

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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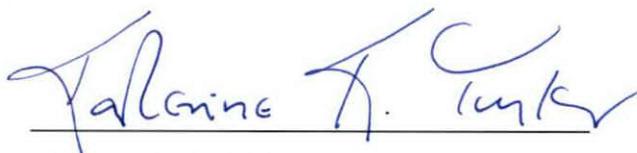
In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015-00283

Proof of Service re
Notice of Application for Declaratory Order

I hereby certify that on September 14, 2015, pursuant to the Commission's 8/26/15 Order directing CompSouth to serve a copy of its Application "on all ILECs, CLECs, and CMRS [*i.e.*, cellular] providers in Kentucky no later than September 14, 2015," a copy of the Application with a Notice (attached as Exhibit A hereto) was sent by first-class mail to each of the 20 ILECs, 187 CLECs, and 88 cellular providers at the address listed therefor on Exhibits B, C, and D hereto, respectively. The addressees are those listed in the Commission's database for active utilities of type 500, 505, and 410, respectively.



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

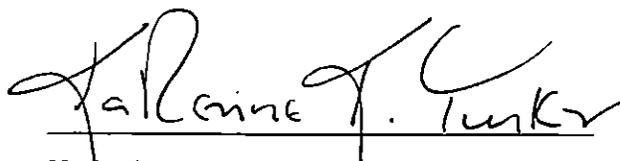
In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015-00283

Notice of Application for Declaratory Order

Please take notice that Competitive Carriers of the South, Inc. ("CompSouth") filed the attached Application for a declaratory order on August 14, 2015. You are being sent this Notice pursuant to the Commission's 8/26/15 Order directing CompSouth to serve a copy of its Application "on all ILECs, CLECs, and CMRS [*i.e.*, cellular] providers in Kentucky no later than September 14, 2015" and setting October deadlines for motions to intervene, responses to the Application, and replies to the responses. Please also be advised that CompSouth has filed a Motion requesting the use of electronic filing procedures for the case and a one-week extension of the October deadlines; as of the preparation of this Notice, the Commission has not ruled on that Motion. You should review the 8/26/15 Order and any more recent Order for directions and deadlines for further proceedings in this case.



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Exh.A — Notice w/ Application

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015- 00283

RECEIVED

AUG 14 2015

PUBLIC SERVICE
COMMISSION

Application of Competitive Carriers of the South, Inc.
for a Declaratory Order

Pursuant to 807 KAR 5:001, Section 19, Competitive Carriers of the South, Inc.

("CompSouth") respectfully requests that the Kentucky Public Service Commission ("KPSC") issue a declaratory order affirming that, regardless of underlying technology, transmission media, or protocol that may be used for the exchange of voice traffic between two carriers' networks,

(a) the interconnection regimes under 47 U.S.C. §§ 251-252 and KRS 278.530 apply and
(b) these statutes permit (among other things) a requesting carrier to file a petition with the KPSC requesting an Order prescribing the rates, terms, and conditions of proposed interconnection with an incumbent local exchange carrier. The requested declaration will formalize the advisory PSC Staff Opinion 2013-015 (dated 10/24/13) as a binding decision of the KPSC.

1. The members of CompSouth who will participate herein are: Birch Communications, Inc.; EarthLink Business, LLC ; Level 3 Communications, LLC, Windstream Communications, Inc.; XO Communications, LLC. Each of these participating CompSouth members offers to provide and does provide voice services to end-user customers in Kentucky and elsewhere which use Internet Protocol ("IP") format or which can be and are converted to IP format for purposes of transport.

2. CompSouth asks that Commission Orders and filings made or documents submitted by parties be served on:

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3. The participating CompSouth members will be substantially affected by the KPSC's decision in this declaration. For example, it is more efficient to simply exchange voice traffic that is in IP format than to covert such traffic to a more traditional format such as time division multiplexing ("TDM") solely for the purposes of handing off the traffic to another provider at an interconnection point. Without a declaration by the KPSC that the interconnection regimes of the above-cited statutes are technology neutral and that a carrier may file a petition for arbitration with the KPSC per said statutes, carriers are uncertain of their interconnection rights and obligations under the law as the Commonwealth of Kentucky and the nation undergo a transition from TDM to IP based voice services. That uncertainty, in turn, could have the effect of slowing the transition, as carriers will be faced with the choice of either a "take-it-or-leave-it," possibly discriminatory offer to interconnect in IP or continuing to interconnect in TDM with the added expense of converting their IP traffic to TDM solely for the purpose of interconnection, even though IP interconnection would be the more efficient, quality, and cost-effective method.

