



9260 E. Stockton Blvd.  
Elk Grove, CA 95624

September 14, 2012

**Via UPS**

Donna Skau  
Commission Secretary  
Public Utilities Commission of Nevada  
Capital Plaza  
1150 E. William Street  
Carson City, Nevada 89701-3109

**Re: Petition for Approval of the Amendment to Interconnection Agreement**

Dear Ms. Skau:

Enclosed please find the Petition for Approval of the Amendment to Interconnection Agreement by and between Trans National Communications International, Inc. and Frontier Communications of the Southwest Inc. Also enclosed is a check in the amount of \$200.00 to cover the filing fee for this petition.

An additional copy of this letter is also enclosed. Please date stamp this copy received and return it in the self-addressed stamped envelope.

If you have any questions or need additional information please contact me at (916) 686-3570 or via email at [Charlie.Born@ftr.com](mailto:Charlie.Born@ftr.com).

Sincerely,

A handwritten signature in cursive script that reads "Charlie Born /pap".

Charlie Born  
Manager, Government and External Affairs

Enclosures

cc: Brian Twomey, Trans National  
Kevin Saville, Frontier (via eMail)  
Jenny Smith, Frontier  
Service List (via eMail)

**PUBLIC UTILITIES COMMISSION OF NEVADA**  
**DRAFT NOTICE (Applications, Tariff Filings,**  
**Complaints, and Petitions)**

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

- I. A title that generally describes the relief requested (see NAC 703.160(4)(a)):

Petition for Approval, pursuant to Section 252 of the Telecommunications Act of 1996, of an Amendment to Interconnection Agreement and in compliance with the recent FCC Order.

- II. The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Frontier Communications of the Southwest Inc.

- III. A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

The purpose of this filing is to receive approval from the Commission for Amendment No. 2 to the Interconnection Agreement between Trans National Communications International, Inc. (Customer) and Frontier Communications of the Southwest Inc. ("Frontier"), formerly known as Verizon California Inc. d/b/a Verizon Nevada ("Verizon"). The Agreement does not discriminate against any telecommunications' carrier not a party to the Agreement, and will, if implemented, be consistent with the public interest, convenience, and necessity.

- IV. A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1) <sup>1</sup>:

In accordance with Nevada Revised Statute 704.069(1) this petition does not require a consumer session.

- V. If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

Not applicable, this is a carrier agreement filing.

<sup>1</sup> NRS 704.069 states in pertinent part:

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:
  - (a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and
  - (b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

In the Matter of the Petition of Frontier  
Communications of the Southwest Inc.  
for approval of the Amendment to  
Interconnection Agreement Pursuant to  
Section 252 of the Telecommunications  
Act of 1996

**NOTICE OF AVAILABILITY**

In accordance with NAC 703-290 of the Public Utilities Commission of Nevada (Commission) Utility Regulations, General Provisions, Frontier Communications of the Southwest Inc. (Frontier) submits this Notice of Availability of the Amendment to Interconnection Agreement filed on September 14, 2012.

The Internet address at which the contents of this filing may be inspected and/or printed is:

<http://frontier.com/Wholesale/ContentPages.aspx?p=14>

Requests for copies of this agreement may also be made through Pam Pittenger at:

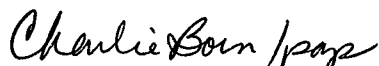
9260 E. Stockton Blvd.  
Elk Grove, CA 95624  
Telephone: (888) 340-9545  
Pam.Pittenger@ftr.com

All other inquiries should be made to:

Jenny Smith  
Interconnection Manager  
9260 E. Stockton Blvd.  
Elk Grove, CA 95624  
Telephone: (916) 686-3533

Dated: September 14, 2012

Very truly yours,



Charlie Born  
Manager – Government & External Affairs

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

In the Matter of the Petition of Frontier Communications of the Southwest Inc. for approval of the Amendment to Interconnection Agreement Pursuant to Section 252 of the Telecommunications Act of 1996

Docket No. \_\_\_\_ - \_\_\_\_\_

**PETITION FOR APPROVAL OF THE AMENDMENT TO INTERCONNECTION AGREEMENT PURSUANT TO SECTION 252 OF THE TELECOMMUNICATIONS ACT OF 1996**

Trans National Communications International, Inc. (Customer) and Frontier Communications of the Southwest Inc. ("Frontier"), formerly known as Verizon California Inc. d/b/a Verizon Nevada ("Verizon"),<sup>1</sup> collectively the "Parties", apply to this Commission for approval of the attached Request for Amendment to Interconnection Agreements with Frontier Communications Corporation, including its subsidiaries and affiliates in the state of Nevada for all non-CMRS traffic attached hereto as Amendment ("Amendment"). This Amendment is Amendment No. 2 and is intended to bring the parties' Interconnection Agreement in line with the "bill and keep" phase-down provisions and other changes in law effectuated by the Federal Communications Commissions' USF/ICC Transformation Order (FCC 11-161).<sup>2</sup> The initial Agreement was entered into by the Parties in accordance with Section 251 of the Telecommunications Act of 1996 ("TA 1996") and was filed in accordance with Docket No. 05-07038 with the Commission on July 26, 2005; Amendment No. 1 was filed on July 26, 2005 in Docket No. 05-07039.

Frontier now submits the Amendment and requests that the Commission approve it in accordance with the terms of Section 252(e) of The Telecommunications Act of 1996 (TA 1996). Frontier requests that the Commission approve the Amendment in accordance with the requirements of Section 252(e) of TA 1996, by determining that the grounds for rejection of such Amendment, set forth in Section 252(e)(2)(A)(i) and Section 252(e)(2)(A)(ii), are not applicable to the Amendment. The Amendment does not discriminate against any telecommunications carrier not a party to the Amendment, and will, if implemented, be consistent with the public interest, convenience, and necessity. The Amendment does not violate any requirement of the Commission, including but not limited to quality of service standards adopted by the Commission. Frontier therefore requests that the Commission expeditiously approve the Amendment, consistent with the intent of TA 1996.

