SUPPLEMENT TO DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Amended Transmittal No. 165
June 29, 2012

Lancaster Telephone Company d/b/a Comporium Communications
SAC 240531 (South Carolina)

On June 18, 2012, John Staurulakis, Inc. ("JSI") submitted its annual access charge tariff ("JSI Tariff F.C.C. No. 1") and Tariff Review Plans ("TRPs") pursuant to the Federal Communications Commission's 2012 Access Charge Order.[1] Included with this filing were separate Descriptions and Justifications ("D&J's") for all of the issuing carriers for JSI Tariff F.C.C. No. 1 which summarized the TRP forms associated with each issuing carrier. One of those forms, TRP form "ROR-ILEC-ICC data," shows Eligible Recovery amounts that provide the justification for charging the ARC and, if needed, the CAF. This Amended Transmittal supplements these D&Js by providing an explanation of the TRP form "ROR-ILEC-ICC data" for Lancaster Telephone Company d/b/a Comporium Communications ("Lancaster").

In the ROR-ILEC-ICC data TRP for Lancaster, there are four worksheet tabs in the TRP workbook. The first Tab, labeled *2012 Eligible Recovery Summary* summarizes the data from the next three tabs.

The second Tab, labeled *2012 RoR ILEC Interstate Rates* details the company's most recently filed Interstate Switched Access Revenue Requirement applied against the baseline adjustment factor for the period (95%). In addition, expected interstate revenue to be received for the TY 2012-2013 is subtracted from the baseline adjusted revenue requirement to indicate TY 2012-2013 Interstate Eligible Recovery.

The third Tab, labeled *2012 RoR ILEC Intrastate Rates* details the company's actual FY 2011 revenue received for transitional Intrastate Access Service Rate Elements applied against the baseline adjustment factor for the period (95%).

1. How the Company determined that the collected amount is only switched access and the usage period associated with the collected amount.

The FY 2011 represents the period October 1, 2010 through September 30, 2011. In order to determine the proper amounts, Lancaster provided detailed access demand units by rate element for the twelve month usage period corresponding to the FY ending September 30, 2011. The access demand units were summarized by access elements from the Carrier Access Bills ("CABs") billed to the applicable interexchange carrier for terminating intrastate access usage

[1] *See In the Matter of July 1, 2010 Annual Access Charge Tariff Filings*, WCB/Pricing File No. 12-07, Order, DA 12-482 (rel. Mar. 28, 2012). Material required pursuant to *In the Matter of Material to be Filed in Support of 2012 Annual Access Tariff Filings*, WCB/Pricing File No. 12-08, Tariff Review Plans, DA 12-575 (rel. Apr. 19, 2012) was also included in this filing.

for the twelve months representing the FY 2011. The applicable intrastate access rates in effect as of December 29, 2011, were then applied to arrive at the billed revenue amounts as shown in Column I. By using this process, Lancaster ensured that there were no late fees or other fees included in the collected amount.

While the calculation of the Intrastate rate reductions are based on billed usage, the FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements is based on Received ("Collected") revenues. This revenue is recorded in Column O of the TRP. In order to arrive at these amounts, the actual demand units billed by rate elements (as shown in Column H) were applied to the actual rates in effect during the fiscal year. Once this actual "billed" amount was determined, an analysis of uncollected revenues was performed to determine to what extent billed revenues for the test period remain uncollected by March 31, 2012, as per the FCC Order. After this analysis is performed, only the amount representing usage billed during the fiscal year ending September 30, 2011, and received (collected) prior to March 31, 2012 is included on the TRP in Column O. This revenue is shown in column O of the worksheet and is summarized at the top of the worksheet. The expected intrastate revenue to be received for the TY 2012-2013, utilizing the appropriate Intrastate rate(s) is subtracted from the baseline adjusted revenue requirement to indicate TY 2012-2013 Intrastate Eligible Recovery.

2. How the Company determined the uncollected amount as of March 31, 2012.

Each month the company keeps track of payments made on its billing through its billing system/accounts receivable system and using this process the Company determines what was unpaid on the booked revenue for the twelve months representing the FY 2011.

The fourth Tab, labeled *2012 RoR ILEC Rec. Comp. Rates* details the company's Net Reciprocal Compensation Eligible Recovery amount. This amount is calculated by netting actual FY 2011 revenue billed for reciprocal compensation against the actual FY 2011 expense paid for reciprocal compensation applied against the baseline adjustment factor for the period (95%). The revenue received or expense incurred must have been received or paid by March 31, 2012. If a company expects any demand units that would be billed or received for reciprocal compensation for the TY 2012-2013, these amounts would be applied against the base year amounts to determine the Net Reciprocal Compensation Eligible Recovery.