

TC Systems, Inc.
P.S.C. No. 7 -- Telephone
Access Services
Effective Date: March 28, 2016

Section 9
Leaf No. 13
Revision: 2
Superseding Revision: 1

9. AT&T DEDICATED ETHERNET

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9.5 General Provisions (continued)

9.5.2 Access Arbitrage

Using any service provided by the Company in connection with Access Arbitrage is considered an abuse and is prohibited. Access Arbitrage is a scheme or device to profit by exploiting differences between the cost of originating or terminating access (as charged to interexchange or international carriers) and the pricing of long distance service provided by a Company affiliate. Access Arbitrage includes:

- using switching equipment or a call processing system (such as a prepaid card, calling card, or teleconferencing platform) to segregate calls and systematically route to the Company calls that are characterized by a greater discrepancy between the access costs and the price charged by a Company affiliate long distance provider.
- using a Company affiliate long distance telephone service (such as AT&T SDN OneNet Service, Virtual Telecommunications Network Service or AT&T BVoIP Service) as a substitute for, or to avoid, originating or terminating switched exchange access obtained from local exchange providers, for the origination or termination of domestic calls originated over the network of another carrier (through 1+ access, special access, carrier access code dial around, or otherwise);
- Routing calls through a call processing system such that the percentage of High Cost minutes routed to the Company using the service is more than 11.1%;
- Segregating calls within another carrier's network or a call processing system to systematically route calls to the Company where the access costs exceed the price of long distance service provided by a Company affiliate.
- Transporting intrastate or intra-country traffic into a different state or country in order to cause the traffic to be rated by the Company at a lower rate than would otherwise apply.

Issued by: Linda Guay, Director