4. KRS Chapter 278 establishes two alternative procedures by which "any telephone company" may seek to compel interconnection with another "upon reasonable terms, rates and conditions." KRS 278.530(1). One procedure is by written application to the KPSC; if the KPSC orders the connection to be made, "it shall indicate the points where the connection is to

be made, the number of wires to be connected, the terms and conditions and the rates to be charged, and the division of the rates charged between the companies handling the messages.”

KRS 278.530(2). The alternative is to file an injunctive action in the Franklin Circuit Court.

KRS 278.530(3).

5. Title 47 U.S.C. § 251(a)(1) imposes on each telecommunications carrier the duty “to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers.” Section 251(c) imposes additional duties on incumbent local exchange carriers, including that interconnection be “on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252 of this title.” 47 U.S.C. § 251(c)(2)(D).

6. Among other things related to the duties imposed on incumbent local exchange carriers, 47 U.S.C. § 252 provides in subsection (b) for interconnection agreements to be arrived at through compulsory arbitration before a state commission such as the KPSC; and in subsection (d)(1) for a determination by a state commission “of the just and reasonable rate for the interconnection of facilities and equipment for purposes of subsection (c)(2) of section 251 of this title....” It also mandates: “Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission.” 47 U.S.C. § 252(e).

7. The statutory interconnection procedures, rights, and obligations of KRS 278.530 and 47 U.S.C. §§ 251 -25 are not limited to a particular technology, transmission media, or protocol. Furthermore, authoritative construction of the scope of state and federal regulatory regimes supports the common-sense proposition that these interconnection rules apply regardless of the technology used to provide voice service, as described briefly below.

8. The Chapter 278 definition of a telecommunications “utility” encompasses any “facility” used in the “transmission or conveyance over wire, in air, *or otherwise*, of any message by telephone or telegraph for the public, for compensation,” KRS 278.010(3)(e) (emphasis added). “Facility” is broadly defined to include “*all property, means, and instrumentalities ... used ... in connection with the business of any utility,*” KRS 278.010(11) (emphasis added). Similarly, the Chapter 279 statutory definition of “telephone company” refers to individuals or entities owning or operating “*any line, facility, or system used in the furnishing of telephone service within this state.*” KRS 279.310(12) (emphasis added). The Kentucky Court of Appeals noted that communications technology had changed since statutes regulating telephone companies had been enacted; however —

This fact does not mean that telephone companies become something else simply because they use improved communication techniques.

Central Ky. Cellular Tel. Co. v. Revenue Cabinet, 897 S.W.2d 601, 605 (Ky. App. 1995) (upholding treatment of wireless carrier as a “telephone company” under state tax statute).

9. The Federal Communications Commission (“FCC”) has described the text of 47 U.S.C. § 251 as “technology neutral” and found that carriers’ interconnection obligations thereunder are not limited to circuit-switched voice traffic. *Connect America Fund*, WC Dkt. No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶¶ 1342, 1381 (2011). “The duty to negotiate in good faith has been a longstanding element of interconnection requirements under the Communications Act and does not depend upon the network technology underlying the interconnection, whether TDM, IP, or otherwise.” *Id.* ¶ 1011.

10. In an advisory opinion, the KPSC staff generally concluded that “the interconnection regimes under KRS 278.530 and 47 U.S.C § 251 are technology neutral.” PSC Staff Opinion 2013-015, p.5. The KPSC staff further concluded:

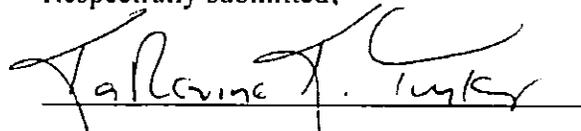
[T]he current interpretation of 47 U.S.C. § 251 allows a carrier to file a petition for arbitration under 47 U.S.C. § 252 and seek interconnection regardless of the underlying technology. Kentucky law does not prohibit this result, nor does the current state of the FCC or federal law. However, each petition for arbitration stands on its own, and each case is 'tied to factual circumstances or otherwise circumscribed in various ways' and does not guarantee interconnection with an IP network.

Id. p.5. CompSouth now asks that the KPSC address this subject and issue a binding declaratory order as requested.

WHEREFORE, Competitive Carriers of the South, Inc. respectfully requests a declaratory order affirming that regardless of underlying technology, transmission media, or protocol,

- (a) the interconnection regimes under 47 U.S.C. §§ 251-252 and KRS 278.530 apply, and
- (b) these statutes permit (among other things) a requesting carrier to file a petition with the KPSC requesting an Order prescribing the rates, terms, and conditions of proposed interconnection with an incumbent local exchange carrier.

