

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Bluffton Telephone Company, Inc.
SAC 240512 (South Carolina)

Bluffton Telephone Company, Inc., (alternatively “Bluffton” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Bluffton is an Issuing Carrier of the JSI Tariff. Bluffton files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Bluffton is one of two wholly-owned subsidiary incumbent local exchange carriers (“ILECs”) in the Hargray Communications Group, Inc. group of companies. The other is Hargray Telephone Company, Inc. (“Hargray”), (SAC 240523). The High Cost report USF2013LC13.xls indicates holding company code 200000263 for both Bluffton and Hargray. Bluffton and Hargray are affiliated “wholly owned operating companies” and are therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

Hargray is also an issuing carrier for JSI Tariff FCC No. 1 and files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Bluffton of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

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JSI Transmittal No. 182 - 2014 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f). Under Section 51.917(e), Bluffton proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each Limited Use rate plan line, other than lines of Lifeline Customers, assessed a primary residential common line charge pursuant to 47 CFR § 69.104, at the maximum rate of \$1.50 per month for single-line business end user common line charge pursuant to § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BLUFFTON TARIFF REVIEW PLANS

Bluffton submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Bluffton 2014 ROR-ILEC-ICC
- Bluffton 2014 Tariff Rate Comp CAF
- Bluffton 2014 True Up
- Hargray Communications Group 2014 Rate Ceiling CAF
- Bluffton 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

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Bluffton Telephone Company, Inc. (SC)

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2014 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Bluffton, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

Interstate Rate Development Process

The Company follows the Commission's multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier ("ILEC"). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC's rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC's regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC's rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the "cost study."

Major Elections and Interpretations Applied

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

**Wireline
Broadband
Internet
Access Service** Effective August 1, 2006, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

**Part 36
Traffic
Factors
Freeze –
Section 36.3(a)** The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

**Part 36
Category** The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part

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JSI Transmittal No. 182 - 2014 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

Relationships- 32 accounts to the separations categories/sub-categories based on
Section the percentage relationships of the categorized/sub-categorized
36.3(b) costs to their associated Part 32 accounts for the twelve month
period ending December 31, 2000.

SPECIAL ACCESS

The Company's proposed Special Access rates represent a 3 percent across the board increase from the current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan files and Attachments 1 through 7, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Citizens Telephone Company d/b/a Comporium Communications,
SAC 230473 (North Carolina)

Citizens Telephone Company d/b/a Comporium Communications, (alternatively “Citizens” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Citizens is an Issuing Carrier of the JSI Tariff. Citizens files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

The following Table comprises the Comporium Communications incumbent local exchange carrier companies (“ILECs”) that are “wholly owned operating companies” and therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

ILEC	Holding Company Code	Study Area Code	State	Tariff for which ILEC is Issuing Carrier	Included in RateCeiling-CAF.xls
Fort Mill Telephone Co.	200000068	240521	SC	JSI	Yes
Lancaster Telephone Co.	200000068	240531	SC	JSI	Yes
Comporium, Inc.	200000068	240542	SC	JSI	Yes
Citizens Telephone Co.	200000068	230473	NC	JSI	Yes
PBT Telecom, Inc.	200000068	240539	SC	NECA	No

Each of the four Comporium Communications issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

Citizens’ ARC ceiling data is contained in the single holding company Tariff Review Plan Comporium Communications 2014 Rate Ceiling CAF.xls file being filed for the four Comporium Companies that are issuing carriers for the JSI Tariff.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Citizens Telephone Company (NC)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Citizens of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission's March 25, 2014 release entitled *In the Matter of July 1, 2014 Annual Access Charge Tariff Filings*, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge ("ARC") consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Citizens proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and True Up adjustment.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Citizens Telephone Company (NC)

3. CITIZENS TARIFF REVIEW PLANS

Citizens submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Citizens 2014 ROR-ILEC-ICC
- Citizens 2014 Tariff Rate Comp CAF
- Citizens 2014 True Up
- Comporium Communications 2014 Rate Ceiling CAF
(A single Rate-Ceiling-CAF TRP is being filed for all four Comporium Communications issuing carriers for the JSI Tariff.)
- Citizens 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Citizens Telephone Company (NC)

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Citizens, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-

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JSI Transmittal No. 182 - 2014 Annual Access Filing
Citizens Telephone Company (NC)

.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service Effective July 1, 2009, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“*Wireline Broadband Order*”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost

Description and Justification
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Citizens Telephone Company (NC)

study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –

Section 36.3(a)

The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Citizens Telephone Company (NC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 3 percent across the board increase from current rates

6. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Comporium, Inc.
SAC 240542 (South Carolina)

Comporium, Inc. (fka Rock Hill Telephone Company), (alternatively “Comporium” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Comporium is an Issuing Carrier of the JSI Tariff. Comporium files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Comporium is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Comporium in the following Table. Together, all five companies comprise what is known as “Comporium Communications.” These companies are “wholly owned operating companies” and therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

ILEC	Holding Company Code	Study Area Code	State	Tariff for which ILEC is Issuing Carrier	Included in RateCeiling-CAF.xls
Comporium, Inc.	200000068	240542	SC	JSI	Yes
Fort Mill Telephone Co.	200000068	240521	SC	JSI	Yes
Lancaster Telephone Co.	200000068	240531	SC	JSI	Yes
Citizens Telephone Co...	200000068	230473	NC	JSI	Yes
PBT Telecom, Inc.	200000068	240539	SC	NECA	No

Each of the four Comporium Communications issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

Because PBT Telecom, Inc. is an issuing carrier for National Exchange Carrier Association, Inc. (“NECA”) Tariff FCC No. 5 and has provided data respecting the ARC/CAF Tariff Review Plan (“TRP”) forms to NECA for the annual filing, the holding company data provided at Comporium Communications 2014 Rate Ceiling CAF.xls does not reflect data for PBT Telecom, Inc.

In addition to the wholly owned operating companies listed in the table above, Comporium has a minority interest in Home Telephone ILEC, LLC d/b/a Home Telecom (“Home”), Study Area 240527 operating in South Carolina. Home is an issuing carrier for JSI Tariff FCC No. 1. However, because Comporium’s interest is a minority interest, Home does not meet the Section 51.917(e)(3) definition for

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Comporium, Inc. (SC)

inclusion in Section 51.917 ARC calculations. Accordingly, the holding company data provided at Comporium Communications 2014 Rate Ceiling CAF.xls does not reflect data for Home.

1. DESCRIPTION OF FILING

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2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Comporium proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

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Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Comporium, Inc. (SC)

3. COMPORIUM TARIFF REVIEW PLANS

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(A single Rate-Ceiling-CAF TRP is being filed for all four Comporium Communications issuing carriers for the JSI Tariff.)
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4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

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Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Comporium, Inc. (SC)

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections for the Company, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Comporium, Inc. (SC)

.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of NECA Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service Effective February 10, 2006, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“*Wireline Broadband Order*”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Comporium, Inc. (SC)

materials indicate the new category WBI.

The Company's rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –

Section 36.3(a)

The Company's Part 36 allocations reflect use of the Company's frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission's rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Comporium, Inc. (SC)

5. DECREASES IN SPECIAL ACCESS RATES

The Company's proposed Special Access rates represent a 5 percent across the board decrease from the current rates.

6. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Farmers Telephone Cooperative, Inc. (South Carolina)
SAC 240520

Farmers Telephone Cooperative, Inc., (alternatively “Farmers” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Farmers is an Issuing Carrier of the JSI Tariff. Farmers files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released April 14, 2014). JSI is also providing as part of this filing, on behalf of TDS Group A Companies, Tariff Review Plan (TRP) documents for Special Access, the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014). In addition to prescribed TRP documents, the TDS Group A Companies are providing additional cost support schedules as indicated in the table below, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Farmers proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. FARMERS TARIFF REVIEW PLANS

Farmers submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Farmers 2014 ROR-ILEC-ICC
- Farmers 2014 Tariff Rate Comp CAF
- Farmers 2014 True Up
- Farmers 2014 Rate Ceiling CAF
- Farmers 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Farmers, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission's multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier ("ILEC"). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC's rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC's regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC's rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the "cost study."

Major Elections and Interpretations Applied

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

Tariff FCC No. 1.

**Wireline
Broadband
Internet
Access Service** Effective April 1, 2006, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

**Part 36
Traffic
Factors
Freeze –
Section 36.3(a)** The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

Part 36 Category Relationships- Section 36.3(b)	The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.
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6. DECREASES IN SPECIAL ACCESS RATES

The Company's proposed Special Access rates represent a 10 percent across the board decrease from the current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2014 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

**Fort Mill Telephone Company d/b/a Comporium Communications,
SAC 240521 (South Carolina)**

Fort Mill Telephone Company d/b/a Comporium Communications, (alternatively “Fort Mill” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fort Mill is an Issuing Carrier of the JSI Tariff. Fort Mill files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

The following Table comprises the Comporium Communications incumbent local exchange carrier companies (“ILECs”) that are “wholly owned operating companies” and therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

ILEC	Holding Company Code	Study Area Code	State	Tariff for which ILEC is Issuing Carrier	Included in RateCeiling-CAF.xls
Fort Mill Telephone Co.	200000068	240521	SC	JSI	Yes
Lancaster Telephone Co.	200000068	240531	SC	JSI	Yes
Comporium, Inc.	200000068	240542	SC	JSI	Yes
Citizens Telephone Co.	200000068	230473	NC	JSI	Yes
PBT Telecom, Inc.	200000068	240539	SC	NECA	No

Each of the four Comporium Communications issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

Fort Mill’s ARC ceiling data is contained in the single holding company Tariff Review Plan Comporium Communications 2014 Rate Ceiling-CAF.xls file being filed for the four Comporium Companies that are issuing carriers for the JSI Tariff.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Fort Mill of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission's March 25, 2014 release entitled *In the Matter of July 1, 2014 Annual Access Charge Tariff Filings*, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge ("ARC") consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Fort Mill proposes an ARC effective July 1, 2014 at the rate of \$1.13 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$2.25 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the second implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and True Up adjustment.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

3. FORT MILL TARIFF REVIEW PLANS

Fort Mill submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Fort Mill 2014 ROR-ILEC-ICC
- Fort Mill 2014 Tariff Rate Comp CAF
- Fort Mill 2014 True Up
- Comporium Communications 2014 Rate Ceiling CAF
(A single Rate-Ceiling-CAF TRP is being filed for all four Comporium Communications issuing carriers for the JSI Tariff.)
- Fort Mill 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Fort Mill, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC's regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC's rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the "cost study."

Major Elections and Interpretations Applied

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line	This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.
Traffic Sensitive	The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.
Wireline Broadband Internet Access Service	Effective February 10, 2006, the Company elected to provide Wireline Broadband Internet Access Service ("WBIAS") on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to <i>Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers</i> , CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (" <i>Wireline Broadband Order</i> "). Because WBIAS is a common-carriage service, apportionment of costs to

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a)

The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Fort Mill Telephone Company (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 16 percent across the board increase from the current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Hargray Telephone Company, Inc.
SAC 240523 (South Carolina)

Hargray Telephone Company, Inc., (alternatively “Hargray” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Hargray is an Issuing Carrier of the JSI Tariff. Hargray files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Hargray is one of two wholly-owned subsidiary incumbent local exchange carriers (“ILECs”) in the Hargray Communications Group, Inc. group of companies. The other is Bluffton Telephone Company, Inc. (“Bluffton”), (SAC 240512). The High Cost report USF2013LC13.xls indicates holding company code 200000263 for both Hargray and Bluffton. Hargray and Bluffton are affiliated “wholly owned operating companies” and are therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

Bluffton is also an issuing carrier for JSI Tariff FCC No. 1 and files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Hargray of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d)..

