users. The customer reported their PVUC as 40%. The Telephone Company's PVUT is 10%. This results in the following: (C)
(C)

PVU = 40% times (1-10%) = 36%
This means that 36% of the originating intrastate MOU exchanged between the Telephone Company's TDM end users and the customer will be rated at VoIP rates and the originating intrastate 10,500 MOU will also be rated at VoIP rates. (C)
(C)

For the originating facility rate elements, the formula that is applied to the intrastate dedicated facilities is as follows: (C)
PVU = 40% plus (10% times (1-40%)) = 46%
Therefore, 46% of the originating intrastate facilities will be rated at VoIP rates. (C)
(L)

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates. (N)
(N)

(L) Material formerly on Sheet 20-F

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(C) Calculation and Application of Percent-VoIP-Usage Factors* (N)
(Cont'd)

The Telephone Company will determine the number of Relevant VoIP-PSTN Traffic originating MOU and the originating facility rate elements effective July 1, 2014, to which VoIP rates will be applied under subsection (B), above, by applying the Percent VoIP Usage ("PVU") factor to the intrastate access originating MOU exchanged and the facilities between the Telephone Company and the customer. The PVU factors will be derived and applied as follows:

- (4) The Telephone Company will apply the customer's PVUC to originating traffic exchanged between the third party providers (e.g. Independent Telephone Companies and local exchange carriers) subtending the Telephone Company's access tandem and customer.

The customer may elect to provide a different factor ("PVUC3") that represents the originating VoIP-PSTN traffic that is exchanged between third party providers and customer.

- (5) If the customer does not furnish the Telephone Company with a PVUC pursuant to the preceding paragraph (C) (1), the Telephone Company will utilize a customer PVUC of 0%.

* Consistent with FCC regulations (47 CFR 51.913(a)), for the period of July 2012 through June 2014 Intrastate VoIP originating usage and originating dedicated facilities charges are required to be at the Intrastate rate and rate structure. Effective July 1, 2013, the Terminating usage and dedicated facilities are at the Interstate rate structure and the lower of the Interstate or Intrastate rates.

Continued

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.16 Identification and Rating of VoIP-PSTN Traffic (Cont'd)

(D) PVU Factor Updates

The customer may update the PVUC factor quarterly using the method set forth in Subsection (C)(1) and (4), above. If the customer chooses to submit such updates, it shall forward to the Telephone Company, no later than 15 days after the first day of January, April, July and/or October of each year, a revised PVUC factor based on data for the prior three months, ending the last day of December, March, June and September, respectively. The Telephone Company will use the revised PVUC to calculate a revised PVU. The revised PVU factor will only apply prospectively and serve as the basis for billing until superseded by a new PVU.

The customer must update the PVUC factor no later than June 1, 2014, to reflect the use of originating VoIP traffic as delineated in Subsection (C)(1) and (4) or the Telephone Company will utilize a customer PVUC of 0%.

Continued