Respectfully submitted,



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Exh.D — CMRS

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

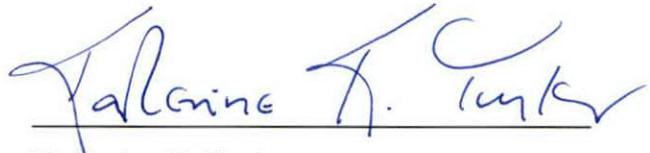
In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015-00283

Proof of Service re
Notice of Application for Declaratory Order

I hereby certify that on September 14, 2015, pursuant to the Commission's 8/26/15 Order directing CompSouth to serve a copy of its Application "on all ILECs, CLECs, and CMRS [*i.e.*, cellular] providers in Kentucky no later than September 14, 2015," a copy of the Application with a Notice (attached as Exhibit A hereto) was sent by first-class mail to each of the 20 ILECs, 187 CLECs, and 88 cellular providers at the address listed therefor on Exhibits B, C, and D hereto, respectively. The addressees are those listed in the Commission's database for active utilities of type 500, 505, and 410, respectively.



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

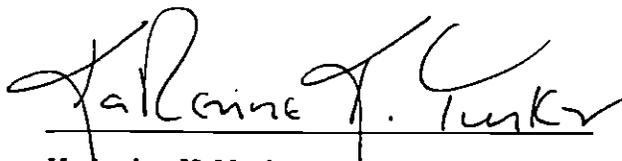
In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015-00283

Notice of Application for Declaratory Order

Please take notice that Competitive Carriers of the South, Inc. ("CompSouth") filed the attached Application for a declaratory order on August 14, 2015. You are being sent this Notice pursuant to the Commission's 8/26/15 Order directing CompSouth to serve a copy of its Application "on all ILECs, CLECs, and CMRS [*i.e.*, cellular] providers in Kentucky no later than September 14, 2015" and setting October deadlines for motions to intervene, responses to the Application, and replies to the responses. Please also be advised that CompSouth has filed a Motion requesting the use of electronic filing procedures for the case and a one-week extension of the October deadlines; as of the preparation of this Notice, the Commission has not ruled on that Motion. You should review the 8/26/15 Order and any more recent Order for directions and deadlines for further proceedings in this case.



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Exh.A — Notice w/ Application

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015- 00283

RECEIVED

AUG 14 2015

PUBLIC SERVICE
COMMISSION

Application of Competitive Carriers of the South, Inc.
for a Declaratory Order

Pursuant to 807 KAR 5:001, Section 19, Competitive Carriers of the South, Inc.

("CompSouth") respectfully requests that the Kentucky Public Service Commission ("KPSC") issue a declaratory order affirming that, regardless of underlying technology, transmission media, or protocol that may be used for the exchange of voice traffic between two carriers' networks,

(a) the interconnection regimes under 47 U.S.C. §§ 251-252 and KRS 278.530 apply and

(b) these statutes permit (among other things) a requesting carrier to file a petition with the KPSC requesting an Order prescribing the rates, terms, and conditions of proposed interconnection with an incumbent local exchange carrier. The requested declaration will formalize the advisory PSC Staff Opinion 2013-015 (dated 10/24/13) as a binding decision of the KPSC.

1. The members of CompSouth who will participate herein are: Birch Communications, Inc.; EarthLink Business, LLC ; Level 3 Communications, LLC, Windstream Communications, Inc.; XO Communications, LLC. Each of these participating CompSouth members offers to provide and does provide voice services to end-user customers in Kentucky and elsewhere which use Internet Protocol ("IP") format or which can be and are converted to IP format for purposes of transport.

2. CompSouth asks that Commission Orders and filings made or documents submitted by parties be served on:

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3. The participating CompSouth members will be substantially affected by the KPSC's decision in this declaration. For example, it is more efficient to simply exchange voice traffic that is in IP format than to covert such traffic to a more traditional format such as time division multiplexing ("TDM") solely for the purposes of handing off the traffic to another provider at an interconnection point. Without a declaration by the KPSC that the interconnection regimes of the above-cited statutes are technology neutral and that a carrier may file a petition for arbitration with the KPSC per said statutes, carriers are uncertain of their interconnection rights and obligations under the law as the Commonwealth of Kentucky and the nation undergo a transition from TDM to IP based voice services. That uncertainty, in turn, could have the effect of slowing the transition, as carriers will be faced with the choice of either a "take-it-or-leave-it," possibly discriminatory offer to interconnect in IP or continuing to interconnect in TDM with the added expense of converting their IP traffic to TDM solely for the purpose of interconnection, even though IP interconnection would be the more efficient, quality, and cost-effective method.