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f). Under Section 51.917(e), Hargray proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each Limited Use rate plan line, other than lines of Lifeline Customers, assessed a primary residential common line charge

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JSI Transmittal No. 182 - 2014 Annual Access Filing
Hargray Telephone Company, Inc. (SC)

pursuant to 47 CFR § 69.104, at the maximum rate of \$1.50 per month for single-line business end user common line charge pursuant to § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2013 - 2014 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HARGRAY TARIFF REVIEW PLANS

Hargray submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Hargray 2014 ROR-ILEC-ICC
- Hargray 2014 Tariff Rate Comp CAF
- Hargray 2014 True Up
- Hargray Communications Group 2014 Rate Ceiling CAF
- Hargray 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

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Hargray Telephone Company, Inc. (SC)

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission's rules and regulations, a projection of the Company's costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or "TYCOS" or "2011 TYCOS"). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Hargray, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission's rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or "PYCOS"):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission's multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier

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JSI Transmittal No. 182 - 2014 Annual Access Filing
Hargray Telephone Company, Inc. (SC)

(“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service Effective August 1, 2006, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities,

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Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a)

The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Hargray Telephone Company, Inc. (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 0.5 percent across the board decrease from the current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Home Telephone ILEC, LLC d/b/a Home Telecom (South Carolina)
SAC 240527

Home Telephone ILEC, LLC d/b/a Home Telecom , (alternatively “Home Telecom” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Home Telecom is an Issuing Carrier of the JSI Tariff. Home Telecom files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Comporium, Inc. (fka Rock Hill Telephone Company) has a minority interest in Home Telecom; however, Home Telecom is not a subsidiary of Comporium, Inc. and files its Access Recovery Charge (“ARC”) on a stand-alone basis. Because Comporium Inc.’s interest is a minority interest, Home Telecom does not meet the Section 51.917(e)(3) definition for inclusion in Section 51.917 ARC calculations of Comporium, Inc.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Home Telecom of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Home Telecom proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Home Telephone ILEC, LLC d/b/a Home Telecom (SC)

line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. HOME TELECOM TARIFF REVIEW PLANS

Home submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- Home 2014 ROR-ILEC-ICC
- Home 2014 Tariff Rate Comp CAF
- Home 2014 True Up
- Home 2014 Rate Ceiling CAF
- Home 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Home Telephone ILEC, LLC d/b/a Home Telecom (SC)

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Home Telecom, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Home Telephone ILEC, LLC d/b/a Home Telecom (SC)

Interstate Rate Development Process

The Company follows the Commission's multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier ("ILEC"). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC's rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC's regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC's rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the "cost study."

Major Elections and Interpretations Applied

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Effective May 9, 2006, the Company elected to provide Wireline Broadband Internet Access Service ("WBIAS") on a permissively detariffed, common-carriage basis under Title II of the

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Home Telephone ILEC, LLC d/b/a Home Telecom (SC)

Access Service Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“*Wireline Broadband Order*”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b) The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Home Telephone ILEC, LLC d/b/a Home Telecom (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 6 percent across the board decrease from the current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Horry Telephone Cooperative, Inc. (South Carolina)
SAC 240528

Horry Telephone Cooperative, Inc., (alternatively “HTC” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). HTC is an Issuing Carrier of the JSI Tariff. HTC files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by HTC of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), HTC proposes an ARC effective July 1, 2014 at a reduced rate of \$0.51 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$1.11 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance

Description and Justification
JSI-Transmittal No. 182 - 2014 Annual Access Filing
Horry Telephone Cooperative, Inc. (SC)

with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true up adjustments.

3. HTC TARIFF REVIEW PLANS

HTC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules:

- HTC 2014 ROR-ILEC-ICC
- HTC 2014 Tariff Rate Comp CAF
- HTC 2014 True Up
- HTC 2014 Rate Ceiling CAF
- HTC 2014 Rate of Return TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI-Transmittal No. 182 - 2014 Annual Access Filing
Horry Telephone Cooperative, Inc. (SC)

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of HTC, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Description and Justification
JSI-Transmittal No. 182 - 2014 Annual Access Filing
Horry Telephone Cooperative, Inc. (SC)

Interstate Rate Development Process

The Company follows the Commission's multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier ("ILEC"). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC's rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC's regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC's rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the "cost study."

Major Elections and Interpretations Applied

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Effective May 9, 2006, the Company elected to provide Wireline Broadband Internet Access Service ("WBIAS") on a permissively detariffed, common-carriage basis under Title II of the

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Access Service Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“*Wireline Broadband Order*”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36
Category
Relationships-
Section
36.3(b) The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

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Horry Telephone Cooperative, Inc. (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 8.0 percent across the board decrease from the current rates

6. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

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

Lancaster Telephone Company d/b/a Comporium Communications, (alternatively “Lancaster” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Lancaster is an Issuing Carrier of the JSI Tariff. Lancaster files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

The following Table comprises the Comporium Communications incumbent local exchange carrier companies (“ILECs”) that are “wholly owned operating companies” and therefore part of a “holding company” as defined by § 51.917(e)(3) for purposes of the Access Recovery Charge (“ARC”).

ILEC	Holding Company Code	Study Area Code	State	Tariff for which ILEC is Issuing Carrier	Included in RateCeiling-CAF.xls
Fort Mill Telephone Co.	200000068	240521	SC	JSI	Yes
Lancaster Telephone Co.	200000068	240531	SC	JSI	Yes
Comporium, Inc.	200000068	240542	SC	JSI	Yes
Citizens Telephone Co.	200000068	230473	NC	JSI	Yes
PBT Telecom, Inc.	200000068	240539	SC	NECA	No

Each of the four Comporium Communications issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.38 and is filing its own, separate Description and Justification under Transmittal No. 182.

Lancaster’s ARC ceiling data is contained in the single holding company Tariff Review Plan Comporium Communications 2014 Rate Ceiling CAF.xls file being filed for the four Comporium Companies that are issuing carriers for the JSI Tariff.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Lancaster of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered

Description and Justification
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Lancaster Telephone Company (SC)

years. In addition, this filing proposes revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6). Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Lancaster proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true up adjustment.

3. LANCASTER TARIFF REVIEW PLANS

Lancaster submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015, as well as the TRP required of rate of return ILECs subject to section 61.38 of the Commission’s rules:

- Lancaster 2014 ROR-ILEC-ICC
- Lancaster 2014 Tariff Rate Comp CAF
- Lancaster 2014 True Up
- Comporium Communications 2014 Rate Ceiling CAF
(A single Rate-Ceiling-CAF TRP is being filed for all four Comporium Communications issuing carriers for the JSI Tariff.)
- Lancaster 2014 Rate of Return TRP

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

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4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company is not proposing any changes in Switched Access (either end office or transport), and thus the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2013 (also referred to herein as the July 1, 2012-June 30, 2013 Test Year Cost of Service or “TYCOS” or “2011 TYCOS”). The costs for the twelve (12) month period ending June 30, 2013 have been based on financial estimates and projections of Lancaster, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue	
Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

Description and Justification
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PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2011, identified as follows (also referred to herein as the 2011 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development

Description and Justification
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of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service Effective February 10, 2006, the Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“*Wireline Broadband Order*”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors Freeze – The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations*

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Section 36.3(a) *Freeze Order.* See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 8, 2012. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 12-49 (rel. May 8, 2012), (*2012 Separations Freeze Extension Order*) (extending the separations freeze until June 30, 2014).

Part 36 The Company has not elected to be subject to the provisions of
Category Section 36.3(b) which allows for assignment of costs from the Part
Relationships- 32 accounts to the separations categories/sub-categories based on
Section the percentage relationships of the categorized/sub-categorized
36.3(b) costs to their associated Part 32 accounts for the twelve month
period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 12 percent across the board decrease from current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 9, the Company believes the proposed rates for its 2012 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding development of its interstate cost of service and, in turn, rate calculations.

John Staurulakis, Inc. Transmittal No. 182 – June 16, 2014
TDS Telecom Companies-Group A
Description and Justification

TDS Telecom, through its consultant John Staurulakis, Inc. (“JSI”), hereby provides a Description and Justification for its individual rates proposed under JSI Transmittal No. 182 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the four TDS Telecom study areas listed below.

In the JSI Tariff the four carriers are currently known collectively as the “TDS Telecom Companies.” Concurrent with this transmittal, JSI is filing JSI Transmittal No. 181 which, *inter alia*, renames TDS Telecom Companies in the JSI Tariff as “TDS Telecom Companies-Group A” to distinguish the extant group from the new group, TDS Telecom Companies-Group B. TDS Telecom Companies-Group B comprises fifteen study areas exiting the National Exchange Carrier Association (NECA) Traffic Sensitive Pool and becoming issuing carriers for the JSI Tariff effective July 1, 2014. A separate Description and Justification is being provided for the TDS Telecom Companies-Group B.

In discussion of the TDS Telecom Companies-Group A following, the name may be abbreviated as “TDS Group A Companies” or “TDS Group A.”

TDS Telecom Companies-Group A files rates on a blended basis reflective of the four TDS Group A study areas.

TDS Telecom Companies-Group A			
Study Area Company Name	Study Area State	Study Area Code	Abbreviation for TRP Files
Camden Telephone and Telegraph Company, Inc. d/b/a TDS Telecom	GA	220351	CTC
Mt. Vernon Telephone Company d/b/a TDS Telecom	WI	330917	MTV
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom	OK	431984	OCSI
Tennessee Telephone Company d/b/a TDS Telecom	TN	290575	TTC

TDS Holding Company Relationships

TDS Telecom has 118 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the four study areas comprising TDS Telecom Companies Group-A, fifteen additional TDS study areas that are new issuing carriers for the JSI Tariff brings the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 19. Currently, TDS Telecom Companies in the JSI Tariff

comprises four TDS Telecom study areas who withdrew from the NECA Traffic Sensitive Pool effective June 30, 2007 at which time they became issuing carriers for JSI Tariff FCC No. 1.

The blending of rates for TDS Telecom Companies-Group A will continue based on the four study areas comprising the group and will not reflect any demand or costs for TDS Telecom Companies-Group B.

As of July 1, 2014, 99 TDS Telecom study areas will remain as issuing carriers for NECA Tariff FCC No. 5. While the 19 TDS Telecom companies that will be issuing carriers for the JSI Tariff as of July 1, 2014 will have all exited the NECA Traffic Sensitive pool either in 2007 or 2014, all of these 19 companies will continue as members of the NECA Common Line pool.

Because the 99 study areas will continue as issuing carriers for NECA Tariff FCC No. 5 and have provided data respecting the ARC/CAF Tariff Review Plan ("TRP") forms to NECA for the NECA annual filing, TDS Telecom holding company data provided at RateCeiling-CAF.xlsm included for filing under this transmittal does not reflect data for the 99 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS Telecom Companies-Group B is presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 14, 2014). JSI is also providing as part of this filing, on behalf of TDS Group A Companies, Tariff Review Plan (TRP) documents for Special Access, the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014). In addition to prescribed TRP documents, the TDS Group A Companies are providing additional cost support schedules as indicated in the table below, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

The TDS Telecom Companies are Section 61.38 prospective filers, and thus make biennial annual filings in even-numbered years. Because of the *USF/ICC Transformation Order*, the filing of prospective rates for the test year beginning July 1, 2014 does not apply to Switched Access End Office and Local Transport rates. See Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, FCC-11-161 (Rel. November 18, 2011), WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*); pets. for review pending sub nom. In re: FCC 11-161, No. 11-9900 (10th Cir. argued Nov. 19, 2013), (and consolidated cases).

2014 Switched Access End Office Terminating Rate

In the USF/ICC Transformation Order, the Commission, *inter alia*, adopted Section 51.909 establishing for rate-of-return carriers steps for the transition of both interstate and intrastate Switched Access End Office and Transport rates. See 47 CFR A§ 51.909. Section 909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 909(a).

Section 909(d)(3)(ii) prescribes a Target Composite Terminating End Office Access Rate of \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite terminating End Office Rate and \$0.005. 47 CFR § 909(d)(3)(ii). Calculations pursuant to Section 909(d)(3)(ii) are shown at Attachment 1 – TDSA. The revised tariff page for Switched Access-End Office reflects bifurcation of originating and terminating Switched Access End Office rates between originating and terminating. For terminating, the Information Surcharge rate has been combined with the Local Switching rate (after first adjusting the Information Surcharge rate from a per 100 minutes basis to a per minute basis to allow consistency with the End Office rate application). The resulting composite Switched Access End Office Terminating Local Switching rate reflects the reduction in the rate calculated on Attachment 1.

2. TDS GROUP A COMPANIES COST SUPPORT DOCUMENTS FILED UNDER THIS TRANSMITTAL

Following are the documents filed by JSI under Transmittal No. 182 on behalf of TDS Telecom for the TDS Telecom Companies-Group A in compliance with the requirements of Section 61.38 of the Commission's tariff rules for rate-of-return prospective filers together with the Tariff Review Plan for Rate-of-Return carriers filing under Section 61.38.

