

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the four TDS Telecom study areas listed below.

In the JSI Tariff these four TDS Telecom carriers are currently known collectively as the “TDS Telecom Companies Group A” and referred to as “TDS Telecom-Group A or “TDS Group A.”

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

TDS Telecom-Group A files Special Access and Switched Access rates on a blended basis reflective of the four TDS Group A study areas.

The four companies comprising the TDS Telecom-Group A will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the four study areas comprising TDS Telecom-Group A, TDS Telecom also has 36 additional TDS study areas (TDS Telecom-Groups B, C, and D) that are currently issuing carriers for the JSI Tariff. In addition to those ILECs, effective July 1, 2017, TDS will bring into the JSI Tariff an additional 62 ILECs (TDS Telecom Groups E, F and G), bringing the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 102. TDS has 6 ILECs that will continue to participate in the NECA Traffic Sensitive Pool.

Currently, TDS Telecom-Group A in the JSI Tariff is comprised of the four TDS Telecom study areas which withdrew from the NECA Traffic Sensitive Pool effective June 30, 2007 at which time they became issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group B, TDS-Group C, TDS-Group D, TDS-Group E, TDS Group F and TDS Group G.

The blending of Switched Access and Special Access rates for TDS Telecom-Group A will continue to be based on the four study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs. Blended Switched Access rates were developed prior to the FCC's USF/ICC Transformation Order.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6

ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups B, C, D, E, F and G is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group A companies, TRP documents for Special Access, the Access Recovery Charge ("ARC") and Inter-Carrier Compensation ("ICC") rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). TDS Telecom Group A is making a mid-course filing under 61.38. In addition, Special Access rates reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection.

TDS has also attached its TDS Group A ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook
- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group A Max ARC Calculations
- TDS Telecom Group A Eligible Recovery Summary

- TDS Telecom Group A ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop (“CBOL”) lines that the carriers would have assessed on voice/data lines for the twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group A proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP” supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate development includes only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commission’s tariff rules for rate-of-return prospective filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Group A Companies	#1-TDSA
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom Group A Companies	#2- TDSA
TRP – Combined TDS Telecom Group A Companies	#3-TDSA
ICC CAF Certification	#4-TDSA

2017 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2013 to 2016. Based on this historical data, demand trends were developed to project end of year demand for 2017 and 2018. TDS Group A Companies experienced a 9 percent decrease in High Capacity DS1 demand from December 2015 through December 2016. This DS1 demand loss combined with other minor demand changes caused an estimated 7 percent decrease in billing at current rate levels during the same timeframe.

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 TDS Group A experience and observations indicates demand for these services is diminishing at a much slower pace than for High Capacity DS1s.

Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terminations (“CMT”) in 2016. 2017 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 2016 demand and 2017 forecasted demand were averaged to determine demand as of July 1, 2017. Next, year-end 2017 and 2018 forecasted demand were averaged to determine July 1, 2018 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

TDS Group A proposes increasing Special Access rates by 6.5 percent as compared with the July 1, 2016 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 and CBOL costs, revenues and rates have been excluded from the rate design.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the fifteen TDS Telecom study areas listed below.

In the JSI Tariff these fifteen TDS Telecom carriers are currently known collectively as the “TDS Telecom Companies Group B” and referred to as “TDS Telecom-Group B or “TDS Group B.”

TDS Telecom Companies-Group B Individual Study Area Company Name	State	Study Area Code
Arvig Telephone Company d/b/a TDS Telecom	MN	361350
Badger Telecom, LLC d/b/a TDS Telecom	WI	330844
Blue Ridge Telephone Company d/b/a TDS Telecom	GA	220346
Bridge Water Telephone Company d/b/a TDS Telecom	MN	361362
Central State Telephone Company, LLC d/b/a TDS Telecom	WI	330859
Concord Telephone Exchange Inc. d/b/a TDS Telecom	TN	290559
Mid-Plains Telephone LLC d/b/a TDS Telecom	WI	330881
Mid-State Telephone Company d/b/a TDS Telecom	MN	361433
Nelson-Ball Ground Telephone Co d/b/a TDS Telecom	GA	220375
Quincy Telephone Company-FL d/b/a TDS Telecom	FL	210338
Quincy Telephone Company-GA d/b/a TDS Telecom	GA	220338
Stockbridge & Sherwood Telephone Company, LLC d/b/a TDS Telecom	WI	330954
Strasburg Telephone Company d/b/a TDS Telecom	CO	462207
Tellico Telephone Company, Inc. d/b/a TDS Telecom	TN	290578
UTELCO LLC. d/b/a TDS Telecom	WI	330963

