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**This material is being filed on 15 days' notice under Section 204(a)(3) of the Communications Act.**

December 16, 2011

Transmittal No. 161

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The accompanying tariff material issued by John Staurulakis, Inc. (JSI), and bearing Tariff F.C.C. No. 1, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended.

The F.C.C. Registration Number (FRN) for JSI is 0003-7481-42. The FRNs for the issuing carriers for JSI Tariff F.C.C. No. 1 are provided at Exhibit 1 to this transmittal letter.

The filing, to become effective January 1, 2012, consists of tariff pages as indicated on the following checksheet:

Tariff F.C.C. No. 1

155th Revised Page 0-1

On behalf of Tri County Telephone Association, Inc., ("Tri County") JSI proposes to add Tri County as an Issuing Carrier of JSI Tariff FCC No. 1, effective January 1, 2012, concurrent with the cancellation of Tri County Interstate Access Tariff FCC No. 1, also effective January 1, 2012. This filing to add Tri County as an Issuing Carrier to JSI Tariff FCC No. 1 does not change any of Tri County's existing interstate access rates. All rates charged by Tri County under JSI Tariff FCC No. 1 effective January 1, 2012 will be the same rates as those rates currently charged under Tri County Tariff FCC No. 1. Additionally, all services currently offered under Tri County Tariff FCC No. 1 will be offered by Tri County under JSI Tariff FCC No. 1. Lastly, no new services with respect to those offered by Tri County will be introduced in this filing. Tri County files under

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9430 Research Boulevard, Austin, Texas 78759  
Phone: 512-338-0473  
Fax: 512-346-0822*

*Egandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
Eagan, Minnesota 55121  
Phone: 651-452-2660  
Fax: 651-452-1909*

*547 South Oakview Lane  
Bountiful, UT 84010  
Phone: 801-294-4576  
Fax: 801-294-5124*

*6849 Peachtree Dunwoody Road  
Building B-3, Suite 200  
Atlanta, Georgia 30328  
Phone: 770-569-2105  
Fax: 770-410-1608*

Section 61.39 of the Commission's Rules. A Description and Justification is provided with tariff comparisons as Exhibits 1 and 2.

Pursuant to Section 61.87(a), JSI is including with this Transmittal the revised Title Page for Tri County Tariff FCC No. 1 with the required indication that the tariff is no longer effective.

Revisions are also being proposed on behalf of the TDS Telecom Companies, Inc. (TDS Telecom) in order to reflect the addition of four new Public Packet Data Network Ethernet Transport Service (ETS) speeds in JSI Tariff F.C.C. No. 1. JSI is also proposing to add a new ETS Fixed Rate Option Plan to mirror the ETS Fixed Rate Option Plan found in the National Exchange Carrier Association ("NECA") Tariff F.C.C. No. 5. Lastly, Term Discount and Volume Discount Plans have been added to TDS Telecom's ETS service offering. A Description and Justification addressing the new ETS speeds as well as the Fixed Rate Option Plan, Term Discount Plan and Volume Discount Plan is being provided with this filing. Pursuant to Section 61.38 of the Commission's Rules, supporting cost information and rate design information related to these services is also attached to this filing as Exhibits 1 and 2 of the Description and Justification.

Additionally, JSI is adding regulations necessary to add Glide Path Language for Replacement Services on Discount Plans to Section 7 of the JSI Tariff FCC No. 1 as well as other minor tariff revisions on behalf of TDS Telecom.

For Knology of the Valley, Inc. (Knology), this filing proposes revision of the Federal Universal Service Charge (FUSC) factor reflective of an increase in the Universal Service Contribution Factor from 15.3% to 17.9% for the first quarter of 2012. See Proposed First Quarter 2012 Universal Service Contribution Factor, CC Docket No. 96-45, Public Notice, DA 11-2020 (released December 14, 2011). Knology is not a member of the National Exchange Carrier Association (NECA) Common Line Pool and therefore bills common line charges and related FUSC charges pursuant to JSI Tariff FCC No. 1. All remaining issuing carriers for JSI Tariff FCC No. 1 are members of and participate in the NECA Common Line Pool and reference NECA Tariff FCC No. 5 with respect to FUSC rates.