TDS TELECOM COMPANIES-GROUP A - COST SUPPORT ATTACHMENTS		
Description	SAC	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Companies		#1-TDS
Demand, and Revenue Impacts: Camden Telephone and Telegraph Company, Inc.	220351	#2-CTC
Demand, and Revenue Impacts: Mt. Vernon Telephone Company	330917	#3-MVT
Demand, and Revenue Impacts: Oklahoma Communication Systems, Inc.	431984	#4-OCSI
Demand, and Revenue Impacts: Tennessee Telephone Company	290575	#5-TTC
TYCOS and PYCOS Parts 36 and 69: Camden Telephone and Telegraph Company, Inc.	220351	#6-CTC
TYCOS and PYCOS Parts 36 and 69: Mt. Vernon Telephone Company	330917	#7-MVT
TYCOS and PYCOS Parts 36 and 69: Oklahoma Communication Systems, Inc.	431984	#8-OCSI
TYCOS and PYCOS Parts 36 and 69: Tennessee Telephone Company.	290575	#10-TTC
TRP - Tennessee Telephone Company	290575	TRP-TTC
TRP - Camden Telephone and Telegraph Company, Inc.	220351	TRP-CTC
TRP - Mt. Vernon Telephone Company	330917	TRP-MVT
TRP - Oklahoma Communication Systems, Inc.	431984	TRP-OCSI

3. SPECIAL ACCESS

Development of Projected Special Access Demand

Special Access (“SPA”) demand quantities for the projected test year were determined by review of historical end of year demand from 2010 to 2013. Based on this historical data, demand trends were developed to project end of year demand for 2014 and 2015. The combined companies experienced a 7 percent decrease in High Capacity DS1 demand and an estimated 7 percent decrease in billing at current rate levels during 2013. The attached charts show the decreasing High Capacity DS1 channel term demand.

Average Monthly High Capacity DS1 Channel Term Demand				
		1st Qtr 2013	2nd Qtr 2013	6 Month Ave
		2,117	2,079	2,098
3rd Qtr 2013	4th Qtr 2013	1st Qtr 2014	2nd Qtr 2014	12 Month Ave
2,009	1,961	1,929	1,902	1,950
Projected 3rd Qtr 2014	Projected 4th Qtr 2014	Projected 1st Qtr 2015	Projected 2nd Qtr 2015	12 Month Ave
1,881	1,860	1,835	1,810	1,847

This trend is expected to continue as wireless carriers migrate to competitive carriers for their larger bandwidth data backhaul networks. Forecasted demand for Voice Grade and Digital Data circuits were left flat or declining as Company experience and observations indicates demand for these services is diminishing at a much slower pace than High Capacity DS1s.

This projected demand was compared with March 2014 actual demand and adjustments to demand were made when current demand deviated from the demand trend. Any pending circuit orders were also included in the forecasted demand. Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terms (“CMT”) in 2013. 2014 CMF demand was calculated by multiplying the CMF/CMT ratio by the forecasted CMT demand.

Developing the final rate design demand was a multiple step process. First year-end 2013 demand and 2014 forecasted demand were averaged to determine demand as of July 1, 2014. Next YE 2014 and 2015 forecasted demand were averaged to determine June 30, 2015 forecasted demand. The two average amounts were then averaged to provide projected monthly demand which was then annualized to show projected demand for the test year.

Special Access Rate Design

The Company proposes increasing Special Access rates by 7.35 percent as compared with the July 1, 2013 Special Access rates. The revenues realized by projected demand at the proposed rates equal the TYCOS Special Access revenue requirement. Consistent with the detariffing of Wireline Internet Access Transport Service (“WBIAS” or “WBI”) effective June 30, 2007, WBI costs, revenues and rates have been excluded from the rate design.

4. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

In addition to the supporting documentation listed above, this filing includes completed, FCC-required forms related to Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC). The accompanying file “TDS Group A ICC-CAF Forms and Information” comprises the following required forms:

- TDS Telecom Group A 2014 ROR-ILEC-ICC.xlsx
- TDS Telecom Group A Tariff Rate Comp CAF.xls
- TDS Telecom Group A 2014 True Up.xls -
- TDS Telecom Group A 2014 Rate Ceiling CAF.xls

As shown in the supporting documentation, the revised ARC rates for TDS Telecom Companies-Group A all reflect the capped ARC rates for 2014 of \$1.50 for Residence and Single Line Business and \$3.00 for Multiline Business.

John Staurulakis, Inc. Transmittal No. 182 – June 16, 2014
TDS Telecom Companies – Group B
Description and Justification

TDS Telecom, through its consultant John Staurulakis, Inc. (“JSI”), hereby provides a Description and Justification for its individual rates proposed under JSI Transmittal No. 182 for JSI Tariff F.C.C. No. 1 (JSI Tariff). Under JSI Transmittal No. 182, the fifteen TDS Telecom study areas listed below are becoming issuing carriers for JSI Tariff F.C.C. No. 1. These fifteen study areas will be known collectively as the “TDS Telecom Companies-Group B” in JSI Tariff F.C.C. No. 1. In discussion of the TDS Telecom Companies-Group B following, the name may be abbreviated as “TDS Group B Companies” or “TDS Group B.”

TDS Telecom Companies-Group B Individual Study Area Company Name	State	Study Area Code	Abbreviation for Cost Support
Arvig Telephone Company d/b/a TDS Telecom	MN	361350	ARV
Badger Telecom, Inc. d/b/a TDS Telecom	WI	330844	BAD
Blue Ridge Telephone Company d/b/a TDS Telecom	GA	220346	BLU
Bridge Water Telephone Company d/b/a TDS Telecom	MN	361362	BRD
Central State Telephone Company d/b/a TDS Telecom	WI	330859	CEN
Concord Telephone Exchange Inc. d/b/a TDS Telecom	TN	290559	CON
Mid-Plains Telephone Company d/b/a TDS Telecom	WI	330881	MDP
Mid-State Telephone Company d/b/a TDS Telecom	MN	361433	MDS
Nelson-Ball Ground Telephone Co d/b/a TDS Telecom	GA	220375	NEL
Quincy Telephone Company-FL d/b/a TDS Telecom	FL	210338	QFL
Quincy Telephone Company-GA d/b/a TDS Telecom	GA	220338	QGA
Stockbridge & Sherwood Telephone d/b/a TDS Telecom	WI	330954	S&S
Strasburg Telephone Company d/b/a TDS Telecom	CO	462207	STR
Tellico Telephone Company d/b/a TDS Telecom	TN	290578	TEL
UTELCO, Inc. d/b/a TDS Telecom	WI	330963	UTE

Effective July 1, 2014, JSI Tariff F.C.C. No. 1 will govern the provision by the TDS Telecom Companies-Group B of interstate Switched Access, Special Access, Miscellaneous and Public Packet Data Network Services and the Access Recovery Charge (“ARC”). The instant filing proposes rates for these services to replace the NECA Tariff F.C.C. No. 5 rates currently charged by the individual companies comprising TDS Telecom Companies-Group B.

Concurrent with this transmittal, the National Exchange Carrier Association (“NECA”) is cancelling these carriers as issuing carrier for NECA Tariff F.C.C. No. 5 effective July 1, 2014. Beginning July 1, 2014, the fifteen study areas will no longer participate in the NECA Traffic Sensitive Pool. However, the fifteen companies comprising the TDS Telecom Group B will remain as participants in the NECA Common Line Pool and rates in JSI Tariff F.C.C. No. 1 for End User Common Line, ISDN Ports, T-1 Channel Service and Federal Universal Service Contribution (“FUSC”) charges will reference the corresponding rates in NECA Tariff F.C.C. No. 5 consistent with the carriers’ duties as members of the NECA Common Line Pool.

TDS Holding Company Relationships

TDS Telecom has 118 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the fifteen study areas comprising TDS Telecom Companies Group-B, there are currently four TDS study areas that are already issuing carriers for the JSI Tariff bringing the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 19. Currently, TDS Telecom Companies comprises four TDS Telecom study areas who withdrew from the NECA Traffic Sensitive Pool effective June 30, 2007 at which time they became issuing carriers for JSI Tariff FCC No. 1.

Concurrent with this transmittal, JSI is filing JSI Transmittal No. 181 that, *inter alia*, renames TDS Telecom Companies as “TDS Telecom Companies-Group A” to distinguish the extant group from the new group, TDS Telecom Companies-Group B. TDS Telecom Companies-Group A has filed blended rates applicable to all four companies comprising the group since June 30, 2007. The blending of rates for TDS Telecom Companies-Group A will continue based on the four study areas comprising the group and will not reflect any demand or costs for TDS Telecom Companies-Group B.

As of July 1, 2014, 99 TDS Telecom study areas will remain as issuing carriers for NECA Tariff FCC No. 5. While the 19 TDS Telecom companies that will be issuing carriers for the JSI Tariff as of July 1, 2014 will have all exited the NECA Traffic Sensitive pool either in 2007 or 2014, all of these 19 companies will continue as members of the NECA Common Line pool.

Because the 99 companies mentioned above will continue as issuing carriers for NECA Tariff FCC No. 5 and have provided data respecting the ARC/CAF Tariff Review Plan (“TRP”) forms to NECA for the NECA annual filing, TDS Telecom holding company data provided at RateCeiling-CAF.xlsm included for filing under this transmittal does not reflect data for the 99 ILECs in the NECA Traffic Sensitive Pool. Moreover, the support for TDS Telecom Companies-Group A is presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of TDS Group B Companies, Tariff Review Plan (TRP) documents for Special Access, the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014). In addition to prescribed TRP documents, the TDS Group B Companies are providing additional cost support schedules as indicated in the table below, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

Parallel Structure

The JSI Tariff maintains regulations and rate structures parallel to those for NECA Tariff FCC No. 5. The JSI Tariff also maintains additional regulations and rate structures elected by some, but not all of the issuing carriers for the JSI Tariff. The TDS Telecom Group B Companies are not electing at this time any of the regulations or rate structures in the JSI tariff that do not parallel NECA Tariff FCC No. 5. Thus, the regulations under which the TDS Telecom Group B Companies will offer interstate access services as issuing carriers for the JSI Tariff reflect those in NECA Tariff FCC No. 5 under which the TDS Telecom 5 companies are offering interstate Switched and Special Access services today. Special Access services include Public Packet Data Network services. Differences between services offered under NECA Tariff FCC No. 5 and those that will be offered under JSI Tariff FCC No.1 by the TDS Group B Companies are limited to the following: Ethernet Switched Access Local Transport ("ESALT") recently added by NECA to its tariff; Switched access transport over Synchronous Optical Channel Service ("SOCS"), also called SONET; and lower volume Ethernet Transport Service EVC capacities. At such time as one or more issuing carriers for JSI Tariff FCC No. 1, including the companies comprising TDS Telecom Companies-Group A and TDS Telecom Group-B, have both demand and technology for these services, JSI will add appropriate regulations to the JSI Tariff as well as filing introductory rates for the individual issuing carriers with demand for the service.

Blended Rates

The TDS Group B Companies are filing blended rates for Special Access. For Switched Access Service TDS must comply with the Commission's Section 901(a) Part 51, Subpart J Transitional Access Pricing rules (47 CFR Part 51, Subpart J) for switched access. The TDS Group B Companies are complying with this section of rules and have filed Switched Access Service rates on an individual company basis of JSI Tariff FCC No. 1. It was the intention of TDS Telecom to file blended rates reflective of the fifteen study areas comprising TDS Telecom Group B. This is consistent with the blended rates that already exist for

the TDS Telecom Companies – Group A. Blended rates will provide administrative efficiencies for both billing of switched access by TDS Telecom and payment of switched access charges by interexchange carriers who invariably operate in all of the study areas comprising TDS Telecom Group B. TDS Telecom plans to petition the Commission in the near future for a limited waiver of Part 51, Subpart J to allow for blending of switched access rates for, among other things, administrative ease for both TDS Telecom carrier access billing and payment of switched access charges by carriers given that the individual study areas serve the same mix of switched access customers.

TDS Telecom Group B Companies Currently Offer Wireline Broadband Internet Access Service on a Permissively Detariffed Common Carriage Basis

Each individual TDS Telecom Group B company has previously detariffed wireline broadband Internet access service (Asymmetric Digital Subscriber Line –ADSL or Symmetric Digital Subscriber Line- SDS) and currently provides such services on a permissively detariffed common carriage basis under generally available rates terms and conditions. Thus, there are no current ADSL or SDSL rates for any of the TDS Telecom Group B Companies in NECA Tariff FCC No. 5 and neither depooling nor becoming issuing carriers for the JSI Tariff reflect ADSL or SDSL.

