

DESCRIPTION AND JUSTIFICATION

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

Transmittal No. 190 - June 16, 2015

John Staurulakis, Inc. (“JSI”) hereby provides description and justification (“D&J”) for JSI Transmittal No. 190 on behalf of the issuing carriers for JSI Tariff F.C.C. No. 1.

INTRODUCTION

In this transmittal, JSI proposes revisions to JSI Tariff F.C.C. No. 1 for the following:

Title Pages

Table of Contents

Section 7 Special Access Services tables at Section 7.1.1(B), Issuing Carrier Special Access Offerings.

Section 16 Public Packet Data Network Services carrier tables at:

- Section 16.1, Frame Relay Access Service
- Section 16.4, Ethernet Transport Service
- Section 16.7, Asynchronous Transfer Mode Cell Relay Access Service

DESCRIPTION

The issuing carrier offerings associated with the above regulations are being filed today under the JSI Tariff F.C.C. No. 1 annual access filing, JSI Transmittal No. 191, for twenty-two new issuing carriers migrating from issuing carrier status for National Exchange Carrier Association, Inc. (“NECA”) Tariff F.C.C. No. 5 and for one new issuing carrier migrating from Etex Telephone Cooperative, Inc. (“Etex”) Tariff F.C.C. No. 1 (collectively, “new issuing carriers”). A list of the twenty-two carriers exiting the NECA Traffic Sensitive Pool and for which NECA will cancel issuing carrier status for NECA Tariff F.C.C. No. 5 and Etex which will cancel Etex Tariff F.C.C. No. 1 is attached hereto as D&J Exhibit 1. A side-by-side comparison of JSI Tariff F.C.C. No. 1 regulations to NECA Tariff F.C.C. No. 5 regulations is attached hereto as D&J Exhibit 2. Etex Tariff F.C.C. No. 1 references the regulations contained in NECA Tariff FCC No. 5 pursuant to the blanket waiver of Sections 61.54(a), 61.54(j), and 61.74(a) of the Commission's rules granted to carriers filing under Section 61.39 by the Common Carrier Bureau in DA 88-1893, released December 9, 1988.

No introduction of new rates for issuing carriers are proposed in this filing.

These revisions are necessary to allow seamless transition for the new issuing carriers concurrent with cancellation as issuing carriers for NECA Tariff F.C.C. No. 5 and Etex Tariff F.C.C. No. 1 effective July 1, 2015.

This transmittal is a companion filing to JSI Transmittal No. 191, the required 2015 annual access filing.

CONCLUSION

This transmittal provides for the addition of new issuing carriers to JSI Tariff F.C.C. No. 1. Allowing the revisions proposed in JSI Transmittal No. 190 to become effective will facilitate the seamless migration of carriers from status as issuing carriers for NECA Tariff F.C.C. No. 5 and for Etex Tariff F.C.C. No. 1 to status as issuing carriers for JSI Tariff F.C.C. No. 1 effective July 1, 2015.

JSI TARIFF F.C.C. NO. 1 - TRANSMITTAL NO. 190 – JUNE 16, 2015

D&J EXHIBIT 1

**NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. NO. 1
EFFECTIVE WITH JSI TRANSMITTAL NO. 191 TO BE FILED JUNE 16, 2015**

<i>Company Name</i>	<i>Study Area Code</i>	<i>Previous Tariff</i>	<i>Filing Rules</i>
Saco River Telephone LLC	100022	NECA	61.39
Etex Telephone Cooperative, Inc.	442070	Etex	61.39
TDS Telecom Companies-Group C			
Butler Telephone Company, Inc. d/b/a TDS Telecom	250284	NECA	61.38
Communications Corporation of Indiana d/b/a TDS Telecom	320776	NECA	61.38
Kearsarge Telephone Company d/b/a TDS Telecom	120045	NECA	61.38
MCTA, Inc. d/b/a TDS Telecom (Merrimack County d/b/a Contoocook Valley Telephone) (Hollis Telephone)	123321	NECA	61.38
Merrimack County Telephone Company d/b/a TDS Telecom	120047	NECA	61.38
Peoples Telephone Company, Inc. d/b/a TDS Telecom	250314	NECA	61.38
Somerset Telephone Company d/b/a TDS Telecom	100024	NECA	61.38
Southwestern Telephone Company d/b/a TDS Telecom	452174	NECA	61.38
Williston Telephone Company d/b/a TDS Telecom	240551	NECA	61.38
TDS Telecom Companies-Group D			
Amelia Telephone Corporation d/b/a TDS Telecom	190217	NECA	61.38
Arizona Telephone Company d/b/a TDS Telecom	452171	NECA	61.38
Delta County Tele-Comm, Inc. d/b/a TDS Telecom	462184	NECA	61.38
Leslie County Telephone Company d/b/a TDS Telecom	260411	NECA	61.38
Midway Telephone Company, LLC d/b/a TDS Telecom	330909	NECA	61.38
Riverside Telecom, LLC d/b/a TDS Telecom	330943	NECA	61.38
Tipton Telephone Company, Inc. d/b/a TDS Telecom	320829	NECA	61.38
Tri-County Telephone Company, Inc. d/b/a TDS Telecom	320830	NECA	61.38
Union Telephone Company d/b/a TDS Telecom	120049	NECA	61.38
Virginia Telephone Company d/b/a TDS Telecom	190253	NECA	61.39
Waunakee Telephone Company, LLC d/b/a TDS Telecom	330968	NECA	61.39
Wilton Telephone Company, Inc. d/b/a TDS Telecom	120050	NECA	61.39

