

**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 161 – Description and Justification**  
**Comparison of Tri County Telephone Association (“TCTA”) Tariff FCC No. 1**  
 Section 17 (Rates) to JSI Tariff FCC No. 1 Section 17

The section numbers within JSI Tariff FCC No. 1 for TCTA interstate access rates correspond to the numbers used in TCTA Tariff FCC No. 1 with the exceptions noted below. With the exception of obsolete references noted below, which will not be carried forward to JSI Tariff FCC No. 1, all references to rate regulations from Section 17 in the existing TCTA Tariff FCC No. 1 correspond to references to the rate regulation in JSI Tariff FCC No. 1.

Based upon JSI’s review, regulations in JSI Tariff FCC No. 1 applicable to the interstate switched access offerings of TCTA under TCTA Tariff FCC No. 1 support concluding that no material changes in regulations will occur because of cancellation of TCTA Tariff FCC No. 1 and inclusion of TCTA as an issuing carrier for JSI Tariff FCC No. 1.

	<i>Section for TCTA Rate in JSI Tariff FCC No. 1</i>	<i>Section for TCTA Rate in TCTA Tariff FCC No. 1</i>	<i>NECA Tariff FCC No. 5 Regulation Section Referenced in TCTA Tariff FCC No. 1</i>	<i>Regulation Section Referenced in JSI Tariff FCC No. 1</i>	<i>Notes</i>
1	N/A	17.1.1 – Carrier Common Line Access Service	N/A	N/A	Section 17.1.1 in TCTA Tariff No. 1 references the former NECA Carrier Common Line (“CCL”) rate section. Effective July 1, 2003, both NECA Tariff No. 5 and JSI Tariff FCC No. 1 deleted Section 17.1. and it remains vacant in both.
2	17.1.2 – End User Access Service	17.1.2 – End User Access Service	References NECA Tariff No. 5 Section 4.6.	JSI Tariff No. 1. Section 17.1.1 references NECA Tariff No. 5.	No Differences in Regulations in NECA Tariff No. 5 versus JSI Tariff No. 1.
3	N/A	17.1.3 – Reserved for Future Use	N/A	N/A	Section 17.1.3 for TCTA in JSI Tariff No. 1 will address the Federal Universal Service Charge (see Item 4 below)

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**Exhibit 2**

	<i>Section for TCTA Rate in JSI Tariff FCC No. 1</i>	<i>Section for TCTA Rate in TCTA Tariff FCC No. 1</i>	<i>NECA Tariff FCC No. 5 Regulation Section Referenced in TCTA Tariff FCC No. 1</i>	<i>Regulation Section Referenced in JSI Tariff FCC No. 1</i>	<i>Notes</i>
4.	17.1.3 – Federal Universal Service Charge (FUSC).	17.1.4 – Lifeline Assistance and Universal Service Charges	References NECA Tariff No. 5 Section 8	JSI Tariff No. 1 Section 17.1.2 references NECA Tariff No. 5	The reference in TCTA Tariff No. 1 to NECA Tariff No. 5, Section 8 for Lifeline Assistance and Universal Service Fund Charges are obsolete. Separate rates no longer exist for Lifeline (inasmuch as Lifeline assistance constitutes credits for tariffed End User Common Line charges). NECA moved the FUSC section to Section 3. Section 8 in NECA Tariff No. 1 now contains DSL regulations.
5	17.2 – Switched Access Service	17.2. – Switched Access Service	References NECA Tariff 5, Section 6.	JSI Tariff FCC No. 1 Section 17.2 references JSI Tariff No. 1 Section 6.	
6	17.3 – Special Access Services	17.3 – Special Access Services	References NECA Tariff 5, Section 7.	JSI Tariff FCC No. 1 Section 17.3 references JSI Tariff FCC No. 1 Section 7	TCTA does not currently offer Special Access Synchronous Optical Channel Service (“SOCS”) and has no plans to do introduce SOCS at this time.

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7	17.4 – Other Services	17.4 – Other Services	References NECA Tariff 5, Section 5, Access Ordering and Section 13, Additional Engineering , Additional Labor and Miscellaneous Services	JSI Tariff No. 17.4 references JSI Tariff No. 1 Section 5, Access Ordering and Section 13, Additional Engineering , Additional Labor and Miscellaneous Services	See Note # 1 below.

Note #1: TCTA Tariff No. 1 does not contain the following optional offerings that, if offered, would have rates tariffed in Section 17.4. Consistent with TCTA Tariff No. 1, these services will not be offered at this time by TCTA under JSI Tariff FCC No. 1:

- Public Packet Data Network Services (Frame Relay Access Service or “FRAS”),
- Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS),
- Ethernet Transport Service or “ETS”,
- Asymmetric DSL (“ADSL”) or Synchronous DSL,
- Local Number Portability “LNP” End User Charges or Query Service Charges.
- Digital Subscriber Line (“DSL”) Transport. See Note #2

Note #2: TCTA has not ever provided Title II common-carriage wireline broadband Internet transport services either as a tariffed offering or a permissively detariffed offering. The Company transferred assets related to DSL to nonregulated operations and has a Petition for Waiver pending with the Commission that would allow provision of wireline broadband Internet transport service on a Title II basis under publicly available rates, terms and conditions. See Pleading Cycle Established for Tri County Telephone Association, Inc. Petition for Waiver of Accounting Rules, WC 08-239, Public Notice, DA 08-2668 (Released December 5, 2008).