2. TDS GROUP B COMPANIES COST SUPPORT DOCUMENTS FILED UNDER THIS TRANSMITTAL

Following are the documents filed by JSI under Transmittal No. 182 on behalf of TDS Telecom in compliance with the requirements of Section 61.38 of the Commissions tariff rules for rate-of-return prospective filers together with Tariff Review Plan documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

COST SUPPORT EXHIBITSS	
Description	Exhibit
Switched Access Rates By Company – Developed Based on Section 51.909 Depooling Rules	Exhibit A
Switched Access Non-Recurring Charges	Exhibit B

COST SUPPORT ATTACHMENTS - Continued		
Description	SAC	Attachment
TYCOS and PYCOS Parts 36 and 69: Arvig Telephone Company, Inc.	361350	#17-ARV
TYCOS and PYCOS Parts 36 and 69: Badger Telecom, LLC	330844	#18-BAD
TYCOS and PYCOS Parts 36 and 69: Blue Ridge Telephone Company	220346	#19-BLU
TYCOS and PYCOS Parts 36 and 69: Bridge Water Telephone Company	361362	#20-BRD
TYCOS and PYCOS Parts 36 and 69: Central State Telephone Company	330859	#21-CEN
TYCOS and PYCOS Parts 36 and 69: Concord Telephone Exchange, Inc.	290559	#22-CON
TYCOS and PYCOS Parts 36 and 69: Mid-Plains Telephone Company	330881	#23-MDP
TYCOS and PYCOS Parts 36 and 69: Mid-State Telephone Company	361433	#24-MDS
TYCOS and PYCOS Parts 36 and 69: Nelson-Ball Ground Telephone Company	220375	#25-NEL
TYCOS and PYCOS Parts 36 and 69: Quincy Telephone Company	210338	#26-QFL
TYCOS and PYCOS Parts 36 and 69: Quincy Telephone Company	220338	#27-QGA
TYCOS and PYCOS Parts 36 and 69: Stockbridge & Sherwood Telephone Company	330954	#28-S&S
TYCOS and PYCOS Parts 36 and 69: Strasburg Telephone Company	462207	#29-STR
TYCOS and PYCOS Parts 36 and 69: Tellico Telephone Company	290578	#30-TEL
TYCOS and PYCOS Parts 36 and 69: UTELCO, LLC	330963	#31-UTE

COST SUPPORT ATTACHMENTS		
Description	SAC	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Companies – Group B		#1-TDSB
Demand, and Revenue Impacts: Arvig Telephone Company, Inc.	361350	#2-ARV
Demand, and Revenue Impacts: Badger Telecom, LLC	330844	#3-BAD
Demand, and Revenue Impacts: Blue Ridge Telephone Company	220346	#4-BLU
Demand, and Revenue Impacts: Bridge Water Telephone Company	361362	#5-BRD
Demand, and Revenue Impacts: Central State Telephone Company	330859	#6-CEN
Demand, and Revenue Impacts: Concord Telephone Exchange, Inc.	290559	#7-CON
Demand, and Revenue Impacts: Mid-Plains Telephone Company	330881	#8-MDP
Demand, and Revenue Impacts: Mid-State Telephone Company	361433	#9-MDS
Demand, and Revenue Impacts: Nelson-Ball Ground Telephone Company	220375	#10-NEL
Demand, and Revenue Impacts: Quincy Telephone Company	210338	#11-QFL
Demand, and Revenue Impacts: Quincy Telephone Company	220338	#12-QGA
Demand, and Revenue Impacts: Stockbridge & Sherwood Telephone Company	330954	#13-S&S
Demand, and Revenue Impacts: Strasburg Telephone Company	462207	#14-STR
Demand, and Revenue Impacts: Tellico Telephone Company	290578	#15-TEL
Demand, and Revenue Impacts: UTELCO, LLC	330963	#16-UTE

COST SUPPORT ATTACHMENTS		
Description	SAC	Attachment
Certification		#32
TRP – Arvig Telephone Company	361350	#33-ARV
TRP – Badger Telecom, LLC	330844	#34-BAD
TRP – Blue Ridge Telephone Company	220346	#35-BLU
TRP – Bridge Water Telephone Company	361362	#36-BRD
TRP – Central State Telephone Company	330859	#37-CEN
TRP – Concord Telephone Exchange, Inc.	290559	#38-CON
TRP – Mid-Plains Telephone Company	330881	#39-MDP
TRP – Mid-State Telephone Company	361433	#40-MDS
TRP – Nelson-Ball Ground Telephone Company	220375	#41-NEL
TRP – Quincy Telephone Company	210338	#42-QFL
TRP – Quincy Telephone Company	220338	#43-QGA
TRP – Stockbridge & Sherwood Telephone Company	330954	#44-S&S
TRP – Strasburg Telephone Company	462207	#45-STR
TRP – Tellico Telephone Company	290578	#46-TEL
TRP – UTELCO, LLC	330963	#47-UTE

3: SWITCHED ACCESS RATES

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, the Group B Companies have followed, with the assistance of and in concert with NECA the Part 51, Subpart J rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the rules pertaining to both NECA and the existing incumbent local exchange carriers (ILECs) for exiting of the pool and the calculations executed by NECA and the Group B Companies to develop switched access rates to be filed in the JSI Tariff.

TDS Exhibit A, providing data and documenting calculations for compliance with the Commission's Part 51, Subpart J Transitional Access Pricing rules, provides data for the above companies on an individual company basis.

Exiting of the NECA Traffic Sensitive Pool by the TDS Telecom Companies-Group B will result in reduced access charges to switched access customers of approximately of \$6,830,000, a rate of decrease of 77.6 percent. The switched access rates of the Group B Companies will decrease an average of 77.6 percent, with highest rate of decrease at 85.5 percent for Quincy Telephone Company- Georgia. Only a single study area among the fifteen Group B Companies will have an increase in rates resulting from exiting the NECA Traffic Sensitive Pool: Strasburg Telephone Company (6.9 percent).

Cross-Reference of Part 51, Subpart J, Section 51.909(a) to TDS Exhibit A		
Step	FCC Rule	Cross-Reference to Exhibit A
1	<p>51.909(a)(4)(ii)(A)</p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<p><i>See Exhibit A, Lines 101 through 104</i></p>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<p><i>See Exhibit A, Line 1</i></p>

Step	FCC Rule	Cross-Reference to Exhibit A
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<p><i>See Exhibit A, Lines 36 through 67</i></p>
4	<p>51.909(d)(3)(ii)</p> <p>Each Rate-of-Return Carrier shall calculate its 2014 interstate Target Composite Terminating End Office Access Rate. The 2014 interstate Target Composite Terminating End Office Access Rate means \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite Terminating End Office Access Rate and \$0.005 per minute.</p>	<p><i>See Exhibit A, Lines 69 through 73</i></p> <p><i>Note: of the 15 TDS Telecom Companies – Group B, only two study areas required adjustment pursuant to Section 51.909(d)(3)(ii), Stockbridge & Sherwood Telephone, SAC 330954 and Strasburg Telephone Company, SAC 462207.</i></p>
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1, TDS Telecom Companies – Group B under JSI Transmittal 182 effective July 1, 2014</i></p>
6	<p>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</p> <p>[...] the Access Recovery Charges that will be assessed, and the amount of Connect America Fund ICC support the carrier will be eligible to receive.</p>	<p><i>See Discussion of ARC Below.</i></p>

4. NONRECURRING CHARGE RATES FOR SWITCHED ACCESS

The proposed TDS Group B Companies Switched Access nonrecurring charge rates are listed at Exhibit B. The Company proposes mirroring the Switched Access nonrecurring charge rates in effect as of the last base tariff filing for NECA Tariff FCC No. 5 on June 1, 2014. It is the understanding of JSI and the TDS Group B Companies that NECA establishes nonrecurring charge rates for its members in NECA Tariff FCC No. 5 based on time and cost studies reflective of its membership. Thus, TDS Telecom and JSI believe that the proposed nonrecurring charge rates are reasonable.

5. SPECIAL ACCESS

The TDS Group B Companies propose filing blended rates for Special Access. The proposed blended rates reflects multiplication of the current NECA Tariff FCC No. 5 Special Access Band 5 rates applicable to all fifteen of the individual TDS Group B Companies through June 30, 2014 by a proposed rate factor. The proposed rate factor is derived by the following three-step process as follows.

Development of Proposed Rate Factor for Special Access

1. Projection of Special Access Demand for the Combined TDS Group B Companies
2. Listing of the current applicable NECA rates for all Special Access rate elements including packet mode communications offerings (Frame Relay, ATM Cell Relay and Ethernet Transport Service). The TDS Group B Companies have detariffed Digital Subscriber Line services and instead offer Wireline Broadband Internet Transport Service on a common carriage, permissively detariffed basis.
3. Determination of revenue for projected demand at current rates by extension of projected demand by current NECA rates (i.e., Step 1 * Step 2) and totaling.
4. Combination of projected test-year Special Access revenue requirements for all fifteen TDS Group B Companies.
5. Determination of Rate Factor based on ratio of combined Special Access revenue requirements for fifteen study areas comprising the TDS Group B Companies (from Step 4) to the total revenue at current rates determined in Step 3.

The Rate Factor resulting from the above steps is 117.22 percent, indicating a projected increase in Special Access rates of 17.22 percent for the initial filing for the TDS Group B Companies following depooling. This level of increase is discussed below.

Calculations consistent with the above steps are shown at Attachment 1-TDSB, Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Companies – Group B

Development of Projected Special Access Demand

Special Access (“SPA”) demand quantities for the projected test year were determined by review of historical end of year demand from 2010 to 2013. Based on this historical data, demand trends were developed to project end of year demand for 2014 and 2015. The combined companies experienced a 7 percent decrease in High Capacity DS1 demand and an estimated 5.5 percent decrease in billing at current rate levels during 2013. The attached charts show the decreasing High Capacity DS1 channel term demand and estimated billing at current rate levels:

Average Monthly High Capacity DS1 Channel Term Demand				
		1st Qtr 2013	2nd Qtr 2013	6 Month Ave
		2,907	2,810	2,858
3rd Qtr 2013	4th Qtr 2013	1st Qtr 2014	2nd Qtr 2014	12 Month Ave
2,728	2,701	2,616	2,418	2,616
Projected 3rd Qtr 2014	Projected 4th Qtr 2014	Projected 1st Qtr 2015	Projected 2nd Qtr 2015	12 Month Ave
2,442	2,465	2,416	2,365	2,422

Average Total Special Access Monthly Billing at Current Rates				
		1st Qtr 2013	2nd Qtr 2013	6 Month Ave
		\$952,287	\$941,943	\$947,115
3rd Qtr 2013	4th Qtr 2013	1st Qtr 2014	2nd Qtr 2014	12 Month Ave
\$919,141	\$900,345	\$863,800	\$824,596	\$876,970
Projected 3rd Qtr 2014	Projected 4th Qtr 2014	Projected 1st Qtr 2015	Projected 2nd Qtr 2015	12 Month Ave
\$840,374	\$837,373	\$825,473	\$811,757	\$828,744

At the current NECA Band 5 Special Access rates, average monthly billing for the TDS Group B companies have fallen from \$947,115 for the first two quarters of 2013 to \$876,970 for the Prior Year Cost of Service (PYCOS) year and are projected to decrease further to \$828,744 for the Test Year Cost of Service (TYCOS) year. The rate of decrease in revenue from the PYCOS to the TYCOS is 5.5 percent. The rate of decrease in revenue from the first six months of 2013 is 12.5 percent.

This trend is expected to continue as wireless carriers migrate to competitive carriers for their larger bandwidth data backhaul networks. Forecasted demand for Voice Grade and Digital Data circuits were left flat or declining as Company experience and observations indicates demand for these services is diminishing at a much slower pace than High Capacity DS1s.

This projected demand was then compared with March 2014 actual demand and adjustments to demand were made when current demand deviated from the demand trend. Any pending circuit orders were also included in the forecasted demand. Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terms (“CMT”) in 2013. 2014 CMF demand was calculated by multiplying the CMF/CMT ratio by the forecasted CMT demand.

Developing the final rate design demand was a multiple step process. First year-end 2013 demand and 2014 forecasted demand were averaged to determine demand as of July 1, 2014. Next YE 2014 and 2015 forecasted demand were averaged to determine June 30, 2015 forecasted demand. The two average amounts were then averaged to provide projected monthly demand which was then annualized to show projected demand for the test year

6. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

In addition to the supporting documentation listed above, this filing includes completed, FCC-required forms related to Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC). The accompanying file “TDS Group B ICC-CAF Forms and Information” comprises the following required forms:

- TDS Telecom Group B 2014 ROR-ILEC-ICC.xlsx
- TDS Telecom Group B Tariff Rate Comp CAF.xls
- TDS Telecom Group B 2014 True Up.xls -
- TDS Telecom Group B 2014 Rate Ceiling CAF.xls

As shown in the supporting documentation, where the current ARC residential rate for an exchange is zero, there will be no change. Where the current rate is set at the ceiling, the rate will increase to the new ceiling.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Atlantic Telephone Membership Corporation, SAC 230468 (North Carolina)

Atlantic Telephone Membership Corporation, (alternatively “Atlantic” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Atlantic is an Issuing Carrier of the JSI Tariff. Atlantic files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Atlantic of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Atlantic is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Atlantic, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Atlantic proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Atlantic proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Atlantic Telephone Membership Corporation (NC)

user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. ATLANTIC TARIFF REVIEW PLANS

Atlantic submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Atlantic 2014 ROR-ILEC-ICC
- Atlantic 2014 Tariff Rate Comp CAF
- Atlantic 2014 True Up
- Atlantic 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Bixby Telephone Company
SAC 431969 (Oklahoma)

Bixby Telephone Company, (alternatively “Bixby” or “Company”), through its consultant John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (JSI Tariff). Effective July 1, 2014, Bixby will exit the National Exchange Carrier Association, Inc. (NECA) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Bixby as an issuing carrier for NECA Tariff F.C.C. No. 5 and Bixby will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014.

