

Citizens Telecommunications Companies  
Tariff F.C.C. No. 1  
Description and Justification  
Transmittal No. 180  
June 25, 2008

1. Introduction

Citizens Telecommunications Companies ("Citizens") submits herewith its Description and Justification ("D&J") in support changes to its Tariff F.C.C. No. 1 filed under Transmittal No. 180. This filing is made on behalf of the exchange carriers issuing Citizens Tariff F.C.C. No. 1. In this tariff, five separate rate schedules are maintained. These rate schedules are referred to as Rate Group 1 through Rate Group 5, and correspond to the COSA codes CTC1 through CTC5. In this filing, Citizens revises title pages to include Global Valley Networks, Inc. as an issuing carrier; implements a price cap rate restructure of the expedited order charge rate element; and makes minor administrative changes to tariff material.

2. Title Pages

On June 16, 2008, Citizens submitted its Annual Interstate Access Tariff Filing under Transmittal No. 179. Among other actions, this introduced Global Valley Networks, Inc. ("GVN") as Rate Group 5.

Through administrative oversight, Transmittal No. 179 failed to include GVN as an issuing carrier. In this filing, Citizens corrects that oversight and makes minor clarifications to other material on the title pages.

### 3. Rate Group 5 DS1 EUCL

Citizens relied on waivers granted in the Commission's *Order* in WC Docket No. 08-18 released May 6, 2008, DA 01-1026 ("*Price Cap Waiver Order*") to introduce GVN as Rate Group 5 and set its rates under Transmittal No. 179. Since Transmittal No. 179 was filed, the Commission's Staff has clarified that the waivers granted by the Price Cap Waiver Order contemplate that GVN will continue to bill the current NECA rate structure for EUCL and port charges on DS1 services. In this filing, Citizens adds language to its Rate Group 5 EUCL and port rates to implement this clarification.

### 4. Price Cap Restructuring

Citizens' current tariff language calls for an Expedited Order Charge

to be computed based on the nonrecurring charges associated with the order being expedited. This rate structure has proven administratively clumsy and difficult for customers to understand. In this filing, Citizens seeks to replace this structure with a flat fee per order per day expedited. In order to implement the restructure, Citizens modifies its price cap models to include the restructured rate element and runs the appropriate price cap calculations to make rates.

End User Common Line (EUCL), Presubscribed Interexchange Carrier Charge (PICC), and Carrier Common Line (CCL) rates are developed in accordance with the Commission's rules applicable to price cap carriers. Because the restructure does not affect the CMT basket, no changes to these rate elements is needed. No changes are proposed to the rate elements comprising the Average Traffic Sensitive rate. All other rates subject to price cap regulation are set to achieve a below-cap, within-band filing, with only the restructured rates changing. Citizens supplies exhibits detailing the

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various price cap rate calculations, including exhibits detailing price cap revenues at a rate element level. Tariff Review Plans ("TRPs") in the format prescribed by the Commission are included to demonstrate compliance with the relevant price cap rules.