TDS Telecom-Group B files Special Access rates on a blended basis reflective of the 15 TDS Group B study areas. Switched Access Rates are at company-specific rates that were established in the USF/ICC Transformation Order and related phase down associated with 47 CFR §51.909 and pool exit subsections as set forth in the initial JSI Tariff filing for these study areas effective July 1, 2014.

The fifteen companies comprising the TDS Telecom-Group B will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff nor pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the fifteen study areas comprising TDS Telecom-Group B, TDS Telecom also has 25 additional TDS study areas (TDS Telecom-Groups A, C, and D) that are currently issuing carriers for the JSI Tariff. In addition to those ILECs, effective July 1, 2017, TDS will bring into the JSI Tariff an additional 62 ILECs, bringing the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 102. TDS has 6 ILECs that will continue to participate in NECA Traffic Sensitive Pool.

Currently, TDS Telecom-Group B in the JSI Tariff is comprised of the fifteen TDS Telecom study areas which withdrew from the NECA Traffic Sensitive Pool effective July 1, 2014 at which time they became issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007, 4 TDS Telecom ILECs (TDS Telecom-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group C, TDS-Group D, TDS-Group E, TDS Group F and TDS Group G.

The blending of Special Access rates for TDS Telecom-Group B will continue to be based on the 15 study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, C, D, E, F and G is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group B companies, TRP documents for Special Access, the Access Recovery Charge (“ARC”) and Inter-Carrier Compensation (“ICC”) rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). TDS Telecom Group B is making a filing for Special Access rates to reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection.

TDS has also attached its TDS Group B ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook
- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group B Max ARC Calculations
- TDS Telecom Group B Eligible Recovery Summary
- TDS Telecom Group B ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop ("CBOL") lines that the carriers would have assessed on voice/data lines for twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group B proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate developments include only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commissions tariff rules for rate-of-return filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
TRP – Combined TDS Telecom Group B Companies	#1-TDSB
ICC CAF Certification	#2-TDSB

2017 Special Access Rates

Special Access Demand

Special Access demand quantities remained at the levels filed on June 16, 2016 in Transmittal No. 198.

Special Access Rate Design

TDS Group B proposes decreasing Special Access rates by .45 percent as compared with the July 1, 2016 Special Access rates. The revenues realized by 2016 filing demand at the proposed rates equal the 2016 TYCOS Special Access revenue requirement adjusted to 10.75 percent rate of return. Consistent with the detariffing of Wireline Internet Access Transport Service (“WBIAS” or “WBI”) effective June 30, 2007, WBI and CBOL costs, revenues and rates have been excluded from the rate design. In addition to the rate decrease, the TDS Group B is proposing a revenue neutral Ethernet Transport Service rate restructure.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
TDS Telecom Companies-Group C
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the nine TDS Telecom study areas listed below.

In the JSI Tariff these 9 study areas are known collectively as the “TDS Telecom Companies-Group C” in the JSI Tariff and referred as TDS Telecom Companies-Group C or as “TDS Group C.”

TDS Telecom Companies-Group C Individual Study Area Company Name	State	Study Area Code
Butler Telephone Company, Inc. d/b/a TDS Telecom	AL	250284
Communications Corporation of Indiana d/b/a TDS Telecom	IN	320776
Kearsarge Telephone Company d/b/a TDS Telecom	NH	120045
Merrimack County Telephone Company d/b/a TDS Telecom	NH	122047
MCTA, Inc. d/b/a Contoocook Valley Telephone Co. and d/b/a Hollis Telephone Company d/b/a TDS Telecom	NH	123321
Peoples Telephone Company, Inc. d/b/a TDS Telecom	AL	250314
Somerset Telephone Company d/b/a TDS Telecom	ME	100024
Southwestern Telephone Company d/b/a TDS Telecom	AZ	452174
Williston Telephone Company d/b/a TDS Telecom	SC	240551

TDS Telecom-Group C files Special Access rates on a blended basis reflective of the 9 TDS Group C study areas. Switched Access Rates are at company-specific rates that were established in the USF/ICC Transformation Order and related phase down associated with 47 CFR §51.909 and pool exit subsections as set forth in the initial JSI Tariff filing for these study areas effective July 1, 2015.

