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MAY 28 2014  
INDIANA UTILITY  
REGULATORY COMMISSION

Via Overnight Delivery

May 27, 2014

Ms. Brandy Darlington  
c/o File Room  
Indiana Utility Regulatory Commission  
National City Center  
101 West Washington Street, Suite 1500 East  
Indianapolis, IN 46204

RE: 30-Day Filing Pursuant to 170 IAC 1-6 and Explanation of Compliance  
With FCC Requirements

Dear Ms. Darlington:

Attached for submission to the Indiana Utility Regulatory Commission ("Commission") are revised Sheet Nos. 1, 39, and 43 to TNCI Operating Company LLC's ("TNCI OpCo") Indiana switched access Tariff, Indiana U.R.C. Tariff No. 1 for incorporation into the Company's Tariff, effective July 1, 2014.

This submission is made pursuant to the Federal Communications Commission's ("FCC") *Report and Order and Further Notice of Proposed Rulemaking*, in Docket Nos. WC Docket No. 10-90, *et al.*, FCC 11-161,<sup>1</sup> *Second Order on Reconsideration* in Docket Nos. WC Docket No. 10-90, *et al.*, FCC 12-47,<sup>2</sup> Section 51.911 of the FCC's rules, 47 C.F.R. §51.911, and the Indiana Utility Regulatory Commission staff's May 15, 2014 guidance memorandum.

TNCI OpCo complies with the above cited orders and rule by reducing its terminating intrastate end office rate elements by a third of the difference between its current end office rate elements and \$0.0007 applicable to price cap incumbent local exchange carriers per Section 51.907 of the FCC's rules, 47 C.F.R. §51.907. TNCI OpCo also reduces its intrastate VoIP-PSTN traffic rates through adoption of the corresponding interstate terminating access rates contained in its Tariff F.C.C. No. 1 by reference.

<sup>1</sup> *Connect America Fund et al.*, WC Dkt. No. 10-90 *et al.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*), *pets. for review pending*, *Direct Comm'ns Cedar Valley, LLC v. FCC*, No. 11-9581 (10th Cir. filed Dec. 8, 2011) (and consolidated cases).

<sup>2</sup> *Id.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 12-47 (rel. April 25, 2014)

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Page 2

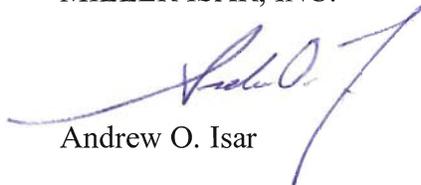
Further, citation to the Company's Tariff F.C.C. No. 1 is corrected in the Section governing Voice Over Internet Protocol – Public Switched Telephone Network (“VoIP – PSTN”) Traffic. The Company's Tariff F.C.C. No. 1 may be viewed at <https://apps.fcc.gov/etfs/public/lecTariffs.action?idLec=611>.

Please acknowledge receipt of this filing by file stamping and returning the additional copy of this transmittal letter in the self-addressed, postage prepaid envelope enclosed for this purpose.

Thank you for your attention to this matter. Questions and communications may be addressed to the undersigned at 253.851.6700, via email to [aiasr@millerisar.com](mailto:aiasr@millerisar.com), or to the above address.

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to  
TNCI Operating Company LLC

Enclosures

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TNCI Operating Company LLC

Indiana U.R.C. Tariff No. 1  
First Revised Sheet No. 1  
Canceling Original Sheet No. 1

**CHECK SHEET**

The sheets of this Tariff are effective as of the date shown. The Sheet revisions appearing below designate amendments from the original Tariff Sheet and are in effect on the date shown at the bottom of this Sheet. An asterisk appearing next to the revision indicates Sheets submitted with an amended filing.

<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>
Title	Original	30	Original				
1	First*	31	Original				
2	Original	32	Original				
3	Original	33	Original				
4	Original	34	Original				
5	Original	35	Original				
6	Original	36	Original				
7	Original	37	Original				
8	Original	38	Original				
9	Original	39	First*				
10	Original	40	Original				
11	Original	41	Original				
12	Original	42	Original				
13	Original	43	First*				
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15	Original						
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Issued By:

Jeff Compton  
President and Chief Executive Officer  
TNCI Operating Company LLC  
114 East Haley Street, Suite A  
Santa Barbara, CA 93101

**SERVICE DESCRIPTIONS, Continued**

**3.2 Voice Over Internet Protocol – Public Switched Telephone Network (“VoIP – PSTN”) Traffic**

- A. This section governs the identification and treatment of VoIP-PSTN Traffic that is required to be compensated at interstate access rates unless the parties have agreed otherwise in a written agreement. Specifically, this section establishes the method of separating such traffic (referred to in this tariff as “Relevant VOIP-PSTN Traffic”) from a Customer’s traditional intrastate access Tariff, so that such Relevant VOIP-PSTN traffic can be billed in accordance with the FCC Order.

Company will bill and collect the full Access Reciprocal Compensation on traffic exchanged with Customers when such traffic originates and/or terminates in Internet Protocol format, as set forth in Section 51.913 of the Federal Communications Commission’s rules, 47 C.F.R. § 51.913, regardless of whether the Company itself delivers such traffic to the called party’s premises or delivers the call to the called party’s premises via contractual or other arrangements with an affiliated or unaffiliated provider of interconnected Voice over Internet Protocol service or a non-interconnected Voice over Internet Protocol service that does not itself seek to collect Access Reciprocal Compensation charges for this traffic.<sup>3</sup>

Intrastate VoIP – PSTN traffic is subject to the Company’s applicable interstate switched access rate per minute, as set forth in the Company’s Tariff F.C.C. No. 1.

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<sup>3</sup> See, *In the Matter of 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 an Unified Intercarrier Compensation Regime Federal-State Joint Board on Universal Service Lifeline and Link-Up Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, Docket Nos. WC Docket No. 10-90, *et al.*, FCC 11-161, (Rel. November 18, 2011).

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Indiana U.R.C. Tariff No. 1  
First Revised Sheet No. 43  
Canceling Original Sheet No. 43

**RATES**

4.1 Access Service

4.1.1 Composite Switched Exchange Access

Originating, per access minute \$0.003539

Terminating, per access minute \*\*

Company adopts the corresponding terminating interstate switched exchange access rates contained in the Company's Tariff F.C.C. No. 1 for Indiana. (T)(R)  
(T)(R)

4.1.2 Toll Free Data Base Access Service

800 Call-Routing Query Charge - per query \$0.002304  
800 Carrier-ID-Only Charge - per query \$0.001108

Additional Functions  
800 Routing Options Charge - per query using options \$0.000199  
POTS Translation Charge - per query with POTS \$0.000000

4.2 Miscellaneous Services

4.2.1 Presubscription

A) Authorized PIC Change  
-Per Telephone Exchange Service  
Line or Trunk, manual only \$5.50

4.3 Individual Case Basis Arrangements

Individual Case Basis ("ICB") arrangements will be developed on a case-by-case basis in response to a bona fide Customer or prospective Customer request and based on specific Customer commitments, unless otherwise prohibited by law or regulation. ICB arrangement switched exchange access service rates will be available to any similarly situated Customer.

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