As an issuing carrier for JSI Tariff F.C.C. No.1, the Company will provide services and bill Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2014 the Company will file interstate Special Access, including Public Packet Data Network, services on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company remains as a member of the NECA Common Line Pool. Rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will reference NECA Tariff F.C.C No. 5 rates for the respective services.

The regulations and rate structures applicable to Bixby Telephone Company parallel those of NECA Tariff FCC No. 5 in all material respects. Differences between services offered under NECA Tariff FCC No. 5 and those the Company will offer under JSI Tariff FCC No.1 are limited to the following for which the Company currently has no demand: Company: Ethernet Switched Access Local Transport (ESALT), recently added by NECA, and Switched Access Local Transport over Synchronous Optical Channel Service (SOCS), also called SONET. JSI will be adding regulations to the JSI Tariff for ESALT and Switched Access Local Transport over SOCS in the near future and at such time as the Company receives requests for either ESALT or SOCS Local Transport the Company will add rates for the respective service.

NECA Tariff FCC No. 5 does not include Wireline Broadband Internet Access Service (WBIAS) rates for the Bixby (WBIAS is offered as either ADSL or SDSL in

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bixby Telephone LLC (Alabama)

NECA Tariff FCC No. 5). The Company provides WBIAS on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, 47 CFR Part 51, Subpart J, the Company has followed, with the assistance of and in concert with NECA, the rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the specific rules pertaining to both NECA and the incumbent local exchange carrier (ILEC) for exiting of the pool and the calculations executed by NECA and the Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Bixby Telephone, LLC Exhibit A provides data documenting calculations for compliance with the Commission's Part 51, Subpart J Transitional Access Pricing rules.

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 22 percent reduction in Switched Access charges to carriers based on historic 2013 demand. Application of the current NECA Switched Access rates applicable to the Company to 2013 historic demand produces revenue of \$283,387. Application of the rates for Switched Access proposed under this transmittal to 2013 historic demand produces revenue of \$220,295, a reduction of \$63,092 or 22 percent.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bixby Telephone LLC (Alabama)

Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations

Step	FCC Rule	Cross-Reference to Exhibit A
1	<p>51.909(a)(4)(ii)(A)</p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<p><i>See Exhibit A, Lines 101 through 104</i></p>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<p><i>See Exhibit A, Line 105</i></p>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>
4	<p>51.909(d)(3)(ii)</p> <p>Each Rate-of-Return Carrier shall calculate its 2014 interstate Target Composite Terminating End Office Access Rate. The 2014 interstate Target Composite Terminating End Office Access Rate means \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite Terminating End Office Access Rate and \$0.005 per minute.</p>	<p><i>See Exhibit A, Lines 410 through 408</i></p>

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bixby Telephone LLC (Alabama)

Step	FCC Rule	Cross-Reference to Exhibit A
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 182 effective July 1, 2014</i></p>
6	<p>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</p> <p>[...] the Access Recovery Charges that will be assessed, and the amount of Connect America Fund ICC support the carrier will be eligible to receive.</p>	<p><i>See below</i></p>

2. SPECIAL ACCESS RATES

The Company is a Cost Company. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2014 have been determined based on historic 2013 demand and cost pursuant to Section 61.39. See 47 CFR § 61.39.

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to Section 51.917(e) and to receive CAF-ICC recovery pursuant to Section 51.917(f). See 47 CFR § 51.917(e), (f).

Under Section 51.917(e), the Company proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to Section 69.104 and \$3.00 per Section 69.104 for the third implementation period of the ARC which ends June 30, 2015. See 47 CFR § 69.104.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The Test Year (TY) 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Bixby Telephone LLC (Alabama)

Tariff Review Plan (TRP) For ARC-ICC-CAF

Bixby Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Bixby 2014 ROR-ILEC-ICC
- Bixby 2014 Tariff Rate Comp CAF
- Bixby 2014 True Up
- Bixby 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

BIXBY TELEPHONE COMPANY

Study Area Code 431969

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$ 380,856
102	Projected 2011-12 Pool Settlements without LSS	NECA	296,063
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 84,793
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	22.26%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-22.26%

**July 1, 2014 Recurring Switched Access Service
End Office**

201	Local Switching Premium Rates	Line 408	\$0.016436
202	Information Surcharge (shown as Per MOU)	Per FCC	\$0.0000
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$31.65
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$50.65
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$154.31
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,408.96
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.25
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.25
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$10.57
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$92.09
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$22.66
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$22.66
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$54.85
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$352.23
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$321.38
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$124.07
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000152
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000791
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001993
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004275
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004742

**Current Recurring Switched Access Service
End Office**

301	Local Switching Premium Rates		\$0.027986
302	Information Surcharge (shown as Per MOU)		\$0.051300
Local Transport			
303	Voice Grade 2-Wire Entrance Facility		\$40.72
304	Voice Grade 4-Wire Entrance Facility		\$65.15
305	DS-1 Entrance Facility		\$198.50
306	DS-3 Entrance Facility		\$1,812.49
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.90
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.90
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$13.60
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Rates from NECA Tariff based on banded rates	\$118.47
311	Voice Grade 2-Wire Direct Trunk Termination		\$29.15
312	Voice Grade 4-Wire Direct Trunk Termination		\$29.15
313	DS-1 Direct Trunk Termination		\$70.56
314	DS-3 Direct Trunk Termination		\$453.11
315	Multiplexing DS3-DS1		\$413.42
316	Multiplexing DS1-Voice		\$159.61
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000195
318	Tandem Switched Termination		\$0.001017
319	Tandem Switching		\$0.002564
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005500
321	800 Data Base Access Service Queries, Per Query - Vertical Feature	\$0.006100	

BIXBY TELEPHONE COMPANY

Study Area Code 431969

SOURCE

Composite Rates Interstate Rates for July 1, 2014 - Before Step Down Calculation

401	Local Switching	Line 301 + (Line 301 * Line 105)	\$0.021755
402	Information Surcharge	Line 302 + (Line 302 * Line 105)	\$0.039879
403	Information Surcharge Adjusted for per 100 to 1 Minute	Line 402 / 100	\$0.000399
404	Combined EOLS + Info Sur For Terminating Interstate and Intrastate Terminating Line 401 + Line 403		\$0.022154

Step-Down Calculation

405	Effective Rate July 1st 2016 - FCC Order	FCC Order	\$0.005000
406	Difference In Unified Rate and July 1st 2016 Rate	Line 405 - Line 404	-\$0.017154
407	Transition to Rate on Line 2 in equal 1/3 Steps	Line 406 / 3 (if Line 306 is negative), otherwise \$0.00	-\$0.005718
408	Rate Effective Date July 2014	Line 404 + Line 407	\$0.016436

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Brindlee Mountain Telephone LLC
SAC 250283 (Alabama)

Brindlee Mountain Telephone LLC, (alternatively “Brindlee” or “Company”), through its consultant John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (JSI Tariff). Effective July 1, 2014, Brindlee will exit the National Exchange Carrier Association, Inc. (NECA) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Brindlee as an issuing carrier for NECA Tariff F.C.C. No. 5 and Brindlee will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014.

As an issuing carrier for JSI Tariff F.C.C. No.1, the Company will provide services and bill Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2014 the Company will file interstate Special Access, including Public Packet Data Network, services on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company remains as a member of the NECA Common Line Pool. Rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will reference NECA Tariff F.C.C No. 5 rates for the respective services.

The regulations and rate structures applicable to Brindlee Mountain Telephone LLC parallel those of NECA Tariff FCC No. 5 in all material respects. Differences between services offered under NECA Tariff FCC No. 5 and those the Company will offer under JSI Tariff FCC No.1 are limited to the following for which the Company currently has no demand: Company: Ethernet Switched Access Local Transport (ESALT), recently added by NECA, and Switched Access Local Transport over Synchronous Optical Channel Service (SOCS), also called SONET. JSI will be adding regulations to the JSI Tariff for ESALT and Switched Access Local Transport over SOCS in the near future and at such time as the Company receives requests for either ESALT or SOCS Local Transport the Company will add rates for the respective service.

NECA Tariff FCC No. 5 does not include Wireline Broadband Internet Access Service (WBIAS) rates for the Brindlee (WBIAS is offered as either ADSL or SDSL

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Brindlee Mountain Telephone LLC (Alabama)

in NECA Tariff FCC No. 5). The Company provides WBIAS on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, 47 CFR Part 51, Subpart J, the Company has followed, with the assistance of and in concert with NECA, the rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the specific rules pertaining to both NECA and the incumbent local exchange carrier (ILEC) for exiting of the pool and the calculations executed by NECA and the Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Brindlee Mountain Telephone, LLC Exhibit A provides data documenting calculations for compliance with the Commission's Part 51, Subpart J Transitional Access Pricing rules.

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 40 percent reduction in Switched Access charges to carriers based on historic 2013 demand. Application of the current NECA Switched Access rates applicable to the Company to 2013 historic demand produces revenue of \$537,000. Application of the rates for Switched Access proposed under this transmittal to 2013 historic demand produces revenue of \$321,000, a reduction of \$216,000 or 40 percent.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Brindlee Mountain Telephone LLC (Alabama)

Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations

Step	FCC Rule	Cross-Reference to Exhibit A
1	<p>51.909(a)(4)(ii)(A)</p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<p><i>See Exhibit A, Lines 101 through 104</i></p>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<p><i>See Exhibit A, Line 105</i></p>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>
4	<p>51.909(d)(3)(ii)</p> <p>Each Rate-of-Return Carrier shall calculate its 2014 interstate Target Composite Terminating End Office Access Rate. The 2014 interstate Target Composite Terminating End Office Access Rate means \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite Terminating End Office Access Rate and \$0.005 per minute.</p>	<p><i>See Exhibit A, Lines 410 through 408</i></p>
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff</i></p>

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Brindlee Mountain Telephone LLC (Alabama)

Step	FCC Rule	Cross-Reference to Exhibit A
	interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>FCC No. 1 under JSI Transmittal 182 effective July 1, 2014</i>
6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] the Access Recovery Charges that will be assessed, and the amount of Connect America Fund ICC support the carrier will be eligible to receive.	<i>See below</i>

2. SPECIAL ACCESS RATES

The Company is a Cost Company. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2014 have been determined based on historic 2013 demand and cost pursuant to Section 61.39. See 47 CFR § 61.39.

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to Section 51.917(e) and to receive CAF-ICC recovery pursuant to Section 51.917(f). See 47 CFR § 51.917(e), (f).

