

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 208 - June 16, 2017

John Staurulakis, Inc. (“JSI”) hereby provides description and justification (“D&J”) for JSI Transmittal No. 208 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 3 Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port and Consumer Broadband-Only Loop Charge – Table of carriers providing services under Section 3.

Section 7 Special Access Services - Carrier 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 revisions are being filed today under the JSI Tariff F.C.C. No. 1 annual access filing, JSI Transmittal No. 209, for 100 new issuing carriers migrating from issuing carrier status for National Exchange Carrier Association, Inc. (“NECA”) Tariff F.C.C. No. 5 (collectively, “new issuing carriers”). A list of the carriers exiting the NECA Traffic Sensitive Pool and for which NECA will cancel issuing carrier status for NECA Tariff F.C.C. No. 5 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.

Included among the additions to the Title Pages list of Issuing Carriers are those carriers who tariff Common Line rates in the JSI Tariff F.C.C. No. 1 at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers, but who continue to tariff traffic sensitive rates in NECA Tariff F.C.C. No. 5. These carriers are noted as issuing carriers for Common Line rates only, and include the following:

| COMPANY NAME | STUDY AREA CODE | STATE |
|-------------------------------------|--------------------------------|--------------|
| Consolidated Telco, Inc.* | 371530 | NE |
| Dalton Telephone Company** | 371537 | NE |
| Elsie Communications, Inc.** | 371518 | NE |
| S & A Telephone Co., Inc.** | 411829 | KS |
| TDS Telecom Companies following:** | | |
| Norway Telephone Company, Inc. | 240535 | SC |
| Oakman Telephone Company, Inc. | 250311 | AL |
| The Vanlue Telephone Company | 300662 | OH |
| S and W Telephone Company, Inc. | 320816 | IN |
| West Point Telephone Company, Inc. | 320837 | IN |
| Mid-State Telephone Company dba KMP | 361413 | MN |

* Common Line rates tariffed effective July 1, 2017 under this JSI Transmittal No. 209
 **Common Line rates tariffed effective February 1, 2017 under JSI Transmittal No. 205

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. effective July 1, 2017.

This transmittal is a companion filing to JSI Transmittal No. 209, the required 2017 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. 208 to become effective will facilitate the seamless migration of carriers from status as issuing carriers for NECA Tariff F.C.C. No. 5 to status as issuing carriers for JSI Tariff F.C.C. No. 1 effective July 1, 2017.

JSI TARIFF F.C.C. NO. 1 - TRANSMITTAL NO. 208 – JUNE 16, 2017**D&J EXHIBIT 1****NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. NO. 1
EFFECTIVE WITH JSI TRANSMITTAL NO. 209 TO BE FILED JUNE 16, 2017**

| <i>Company Name</i> | <i>State</i> | <i>Study Area Code</i> | <i>Previous Tariff</i> | <i>Filing Rules</i> |
|---|--------------|------------------------|------------------------|---------------------|
| Arkwest Communications, Inc. | AR | 401734 | NECA | 61.39 |
| Blackfoot Telephone Cooperative, Inc. | MT | 482235 483308 | NECA | 61.39 |
| Chazy & Westport Telephone Corporation | NY | 150079 | NECA | 61.39 |
| ComSouth Telecommunications, Inc. | GA | 220369 | NECA | 61.39 |
| Consolidated Telco, Inc. | NE | 371530 | N/A* | |
| Consolidated Telecom, Inc. | NE | 371562 | NECA | 61.39 |
| Consolidated Telephone Company | NE | 371532 | NECA | 61.39 |
| Curtis Telephone Company | NE | 371536 | NECA | 61.39 |
| Cross Tel. Co. | OK | 431985 | NECA | 61.39 |
| Eastex Telephone Cooperative, Inc. | TX | 442068 | NECA | 61.39 |
| Fremont Telcom Co. | ID | 472222 | NECA | 61.39 |
| Grand River Mutual Telephone Company (IA) Comprised of Grand River Mutual Telephone Company SAC 351888 and South Central Communications, Inc. SAC 351888 | IA | 351888 | NECA | 61.39 |
| Grand River Mutual Telephone Company (MO) | MO | 421888 | NECA | 61.39 |
| Highland Telephone Cooperative | VA | 190237 | NECA | 61.39 |
| Industry Telephone Company | TX | 442093 | NECA | 61.39 |
| Lumos Telephone of Botetourt Inc. | VA | 190249 | NECA | 61.39 |
| Mark Twain Rural Telephone Company | MO | 421914 | NECA | 61.39 |
| Mid-Plains Rural Tel. Coop., Inc. | TX | 442112 | NECA | 61.39 |
| Pineland Telephone Cooperative, Inc. | GA | 220377 | NECA | 61.39 |
| Twin Lakes Telephone Cooperative Corp. | TN | 290579 | NECA | 61.39 |
| Wilkes Telephone & Electric Company | GA | 220394 | NECA | 61.39 |
| Bruce Telephone Company, Inc. | MS | 280447 | NECA | 61.39 |
| Chickamauga Telephone Corporation | GA | 220354 | NECA | 61.39 |
| Fulton Telephone Company, Inc. | MS | 280455 | NECA | 61.39 |
| Mound Bayou Telephone & Communications, Inc. | MS | 280462 | NECA | 61.39 |
| Knology Total Communications, Inc. | AL | 250295 | NECA | 61.39 |
| Valley Telephone Co., LLC | GA | 220324 | NECA | 61.39 |

*Common Line rates only; traffic sensitive rates remain tariffed in NECA Tariff F.C.C. No. 5.

