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April 23, 2012

Via Email

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

Dear Secretary:

Enclosed with this letter is a tariff revision for AT&T Indiana, AT&T Communications of Indiana, GP, and TCG Indianapolis (AT&T). The enclosed pages for each company adds language implementing the decision by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (Nov. 18, 2011) (FCC Order). The language proposed in this filing is identical to language that is found in FCC No. 2 Ameritech Operating Companies effective February 15, 2012, AT&T Communications FCC No. 28 effective January 6, 2012, and TCG FCC No. 2 effective January 6, 2012.

Per discussions with staff, this filing is being made under 170 IAC 1-6 *Thirty-Day Administrative Filing Procedures and Guidelines*, and is allowable per section 3(3) *Changes to rules and regulations of the utility*. The filing is intended to implement the FCC decision referenced above stating that VoIP-PSTN access traffic should be exchanged at interstate access rates (unless the parties have agreed otherwise). The language added to the tariff applies to VoIP-PSTN traffic exchanged between these three AT&T companies and their carrier customers in time division multiplexing (TDM) format that originates and/or terminates in Internet protocol (IP) format. These revisions do not apply to nor affect any AT&T retail customers.

In accordance with 170 IAC 1-6-6(b), a notice which meets these requirements has been published in the Indianapolis Star on April 18, 2012, its circulation covering the majority of affected AT&T customers. A copy of the notice is enclosed and may also be accessed at <http://www2.indystar.com/webcat/classified/adshow?category=Public+Notices&keyword=tcg>. Please see affidavit enclosed. AT&T is unable to address (6)(a)(1)(A) as it no longer has a public local customer service office in Indiana. However, the proposed pages, which are also enclosed for your convenience, may be found on the AT&T website per (6)(a)(1)(B) at 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 Indiana

IURC No. 20 Part 21 Sec. 1 2nd Revised Sheet 3
<http://cpr.att.com/pdf/it/filings/pend/IT-12-0001.pdf>

AT&T Communications of Indiana, GP

IURC No. T-3 Part 1 Sec. 2 1st Revised Page 1
Original Pages 1.1-1.6
<http://serviceguide.att.com/tariff/business/ext/files/IN-12-0002%20issue%204-23-12%20No%20eff%20date.pdf>

TCG Indianapolis

IURC No. 2 Sec. 2 Original Pages 26.1
<http://serviceguide.att.com/tariff/business/ext/files/IN-12-0501%20issue%204-23-12%20No%20eff%20date.pdf>

Please call me with any questions you may have.

Sincerely,

Candice Glover
Area Manager

Enclosures

Copy to: Indiana Office of Utility Consumer Counselor



PUBLIC NOTICE This notice applies to a tariff filing that describes VoIP-PSTN traffic exchanged between TCG Indianapolis, AT&T Communications of Indiana, GP, and Indiana Bell Telephone Company, Incorporated, (AT&T) and only their wholesale carrier customers who provide service in time division multiplexing format that originates and/or terminates in Internet protocol, or IP, format. VoIP-PSTN traffic originates and/or terminates in IP format if it originates from and/or terminates to a carrier's end-user customer that requires IP compatible customer premises equipment. The transitional Intercarrier Compensation framework for VoIP-PSTN traffic, adopted by the Federal Communications Commission in its Report and Order, Release No. 11-161 (Nov. 18, 2011) directed that this intrastate VoIP-PSTN traffic be billed employing interstate rates. AT&T's retail end user customers are not impacted by these filings. AT&T will file these tariff revisions on April 23, 2012 and these revisions will become effective upon the approval of the Indiana Utility Regulatory Commission (IURC), but will be no earlier than May 23, 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 - 4/18/12 - 5937770)

Indiana Bell
Telephone Company, Inc.

AT&T TARIFF

IURC NO. 20
Part 21 Section 1

PART 21 - Access Services
SECTION 1 - General

2nd Revised Sheet 3

Exception Statements

Preface

The following exception statements correspond to Indiana Bell's FCC #2 Check Sheet Access Tariff and identify FCC tariff pages where an exception exists for the purpose of clarifying those services offered in the Indiana Jurisdiction. Exceptions are given by section and describe those services or areas of the FCC No. 2 tariff that either do not apply to Indiana Jurisdiction or differ such that a statement explaining Indiana-specific regulations is required.

In some cases, entire FCC No. 2 pages will be replaced by an appropriate statement or page detailing the appropriate application of the service, administrative process, etc. in question to the Indiana Jurisdiction. Additionally, sections may include tariff exception pages applicable to Indiana Jurisdiction only.

When reference is made to a particular section's exceptions and a specific exception statement is not given, general exception statements of that section apply. General exception statements have been provided for the Preface and Sections 6 and 7 where the same exception applies throughout the section or tariff, in the case of the Preface.

General Tariff No. 2 Exceptions

1. Unless otherwise indicated read intra where inter is stated with the exception of Percent Interstate Use (PIU) where interstate should be read as interstate.
2. The terms International Boundary Point and Foreign Communications do not apply to Indiana Jurisdiction.
3. Service that is interstate only in nature does not apply to Indiana Jurisdiction. Service that applies specifically to any other Ameritech Operating Company, does not apply to Indiana Jurisdiction unless otherwise stated.
4. VoIP-PSTN Traffic

This section applies to VoIP-PSTN traffic exchanged between the Telephone Company and the customer in time division multiplexing ("TDM") format that originates and/or terminates in Internet protocol ("IP") format. VoIP-PSTN traffic originates and/or terminates in IP format if it originates from and/or terminates to an end-user customer of a service that requires Internet protocol-compatible customer premises equipment. The transitional Intercarrier Compensation framework for VoIP-PSTN traffic adopted by the Federal Communications Commission in its Report and Order, Release No. 11-161 (Nov. 18, 2011) ("FCC Order") directed that this intrastate VoIP-PSTN traffic be billed employing interstate rates.⁽¹⁾

The intrastate switched access rates in this tariff are the same as the interstate rates for Switched Access rate elements. Thus, no modifications to the rates and/or billing are necessary as a result of the VoIP-PSTN provisions of the FCC Order.

⁽¹⁾ Although the Telephone Company has taken the position that this tariff, by its own terms, already applies to VoIP-PSTN traffic, as defined herein, the Telephone Company has included this Section in the tariff out of an abundance of caution to prevent any claim that it does not so apply, and to implement the decision by the Federal Communications Commission in its Report and Order in WC Docket Nos. 10-90, etc., FCC Release No. 11-161 (Nov. 18, 2011) ("FCC Order") that VoIP-PSTN access traffic should be exchanged at interstate access rates (unless the parties have agreed otherwise). By its terms, the FCC Order is prospective only, and does not address preexisting law with regard to the applicability of intercarrier compensation or the enhanced service providers ("ESP") exemption to VoIP-PSTN Traffic. Including this section in the tariff in no way alters or otherwise affects the applicability of this tariff to VoIP-PSTN Traffic before the effective date of the FCC Order.

(N)

(N)