Under Section 51.917(e), the Company proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to Section 69.104 and \$3.00 per Section 69.104 for the third implementation period of the ARC which ends June 30, 2015. See 47 CFR § 69.104.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The Test Year (TY) 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Brindlee Mountain Telephone LLC (Alabama)

Tariff Review Plan (TRP) For ARC-ICC-CAF

Brindlee Mountain Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Brindlee 2014 ROR-ILEC-ICC
- Brindlee 2014 Tariff Rate Comp CAF
- Brindlee 2014 True Up
- Brindlee 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

BRINDLEE MOUNTAIN TELEPHONE LLC

Study Area Code 250283

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$ 561,437
102	Projected 2011-12 Pool Settlements without LSS	NECA	335,100
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 226,337
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	40.31%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-40.31%

July 1, 2014 Recurring Switched Access Service
End Office

201	Local Switching Premium Rates	Line 408	\$0.007438
202	Information Surcharge (shown as Per MOU)	Per FCC	\$0.0000
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$24.30
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$38.89
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$118.48
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,081.80
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.73
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.73
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$8.12
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$70.71
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$17.40
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$17.40
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$42.11
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$270.44
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$246.75
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$95.26
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000249
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001296
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003268
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003283
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003641

Current Recurring Switched Access Service
End Office

301	Local Switching Premium Rates	NECA BANDs--	LS / LT / TST>	1 / 7 / 2	\$0.013992
302	Information Surcharge (shown as Per MOU)				\$0.051300
Local Transport					
303	Voice Grade 2-Wire Entrance Facility				\$40.72
304	Voice Grade 4-Wire Entrance Facility				\$65.15
305	DS-1 Entrance Facility				\$198.50
306	DS-3 Entrance Facility				\$1,812.49
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)				\$2.90
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)				\$2.90
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)				\$13.60
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)				\$118.47
311	Voice Grade 2-Wire Direct Trunk Termination				\$29.15
312	Voice Grade 4-Wire Direct Trunk Termination				\$29.15
313	DS-1 Direct Trunk Termination				\$70.56
314	DS-3 Direct Trunk Termination				\$453.11
315	Multiplexing DS3-DS1				\$413.42
316	Multiplexing DS1-Voice				\$159.61
317	Tandem Switched Facility (Per MOU per Mile)				\$0.000418
318	Tandem Switched Termination				\$0.002171
319	Tandem Switching				\$0.005476
320	800 Data Base Access Service Queries, Per Query - Basic				\$0.005500
321	800 Data Base Access Service Queries, Per Query - Vertical Feature				\$0.006100

Rates from NECA Tariff based on banded rates

BRINDLEE MOUNTAIN TELEPHONE LLC

Study Area Code 250283

SOURCE

Composite Rates Interstate Rates for July 1, 2014 - Before Step Down Calculation

401	Local Switching	Line 301 + (Line 301 * Line 105)	\$0.008351
402	Information Surcharge	Line 302 + (Line 302 * Line 105)	\$0.030619
403	Information Surcharge Adjusted for per 100 to 1 Minute	Line 402 / 100	\$0.000306
404	Combined EOLS + Info Sur For Terminating Interstate and Intrastate Terminating Line 401 + Line 403		\$0.008657

Step-Down Calculation

405	Effective Rate July 1st 2016 - FCC Order	FCC Order	\$0.005000
406	Difference In Unified Rate and July 1st 2016 Rate	Line 405 - Line 404	-\$0.003657
407	Transition to Rate on Line 2 in equal 1/3 Steps	Line 406 / 3 (if Line 306 is negative), otherwise \$0.00	-\$0.001219
408	Rate Effective Date July 2014	Line 404 + Line 407	\$0.007438

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Chesnee Telephone Company, Inc. d/b/a Chesnee Communications
SAC 240515 (South Carolina)

Chesnee Telephone Company, Inc. d/b/a Chesnee Communications, (alternatively “Chesnee” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Chesnee is an Issuing Carrier of the JSI Tariff. Chesnee files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Chesnee of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services and, beginning July 3, 2012, the Access Recovery Charge (“ARC”). With respect to Common Line, Chesnee is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Chesnee, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Chesnee proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Chesnee proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers

Description and Justification**JSI Transmittal No. 182 - 2014 Annual Access Filing****Chesnee Telephone Company, Inc. d/b/a Chesnee Communications (SC)**

assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. CHESNEE TARIFF REVIEW PLANS

Chesnee submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Chesnee 2014 ROR-ILEC-ICC.xlsx
- Chesnee 2014 Tariff Rate Comp CAF.xls
- Chesnee 2014 True Up
- Chesnee 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

**Gearheart Communications Company, Inc. d/b/a Coalfields Telephone
Company, SAC 260408 (Kentucky)**

Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company, (alternatively “Coalfields” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Coalfields is an Issuing Carrier of the JSI Tariff. Coalfields files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Coalfields of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services and, beginning July 3, 2012, the Access Recovery Charge (“ARC”). With respect to Common Line, Coalfields is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Coalfields, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Coalfields proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Coalfields proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge

Description and Justification**JSI Transmittal No. 182 - 2014 Annual Access Filing****Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company (KY)**

pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. COALFIELDS TARIFF REVIEW PLANS

Coalfields submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Coalfields 2014 ROR-ILEC-ICC.xlsx
- Coalfields 2014 Tariff Rate Comp CAF.xls
- Coalfields 2014 True Up
- Coalfields 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Egyptian Telephone Cooperative Association
SAC 341003 (Illinois)

Egyptian Telephone Cooperative Association, (alternatively “Egyptian” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2014, Egyptian will exit the GVNW Inc./Management Tariff F.C.C. No. 2 (“GVNW Tariff”). Concomitant with exiting the GVNW Tariff, GVNW will cancel Egyptian as an issuing carrier for GVNW Tariff No. 2 and Egyptian will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014. Beginning July 1, 2014 Egyptian will file interstate Special Access on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing.

Egyptian is remaining in the National Exchange Carrier Association (“NECA”) Common Line Pool and therefore will continue to bill End User rates under NECA Tariff F.C.C. No. 5. Appropriate references in the proposed rate pages for Egyptian contained herein will indicate End User rates are billed at NECA Tariff rates.

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

GVNW Tariff regulations mirror the NECA Tariff on a more streamlined basis than the JSI Tariff. The JSI Tariff parallels the GVNW Tariff in all material aspects of the tariff as it applies to Egyptian’s interstate access services. The Company does not have any current demand for Public Packet Data Network services and thus has not established rates for such service. At such time as the Company has demand for Ethernet Transport Service (ETS) or other Public Packet Data Network services, the Company will add appropriate rates to the JSI Tariff under the regulations and rate structure of the JSI Tariff.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Egyptian Telephone Cooperative Association - Illinois

1. SWITCHED ACCESS RATES

In the USF/ICC Transformation Order, the Commission, inter alia, adopted Section 51.909 establishing for rate-of-return carriers steps for the transition of both interstate and intrastate Switched Access End Office and Transport rates. See 47 CFR A§ 51.909. Section 909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 909(a).

With the exception of transitional reductions in composite terminating Local Switching rates, the Company's Switched Access rates have been carried forward from the GVNW tariff inasmuch as those rates are frozen.

Section 909(d)(3)(ii) prescribes a Target Composite Terminating End Office Access Rate of \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite terminating End Office Rate and \$0.005. 47 CFR § 909(d)(3)(ii). The new tariff page for Switched Access-End Office reflects bifurcation of originating and terminating Switched Access End Office rates between originating and terminating. For terminating, the Information Surcharge rate has been combined with the Local Switching rate (after first adjusting the Information Surcharge rate from a per 100 minutes basis to a per minute basis to allow consistency with the End Office rate application). The resulting composite Switched Access End Office Terminating Local Switching rate reflects the reduction in the rate calculated to reduce the composite terminating Switched Access End Office Local Switching rate by one third of the difference between the frozen rate and \$0.005.

2. SPECIAL ACCESS RATES

The Company is electing to make a mid-course filing for Special Access. The Company's proposed Special Access rates to be effective July 1, 2014 have been calculated based on historic demand and historic cost for the calendar year 2013 consistent with Section 61.39 of the Commission's rules.

Consistent with Section 61.39, cost support for Special Access is available upon request.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Egyptian Telephone Cooperative Association - Illinois

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f). Under Section 51.917(e), Egyptian proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015. The foregoing rates apply to all exchanges with the exception of the Rice – Perry County exchange which proposes an ARC effective July 1, 2014 at the rate of \$1.34 for primary residential lines.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

4. EGYPTIAN TARIFF REVIEW PLANS

Egyptian submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Egyptian 2014 ROR-ILEC-ICC
- Egyptian 2014 Tariff Rate Comp CAF
- Egyptian 2014 True Up
- Egyptian 2014 Rate Ceiling CAF

5. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Ellijay Telephone Company
SAC 220360 (Georgia)

Ellijay Telephone Company, (alternatively “Ellijay” or “Company”), through its consultant John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (JSI Tariff). Effective July 1, 2014, Ellijay will exit the National Exchange Carrier Association, Inc. (NECA) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Ellijay as an issuing carrier for NECA Tariff F.C.C. No. 5 and Ellijay will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014.

As an issuing carrier for JSI Tariff F.C.C. No.1, the Company will provide services and bill Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2014 the Company will file interstate Special Access, including Public Packet Data Network, services on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company remains as a member of the NECA Common Line Pool. Rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will reference NECA Tariff F.C.C No. 5 rates for the respective services.

The regulations and rate structures applicable to Ellijay Telephone Company parallel those of NECA Tariff FCC No. 5 in all material respects. Differences between services offered under NECA Tariff FCC No. 5 and those the Company will offer under JSI Tariff FCC No.1 are limited to the following for which the Company currently has no demand: Company: Ethernet Switched Access Local Transport (ESALT), recently added by NECA, and Switched Access Local Transport over Synchronous Optical Channel Service (SOCS), also called SONET. JSI will be adding regulations to the JSI Tariff for ESALT and Switched Access Local Transport over SOCS in the near future and at such time as the Company receives requests for either ESALT or SOCS Local Transport the Company will add rates for the respective service.

The Company has previously detariffed Wireline Broadband Internet Access Service. (WBIAS) and provides the service on a Title II common-carriage basis on a permissively detariffed basis.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Ellijay Telephone Company - Georgia

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, 47 CFR Part 51, Subpart J, the Company has followed, with the assistance of and in concert with NECA, the rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the specific rules pertaining to both NECA and the incumbent local exchange carrier (ILEC) for exiting of the pool and the calculations executed by NECA and the Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Ellijay Exhibit A provides data documenting calculations for compliance with the Commission's Part 51, Subpart J Transitional Access Pricing rules.

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 39 percent reduction in Switched Access charges to carriers based on historic 2013 demand. Application of the current NECA Switched Access rates applicable to the Company to 2013 historic demand produces revenue of \$299,000. Application of the rates for Switched Access proposed under this transmittal to 2013 historic demand produces revenue of \$181,000, a reduction of \$118,000 or 39 percent.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Ellijay Telephone Company - Georgia

Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations

Step	FCC Rule	Cross-Reference to Exhibit A
1	<p>51.909(a)(4)(ii)(A)</p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<p><i>See Exhibit A, Lines 101 through 104</i></p>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<p><i>See Exhibit A, Line 105</i></p>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>
4	<p>51.909(d)(3)(ii)</p> <p>Each Rate-of-Return Carrier shall calculate its 2014 interstate Target Composite Terminating End Office Access Rate. The 2014 interstate Target Composite Terminating End Office Access Rate means \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite Terminating End Office Access Rate and \$0.005 per minute.</p>	<p><i>See Exhibit A, Lines 410 through 408</i></p>

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Ellijay Telephone Company - Georgia

Step	FCC Rule	Cross-Reference to Exhibit A
5	51.909(a)(5)(ii) [Step 4 Portion of the Rule] The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 182 effective July 1, 2014</i>
6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] the Access Recovery Charges that will be assessed, and the amount of Connect America Fund ICC support the carrier will be eligible to receive.	<i>See below</i>

2. SPECIAL ACCESS RATES

The Company is an Average Schedule carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2014 have been determined based on Section 61.39(b)(2)(i) of the Commission's rules. See 47 CFR § 61.39(b)(2)(i).¹

61.39(b)(2)

For a tariff change, the incumbent local exchange carrier that is an average schedule carrier must propose Traffic Sensitive rates based on the following:

61.39(b)(2)(i)

For the first period, the incumbent local exchange carrier's most recent annual Traffic Sensitive settlement from the National Exchange Carrier Association pool.

61.39(b)(2)(ii)

For subsequent filings, an amount calculated to reflect the Traffic Sensitive average schedule pool settlement the carrier would have received if the carrier had continued to participate, based upon the most recent average schedule formulas approved by the Commission.

¹ Section 61.39(b)(2) no longer applies to Switched Access as the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J govern Switched Access pricing. See 47 CFR Part 51, Subpart J.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Ellijay Telephone Company - Georgia

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to Section 51.917(e) and to receive CAF-ICC recovery pursuant to Section 51.917(f). See 47 CFR § 51.917(e), (f).