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D&J EXHIBIT 1 (CONT'D)

| <i>Company Name</i> | <i>State</i> | <i>Study Area Code</i> | <i>Previous Tariff</i> | <i>Filing Rules</i> |
|--|--------------|------------------------|------------------------|---------------------|
| Blountsville Telephone LLC | AL | 250282 | NECA | 61.39 |
| Granby Telephone LLC | MA | 110036 | NECA | 61.39 |
| Hopper Telecommunications LLC | AL | 250300 | NECA | 61.39 |
| Mid-Maine Telecom LLC | ME | 103315 | NECA | 61.39 |
| Otelco Mid-Missouri LLC | MO | 421917 | NECA | 61.39 |
| Pine Tree Telephone LLC | ME | 100020 | NECA | 61.39 |
| Shoreham Telephone LLC | VT | 140064 | NECA | 61.39 |
| War Telephone LLC | WV | 200258 | NECA | 61.39 |
| Mutual Telephone Company | IA | 351252 | NECA | 61.39 |
| Northern Iowa Telephone Company | IA | 351259 | NECA | 61.39 |
| Webb-Dickens Telephone Corporation | IA | 351327 | NECA | 61.39 |
| Smithville Telephone Company, Inc. | MS | 280467 | NECA | 61.39 |
| Tri-County Telephone Company, Inc. | AR | 401726 | NECA | 61.39 |
| TDS Telecom Companies Group E | | | | |
| Communication Corporation of Michigan | MI | 310672 | NECA | 61.38 |
| Deposit Telephone Company, Inc | NY | 150089 | NECA | 61.38 |
| Hampden Telephone Company | ME | 100010 | NECA | 61.38 |
| Hartland and St Albans Telephone Company | ME | 100011 | NECA | 61.38 |
| Hornitos Telephone Co | CA | 542322 | NECA | 61.38 |
| Ludlow Telephone Company | VT | 140058 | NECA | 61.38 |
| McClellanville Telephone Company, Inc | SC | 240533 | NECA | 61.38 |
| New Castle Telephone Company | VA | 193029 | NECA | 61.38 |
| Port Byron Telephone Company | NY | 150118 | NECA | 61.38 |
| Southeast Mississippi Telephone Company, Inc | MS | 283301 | NECA | 61.38 |
| St. Stephen Telephone Company | SC | 240544 | NECA | 61.38 |
| Sugar Valley Telephone Company | PA | 170206 | NECA | 61.38 |
| Vernon Telephone Company, Inc | NT | 150133 | NECA | 61.38 |
| Warren Telephone Company | ME | 100031 | NECA | 61.38 |
| Winterhaven Telephone Company | CA | 542323 | NECA | 61.38 |

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D&J EXHIBIT 1 (CONT'D)

| <i>Company Name</i> | <i>State</i> | <i>Study Area Code</i> | <i>Previous Tariff</i> | <i>Filing Rules</i> |
|---|--------------|------------------------|------------------------|---------------------|
| TDS Telecom Companies Group F | | | | |
| Asotin Telephone Company (OR) | OR | 532404 | NECA | 61.38 |
| Asotin Telephone Company (WA) | WA | 522404 | NECA | 61.38 |
| Calhoun City Telephone Company, Inc | MS | 280448 | NECA | 61.38 |
| Chatham Telephone Company | MI | 310685 | NECA | 61.38 |
| Communications Corporation of Southern Indiana | IN | 320809 | NECA | 61.38 |
| Dickeyville Telephone, LLC | WI | 330875 | NECA | 61.38 |
| EastCoast Telecom of Wisconsin, LLC | WI | 330914 | NECA | 61.38 |
| Edwards Telephone Company, Inc | NY | 150092 | NECA | 61.38 |
| Home Telephone Company, Inc Waldron | IN | 320778 | NECA | 61.38 |
| Humphreys County Telephone Company | KY | 290566 | NECA | 61.38 |
| Mid-America Telephone, Inc | OK | 432010 | NECA | 61.38 |
| Myrtle Telephone Company, Inc | MS | 287449 | NECA | 61.38 |
| Potlatch Telephone Company | ID | 472230 | NECA | 61.38 |
| Shiawassee Telephone Company | MI | 310726 | NECA | 61.38 |
| Tenney Telephone Company, LLC | WI | 330958 | NECA | 61.38 |
| The Farmers Telephone Company, LLC | WI | 330880 | NECA | 61.38 |
| Wolverine Telephone Company | MI | 310738 | NECA | 61.38 |
| TDS Telecom Companies Group G | | | | |
| Arcadia Telephone Company | OH | 300585 | NECA | 61.38 |
| Black Earth Telephone Company, LLC | WI | 330849 | NECA | 61.38 |
| Bonduel Telephone Company, LLC | WI | 330851 | NECA | 61.38 |
| Burlington, Brighton and Wheatland Telephone Company, LLC | WI | 330856 | NECA | 61.38 |
| Camden Telephone Company, Inc | IN | 320744 | NECA | 61.38 |
| Cobbosseecontee Telephone Company | ME | 100005 | NECA | 61.38 |
| Continental Telephone Company | OH | 300607 | NECA | 61.38 |
| Grantland Telecom, LLC | WI | 330930 | NECA | 61.38 |
| Happy Valley Telephone Company | CA | 542321 | NECA | 61.38 |
| Island Telephone Company | MI | 310677 | NECA | 61.38 |
| Lewis River Telephone Company, Inc | WA | 522427 | NECA | 61.38 |
| Lewisport Telephone Company | KY | 260412 | NECA | 61.38 |
| Little Miami Communications Corporation | OH | 300613 | NECA | 61.38 |
| Mahanoy and Mahantango Telephone Company | PA | 170183 | NECA | 61.38 |
| McDaniel Telephone Company | WA | 522430 | NECA | 61.38 |
| Mosinee Telephone Company, LLC | WI | 330915 | NECA | 61.38 |
| Northfield Telephone Company | VT | 140061 | NECA | 61.38 |

