

Law Office of  
Richard A. Finnigan  
2112 Black Lake Blvd. SW  
Olympia, Washington 98512  
Fax (360) 587-3852

Richard A. Finnigan  
(360) 956-7001  
rickfinn@localaccess.com

Candace Shofstall  
Legal Assistant  
(360) 753-7012  
candaces@localaccess.com

---

May 24, 2013

**VIA E-FILING**

Mr. Steven V. King, Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: YCOM Networks, Inc. - Section X - First Revision of Sheet No. 3 Canceling Original Sheet No. 3; First Revision of Sheet No. 4 Canceling Original Sheet No. 4; First Revision of Sheet No. 4.2 Canceling Original Sheet No. 4.2; First Revision of Sheet No. 4.3 Canceling Original Sheet No. 4.3; First Revision of Sheet No. 4.3.1 Canceling Original Sheet No. 4.3.1

Dear Mr. King:

Attached you will find the above-referenced Tariff Sheets. The purpose of this filing is to clarify that the company-specific terminating access rates for Switched Access Service no longer apply. Instead, the WECA Tariff WN U-2 adoption by reference of the NECA Tariff F.C.C. No. 4 and NECA Tariff F.C.C. No. 5 means that the applicable rates, terms and conditions of those tariffs will control.

The result of these changes is that the company is adopting the rate structure and rates for terminating Switched Access Service that exist in the interstate jurisdiction for intrastate purposes. In addition, the company is adopting the Direct Trunked Transport rate structure and rates that exist on the interstate jurisdiction for intrastate purposes.

The methodology used by the company to implement the restructuring of the terminating per minute transport rates pursuant to the FCC order, requires consideration be given to the originating per minute transport billing. The company projects, based on interstate traffic patterns, that the current demand for originating and terminating access traffic will change. The company expects many of the per minute usage will be converted to flat rated direct trunks. As a result, the company is proposing implementation of the interstate originating and terminating per

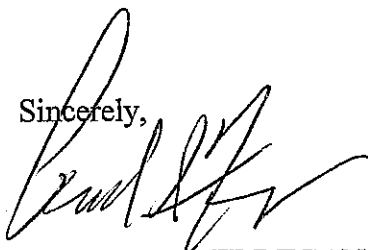
Steven V. King  
May 24, 2013  
Page 2 of 2

minute transport and direct trunking rates and rate structure. Converting the originating transport traffic to the interstate rate structure and rates also simplifies billing. The company is also proposing to implement an Interconnection Charge on originating traffic to cover the revenue shortage created through this restructure. Attached are workpapers to support this revenue neutral restructuring of intrastate access. The Interconnection Charge can be found on Sheet No. 4.2.

This filing is intended to meet the Federal Communications Commission's requirements in its Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011)(*USF/ICC Transformation Order*) and as contained in 47 C.F.R. § 51.909.

Mr. Morse has authority to sign tariff sheets for YCOM Networks, Inc. The undersigned has authority to file said sheets on behalf of YCOM Networks, Inc.

Thank you for your attention to this matter.

Sincerely,  
  
RICHARD A. FINNIGAN

RAF/cs  
Enclosures

cc: Patrick Morse (via e-mail)  
Barbara Galardo (via e-mail)  
Carole Williamson (via e-mail)  
Jana Manterola (via e-mail)