Under Section 51.917(e), the Company proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to Section 69.104 and \$3.00 per Section 69.104 for the third implementation period of the ARC which ends June 30, 2015. See 47 CFR § 69.104.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.² The Test Year (TY) 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

Tariff Review Plan (TRP) For ARC-ICC-CAF

Ellijay submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Ellijay 2014 ROR-ILEC-ICC
- Ellijay 2014 Tariff Rate Comp CAF
- Ellijay 2014 True Up
- Ellijay 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

² See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

ELLIJAY TELEPHONE COMPANY

Study Area Code 220360

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$ 307,632
102	Projected 2011-12 Pool Settlements without LSS	NECA	186,255
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 121,377
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	39.46%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-39.46%
July 1, 2014 Recurring Switched Access Service			
End Office			
201	Local Switching Premium Rates	Line 408	\$0.007521
202	Information Surcharge (shown as Per MOU)	Per FCC	\$0.0000
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$11.85
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$18.96
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$57.77
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$527.54
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.84
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.84
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$3.95
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$34.49
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$8.48
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$8.48
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$20.54
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$131.88
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$120.33
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$46.46
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000118
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000616
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001552
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003330
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003693
Current Recurring Switched Access Service		NECA BANDS--	LS / LT / TST> 1 / 1 / 1
End Office			
301	Local Switching Premium Rates		\$0.013992
302	Information Surcharge (shown as Per MOU)		\$0.051300
Local Transport			
303	Voice Grade 2-Wire Entrance Facility		\$19.57
304	Voice Grade 4-Wire Entrance Facility		\$31.32
305	DS-1 Entrance Facility		\$95.42
306	DS-3 Entrance Facility		\$871.33
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.39
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.39
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$6.53
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$56.96
311	Voice Grade 2-Wire Direct Trunk Termination		\$14.01
312	Voice Grade 4-Wire Direct Trunk Termination		\$14.01
313	DS-1 Direct Trunk Termination		\$33.93
314	DS-3 Direct Trunk Termination		\$217.82
315	Multiplexing DS3-DS1		\$198.74
316	Multiplexing DS1-Voice		\$76.74
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000195
318	Tandem Switched Termination		\$0.001017
319	Tandem Switching		\$0.002564
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005500
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006100

ELLIJAY TELEPHONE COMPANY

Study Area Code 220360

SOURCE

Composite Rates Interstate Rates for July 1, 2014 - Before Step Down Calculation

401	Local Switching	Line 301 + (Line 301 * Line 105)	\$0.008471
402	Information Surcharge	Line 302 + (Line 302 * Line 105)	\$0.031059
403	Information Surcharge Adjusted for per 100 to 1 Minute	Line 402 / 100	\$0.000311
404	Combined EOLS + Info Sur For Terminating Interstate and Intrastate Terminating Line 401 + Line 403		\$0.008782

Step-Down Calculation

405	Effective Rate July 1st 2016 - FCC Order	FCC Order	\$0.005000
406	Difference In Unified Rate and July 1st 2016 Rate	Line 405 - Line 404	-\$0.003782
407	Transition to Rate on Line 2 in equal 1/3 Steps	Line 406 / 3 (if Line 306 is negative), otherwise \$0.00	-\$0.001261
408	Rate Effective Date July 2014	Line 404 + Line 407	\$0.007521

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Flat Rock Telephone Co-Op, Inc.
SAC 341012 (Illinois)

Flat Rock Telephone Co-Op, Inc., (alternatively “Flat Rock” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2014, Flat Rock will exit the GVNW Inc./Management Tariff F.C.C. No. 2 (“GVNW Tariff”). Concomitant with exiting the GVNW Tariff, GVNW will cancel Flat Rock as an issuing carrier for GVNW Tariff No. 2 and Flat Rock will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014. Beginning July 1, 2014 Flat Rock will file interstate Special Access on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing.

Flat Rock is remaining in the National Exchange Carrier Association (“NECA”) Common Line Pool and therefore will continue to bill End User rates under NECA Tariff F.C.C. No. 5. Appropriate references in the proposed rate pages for Flat Rock contained herein will indicate End User rates are billed at NECA Tariff rates.

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

GVNW Tariff regulations mirror the NECA Tariff on a more streamlined basis than the JSI Tariff. The JSI Tariff parallels the GVNW Tariff in all material aspects of the tariff as it applies to Flat Rock’s interstate access services. The Company does not have any current demand for Public Packet Data Network services and thus has not established rates for such service. At such time as the Company has demand for Ethernet Transport Service (ETS) or other Public Packet Data Network services, the

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Flat Rock Telephone Co-Op, Inc. - Illinois

Company will add appropriate rates to the JSI Tariff under the regulations and rate structure of the JSI Tariff.

1. SWITCHED ACCESS RATES

In the USF/ICC Transformation Order, the Commission, inter alia, adopted Section 51.909 establishing for rate-of-return carriers steps for the transition of both interstate and intrastate Switched Access End Office and Transport rates. See 47 CFR A§ 51.909. Section 909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 909(a).

With the exception of transitional reductions in composite terminating Local Switching rates, the Company's Switched Access rates have been carried forward from the GVNW tariff inasmuch as those rates are frozen.

Section 909(d)(3)(ii) prescribes a Target Composite Terminating End Office Access Rate of \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite terminating End Office Rate and \$0.005. 47 CFR § 909(d)(3)(ii). The new tariff page for Switched Access-End Office reflects bifurcation of originating and terminating Switched Access End Office rates between originating and terminating. For terminating, the Information Surcharge rate has been combined with the Local Switching rate (after first adjusting the Information Surcharge rate from a per 100 minutes basis to a per minute basis to allow consistency with the End Office rate application). The resulting composite Switched Access End Office Terminating Local Switching rate reflects the reduction in the rate calculated to reduce the composite terminating Switched Access End Office Local Switching rate by one third of the difference between the frozen rate and \$0.005.

2. SPECIAL ACCESS RATES

The Company is a historic filer under Section 61.39 of the Commission's rules required to make annual filings in odd-numbered years. Thus, the Company is carrying forward its Special Access rates from the GVNW Tariff

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Flat Rock Telephone Co-Op, Inc. - Illinois

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f). Under Section 51.917(e), Flat Rock proposes an ARC effective July 1, 2014 of \$1.18 per month for residential line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, of \$1.50 for each line assessed a single line business end user common line charge and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

4. FLAT ROCK TARIFF REVIEW PLANS

Flat Rock submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Flat Rock 2014 ROR-ILEC-ICC
- Flat Rock 2014 Tariff Rate Comp CAF
- Flat Rock 2014 True Up
- Flat Rock 2014 Rate Ceiling CAF

5. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Knology of the Valley, Inc., SAC 220371 (GA)

Knology of the Valley, Inc. , (alternatively “Knology” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Knology is an Issuing Carrier of the JSI Tariff. Knology files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

Knology is filing its Access Recovery Charge (“ARC”) under this transmittal on a single study area, stand-alone basis. Knology is one of four study areas listed in the USF2013LC13.xls file or the USF2013LA13.xls with an association with Knology, Inc. holding company code 200000314. The other three are each an issuing carrier for National Exchange Carrier Association, Inc. (“NECA”) Tariff FCC No. 5: Knology Total Communications, Inc. (SAC 250295); Knology Community Telephone, Inc. (SAC 391652); and Valley Telephone Co., LLC (SAC 220324). Because the three Knology, Inc. affiliates that are issuing carriers for NECA Tariff FCC No. 5 are filing ARCs in the NECA Tariff, Knology has no control over those rates. ARC rates effective July 1, 2014 for Knology will be the maximum rates under Section 51.917(e), described in item 2., following.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Knology of interstate Common Line, Federal Universal Service Charge, Switched Access, Special Access and Miscellaneous services. 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.

Knology, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Knology proposes revisions to the Federal Universal Service Charge factor reflective of a decrease in the Universal Service Contribution Factor from 16.6% to 15.7% for the third quarter of 2014, as well as to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Knology of the Valley, Inc. (GA)

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Knology proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. KNOLOGY TARIFF REVIEW PLANS

Knology submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Knology 2014 ROR-ILEC-ICC.xlsx
- Knology 2014 Tariff Rate Comp CAF.xls
- Knology 2014 True Up
- Knology 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Knology of the Valley, Inc. (GA)

- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Livingston Telephone Company
SAC 442107 (Texas)

Livingston Telephone Company, (alternatively “Livingston” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Livingston is an Issuing Carrier of the JSI Tariff. Livingston files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Livingston of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Livingston is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Livingston, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Livingston proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Livingston proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Livingston Telephone Company - Texas

common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments

3. LIVINGSTON TARIFF REVIEW PLANS

Livingston submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Livingston 2014 ROR-ILEC-ICC
- Livingston 2014 Tariff Rate Comp CAF
- Livingston 2014 True Up
- Livingston 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Millington Telephone Company, Inc., SAC 290571 (Tennessee)

Millington Telephone Company, Inc., (alternatively “Millington” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Millington is an Issuing Carrier of the JSI Tariff. Millington files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Millington of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Millington is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Millington, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Millington proposes revisions to the End Office Access Service rate elements pursuant to § 51.909(d), the Company is making the filing described herein in what is otherwise a non-mandatory filing year.

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Millington proposes no revisions to the currently effective ARC rate of \$1.00 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$2.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Millington Telephone Company (TN)

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. MILLINGTON TARIFF REVIEW PLANS

Millington submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Millington 2014 ROR-ILEC-ICC.xlsx
- Millington 2014 Tariff Rate Comp CAF.xls
- Millington 2014 True Up
- Millington 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Mt. Horeb Telephone Co., SAC 330916 (Wisconsin)

Mt. Horeb Telephone Co., (alternatively “Mt. Horeb” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mt. Horeb is an Issuing Carrier of the JSI Tariff. Mt. Horeb files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mt. Horeb of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Mt. Horeb is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Mt. Horeb, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Mt. Horeb proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Mt. Horeb proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user

Description and Justification
JSI Transmittal No. 182- 2014 Annual Access Filing
Mt. Horeb Telephone Co. - Wisconsin

common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. MT. HOREB TARIFF REVIEW PLANS

Mt. Horeb submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Mt. Horeb 2014 ROR-ILEC-ICC
- Mt. Horeb 2014 Tariff Rate Comp CAF
- Mt. Horeb 2014 True Up
- Mt. Horeb 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Otelco Telephone LLC
SAC 250312 (Alabama)

Otelco Telephone LLC, (alternatively “Otelco” or “Company”), through its consultant John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (JSI Tariff). Effective July 1, 2014, Otelco will exit the National Exchange Carrier Association, Inc. (NECA) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Otelco as an issuing carrier for NECA Tariff F.C.C. No. 5 and Otelco will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2014.

As an issuing carrier for JSI Tariff F.C.C. No.1, the Company will provide services and bill Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2014 the Company will file interstate Special Access, including Public Packet Data Network, services on a historic basis under Section 61.39 of the Commission’s rules and Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company remains as a member of the NECA Common Line Pool. Rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will reference NECA Tariff F.C.C No. 5 rates for the respective services.

The regulations and rate structures applicable to Otelco Telephone LLC parallel those of NECA Tariff FCC No. 5 in all material respects. Differences between services offered under NECA Tariff FCC No. 5 and those the Company will offer under JSI Tariff FCC No.1 are limited to the following for which the Company currently has no demand: Company: Ethernet Switched Access Local Transport (ESALT), recently added by NECA, and Switched Access Local Transport over Synchronous Optical Channel Service (SOCS), also called SONET. JSI will be adding regulations to the JSI Tariff for ESALT and Switched Access Local Transport over SOCS in the near future and at such time as the Company receives requests for either ESALT or SOCS Local Transport the Company will add rates for the respective service.

Currently, the Company provides Wireline Broadband Internet Access Service (WBIAS) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2014 the Company will begin offering WBIAS on a permissively detariffed

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Otelco Telephone LLC (Alabama)

common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2014 Access Filing Order and 2014 TRP Order

The filing is made in accordance with the 2014 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404 (Released March 25, 2014). JSI is also providing as part of this filing, on behalf of the Company, Tariff Review Plan (TRP) documents for the Access Recovery Charge (ARC) and Inter-Carrier Compensation (ICC) as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2014 Annual Access Tariff Filings, WC Docket No. 14-48, Order, DA 14-494 (Released April 14, 2014).

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, 47 CFR Part 51, Subpart J, the Company has followed, with the assistance of and in concert with NECA, the rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the specific rules pertaining to both NECA and the incumbent local exchange carrier (ILEC) for exiting of the pool and the calculations executed by NECA and the Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Otelco Telephone, LLC Exhibit A provides data documenting calculations for compliance with the Commission's Part 51, Subpart J Transitional Access Pricing rules.

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 58 percent reduction in Switched Access charges to carriers based on historic 2013 demand. Application of the current NECA Switched Access rates applicable to the Company to 2013 historic demand produces revenue of \$290,000. Application of the rates for Switched Access proposed under this transmittal to 2013 historic demand produces revenue of \$123,000, a reduction of \$167,000 or 58 percent.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Otelco Telephone LLC (Alabama)

Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations

Step	FCC Rule	Cross-Reference to Exhibit A
1	<p>51.909(a)(4)(ii)(A)</p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<p><i>See Exhibit A, Lines 101 through 104</i></p>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<p><i>See Exhibit A, Line 105</i></p>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>
4	<p>51.909(d)(3)(ii)</p> <p>Each Rate-of-Return Carrier shall calculate its 2014 interstate Target Composite Terminating End Office Access Rate. The 2014 interstate Target Composite Terminating End Office Access Rate means \$0.005 per minute plus two-thirds of any difference between the 2011 Baseline Composite Terminating End Office Access Rate and \$0.005 per minute.</p>	<p><i>See Exhibit A, Lines 410 through 408</i></p>
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</p> <p>The interstate switched access rate caps determined pursuant to</p>	<p><i>Rates determined</i></p>

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Otelco Telephone LLC (Alabama)

Step	FCC Rule	Cross-Reference to Exhibit A
	paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 182 effective July 1, 2014</i>
6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] the Access Recovery Charges that will be assessed, and the amount of Connect America Fund ICC support the carrier will be eligible to receive.	<i>See below</i>

2. SPECIAL ACCESS RATES

The Company is an Average Schedule carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2014 have been determined based on Section 61.39(b)(2)(i) of the Commission's rules. See 47 CFR § 61.39(b)(2)(i).¹

61.39(b)(2)

For a tariff change, the incumbent local exchange carrier that is an average schedule carrier must propose Traffic Sensitive rates based on the following:

61.39(b)(2)(i)

For the first period, the incumbent local exchange carrier's most recent annual Traffic Sensitive settlement from the National Exchange Carrier Association pool.