As the final item, this filing encompasses a variety of "housekeeping" revisions that JSI is making in order to add regulations to Section 5, Access Ordering, maintain current Issuing Carrier tables in Section 7, Special Access Service, and Section 16, Public Packet Data Network, as well as minor text corrections to Section 16 regulations and Section 17 rate pages. For your convenience, attached to this transmittal letter you will also find Exhibit 2 which is a summary of the "housekeeping" tariff revisions that JSI is proposing at this time.

Pursuant to Section 61.32(b) of the Commission's Rules, the original of this letter, Form 159, and a check for \$845.00 have been sent via overnight delivery to the U.S. Bank, St. Louis, Missouri, as of this date.

Any questions regarding the filing may be directed to me at the address and telephone number listed above, or by email at [kcartmell@jsitel.com](mailto:kcartmell@jsitel.com). Additionally, questions may be directed to Ms. Marty Klueh, Senior Consultant-Regulatory Affairs, at the address and telephone number listed above, or by email at [mklueh@jsitel.com](mailto:mklueh@jsitel.com). Thank you for your assistance with this matter.

Sincerely,

*/s/ Kenneth T. Cartmell*

Kenneth T. Cartmell  
Manager-Regulatory Affairs

KTC/tms  
Enclosures

cc: Issuing Carriers

JSI Interstate Access Tariff F.C.C. No. 1  
Transmittal No. 161 – Exhibit 1  
F.C.C. Registration Numbers (FRNs)  
December 16, 2011

John Staurulakis, Inc. FRN 0003-7481-42

<u>JSI Issuing Carrier</u>	<u>FRN</u>
Atlantic Telephone Membership Corporation	0004-0615-86
Bluffton Telephone Company, Inc.	0005-0581-51
Camden Telephone. & Telegraph. Company Inc. d/b/a TDS Telecom	0001-8558-81
Chesnee Telephone Company	0001-8877-28
Chester Telephone Company d/b/a TruVista Communications	0003-7077-75
Citizens Telephone Company d/b/a Comporium Communications	0001-9614-16
Farmers Telephone Cooperative, Inc.	0001-8870-25
Fort Mill Telephone Company d/b/a Comporium Communications	0001-8896-17
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	0001-7919-95
Hargray Telephone Company, Inc.	0001-8867-04
Home Telephone ILEC, LLC d/b/a Home Telecom	0020-9801-16
Horry Telephone Cooperative, Inc.	0001-8869-44
Knology of the Valley, Inc.	0003-7335-81
Lancaster Telephone Company d/b/a Comporium Communications	0001-8892-45
Lockhart Telephone Company d/b/a TruVista Communications	0003-7078-74
Millington Telephone Company, Inc.	0004-3095-48
Mt. Horeb Telephone Company	0002-7190-45
Mt. Vernon Telephone Company d/b/a TDS Telecom	0003-7673-32
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom	0003-7672-74
Rock Hill Telephone Company d/b/a Comporium Communications	0001-8887-18
Ridgeway Telephone Company d/b/a TruVista Communications	0003-7077-91
Skyline Telephone Membership Corporation	0001-9525-55
Smart City Telecommunications LLC d/b/a Smart City Telecom	0005-0260-75
South Central Rural Telephone Cooperative	0001-7926-96
Tennessee Telephone Company d/b/a TDS Telecom	0001-7737-79
Yadkin Valley Telephone Membership Corporation	0004-3412-85
Tri County Telephone Association, Inc.	0003-7444-63

**JSI Interstate Access Tariff F.C.C. No. 1**  
**Transmittal No. 161 – Exhibit 2**  
**Summary of Proposed Revisions**  
**December 16, 2011**

