

**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:

<b>COMPANY NAME</b>	<b>STUDY AREA CODE</b>	<b>STATE</b>
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 tarified effective July 1, 2017 under this JSI Transmittal No. 209

\*\*Common Line rates tarified 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><b>Company Name</b></i>	<i><b>State</b></i>	<i><b>Study Area Code</b></i>	<i><b>Previous Tariff</b></i>	<i><b>Filing Rules</b></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
<b>TDS Telecom Companies Group E</b>				
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>
<b>TDS Telecom Companies Group F</b>				
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
<b>TDS Telecom Companies Group G</b>				
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>
<b>TDS Telecom Companies Group G (Cont'd)</b>				
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**

<b><i>NECA Tariff FCC No. 5</i></b>	<b><i>JSI Tariff FCC No. 1</i></b>	<b><i>Note</i></b>
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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<b><i>NECA Tariff FCC No. 5</i></b>	<b><i>JSI Tariff FCC No. 1</i></b>	<b><i>Note</i></b>
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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<b><i>NECA Tariff FCC No. 5</i></b>	<b><i>JSI Tariff FCC No. 1</i></b>	<b><i>Note</i></b>
		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 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.
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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<b><i>NECA Tariff FCC No. 5</i></b>	<b><i>JSI Tariff FCC No. 1</i></b>	<b><i>Note</i></b>
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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<b><i>NECA Tariff FCC No. 5</i></b>	<b><i>JSI Tariff FCC No. 1</i></b>	<b><i>Note</i></b>
		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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