61.39(b)(2)(ii)

For subsequent filings, an amount calculated to reflect the Traffic Sensitive average schedule pool settlement the carrier would have received if the carrier had continued to participate, based upon the most recent average schedule formulas approved by the Commission.

¹ Section 61.39(b)(2) no longer applies to Switched Access as the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J govern Switched Access pricing. See 47 CFR Part 51, Subpart J.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Otelco Telephone LLC (Alabama)

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to Section 51.917(e) and to receive CAF-ICC recovery pursuant to Section 51.917(f). See 47 CFR § 51.917(e), (f).

Under Section 51.917(e), the Company proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to Section 69.104 and \$3.00 per Section 69.104 for the third implementation period of the ARC which ends June 30, 2015. See 47 CFR § 69.104.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.² The Test Year (TY) 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

Tariff Review Plan (TRP) For ARC-ICC-CAF

Otelco Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Otelco 2014 ROR-ILEC-ICC
- Otelco 2014 Tariff Rate Comp CAF
- Otelco 2014 True Up
- Otelco 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

² See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

OTELCO TELEPHONE COMPANY, LLC

Study Area Code 220360

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$ 354,692
102	Projected 2011-12 Pool Settlements without LSS	NECA	150,411
103	Net Pool Contributions	Ln 101 - Ln 102	<u>\$ 204,281</u>
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	57.59%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-57.59%

July 1, 2014 Recurring Switched Access Service
End Office

201	Local Switching Premium Rates	Line 408	\$0.005767
202	Information Surcharge (shown as Per MOU)	Per FCC	\$0.0000
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.27
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$27.63
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$84.18
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$768.61
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.23
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.23
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.77
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$50.24
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.36
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.36
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$29.92
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$192.15
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$175.32
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$67.68
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000177
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000921
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.002322
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002332
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002587

Current Recurring Switched Access Service
End Office

	NECA BANDs--	LS / LT / TST>	1 / 7 / 2
301	Local Switching Premium Rates		\$0.013992
302	Information Surcharge (shown as Per MOU)		\$0.051300
Local Transport			
303	Voice Grade 2-Wire Entrance Facility		\$40.72
304	Voice Grade 4-Wire Entrance Facility		\$65.15
305	DS-1 Entrance Facility		\$198.50
306	DS-3 Entrance Facility		\$1,812.49
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.90
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.90
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$13.60
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$118.47
311	Voice Grade 2-Wire Direct Trunk Termination		\$29.15
312	Voice Grade 4-Wire Direct Trunk Termination		\$29.15
313	DS-1 Direct Trunk Termination		\$70.56
314	DS-3 Direct Trunk Termination		\$453.11
315	Multiplexing DS3-DS1		\$413.42
316	Multiplexing DS1-Voice		\$159.61
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000418
318	Tandem Switched Termination		\$0.002171
319	Tandem Switching		\$0.005476
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005500
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006100

Rates from NECA Tariff based on banded rates

OTELCO TELEPHONE COMPANY, LLC

Study Area Code 220360

SOURCE

Composite Rates Interstate Rates for July 1, 2014 - Before Step Down Calculation

401	Local Switching	Line 301 + (Line 301 * Line 105)	\$0.005933
402	Information Surcharge	Line 302 + (Line 302 * Line 105)	\$0.021754
403	Information Surcharge Adjusted for per 100 to 1 Minute	Line 402 / 100	\$0.000218
404	Combined EOLS + Info Sur For Terminating Interstate and Intrastate Terminating Line 401 + Line 403		\$0.006151

Step-Down Calculation

405	Effective Rate July 1st 2016 - FCC Order	FCC Order	\$0.005000
406	Difference In Unified Rate and July 1st 2016 Rate	Line 405 - Line 404	-\$0.001151
407	Transition to Rate on Line 2 in equal 1/3 Steps	Line 406 / 3 (if Line 306 is negative), otherwise \$0.00	-\$0.000384
408	Rate Effective Date July 2014	Line 404 + Line 407	\$0.005767

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Skyline Telephone Membership Corporation, SAC 230501 (North Carolina)

Skyline Telephone Membership Corporation, (alternatively “Skyline” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The Skyline Study Area is located in North Carolina. Skyline is an Issuing Carrier of the JSI Tariff. Skyline files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Skyline of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services and, beginning July 3, 2012, the Access Recovery Charge (“ARC”). With respect to Common Line, Skyline is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Skyline, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Skyline proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Skyline proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Skyline Telephone Membership Corporation (NC)

pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. SKYLINE TARIFF REVIEW PLANS

Skyline submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Skyline 2013 ROR-ILEC-ICC.xlsx
- Skyline 2013 Tariff Rate Comp CAF.xls
- Skyline 2014 True Up
- Skyline 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Smart City Telecommunications LLC d/b/a Smart City Telecom
SAC 210330 (Florida)

Smart City Telecommunications LLC d/b/a Smart City Telecom, (alternatively “Smart City Telecom” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Smart City Telecom is an Issuing Carrier of the JSI Tariff. Smart City Telecom files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Smart City Telecom of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Smart City Telecom is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Smart City, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Smart City proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. No changes are proposed to Interstate Switched Access End Office Access Service rates as currently effective End Office rates are below \$0.005 (see § 51.909(d)).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Smart City Telecom proposes an ARC effective July 1, 2013 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Smart City Telecom (FL)

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013

3. SMART CITY TELECOM TARIFF REVIEW PLANS

Smart City Telecom submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Smart City Telecom 2014 ROR-ILEC-ICC.xlsx
- Smart City Telecom 2014 Tariff Rate Comp CAF.xls
- Smart City Telecom 2014 True Up
- Smart City Telecom 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

South Central Rural Telephone Cooperative, SAC 260418 (Kentucky)

South Central Rural Telephone Cooperative, (alternatively “South Central” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). South Central is an Issuing Carrier of the JSI Tariff. South Central files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by South Central of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, South Central is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

South Central, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As South Central proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), South Central proposes an ARC effective July 1, 2014 at the rate of \$0.76 per month for each LaRue County EAS line in the Buffalo, Magnolia and Bonnieville exchanges, other than lines of Lifeline Customers, assessed

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
South Central Rural Telephone Cooperative (KY)

a primary residential end user common line charge pursuant to 47 CFR § 69.104. South Central proposes an ARC effective July 1, 2014 for all other lines at the maximum rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. SOUTH CENTRAL TARIFF REVIEW PLANS

South Central submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- South Central 2014 ROR-ILEC-ICC.xlsx
- South Central 2014 Tariff Rate Comp CAF.xls
- South Central 2014 True Up
- South Central 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Tri County Telephone Association, Inc., SAC 512296 (Wyoming)

Tri County Telephone Association, Inc., (alternatively “Tri County” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Tri County is an Issuing Carrier of the JSI Tariff. Tri County files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Tri County of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Tri County is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Tri County, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Tri County proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Tri County proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each SAFETel plan line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge pursuant to 47 CFR § 69.104, at the maximum rate of \$1.00 per month for single-line business end user common line charge pursuant to § 69.104 and \$3.00 per month for

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Tri County Telephone Association, Inc. (WY)

each multi-line business end user common line charge assessed pursuant to § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. TRI COUNTY TARIFF REVIEW PLANS

Tri County submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

- Tri County 2014 ROR-ILEC-ICC.xlsx
- Tri County 2014 Tariff Rate Comp CAF.xls
- Tri County 2014 True Up
- Tri County 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing
TruVista Communications Companies

TruVista Communications, through its consultant John Staurulakis, Inc. (“JSI”), hereby provides a Description and Justification (“D&J”) for its individual rates proposed under JSI Transmittal No. 182 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”). The three TruVista Communications study areas listed below are collectively an issuing carrier for the JSI Tariff and are alternately referred to herein as “TruVista”, “the Company” or “the Companies.”

<i>Study Area Company Name</i>	<i>Holding Company Code</i>	<i>Study Area State</i>	<i>Study Area Code</i>
Chester Telephone Company d/b/a TruVista Communications	200000093	SC	240516
Lockhart Telephone Company, Inc. d/b/a TruVista Communications	200000093	SC	240532
Ridgeway Telephone Company, Inc. d/b/a TruVista Communications	200000093	SC	240541

The three study areas comprising the TruVista Communications Companies do not participate in the National Exchange Carrier Association (“NECA”) Traffic Sensitive Pool and thus provide interstate Traffic Sensitive Switched Access and Special Access service at TruVista specific rates filed in the JSI Tariff. The three study areas are participants in the NECA Common Line Pool and thus rates in the JSI Tariff for End User Common Line, ISDN Ports, T-1 Channel Service and Federal Universal Service Contribution (“FUSC”) charges reference the corresponding rates in NECA Tariff F.C.C. No. 5 consistent with the carriers’ duties as members of the NECA Common Line Pool.

TruVista files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by TruVista of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, TruVista is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
TruVista Communications Companies

Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

TruVista, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As TruVista proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Companies elected in the July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), TruVista proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. TRUVISTA COMMUNICATIONS COMPANIES TARIFF REVIEW PLANS

TruVista Communications Companies submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2014-2015:

Chester Telephone Company d/b/a TruVista Communications

- 2014 ROR-ILEC-ICC.xlsx
- 2014 Tariff Rate Comp CAF.xls
- 2014 True Up

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
TruVista Communications Companies

Lockhart Telephone Company, Inc. d/b/a TruVista Communications

- 2014 ROR-ILEC-ICC.xlsx
- 2014 Tariff Rate Comp CAF.xls
- 2014 True Up

Ridgeway Telephone Company, Inc. d/b/a TruVista Communications

- 2014 ROR-ILEC-ICC.xlsx
- 2014 Tariff Rate Comp CAF.xls
- 2014 True Up

TruVista Communications Companies
(single file covers all three study areas)

- 2014 Rate Ceiling CAF.xls

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 182 – 2014 Annual Access Filing

Yadkin Valley Telephone Membership Corporation, SAC 230511 (NC)

Yadkin Valley Telephone Membership Corporation, (alternatively “Yadkin Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 182 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Yadkin Valley is an Issuing Carrier of the JSI Tariff. Yadkin Valley files interstate access rates on an historic basis pursuant to Section 61.39 of the Commission’s rules. The filing is made in accordance with the Commission’s March 25, 2014 release entitled In the Matter of July 1, 2014 Annual Access Charge Tariff Filings, WC Docket No. 14-48, Order, DA 14-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Yadkin Valley of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services and, beginning July 3, 2012, the Access Recovery Charge (“ARC”). With respect to Common Line, Yadkin Valley is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Yadkin Valley, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. As Yadkin Valley proposes revisions to the Access Recovery Charge consistent with § 51.917(e)(6), the Company is making the filing described herein in what is otherwise a non-mandatory filing year. Interstate Switched Access rate changes are limited to establishing separate originating and terminating End Office Access Service rate elements pursuant to § 51.909(d).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Company elected in its July 3, 2012 access tariff filing to assess the Access Recovery Charge pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f).

Under Section 51.917(e), Yadkin Valley proposes an ARC effective July 1, 2014 at the maximum rate of \$1.50 per month for each line other than lines of Lifeline Customers assessed a primary residential or single-line business end user common

Description and Justification
JSI Transmittal No. 182 - 2014 Annual Access Filing
Yadkin Valley Telephone Membership Corporation (NC)

line charge pursuant to 47 CFR § 69.104 and \$3.00 per month for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104 for the third implementation period of the ARC which ends June 30, 2015.

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.¹ The TY 2014 - 2015 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments for the year ending June 30, 2013.

3. YADKIN VALLEY TARIFF REVIEW PLANS

Yadkin Valley submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2013-2014:

- Yadkin Valley 2014 ROR-ILEC-ICC.xlsx
- Yadkin Valley 2014 Tariff Rate Comp CAF.xls
- Yadkin Valley 2014 True Up
- Yadkin Valley 2014 Rate Ceiling CAF

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB Pricing No. 12-09, Order, FCC 12-147 (rel. Dec. 3, 2012).