JSI TARIFF F.C.C. NO. 1 - TRANSMITTAL NO. 190 – JUNE 16, 2015

D&J EXHIBIT 2

TARIFF COMPARISON – NECA to JSI

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
1. Application of Tariff	1. Application of Tariff	JSI Tariff FCC No. 1 Section 1 is reflective of NECA Tariff FCC No. 5 Section 1.
2. General Regulations	2. General Regulations	JSI Tariff FCC No. 1 Section 2 is reflective of NECA Tariff FCC No. 5 Section 2.
3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port	3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port	JSI Tariff FCC No. 1 Section 3 is reflective of NECA Tariff FCC No. 5 Section 3.
4. End User Access Service	4. End User Access Service	JSI Tariff FCC No. 1 Section 4 is reflective of NECA Tariff FCC No. 5 Section 4.
5. Access Ordering	5. Access Ordering	JSI Tariff FCC No. 1 Section 5 is reflective of NECA Tariff FCC No. 5 Section 5.
6. Switched Access Service	6. Switched Access Service	JSI Tariff FCC No. 1 Section 6 is reflective of NECA Tariff FCC No. 5 Section 6 with the exceptions indicated following.
6.1.3(A) Local Transport Ethernet Switched Access Local Transport (ESALT) speed options 6.10.3(E) Ethernet Switched Access Local Transport Real Time Class of Service/Quality of Service		JSI Tariff FCC No. 1 does not include ESALT options at this time. None of the new issuing carriers offer ESALT options. In the event a JSI issuing carrier receives a bona fide request for an ESALT-like service, JSI will take steps to add it to the JSI Tariff.

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
(ESALT RT CoS/QoS)		
7. Special Access Service	7. Special Access Service	JSI Tariff FCC No. 1 Section 7, is reflective of NECA Tariff FCC No. 5 Section 7 with the following additional subsection for regulations applicable to optional offerings for election by individual issuing carriers for JSI Tariff FCC No. 1.
7.11.3 Synchronous Optical Channel (SOCS) Optional Features and Functions	7.11.3 SOCS Rate Regs. I – CT Without Mileage Charges	Optional offering reflective of NECA 7.11.3 SOCS Optional Features and Functions. New issuing carriers offer SOCS Optional Features and Functions under these regulations
	7.11.4 SOCS Rate Regs. II - CT With Mileage Charges	Optional offering, not offered by new issuing carriers.
7.2.8(B) SOCS Optional Rate Plan	7.2.9(A) SOCS Optional Rate Plan A	Optional offering reflective of NECA Optional Rate Plan which provides for term discounts. New issuing carriers with SOCS offerings provide SOCS term discounts under these regulations.
	7.2.9(B) SOCS Optional Rate Plan B	Optional offering, not offered by new issuing carriers.
	7.12 Digital Access Cross Connect Service (DACCS)	Optional offering, not offered by new issuing carriers
8. Digital Subscriber Line (DSL) Access Services	8. Digital Subscriber Line Access Services	Saco River Telephone, LLC and Etex Telephone Cooperative, Inc. have elected to permissively detariff DSL services effective July 1, 2015. All other new issuing carriers have previously detariffed DSL services. Therefore,

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		<p>Section 8 DSL regulations do not apply to new issuing carriers.</p> <p>Note: Prior to certain carriers exiting the NECA Traffic Sensitive Pool in 2007, JSI Tariff FCC No. 1 did not have any regulations in Section 8. JSI added Digital Subscriber Line Access Services to Section 8 reflective of NECA Tariff FCC No. 5 regulations for the benefit of the new issuing carriers for JSI Tariff FCC No. 5. For those issuing carriers offering DSL Access Service of any kind pursuant to JSI Tariff FCC No. 1 at the beginning of 2007, such carriers did so pursuant to either JSI Tariff FCC No. 1 Section 16.2, Asymmetrical Digital Subscriber Line (ADSL) Service, Section 16.3, Symmetrical Digital Subscriber Line (SDSL) Access Service or Section 16.6 High Speed Internet (HSI) Access Service.</p>
9. Directory Assistance Service	9. Reserved for Future Use	No current JSI Tariff FCC No. 1 issuing carriers or new issuing carriers provide interstate directory assistance service. Therefore, JSI Tariff FCC No. 1 does not contain regulations for interstate directory assistance service. DA listings are provided to IXC's and other ILECs under contract.
10. Special Federal Government Access Services	10. Special Federal Government Access Services	JSI Tariff FCC No. 1 Section 10 is reflective of NECA Tariff FCC No. 5 Section 10.
11. Special Facilities Routing of Access Services	11. Special Facilities Routing of Access Services	JSI Tariff FCC No. 1 Section 11 is reflective of NECA Tariff FCC No. 5 Section 11.