Please forward any questions or notices regarding this filing to Charlie Born at (916) 686-3570, at [Charlie.Born@ftr.com](mailto:Charlie.Born@ftr.com) or at the following address:

9260 E. Stockton Blvd., Elk Grove, CA 95624

Dated this 14th day of September 2012

Very truly yours,



Charlie Born  
Manager – Government & External Affairs

<sup>1</sup> Frontier's acquisition of the Verizon property was approved in Docket No. 09-06005 on November 16, 2009.  
<sup>2</sup> *In the Matter of Connect America Fund*, WC Docket No. 10-90, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011).



May 9, 2012

Sent Via First Class Mail

Trans National Communications International, Inc.  
Brian Twomey President  
2 Charlesgate West  
Boston, MA 02215

Re: Request for Amendment to Interconnection Agreements with Frontier Communications Corporation, including its subsidiaries and affiliates in the states of AL, ~~AZ~~ CA, FL, GA, IA, ID, IL, IN, MI, MN, MS, NC, NE, NV, NY, NM, OH, OR, PA, SC, TN, UT, WA, WI, WV for all non-CMRS traffic.

Dear Carrier:

On November 18, 2011, the Federal Communications Commission ("FCC") released an order that makes sweeping changes to the laws governing universal service and intercarrier compensation on December 23, 2011, the FCC released the USF/ICC Transformation Order on Reconsideration (*USF/ICC Transformation Order FCC 11-161*), in which it determined that the default intercarrier compensation methodology for all non-access telecommunications traffic exchanged between carriers and competitive Local Exchange Carriers will transition to bill and keep over the next six years beginning July 1, 2012 and the FCC urged all parties with interconnection agreements to immediately begin preparations for the July 1 effective date, including commencing discussions regarding change of law provisions, if applicable.

To this end, pursuant to the applicable provisions of the interconnection, traffic exchange, transport and termination agreements with Frontier Communications Corporation, including its subsidiaries and affiliates ("Frontier"), in the above captioned states, the ICC Transformation Orders, FCC rules, and all the applicable provisions of the Communications Act of 1934, as amended, Frontier hereby requests your agreement by signature in the space provided below incorporating paragraph one, as the next amendment in sequence to your underlying interconnection agreement, reflecting implementation of the FCC's Intercarrier Compensation Reform Timeline, with an effective date of July 1, 2012.

**NOW, THEREFORE**, in consideration of the mutual promises contained herein, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows

1. **Reciprocal Compensation.** Reciprocal compensation rates in this Agreement will be phased down as provided in the *USF/ICC Transformation Order FCC 11-161 (rel. November 18, 2011)* as such order may be revised, reconsidered, modified or changed in the future. When any such revisions, reconsiderations, modifications or changes are effective, such action shall be automatically incorporated into the Agreement. For clarity, Reciprocal compensation rates are capped effective immediately and subject to reductions pursuant to the FCC's Reform Timeline

as outlined in paragraph 801 of FCC 11-161, or as such Reform Timeline may be revised, reconsidered, modified or changed in the future.

Please return this letter to the following address below within 14 business days of receipt to ensure a timely filing by Frontier on or before the effective date.

Frontier Communications  
Attn: Director, Business Operations – Carrier Services  
FCC ICC Amendment  
180 S. Clinton Avenue  
Rochester, NY 14646

Or email signature page via pdf to (all states except NV):

Roderick.cameron@ftr.com

Subject line – CLEC FCC ICC Amendment – Executed by “insert Company name”

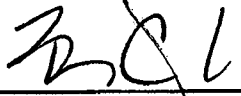
Sincerely,



Stephen LeVan  
SVP, Carrier Sales and Services

**IN WITNESS WHEREOF**, Carrier’s signature below is confirmation and agreement to the terms above as of the Amendment Effective Date.

Trans National Communications International, Inc.

By: 

Printed: Brian C Twomey

Title: President + CEO

Date: 5/14/2012

CERTIFICATE OF SERVICE  
252 Telecommunications Service List  
Docket No. \_\_\_ - \_\_\_\_\_

**I hereby certify that I have this day served the foregoing documents upon all parties of record in this proceeding by delivering a copy thereof to:**

Via UPS:

Public Utilities Commission of Nevada  
Donna Skau, Secretary  
1150 E. William Street  
Carson City, NV 89701

**I hereby certify that I have this day served the foregoing documents upon other parties to negotiations by mailing via U.S. Mail with postage pre-paid to:**

Trans National Communications International, Inc.  
Brian Twomey, President  
2 Charlesgate West  
Boston, MA 02215

**I hereby certify that I have this day served Document Available Notice by electronic transmission to an acceptable location to the list established pursuant to NAC 703.296:**

Torry Somers & Linda Stinar  
CenturyLink  
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bcpserv@ag.nv.gov

Staff Counsel  
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greatsam@usfds.com

**I hereby certify the foregoing documents are available for inspection at website Internet address:**

<http://frontier.com/Wholesale/ContentPages.aspx?p=14>

**The foregoing documents are available in electronic or paper format by sending a request to:**

Ms. Pam Pittenger  
Frontier Communications  
9260 E. Stockton Blvd.  
Elk Grove, CA 95624  
(916) 686-3567  
Pam.Pittenger@ftr.com

Dated at Elk Grove, CA this 14th day of September 2012.



Pam Pittenger  
Analyst – Government & External Affairs