

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Shari Feist Albrecht, Chairman
 Jay Scott Emler
 Dwight D. Keen

In the Matter of a General Investigation into)
the Adjustment of Intrastate Switched Access)
and Reciprocal Compensation Charges) Docket No. 18-GIMT-448-GIT
Pursuant to the Federal Communications)
Commission's Reforms, Effective July 3,)
2018.)

ORDER OPENING DOCKET; REQUIRING TARIFF AND COMPLIANCE FILINGS

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having examined its files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

BACKGROUND

1. On November 18, 2011, the Federal Communications Commission (FCC) released a *Report and Order and Further Notice of Proposed Rulemaking* (USF/ICC Order) which, among other things, overhauled the traditional inter-carrier compensation regime for all intrastate and interstate telecommunications traffic traditionally classified as “access” traffic.¹ Relevant to this docket, the FCC set forth a transition path for terminating end-office switching and certain transport rate elements and reciprocal compensation charges.² States are charged with overseeing the modifications to rates in intrastate access tariffs to ensure carriers are

¹See Connect America Fund, 26 F.C.C.R. 17663 ¶ 762 (Fed. Comm. Comm’n November 18, 2011) (Report and Order and Further Notice of Proposed Rulemaking) (USF/ICC Order).

²See Id. at ¶ 800-801.

complying with the framework adopted in the USF/ICC Order and not shifting costs or otherwise seeking to gain excess recovery.³

2. The Commission has complied with the FCC's directives and overseen the rate transition contemplated in the USF/ICC Order every year since adoption. Rate adjustments generally occur on July 1 of each year, and the transition period runs from 2011-2020. Rate adjustments occur for price cap carriers, rate-of-return carriers, and competitive local exchange carriers (CLECs). For a complete history of this transition at the Commission, refer to the following dockets: 12-GIMT-170-GIT; 13-GIMT-004-GIT; 13-GIMT-611-GIT; 14-GIMT-446-GIT; 15-GIMT-068-GIT; 15-GIMT-436-GIT; 16-GIMT-413-GIT; 16-GIMT-587-GIT and 17-GIMT-426-GIT.

3. On April 6, 2018, Commission Staff (Staff) submitted a Report and Recommendation (R&R) to the Commissioners explaining the USF/ICC Order requirements for July 1, 2018, attached hereto and made a part hereof by reference.⁴

4. Staff explained in its R&R that effective July 3, 2018, price cap carriers will complete the transition of their interstate and intrastate terminating switched end-office access and transport rates to the bill and keep (\$0.00) methodology by eliminating the rate for all terminating traffic within a tandem serving area when the carrier owns the tandem switch.⁵ Rate-of-return local exchange carriers (LECs) will implement the second phase of the three-year phase down in their interstate and intrastate terminating switched end-office access and reciprocal compensation rates, from \$.005 to \$.0007.⁶ All of the rural LECs (RLECs) in Kansas operate under rate-of-

³Id. at ¶ 35.

⁴Report and Recommendation (Apr. 6, 2018) (R&R).

⁵USF/ICC Order at ¶ 801, Figure 9; R&R at 1-2.

⁶USF/ICC Order at ¶ 801, Figure 9; R&R at 1-2.

return regulation. Competitive LECs that benchmark to a LEC's rate will also reduce their terminating end-office access and reciprocal compensation rates.⁷

5. Staff notes in its R&R that the RLECs' revised intrastate access tariffs will only reflect changes to their terminating access rates consistent with the FCC's reforms. Their intrastate originating rates will remain unchanged and, pursuant to K.S.A. 66-2005(c), be adjusted July 2019 to parity with their interstate rates.