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D&J EXHIBIT 1 (CONT'D)

| <i>Company Name</i> | <i>State</i> | <i>Study Area Code</i> | <i>Previous Tariff</i> | <i>Filing Rules</i> |
|--|--------------|------------------------|------------------------|---------------------|
| TDS Telecom Companies Group G (Cont'd) | | | | |
| Oakwood Telephone Company | OH | 300645 | NECA | 61.38 |
| Oriskany Falls Telephone Corporation | NY | 150114 | NECA | 61.38 |
| Perkinsville Telephone Company, Inc | VT | 140062 | NECA | 61.38 |
| Salem Telephone Company | KY | 260417 | NECA | 61.38 |
| Scandinavia Telephone Company, LLC | WI | 330945 | NECA | 61.38 |
| Southeast Telephone Co. of Wisconsin, LLC | WI | 330952 | NECA | 61.38 |
| The Home Telephone Company of Pittsboro, Inc | IN | 320777 | NECA | 61.38 |
| The Island Telephone Company | ME | 100007 | NECA | 61.38 |
| The Merchants and Farmers Telephone Company | IN | 320788 | NECA | 61.38 |
| The State Long Distance Telephone Company, LLC | WI | 330955 | NECA | 61.38 |
| The West Penobscot Telephone and Telegraph Company | ME | 100034 | NECA | 61.38 |
| Township Telephone Company, Inc | NY | 150129 | NECA | 61.38 |
| Winsted Telephone Company | MN | 361507 | NECA | 61.38 |

JSI TARIFF F.C.C. NO. 1 - TRANSMITTAL NO. 208 – JUNE 16, 2017

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 and Consumer Broadband-Only Loop Charge | 3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port and Consumer Broadband-Only Loop Charge | 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. |
| 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. |

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| <i>NECA Tariff FCC No. 5</i> | <i>JSI Tariff FCC No. 1</i> | <i>Note</i> |
|---|---|--|
| 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 | <p>All new issuing carriers have elected to permissively detariff DSL services effective July 1, 2017, or have previously detariffed DSL services. Therefore, 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. 1. 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</p> |

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| <i>NECA Tariff FCC No. 5</i> | <i>JSI Tariff FCC No. 1</i> | <i>Note</i> |
|---|---|--|
| | | 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. |
| 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 IXCs 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. |
| 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. |

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| <i>NECA Tariff FCC No. 5</i> | <i>JSI Tariff FCC No. 1</i> | <i>Note</i> |
|---|--|--|
| 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. None of the new issuing carriers offer ADSL 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. None of the new issuing carriers offer SDSL service under tariff (see note under Section 8 preceding). |
| 16.2 Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS) | 16.7 Asynchronous Transfer Mode Cell Relay Access Service | JSI Tariff FCC No. 1 Section 16.7 is reflective of NECA 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. |
| 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 following exceptions: (1) DSL Access Service Connection Optional Feature Two-Way ETS MM-VCC; (2) ETS E-Rate Option. None of the new issuing carriers offer the Two-Way ETS MM-VCC or the ETS E-Rate Option. In the event a JSI carrier receives a bona fide request for these services, JSI |

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| <i>NECA Tariff FCC No. 5</i> | <i>JSI Tariff FCC No. 1</i> | <i>Note</i> |
|---|---|--|
| | | will take steps to add it to the tariff. |
| | 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. |
| 16.4 Internet Protocol Gateway (IPG) Access Service | 16.9 Internet Protocol Gateway Access Service | JSI Tariff FCC No. 1 is reflective of NECA Tariff FCC No. 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. |

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