4. KRS Chapter 278 establishes two alternative procedures by which "any telephone company" may seek to compel interconnection with another "upon reasonable terms, rates and conditions." KRS 278.530(1). One procedure is by written application to the KPSC; if the KPSC orders the connection to be made, "it shall indicate the points where the connection is to

be made, the number of wires to be connected, the terms and conditions and the rates to be charged, and the division of the rates charged between the companies handling the messages.” KRS 278.530(2). The alternative is to file an injunctive action in the Franklin Circuit Court. KRS 278.530(3).

5. Title 47 U.S.C. § 251(a)(1) imposes on each telecommunications carrier the duty “to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers.” Section 251(c) imposes additional duties on incumbent local exchange carriers, including that interconnection be “on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252 of this title.” 47 U.S.C. § 251(c)(2)(D).

6. Among other things related to the duties imposed on incumbent local exchange carriers, 47 U.S.C. § 252 provides in subsection (b) for interconnection agreements to be arrived at through compulsory arbitration before a state commission such as the KPSC; and in subsection (d)(1) for a determination by a state commission “of the just and reasonable rate for the interconnection of facilities and equipment for purposes of subsection (c)(2) of section 251 of this title....” It also mandates: “Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission.” 47 U.S.C. § 252(e).

7. The statutory interconnection procedures, rights, and obligations of KRS 278.530 and 47 U.S.C. §§ 251 -25 are not limited to a particular technology, transmission media, or protocol. Furthermore, authoritative construction of the scope of state and federal regulatory regimes supports the common-sense proposition that these interconnection rules apply regardless of the technology used to provide voice service, as described briefly below.

8. The Chapter 278 definition of a telecommunications “utility” encompasses any “facility” used in the “transmission or conveyance over wire, in air, *or otherwise*, of any message by telephone or telegraph for the public, for compensation,” KRS 278.010(3)(e) (emphasis added). “Facility” is broadly defined to include “*all property, means, and instrumentalities ... used ... in connection with the business of any utility,*” KRS 278.010(11) (emphasis added). Similarly, the Chapter 279 statutory definition of “telephone company” refers to individuals or entities owning or operating “*any line, facility, or system used in the furnishing of telephone service within this state.*” KRS 279.310(12) (emphasis added). The Kentucky Court of Appeals noted that communications technology had changed since statutes regulating telephone companies had been enacted; however —

This fact does not mean that telephone companies become something else simply because they use improved communication techniques.

Central Ky. Cellular Tel. Co. v. Revenue Cabinet, 897 S.W.2d 601, 605 (Ky. App. 1995) (upholding treatment of wireless carrier as a “telephone company” under state tax statute).

9. The Federal Communications Commission (“FCC”) has described the text of 47 U.S.C. § 251 as “technology neutral” and found that carriers’ interconnection obligations thereunder are not limited to circuit-switched voice traffic. *Connect America Fund*, WC Dkt. No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶¶ 1342, 1381 (2011). “The duty to negotiate in good faith has been a longstanding element of interconnection requirements under the Communications Act and does not depend upon the network technology underlying the interconnection, whether TDM, IP, or otherwise.” *Id.* ¶ 1011.

10. In an advisory opinion, the KPSC staff generally concluded that “the interconnection regimes under KRS 278.530 and 47 U.S.C § 251 are technology neutral.” PSC Staff Opinion 2013-015, p.5. The KPSC staff further concluded:

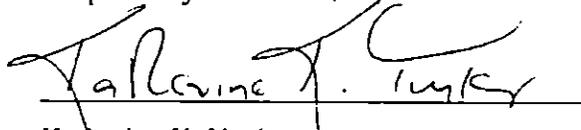
[T]he current interpretation of 47 U.S.C. § 251 allows a carrier to file a petition for arbitration under 47 U.S.C. § 252 and seek interconnection regardless of the underlying technology. Kentucky law does not prohibit this result, nor does the current state of the FCC or federal law. However, each petition for arbitration stands on its own, and each case is 'tied to factual circumstances or otherwise circumscribed in various ways' and does not guarantee interconnection with an IP network.

Id. p.5. CompSouth now asks that the KPSC address this subject and issue a binding declaratory order as requested.

WHEREFORE, Competitive Carriers of the South, Inc. respectfully requests a declaratory order affirming that regardless of underlying technology, transmission media, or protocol,

- (a) the interconnection regimes under 47 U.S.C. §§ 251-252 and KRS 278.530 apply, and
- (b) these statutes permit (among other things) a requesting carrier to file a petition with the KPSC requesting an Order prescribing the rates, terms, and conditions of proposed interconnection with an incumbent local exchange carrier.

Respectfully submitted,



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