6. Staff explains that along with required inter-carrier compensation rate reductions, the FCC created the Connect America Fund (CAF) and Access Recovery Charge (ARC) to allow LECs to recover a portion of their lost revenues.⁸ However, LECs receiving such support must certify annually to the FCC and applicable state commissions that such carrier is not seeking duplicative recovery in the state jurisdiction.⁹ Additionally, the LECs must file its annual Baseline and Eligible Recovery data with the FCC and the Commission.¹⁰

7. Staff explains that pursuant to K.S.A. 66-117, an RLEC must file proposed tariff revisions no later than 30 days prior to the effective date and CenturyLink¹¹ must file proposed revised tariff revisions no later than 21 days prior to the requested effective date. Staff will need to review the filed tariffs and work with companies if questions arise and then submit a Report and Recommendation regarding its review of CenturyLink's and the RLECs' revised intrastate access tariffs. Staff states that the Commission must issue an Order approving the tariffs prior to July 3, 2018.

⁷USF/ICC Order at ¶ 801, Figure 9; R&R at 2.

⁸R&R at 2.

⁹R&R at 3; 47 C.F.R. § 51.915(d)(viii)(3); 47 C.F.R. § 51.917(d)(vii).

¹⁰R&R at 3; 47 C.F.R. § 54.304.

¹¹The United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink).

8. Staff recommends that in order to facilitate the July 3, 2018 USF/ICC Order reforms, the Commission should adopt the following requirements:

- 1) The RLECs and CenturyLink shall file revised intrastate access tariffs and any applicable supporting documentation in the Docket no later than May 18, 2018;
- 2) Competitive LECs that benchmark to a price cap carrier or an RLEC's rates shall file revised intrastate access tariffs in the docket by June 15, 2018, and if a tariff will be effective after July 3, 2018, provide the effective date of the tariff;
- 3) The price cap LECs and the RLECS are to file all FCC required documentation, including their Baseline, Eligible Recovery and annual Duplicative Recovery Certification documentation, in the Docket no later than June 15, 2018;
- 4) Any LEC required to file a revised interstate access tariff shall notify the Commission, submit its revised intrastate access tariff, if applicable, and advise the Commission of the revised tariff's effective date within three (3) business days of filing the revised tariff with the FCC; and
- 5) The Commission should remind LECs that they may incorporate a uniform resource locator (URL) and/or reference to their interstate access tariff in their intrastate access tariff and, if an LEC has already done so, it will not need to file a revised intrastate access tariff absent other revisions.¹²

¹²See R&R at 2.

JURISDICTION AND DUE PROCESS

9. The Commission has general supervisory jurisdiction over LECs pursuant to K.S.A. 66-1,188, and jurisdiction over telecommunications public utility rates pursuant to K.S.A. 66-1,189. The Commission retains jurisdiction over telecommunications carrier and electing carrier intrastate switched access rates, including the implementation of federal law concerning inter-carrier compensation pursuant to K.S.A. 66-2005(z)(2)(C).

10. K.S.A. 66-117 requires all proceedings concerning changes in rates to be conducted in accordance with the provisions of the Kansas Administrative Procedure Act, K.S.A. 77-501 *et seq.*

STANDARD FOR APPROVAL

11. As the Commission is not being tasked with making a determination of fact at this stage, Staff's recommendations may be adopted so long as the recommended actions are within the jurisdictional authority of the Commission and conform to applicable federal and state law.¹³

COMMISSION FINDINGS

12. Having reviewed Staff's R&R in this matter and the applicable law, the Commission finds that at this stage, summary proceedings are appropriate pursuant to K.S.A. 77-537(a).

13. The Commission finds that Staff's recommendations contained in its April 6, 2018, R&R are lawful and reasonable, and hereby adopts the same.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

(A) This docket shall be opened for the purpose of addressing the FCC's July 3, 2018 ICC reforms.

¹³See generally K.S.A. 77-621; USF/ICC Order; K.S.A. 66-101 *et seq.*; K.S.A. 66-2001 *et seq.*; 47 C.F.R. § 51.1 *et seq.*; 47 C.F.R. § 54.304.

(B) The RLECs and CenturyLink shall file revised intrastate access tariffs and any applicable supporting documentation in this Docket no later than May 18, 2018.

(C) Competitive LECs that benchmark to a price cap carrier or rate-of-return regulated carrier's rates shall file revised intrastate access tariffs in this Docket by June 15, 2018, and, if a tariff will be effective after July 3, 2018, provide the effective date of the tariff.