The nine companies comprising the TDS Telecom-Group C will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the nine study areas comprising TDS Telecom-Group C, TDS Telecom also has 31 additional TDS study areas (TDS Telecom-Groups A, B, and D) that are currently issuing carriers for the JSI Tariff. In addition to those ILECs, effective July 1, 2017, TDS will bring into the JSI Tariff an additional 62 ILECs, bringing the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 102. TDS has 6 ILECs that will continue to participate in NECA Traffic Sensitive Pool.

Currently, TDS Telecom-Group C in the JSI Tariff is comprised of the nine TDS Telecom study areas which withdrew from the NECA Traffic Sensitive Pool effective July 1, 2015 at which time they became issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007, 4 TDS Telecom ILECs (TDS Telecom-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for JSI Tariff FCC No. 1.

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group B, TDS-Group D, TDS-Group E, TDS Group F and TDS Group G.

The blending of Special Access rates for TDS Telecom-Group C will continue to be based on the 9 study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, B, D, E, F and G is being presented separately.

1. DESCRIPTION OF FILING

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2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection.

TDS has also attached its TDS Group C ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook

- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group C Max ARC Calculations
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TDS Group C proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate developments include only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commissions tariff rules for rate-of-return filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
TRP – Combined TDS Telecom Group C Companies	#1-TDSC
ICC CAF Certification	#2-TDSC

2017 Special Access Rates

Special Access Demand

Special Access demand quantities remained at the levels filed on June 16, 2016 in Transmittal No. 198.

Special Access Rate Design

TDS Group C proposes decreasing Special Access rates by .47 percent as compared with the July 1, 2016 Special Access rates. The revenues realized by 2016 filing demand at the proposed rates equal the 2016 TYCOS Special Access revenue requirement adjusted to 10.75 percent rate of return. Consistent with the detariffing of Wireline Internet Access Transport Service (“WBIAS” or “WBI”) effective June 30, 2007, WBI and CBOL costs, revenues and rates have been excluded from the rate design. In addition to the rate decrease, the TDS Group C is proposing a revenue neutral Ethernet Transport Service rate restructure.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
TDS Telecom Companies-Group D
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the four TDS Telecom study areas listed below.

In the JSI Tariff these twelve TDS Telecom carriers are currently known collectively as the “TDS Telecom Companies Group D” and referred to as “TDS Telecom-Group D or “TDS Group D.”

TDS Telecom Companies-Group D Individual Study Area Company Name	State	Study Area Code
Amelia Telephone Corporation. d/b/a TDS Telecom	VA	190217
Arizona Telephone Company d/b/a TDS Telecom	AZ	452171
Delta County Tele-Comm, Inc. d/b/a TDS Telecom	CO	462184
Leslie County Telephone Company d/b/a TDS Telecom	KY	260411
Midway Telephone Company, LLC d/b/a TDS Telecom	WI	330909
Riverside Telecom, LLC d/b/a TDS Telecom	WI	330943
Tipton Telephone Company, Inc. d/b/a TDS Telecom	IN	320829
Tri-County Telephone Company, Inc. d/b/a TDS Telecom	IN	320830
Union Telephone Company d/b/a TDS Telecom	NH	120049
Virginia Telephone Company d/b/a TDS Telecom	VA	190253
Waunakee Telephone Company, LLC d/b/a TDS Telecom	WI	330968
Wilton Telephone Company, Inc. d/b/a TDS Telecom	NH	120050

TDS Telecom-Group D files Special Access rates on a blended basis reflective of the 12 TDS Group D study areas. Switched Access Rates are at company-specific rates that were established in the USF/ICC Transformation Order and related phase down associated with 47 CFR §51.909 and pool exit subsections as set forth in the initial JSI Tariff filing for these study areas effective July 1, 2015.

