

**COMPORIUM COMMUNICATIONS**  
**DESCRIPTION AND JUSTIFICATION**  
**Metro Ethernet Service (Metro Ethernet)**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1 -Transmittal No. 186**  
**December 17, 2014**

Comporium Communications (alternatively “Comporium” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”), hereby provides a Description and Justification for its proposed change in name of its current Multi-Megabit Ethernet Transmission Service (“METS”) to “Metro Ethernet Service”, alternately called “Metro Ethernet.” In addition to the proposed change in the name of the service, Comporium proposes addition to its Metro Ethernet regulations of a non-chargeable Service Level Commitment or “SLC.”

The following three Comporium companies are issuing carriers for JSI Tariff FCC No. 1 in which each individual Comporium company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. These three companies are the only current Comporium companies that offer METS and thus are the only companies affected by this transmittal. Any reference to “Comporium” in this D&J and the proposed revised tariff pages for the JSI Tariff does not include or otherwise apply to any other Comporium Communications study area not included in the list below.

<i>Study Area Company Name</i>	<i>Study Area State</i>	<i>Study Area Code</i>
Fort Mill Telephone Company d/b/a Comporium Communications	South Carolina	240521
Lancaster Telephone Company d/b/a Comporium Communications	South Carolina	240531
Comporium, Inc.	South Carolina	240542

**Change in Name to Metro Ethernet Service**

In the marketing, provisioning and billing of the Comporium Companies’ Ethernet transport offerings, the overwhelming experience of the Companies is that customers are more comfortable with the term “Metro Ethernet” as is used by other carriers in South Carolina and elsewhere. Moreover, the descriptions and technical requirements of Ethernet service currently in JSI Tariff FCC No. 1 for METS comport with the descriptions and technical requirements for Metro Ethernet Service in the interstate jurisdiction. Accordingly, the Company believes it is appropriate at this time to change the name from METS to “Metro Ethernet Service” or, alternatively, “Metro Ethernet.”

### **Addition of Service Level Commitment (SLC) Provisions**

Competitive pressures as well as customer expectations have created a need for the Companies to provide Service Level Commitments (SLCs) to Metro Ethernet customers. The Companies have the technical capability to meet SLCs where it has the appropriate Ethernet terminal equipment at the customer premises. Such terminal equipment provides feedback to the Companies' network control center to allow rapid remediation of any transmission failures. For all new installations of Metro Ethernet, the Company installs the terminal equipment capable of supporting the SLCs. With respect to embedded customers, the Company is in the process of replacing all Metro Ethernet terminal equipment at the customer premises with equipment capable of supporting SLCs. Within two years, the Company expects the technical capability for SLCs to be ubiquitous for the Companies.

### **Revenue and Cost Effect of SLC Provisions**

Because the Companies expect SLC provisions to be universally available and provided to Metro Ethernet customers, the Companies propose providing the SLCs without additional charge.

The Companies have tested their ability to meet SLCs for existing METS customers who have the appropriate Company-installed terminal equipment at the customer premises. Based on tests, the Companies project the ability to control Company meeting of SLCs with no or only extremely rare failure with very comprehensive restoration capability. Accordingly, the Companies project no material effect on revenue due to SLC commitment failures.

The cost impact of installing equipment necessary to support SLC capability is essentially none. The Company currently installs Metro Ethernet customer premises terminal equipment capable of supporting SLCs for all new Metro Ethernet subscribers. With respect to replacement of terminal equipment for embedded customers, the retirement of old technology and purchase and installation of newer technology does not materially affect existing level of depreciation expense or net plant due to the approximate five-year life of the embedded terminal equipment.