(D) AT&T, CenturyLink, and the RLECs shall file all FCC required documentation, including Baseline, Eligible Recovery, and annual Duplicative Recovery Certification documentation in this docket by June 15, 2018.

(E) Any LEC required to file a revised interstate access tariff shall notify the Commission, submit its revised intrastate access tariff, if applicable, and advise the Commission of the revised tariff's effective date within three (3) business days of filing the revised tariff with the FCC.

(F) All LECs are hereby reminded that they may incorporate a URL and/or reference to their interstate access tariff in their intrastate access tariff, and, if a LEC has already done so, it does not need to file a revised intrastate access tariff absent other revisions.

(G) Filings made in compliance with this Order do not need to be served on other parties to the proceeding. The Commission waives K.A.R. 82-1-216 with respect to the specific filings required by this Order.

(H) Parties have 15 days, plus three days if service is by mail, from the date of service of this Order to petition the Commission for reconsideration or request a hearing, as provided in K.S.A. 77-542.¹⁴

¹⁴K.S.A. 77-537(b); K.S.A. 66-118b; K.S.A. 77-529(a)(1).

(I) The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders as it may deem necessary and proper.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chairman; Emler, Commissioner; Keen, Commissioner

Dated: 04/26/2018 _____

A handwritten signature in cursive script, appearing to read "Lynn M. Retz", written over a horizontal line.

Lynn M. Retz
Secretary to the Commission

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REPORT AND RECOMMENDATION UTILITIES DIVISION

To: Chair Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Dwight Keen

From: Sandy Reams, Assistant Chief of Telecommunications
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Director of Utilities

Date: April 6, 2018

Re: Docket No. 18-GIMT 448-GIT
In the Matter of a General Investigation into the Adjustment of Intrastate Switched Access and Reciprocal Compensation Charges Pursuant to the Federal Communications Commission's Reforms, Effective July 3, 2018.

EXECUTIVE SUMMARY

Effective July 3, 2018,¹ price cap carriers² will complete the transition of their interstate and intrastate terminating switched end-office access and transport rates to the bill and keep (\$0.00) methodology by eliminating the rate for all terminating traffic within a tandem serving area when the carrier owns the tandem switch.³ Effective July 3, 2018, the rate-of-return LECs will implement the second phase of a three-year phase down in their interstate and intrastate terminating

¹ Order, *In the Matter of July 1, 2018 Annual Access Charge Tariff Filings*, WC Docket No. 18-100, Rel. April 5, 2018.

² Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T) and the United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink) operate under price cap regulation in the interstate jurisdiction. In Kansas, AT&T operates as an electing carrier and CenturyLink operates as a price cap carrier. For purposes of this Report, the reference to a price cap carrier includes AT&T and CenturyLink.

³ Report and Order and Further Notice of Proposed Rulemaking, *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208 (*Connect America Fund et. al*), Rel. Nov. 18, 2011 (November 2011 Order).

Memorandum Opinion and Order, *In the Matter of Level 3 Communications, LLC, Complainant v. AT&T Inc., BellSouth Telecommunications, LLC, Nevada Bell Telephone Company, Pacific Bell Telephone Company, Southwestern Bell Telephone, L.P., Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, Ohio Bell Telephone Company, Wisconsin Bell Telephone Company, Defendants*, Proceeding No. 17-227, Bureau ID No. EB-17-MD-003, Rel. Feb. 12, 2018.

switched end-office access and reciprocal compensation rates, from \$.005 to \$.0007.⁴ All competitive LECs that benchmark to a rate-of-return LEC's rates are also required to reduce their terminating end office access and reciprocal compensation rates.⁵ All of the rural LECs (RLECs) in Kansas operate under rate-of-return regulation.⁶

Staff recommends that the Commission issue an Order to open a Docket to address the July 2018 intrastate access reforms pursuant to the Federal Communications Commission's (FCC) directives. Staff further recommends that the Commission direct: (1) the RLECs and CenturyLink to file revised intrastate access tariffs and any applicable supporting documentation in the Docket no later than May 18th; (2) competitive LECs that benchmark to a price cap or rate of return LEC's rates to file revised intrastate access tariffs in the Docket by June 15th; and (3) the price cap LECs and the RLECs to file all FCC required documentation, including their Baseline, Eligible Recovery, and annual Duplicative Recovery Certification documentation, in the Docket no later than June 15th.