The twelve companies comprising the TDS Telecom-Group D will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the twelve study areas comprising TDS Telecom-Group D, TDS Telecom also has 28 additional TDS study areas (TDS Telecom-Groups A, B and C) that are currently issuing carriers for the JSI Tariff. In addition to those ILECs, effective July 1, 2017, TDS will bring into the JSI Tariff an additional 62 ILECs (TDS Telecom Groups E, F and G), bringing the total number of TDS Telecom affiliate study areas that are issuing carriers for the JSI Tariff to 102. TDS has 6 ILECs that will continue to participate in the NECA Traffic Sensitive Pool.

Currently, TDS Telecom-Group D in the JSI Tariff is comprised of the twelve TDS Telecom study areas which withdrew from the NECA Traffic Sensitive Pool effective July 1, 2015 at which time they became issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007 4 TDS Telecom ILECs (TDS-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No.1.

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group B, TDS-Group C, TDS-Group E, TDS Group F and TDS Group G.

The blending of Special Access rates for TDS Telecom-Group D will continue to be based on the twelve study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, B, C, E, F and G is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group D companies, TRP documents for Special Access, the Access Recovery Charge ("ARC") and Inter-Carrier Compensation ("ICC") rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). TDS Telecom Group D is making a mid-course filing under 61.38. In addition, Special Access rates reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection.

TDS has also attached its TDS Group D ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook

- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group D Max ARC Calculations
- TDS Telecom Group D Eligible Recovery Summary
- TDS Telecom Group D ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop (“CBOL”) lines that the carriers would have assessed on voice/data lines for the twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group D proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP” supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate development includes only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commission’s tariff rules for rate-of-return prospective filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Group D Companies	#1-TDSD
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom Group D Companies	#2- TDSD
TRP – Combined TDS Telecom Group D Companies	#3-TDSD
ICC CAF Certification	#4-TDSD

2017 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2013 to 2016. Based on this historical data, demand trends were developed to project end of year demand for 2017 and 2018. TDS Group D Companies experienced a 13 percent decrease in High Capacity DS1 demand from December 2015 through December 2016. This DS1 demand loss combined with other minor demand changes caused an estimated 5 percent decrease in billing at current rate levels during the same timeframe.

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 TDS Group D experience and observations indicates demand for these services is diminishing at a much slower pace than for High Capacity DS1s.

Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terminations (“CMT”) in 2016. 2017 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 2016 demand and 2017 forecasted demand were averaged to determine demand as of July 1, 2017. Next, year-end 2017 and 2018 forecasted demand were averaged to determine July 1, 2018 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

TDS Group D proposes increasing Special Access rates by 6.6 percent as compared with the July 1, 2016 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 and CBOL costs, revenues and rates have been excluded from the rate design.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
TDS Telecom Companies-Group E
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the fifteen TDS Telecom study areas listed below.

Under JSI Transmittal No. 209, the below fifteen TDS Telecom carriers are becoming issuing carriers for the JSI Tariff. These fifteen study areas will be known collectively as the “TDS Telecom Companies Group E” and referred as “TDS Telecom-Group E or “TDS Group E.”

TDS Telecom Companies Group E Study Area Company Name	Study Area State	Study Area Code
Communication Corporation of Michigan d/b/a TDS Telecom	MI	310672
Deposit Telephone Company, Inc d/b/a TDS Telecom	NY	150089
Hampden Telephone Company d/b/a TDS Telecom	ME	100010
Hartland and St Albans Telephone Company d/b/a TDS Telecom	ME	100011
Hornitos Telephone Co d/b/a TDS Telecom	CA	542322
Ludlow Telephone Company d/b/a TDS Telecom	VT	140058
McClellanville Telephone Company, Inc. d/b/a TDS Telecom	SC	240533
New Castle Telephone Company d/b/a TDS Telecom	VA	193029
Port Byron Telephone Company d/b/a TDS Telecom	NY	150118
Southeast Mississippi Telephone Company, Inc d/b/a TDS Telecom	MS	283301
St. Stephen Telephone Company d/b/a TDS Telecom	SC	240544
Sugar Valley Telephone Company d/b/a TDS Telecom	PA	170206
Vernon Telephone Company, Inc d/b/a TDS Telecom	NY	150133
Warren Telephone Company d/b/a TDS Telecom	ME	100031
Winterhaven Telephone Company d/b/a TDS Telecom	CA	542323