<p>4th Revised Title Page 4 Original Page 0-24.28</p>	<p>Add new issuing carrier, Tri County Telephone Association, Inc.</p>
<p><b>Section 5 Access Ordering</b></p>	<p>Establish regulations for Special Access ordering requirements for Rate Plan Replacements</p>
<p><b>Section 7 Special Access Service</b></p> <p>3rd Revised Page 7-3.2 1st Revised Page 7-3.3.1 7th Revised Page 7-3.4 1st Revised Page 7-3.4.1 1st Revised page 7-3.5.1 8th Revised Page 7-3.6 1st Revised Page 7-3.6.1</p> <p>1st Revised Page 7-12</p> <p>3rd Revised Page 7-21 1st Revised page 7-27.2 2nd Revised Page 7-28 Original Page 7-30.1 Original Page 7-30.2 Original Page 7-30.3 Original Page 7-30.4 1st Revised Page 7-31 4th Revised Page 7-34.1 4th Revised Page 7-34.2</p> <p>3rd Revised Page 7-34.3 1st Revised Page 7-34.3.1 Original Page 7-34.3.2 Original Page 7-34.3.3 Original Page 7-34.3.4 4th Revised page 7-34.4</p> <p>1st Revised page 7-34.10 1st Revised Page 7-34.11</p>	<p><u>Issuing Carrier Tables:</u></p> <p>Add new issuing carrier, Tri County Telephone Association, Inc., and reflect TDS Telecom Companies' provision of Special Access Optional Rate Plan Replacements</p> <p>Establish regulations to clarify the provision of Special Access Services are subject to availability and limitations of existing facilities.</p> <p>Regulations to establish Special Access Optional Rate Plan Replacements</p> <p>References to DS1/DS3 corrected to OC3/OC12</p> <p>Establish Regulations for SOCS Optional Rate Plan Replacements</p> <p>Item numbering corrected.</p>

JSI Transmittal No. 161 – Exhibit 2 (Cont'd)

<p><b>Section 16 Public Packet Data Network</b></p> <p>8th Revised Page 16-27 1st Revised Page 16-27.1</p> <p>Original Page 16-27.2 3rd Revised Page 16-34 3rd Revised Page 16-36 3rd Revised Page 16-38 3rd Revised Page 16-39</p> <p>2nd Revised page 16-40.13 through 2nd Revised Page 16-40.25</p> <p>Original Page 16-40.26 through Original Page 16-40.31</p>	<p><u>Issuing Carrier Tables:</u></p> <p>Reflect TDS Telecom Companies' provision of ETS Term Discount Plan, Volume Discount Plan, and ETS Fixed Rate Option.</p> <p>Addition of ETS speeds of 2, 5, 250 and 750 Mbps.</p> <p>Item numbering corrected.</p> <p>Establish regulations for ETS Volume Discount Plan and ETS Fixed Rate Option.</p>
<p><b>Section 17 Rates and Charges</b> <b>Rock Hill Telephone Company</b> <b>Lancaster Telephone Company</b> <b>Fort Mill Telephone Company</b></p> <p>1st Revised page 17-424.1 1st Revised page 17-458.1 1st Revised page 17-492.1</p>	<p>Removal of expiring LNP End User Charges</p>
<p><b>Section 17 Rates and Charges</b> <b>Knology of the Valley, Inc.</b></p> <p>35th Revised Page 17-631.1</p>	<p>First Quarter 2012 Federal Universal Service Charge Factor</p>

JSI Transmittal No. 161 – Exhibit 2 (Cont'd)

<p><b>Section 17 Rates and Charges</b> <b>TDS Telecom Companies</b></p> <p>1st Revised page 17-786</p> <p>3rd Revised Page 17-797 through Original page 17-801.7</p>	<p>Removal of expired LNP End User Charges.</p> <p>Establish rates for new ETS speeds, ETS Term Discount Plan, ETS Volume Discount Plan and ETS Fixed Rate Option Plan 1</p>
<p><b>Section 17 Rates and Charges</b> <b>Tri County Telephone Association, Inc.</b></p> <p>Original page 17-1073 through Original Page 17-1106</p>	<p>Add current rates for new issuing carrier, Tri County Telephone Association, Inc., effective upon cancellation of the Tri County Tariff F.C.C. No. 1.</p>