Staff further recommends that, if a LEC's tariff will be effective after July 3, 2018, the LEC be directed to inform the Commission of the effective date of the tariff and that if a LEC is required to file a revised interstate access tariff, it be directed to notify the Commission, submit a revised intrastate access tariff, if applicable, and advise the Commission of the effective date of the revised tariffs within three (3) business days of filing the revised tariff with the FCC. Lastly, Staff recommends that the Commission remind LECs that they may incorporate a Uniform Resource Locator (URL) and/or reference to their interstate access tariffs in the intrastate access tariff and avoid annual intrastate access tariff filings absent any other revision.

BACKGROUND

On November 18, 2011, the FCC released an Order to reform the intercarrier compensation (ICC) regime by transitioning all price cap, rate-of-return, and competitive LEC⁷ interstate and intrastate terminating switched end-office and reciprocal compensation rates to a bill-and-keep methodology.⁸ The FCC created two new ICC recovery mechanisms - the Connect America Fund (CAF) and the Access Recovery Charge (ARC)⁹ - to allow price cap and rate-of-return LECs to recover some of the reduction in their access revenues.

⁴ November 2011 Order, ¶ 801, Figure 9.

⁵ Reciprocal compensation generally applies to calls that begin and end within the same calling area. Reciprocal compensation is generally addressed in negotiated interconnection agreements, with such rates at or below \$.0007. (Id., note 1286). Traffic not accounted for through interconnection agreements is subject to the access regime; therefore, carriers do not need to file separate reciprocal compensation tariffs.

⁶ All of the rate-of-return LECs in Kansas are RLECs that operate under rate-of-return regulation in the interstate and intrastate jurisdiction and are herein referred to as "RLECs" or "rate-of-return LECs." Bluestem Telephone Company, Sunflower Telephone Company, and FairPoint Communications of Missouri, purchased by Consolidated Communications Holding, Inc. (Docket No. 17-SFLT-283-AQC), operate under price cap regulation in the federal jurisdiction and rate-of-return regulation in Kansas. For Kansas ICC reform purposes, these entities are required to comply with the rate-of-return LEC rules.

⁷ 47 C.F.R. §51.911(a) provides that if a competitive LEC operates in an RLEC's service area or is subject to the rural exemption in §61.26(e), the competitive LEC's intrastate originating access service shall remain subject to the state rate regulation in effect as of December 31, 2011.

⁸ November 2011 Order, ¶¶ 798, 801.

⁹ Ibid., ¶ 38.

The FCC recognized that state commissions will play a significant role during the ICC reform, especially with regard to oversight of carriers' compliance with the FCC's directives.¹⁰ Furthermore, the FCC requires any LEC receiving revenue recovery via the interstate jurisdiction to certify to the FCC and any state commission exercising jurisdiction over the LEC's intrastate costs that it is not seeking duplicative recovery in the state jurisdiction.¹¹ The annual certification must be provided in conjunction with the LEC's annual access tariff filings with the FCC and the state commission. A LEC is also required to file its annual Baseline and Eligible Recovery data with the FCC and state commission.

The Commission addressed the July 2012 (Phase I) intrastate access reforms, in which all affected LECs began to transition their intrastate terminating switched end-office rates, certain transport access rates, and rate structures to parity with the corresponding interstate access rates and rate structure, in Docket No. 12-GIMT-170-GIT.