Effective July 1, 2017, the JSI Tariff will govern the provision by the TDS Telecom Companies-Group E of interstate Common Line, 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 E.

Concurrent with this transmittal, the National Exchange Carrier Association (“NECA”) is cancelling these carriers as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 1, 2017. Beginning July 1, 2017, the 15 study areas will no longer participate in the NECA Traffic Sensitive Pool.

The fifteen companies comprising the TDS Telecom-Group E will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the 15 study areas comprising new TDS Telecom Group E, TDS Telecom has 87 additional TDS study areas that are issuing carriers for the JSI Tariff or will be issuing carriers for the JSI Tariff effective July 1, 2017. TDS has 6 ILECs that will continue to participate in NECA Traffic Sensitive Pool.

TDS Telecom-Group E which will be entering the JSI Tariff is comprised of the 15 TDS Telecom study areas which will withdraw from the NECA Traffic Sensitive Pool on July 1, 2017 at which time they will become issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007, 4 TDS Telecom ILECs (TDS Telecom-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff.

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group B, TDS-Group C, TDS-Group D, TDS Group F and TDS Group G.

The blending of Special Access rates for TDS Telecom-Group E will be based on the 15 study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, B, C, D, F and G is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group E companies, TRP documents for Special Access, the ARC and Inter-Carrier Compensation ("ICC") rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). In addition, Special Access rates reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

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 Group E 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-Group E 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-Group E companies are offering interstate Switched and Special Access services today. Special Access services include Public Packet Data Network services.

Blended Rates

The TDS Group E 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 E Companies are complying with this section of rules and have filed Switched Access Service rates on an individual company basis in the JSI Tariff.

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

Each individual TDS Group E company has previously detariffed wireline broadband Internet access service (Asymmetric Digital Subscriber Line –ADSL or Symmetric Digital Subscriber Line- SDSL) 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 Group E companies in NECA Tariff FCC No. 5 and neither depooling nor becoming issuing carriers for the JSI Tariff reflect ADSL or SDSL.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection

TDS has also attached its TDS Group E ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook
- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group E Max ARC Calculations
- TDS Telecom Group E Eligible Recovery Summary

- TDS Telecom Group E ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop (“CBOL”) lines that the carriers would have assessed on voice/data lines for the twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group E proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate development includes only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commission’s tariff rules for rate-of-return prospective filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Group E Companies	#1-TDSE
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom Group E Companies	#2- TDSE
TRP – Combined TDS Telecom Group E Companies	#3-TDSE
SWA Recurring Rates by Company – Developed Based on Section 51.909 Depooling Rules	#4-TDSE
ICC CAF Certification	#5-TDSE

2017 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2013 to 2016. Based on this historical data, demand trends were developed to project end of year demand for 2017 and 2018. TDS Group E Companies experienced a 15 percent decrease in High Capacity DS1 demand from December 2015 through December 2016. This DS1 demand loss combined with other minor demand changes caused an estimated 11 percent decrease in billing at current rate levels during the same timeframe.

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 TDS Group E experience and observations indicates demand for these services is diminishing at a much slower pace than for High Capacity DS1s.

Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terminations (“CMT”) in 2016. 2017 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 2016 demand and 2017 forecasted demand were averaged to determine demand as of July 1, 2017. Next, year-end 2017 and 2018 forecasted demand were averaged to determine July 1, 2018 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

TDS Group E proposes increasing Special Access rates by 5 percent as compared with the July 1, 2016 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 and CBOL costs, revenues and rates have been excluded from the rate design.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
TDS Telecom Companies-Group F
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the seventeen TDS Telecom study areas listed below.

