

SUPPLEMENT TO DESCRIPTION AND JUSTIFICATION

John Staurulakis, Inc. Tariff F.C.C. No. 1

Amended Transmittal No. 165

June 29, 2012

TDS Telecom Companies:

**Camden Telephone and Telegraph Company, Inc. d/b/a TDS Telecom
SAC 220351 (GA)**

**Mt. Vernon Telephone Company d/b/a TDS Telecom
SAC 330917 (WI)**

**Oklahoma Communication Systems, Inc. d/b/a TDS Telecom
SAC 431984 (OK)**

**Tennessee Telephone Company d/b/a TDS Telecom
SAC 290575 (TN)**

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."

Fiscal Year Revenue Reporting-Intrastate for TDS Telecom Companies

The above-listed TDS Telecom Companies filed fiscal year data utilizing the Commissions excel spreadsheet entitled RoR-ILEC-ICC data.xls. The fiscal year revenues are represented in col O which is referenced on the worksheet tab entitled 2012 RoR ILEC intrastate rates in Cell G7, and are used in calculating each of our ILECs Eligible Recovery. There were three steps taken to gather that data.

Access Revenues Billed

The Company provided detailed access demand units by rate element for the twelve month usage period corresponding to the FY ending 9/30/2011. 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 for the twelve months representing the FY 2011.

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.

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.

OCC and other Adjustments

In addition to access revenues billed through our CABS system, TDS evaluated other revenues, which included Other Charges and Credits (OCC) and other adjustments. These OCC and other adjustments were for usage not captured during the normal billing cycle and include adjustments due to bill disputes, fractional month billing of direct trunks and entrance facilities, as well as one time charges for direct trunk facilities and entrance facilities that carriers would have ordered. Since this report does not provide direction of the revenues (some are credits). The TDS companies used a terminating revenue percentage of fiscal year of total access revenues billed during the fiscal year October 2010-September 2011, and reported those revenues as terminating, excluding the originating portion of any OCC or Other Adjustment.

Uncollected Revenues

In order to comply with the reformation ordered, one more analysis was completed which reduced Access Revenues Billed as well as any OCC and Adjustment revenues that had not been paid through March 31, 2012 for the fiscal period. Unfortunately there is one major carrier that has had on-going issues of not paying for access as deemed appropriate by regulatory agencies, and our tariffs.