The July 2013 (Phase 2) ICC reforms for the RLECs were addressed in Docket No. 13-GIMT-004-GIT. The Phase 2 reforms for price cap and competitive LECs were addressed in Docket No. 13-GIMT-611-GIT (Docket 13-611), in which the Commission also adopted intrastate access benchmarking rules for all competitive LECs.¹²

Phase 3 of the FCC's reforms, effective July 2014, were addressed by the Commission in Docket No. 14-GIMT-446-GIT (Docket 14-446). In Phase 3, all price cap LECs began to transition their interstate and intrastate terminating switched end-office rates towards \$.0007, while all rate-of-return LECs began to transition their interstate and intrastate terminating switched end-office rates towards \$.005. Phase 3 was achieved by a LEC reducing its rates by one-third of the difference between the rates in effect at the time and the respective \$.0007 or \$.005 rate. All LECs were authorized to include a reference and/or a URL to its interstate access tariff in its intrastate access tariff to eliminate the need to file a revised intrastate tariff each year.¹³

The Commission addressed the July 2015 (Phase 4) ICC reforms for the RLECs in Docket No. 15-GIMT-068-GIT and the ICC reforms for price cap and competitive LECs in Docket No. 15-GIMT-436-GIT. In Phase 4, price cap and rate of return LECs were required to continue to reduce their interstate and intrastate terminating switched end-office and reciprocal compensation rates towards \$.0007 or \$.005, respectively.

The July 2016 (Phase 5) ICC reforms for price cap carriers were addressed by the Commission in Docket No. 16-GIMT-413-GIT. In Phase 5, price cap carriers reduced their interstate and intrastate terminating switched end-office rates to \$.0007. Phase 5 of the ICC reforms for the rate-of-return LECs with the RLECs reducing their interstate and intrastate terminating switched end-office rates to \$.005.

The Commission addressed the July 2017 FCC reforms (Phase 6) for price cap LECs in Docket No. 17-GIMT-426-GIT, in which price cap carriers transitioned their interstate and intrastate

¹⁰ Ibid., ¶813.

¹¹ Ibid., footnote 1664.

¹² Order Requiring Parity and Benchmarking of CLEC Intrastate Access Rates, Dec. 5, 2013, and Order Granting Reconsideration, Docket 13-611, Jan. 14, 2014.

¹³ Order, Docket 14-446, April 15, 2014.

terminating switched end-office rates to the bill and keep methodology. A price cap LEC's rates for all terminating traffic within a tandem serving area when the terminating price cap LEC owns the serving tandem switch were reduced to \$.007. The Commission addressed Phase 6 for the RLECs in Docket No. 16-GIMT-587-GIT, in which the RLECs began to transition their interstate and intrastate terminating switched end-office rates from \$.005 to \$.007 by reducing the rate by one-third of the rate differential.

Competitive LECs that benchmark to an incumbent LEC's rate are allowed fifteen days after the effective date of the incumbent LEC's tariffs to file their tariffs.¹⁴ In addition, 47 C.F.R. § 61.26(c) provides that when an incumbent LEC lowers a rate to which a competitive LEC benchmarks, the competitive LEC's benchmark rate must be revised to the lower rate within fifteen days of the effective date of the incumbent LEC's revised rate.

For interstate tariff purposes, many of the RLECs concur in the tariff maintained by the National Exchange Carrier Association, Inc. (NECA) and the intrastate access tariff maintained by Blue Valley Tele-Communications (Blue Valley). Blue Valley, Columbus Communications Services, LLC (Columbus); LaHarpe Telephone Company (LaHarpe); Moundridge Telephone Company (Moundridge); Pioneer Telephone Association, Inc. (Pioneer); Rural Telephone Service Co., Inc. (Rural); and Totah Telephone Co., Inc. (Totah) maintain their own interstate tariffs.¹⁵ Blue Valley, Columbus, and LaHarpe also maintain their own intrastate access tariffs, while Moundridge, Pioneer, Rural, and Totah concur, in part, in Blue Valley's intrastate tariffs and maintain separate rates within the Blue Valley tariff for rates with which they do not concur. The remaining RLECs concur in Blue Valley's tariff and do not need to file separate intrastate access tariffs.

ANALYSIS

Effective July 3, 2018, a price cap LEC that owns the terminating serving tandem switch will reduce its interstate and intrastate terminating end-office access and transport rates for all terminating traffic within its tandem service area to bill and keep.¹⁶ Rate-of-return LECs will implement the second phase of transitioning their interstate and intrastate terminating end office access and reciprocal compensation rates towards \$.0007. Competitive LECs that benchmark to a price cap or rate-of-return LEC's rates will also reduce their terminating switched end office, transport, and reciprocal compensation rates accordingly.