Under JSI Transmittal No. 209, the below seventeen TDS Telecom carriers are becoming issuing carriers for the JSI Tariff. These seventeen study areas will be known collectively as the “TDS Telecom Companies Group F” and referred as “TDS Telecom-Group F or “TDS Group F.”

TDS Telecom Companies Group F Study Area Company Name	Study Area State	Study Area Code
Asotin Telephone Company (OR) d/b/a TDS Telecom	OR	532404
Asotin Telephone Company (WA) d/b/a TDS Telecom	WA	522404
Calhoun City Telephone Company, Inc. d/b/a TDS Telecom	MS	280448
Chatham Telephone Company d/b/a TDS Telecom	MI	310685
Communications Corporation of Southern Indiana d/b/a TDS Telecom	IN	320809
Dickeyville Telephone, LLC d/b/a TDS Telecom	WI	330875
EastCoast Telecom of Wisconsin, LLC d/b/a TDS Telecom	WI	330914
Edwards Telephone Company, Inc. d/b/a TDS Telecom	NY	150092
Home Telephone Company, Inc. Waldron d/b/a TDS Telecom	IN	320778
Humphreys County Telephone Company d/b/a TDS Telecom	TN	290566
Mid-America Telephone, Inc. d/b/a TDS Telecom	OK	432010
Myrtle Telephone Company, Inc. d/b/a TDS Telecom	MS	287449
Potlatch Telephone Company d/b/a TDS Telecom	ID	472230
Shiawassee Telephone Company d/b/a TDS Telecom	MI	310726
Tenney Telephone Company, LLC d/b/a TDS Telecom	WI	330958
The Farmers Telephone Company, LLC d/b/a TDS Telecom	WI	330880
Wolverine Telephone Company d/b/a TDS Telecom	MI	310738

Effective July 1, 2017, the JSI Tariff will govern the provision by the TDS Telecom Companies-Group F of interstate Common Line, 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 F.

Concurrent with this transmittal, the National Exchange Carrier Association (“NECA”) is cancelling these carriers as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 1, 2017. Beginning July 1, 2017, the 17 study areas will no longer participate in the NECA Traffic Sensitive Pool.

The seventeen companies comprising the TDS Telecom-Group F will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the 17 study areas comprising new TDS Telecom Group F, TDS Telecom has 85 additional TDS study areas that are issuing carriers for the JSI Tariff or will be issuing carriers for the JSI Tariff effective July 1, 2017. TDS has 6 ILECs that will continue to participate in NECA Traffic Sensitive Pool.

TDS Telecom-Group F which will be entering the JSI Tariff is comprised of the 17 TDS Telecom study areas which will withdraw from the NECA Traffic Sensitive Pool on July 1, 2017 at which time they will become issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007, 4 TDS Telecom ILECs (TDS Telecom-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff.

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 30 TDS Telecom ILECs (TDS Telecom-Group G) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group B, TDS-Group C, TDS-Group D, TDS Group E and TDS Group G.

The blending of Special Access rates for TDS Telecom-Group F will be based on the 17 study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, B, C, D, E and G is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group F companies, TRP documents for Special Access, the ARC and Inter-Carrier Compensation ("ICC") rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). In addition, Special Access rates reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

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 Group F 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-Group F 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-Group F companies are offering interstate Switched and Special Access services today. Special Access services include Public Packet Data Network services.

Blended Rates

The TDS Group F 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 F Companies are complying with this section of rules and have filed Switched Access Service rates on an individual company basis in the JSI Tariff.

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

Each individual TDS Group F company has previously detariffed wireline broadband Internet access service (Asymmetric Digital Subscriber Line –ADSL or Symmetric Digital Subscriber Line- SDSL) 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 Group F companies in NECA Tariff FCC No. 5 and neither depooling nor becoming issuing carriers for the JSI Tariff reflect ADSL or SDSL.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection

TDS has also attached its TDS Group F ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook
- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates