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
12. Specialized Service Or Arrangements	12. Specialized Service Or Arrangements	JSI Tariff FCC No. 1 Section 12 is reflective of NECA Tariff FCC No. 5 Section 12.
13. Additional Engineering	13. Additional Engineering	JSI Tariff FCC No. 1 Section 13 is reflective of NECA Tariff FCC No. 5 Section 13.
14. Exceptions to Access Service Offerings	14. Reserved for Future Use	There are no exceptions applicable to current or new issuing carriers for JSI Tariff FCC No. 1.
15. Access Service Interfaces and Transmission Specifications	15. Access Service Interfaces and Transmission Specifications	JSI Tariff FCC No. 1 Section 15 is reflective of NECA Tariff FCC No. 5 Section 15.
16. Public Packet Data Network	16. Public Packet Data Network	See Below:
16.1 Frame Relay Access Service	16.1 Frame Relay Access Service	JSI Tariff FCC No. 1 Section 16.1 is reflective of NECA Tariff FCC No. 5 Section 16.1.
	16.2 Asymmetrical Digital Subscriber Line (ADSL) Service	JSI Tariff FCC No. 1 includes ADSL regulations at Section 16.2 based on earlier versions of NECA Tariff FCC No. 5 Section 8.2. At this time, only two issuing carriers for JSI Tariff FCC No. 1 offer ADSL pursuant to Section 16.2. None of the new issuing carriers offer DSL service under tariff (see note under Section 8 preceding).
	16.3 Symmetrical Digital Subscriber Line (SDSL) Access Service	JSI Tariff FCC No. 1 contains SDSL regulations at Section 16.3 similar to earlier versions of NECA SDSL regulations. Currently, no JSI issuing carriers offer SDSL under Section 16.3.
16.2 Asynchronous Transfer Mode	16.7 Asynchronous Transfer Mode Cell	JSI Tariff FCC No. 1 Section 16.7 is reflective of NECA

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
Cell Relay Access Service (ATM-CRS)	Relay Access Service	Tariff FCC No. 5 Section 16.2 with the addition of one optional feature and function not available in NECA Tariff FCC No. 5. That feature is Inverse Multiplexing Over ATM (IMA) tariffed at Section 16.7.4(A)(4)(c) of JSI Tariff FCC No. 1. New issuing carriers do not offer this optional feature; only one issuing carrier for JSI Tariff FCC No. 1 offers IMA.
16.3 Ethernet Transport Service	16.4 Ethernet Transport Service	JSI Tariff FCC No. 1 Section 16.4 is reflective of NECA Tariff FCC No. 5 Section 16.3 with the two exceptions indicated following.
16.3.4(D) Mixed Use Regulations for ESALT		JSI Tariff FCC No. 1 does not include ESALT options at this time. New issuing carriers do not offer ESALT options.
	16.4.4(A)(5)(b) VLAN Service (ETS Virtual Local Area Network)	NECA Tariff FCC No. 5 does not include ETS VLAN Service at this time. New issuing carriers do not offer ETS VLAN service.
	16.4.4(A)(6) ETS Meet Point Interface (ETS-MPI)	NECA Tariff FCC No. 5 does not include ETS Meet Point Interface at this time. New issuing carriers do not offer ETS MPI.
16.3.4(A)(6)(b) ETS Port Protection		JSI Tariff FCC No. 1 does not include the ETS Port Protection option at this time. New issuing carriers do not offer this optional feature.
16.4 Internet Protocol Gateway (IPG)	16.9 Internet Protocol Gateway Access	JSI Tariff FCC No. 1 is reflective of NECA Tariff FCC No.

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
Access Service	Service	5 Section 16.4.
	16.5 Metro Ethernet Service (Metro Ethernet)	Metro Ethernet is the Ethernet Transport Service for the Comporium Companies (issuing carriers for JSI Tariff FCC No. 1, who tariffed Ethernet prior to NECA Tariff FCC No. 5). This service is not offered by new issuing carriers.
	16.6 High Speed Internet (HSI) Access Service	HSI is the wireline broadband Internet access transport offering for a single issuing carrier for JSI Tariff FCC No. 1 (Mt. Horeb Telephone Company). This service is not offered by new issuing carriers.
	16.8 Stand-Alone Broadband Network Transport (SABNT)	SABNT allows provision of combinations of Ethernet technology with IP technologies delivered over High Capacity circuits, providing the same virtual connections as Ethernet Transport Services. Two issuing carriers for JSI Tariff FCC No. 1 offer SABNT in lieu of Ethernet Transport Service - Horry Telephone Cooperative, Inc. and Atlantic Telephone Membership Corporation. This service is not offered by new issuing carriers.