As a result of the FCC's reforms, AT&T and a majority of the competitive LECs and the RLECs have included a reference or URL to their interstate access tariffs in their intrastate access tariffs. As a result, these LECs do not need to file revised intrastate access tariffs.

¹⁴ November 2011 Order, ¶ 807.

¹⁵ Moundridge, Pioneer and Totah's interstate tariffs are included in John Staurulakis, Inc.'s interstate tariff. Rural's interstate tariff is contained in Alexicon's interstate tariff.

¹⁶ Memorandum Opinion and Order, *In the Matter of Level 3 Communications, LLC, Complainant v. AT&T Inc., BellSouth Telecommunications, LLC, Nevada Bell Telephone Company, Pacific Bell Telephone Company, Southwestern Bell Telephone, L.P., Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, Ohio Bell Telephone Company, Wisconsin Bell Telephone Company, Defendants*, Proceeding No. 17-227, Bureau ID No. EB-17-MD-003, Rel. Feb. 12, 2018.

CenturyLink's interstate and intrastate terminating switched end-office and transport rates will transition to bill and keep, effective July 3rd, for terminating traffic within a tandem serving area in which CenturyLink owns the terminating tandem switch. CenturyLink's intrastate access tariff includes specific access rates, not a reference and/or URL to its interstate tariff and, therefore, the Company will need to file a revised intrastate access tariff. Pursuant to K.S.A. 66-117, CenturyLink must file its proposed revised intrastate access tariff no later than 21 days prior to the requested effective date of July 3, 2018, or no later than June 12th.

An RLEC needs to file a revised intrastate access tariff to reflect the second phase of the transition of its terminating switched end office and reciprocal compensation rates towards \$.0007. Pursuant to K.S.A. 66-117, an RLEC must file its proposed tariff revisions no later than 30 days prior to the July 3, 2018, effective date, or no later than June 3rd.

The RLECs' revised intrastate access tariffs will only reflect changes to their terminating access rates consistent with the FCC's reforms. Their intrastate originating rates will remain unchanged and, pursuant to K.S.A. 66-2005(c), be adjusted July 2019 to parity with their interstate rates.

Consistent with the FCC's rules, the RLECs, CenturyLink, and AT&T must submit their Baseline and Eligible Recovery and annual certification documentation to the Commission.

Staff will review the proposed tariffs to verify compliance with the FCC's requirements. If a proposed tariff does not comply with the FCC's requirements, Staff will work with the LEC to ensure such compliance. After its review of CenturyLink's and the RLECs' revised intrastate access tariffs, Staff will submit a Report and Recommendation regarding that review. The Commission must then have time to issue an Order approving the tariffs prior to the effective date of July 3, 2018.

RECOMMENDATION

Staff recommends that the Commission issue an Order to open a new Docket to address the FCC's July 1, 2018 ICC reforms. Staff recommends that Blue Valley, Columbus, LaHarpe, Moundridge, Pioneer, Rural, Totah, and CenturyLink be directed to file revised intrastate access tariffs in the new Docket by May 18, 2018. Staff recommends that the RLECs, CenturyLink, and AT&T file their required FCC documentation, to include their Baseline, Eligible Recovery, and annual Duplicative Recovery Certification documentation, no later than June 15, 2018. Staff also recommends that competitive LECs be directed to file their revised intrastate access tariffs in the Docket no later than June 15, 2018.

In addition, Staff recommends that a LEC be directed to notify the Commission if its intrastate access rate will be effective after July 3, 2018. If an incumbent LEC's interstate tariff is revised, the incumbent LEC and any affected competitive LECs should be directed to notify the Commission, submit a revised intrastate access tariff, if applicable, and advise the Commission of the effective date of the revised access rate tariff.

Staff also recommends that the Commission continue to authorize, but not require, a LEC to incorporate a reference and/or a URL to their interstate access tariffs in its intrastate access tariff, provided such tariffs meet all of the FCC's and this Commission's access reform requirements.

CERTIFICATE OF SERVICE

18-GIMT-448-GIT

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of first class mail/hand delivered on 04/27/2018.

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