- Holding Company Group F Max ARC Calculations
- TDS Telecom Group F Eligible Recovery Summary
- TDS Telecom Group F ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop (“CBOL”) lines that the carriers would have assessed on voice/data lines for the twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group F proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate development includes only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commission’s tariff rules for rate-of-return prospective filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Group F Companies	#1-TDSF
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom Group F Companies	#2- TDSF
TRP – Combined TDS Telecom Group F Companies	#3-TDSF
SWA Recurring Rates by Company – Developed Based on Section 51.909 Depooling Rules	#4-TDSF
ICC CAF Certification	#5-TDSF

2017 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2013 to 2016. Based on this historical data, demand trends were developed to project end of year demand for 2017 and 2018. TDS Group F Companies experienced an 11 percent decrease in High Capacity DS1 demand from December 2015 through December 2016. This DS1 demand loss combined with other minor demand changes caused an estimated 5 percent decrease in billing at current rate levels during the same timeframe.

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 TDS Group F experience and observations indicates demand for these services is diminishing at a much slower pace than for High Capacity DS1s.

Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terminations (“CMT”) in 2016. 2017 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 2016 demand and 2017 forecasted demand were averaged to determine demand as of July 1, 2017. Next, year-end 2017 and 2018 forecasted demand were averaged to determine July 1, 2018 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

TDS Group F proposes increasing Special Access rates by 8.8 percent as compared with the July 1, 2016 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 and CBOL costs, revenues and rates have been excluded from the rate design.

John Staurulakis, Inc. Transmittal No. 209 – June 16, 2017
TDS Telecom Companies-Group G
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. 209 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the thirty TDS Telecom study areas listed below.

Under JSI Transmittal No. 209, the below thirty TDS Telecom carriers are becoming issuing carriers for the JSI Tariff. These thirty study areas will be known collectively as the “TDS Telecom Companies Group G” and referred as “TDS Telecom-Group G or “TDS Group G.”

TDS Telecom Companies Group G Study Area Company Name	Study Area State	Study Area Code
Arcadia Telephone Company d/b/a TDS Telecom	OH	300585
Black Earth Telephone Company, LLC d/b/a TDS Telecom	WI	330849
Bonduel Telephone Company, LLC d/b/a TDS Telecom	WI	330851
Burlington, Brighton and Wheatland Telephone Company, LLC d/b/a TDS Telecom	WI	330856
Camden Telephone Company, Inc. d/b/a TDS Telecom	IN	320744
Cobbosseecontee Telephone Company d/b/a TDS Telecom	ME	100005
Continental Telephone Company d/b/a TDS Telecom	OH	300607
Grantland Telecom, LLC d/b/a TDS Telecom	WI	330930
Happy Valley Telephone Company d/b/a TDS Telecom	CA	542321
Island Telephone Company d/b/a TDS Telecom	MI	310677
Lewis River Telephone Company, Inc. d/b/a TDS Telecom	WA	522427
Lewisport Telephone Company d/b/a TDS Telecom	KY	260412
Little Miami Communications Corporation d/b/a TDS Telecom	OH	300613
Mahanoy and Mahantango Telephone Company d/b/a TDS Telecom	PA	170183
McDaniel Telephone Company d/b/a TDS Telecom	WA	522430
Mosinee Telephone Company, LLC d/b/a TDS Telecom	WI	330915
Northfield Telephone Company d/b/a TDS Telecom	VT	140061
Oakwood Telephone Company d/b/a TDS Telecom	OH	300645
Oriskany Falls Telephone Corporation d/b/a TDS Telecom	NY	150114
Perkinsville Telephone Company, Inc. d/b/a TDS	VT	140062

TDS Telecom Companies Group G Study Area Company Name	Study Area State	Study Area Code
Telecom		
Salem Telephone Company d/b/a TDS Telecom	KY	260417
Scandinavia Telephone Company, LLC d/b/a TDS Telecom	WI	330945
Southeast Telephone Co. of Wisconsin, LLC d/b/a TDS Telecom	WI	330952
The Home Telephone Company of Pittsboro, Inc. d/b/a TDS Telecom	IN	320777
The Island Telephone Company d/b/a TDS Telecom	ME	100007
The Merchants and Farmers Telephone Company d/b/a TDS Telecom	IN	320788
The State Long Distance Telephone Company, LLC d/b/a TDS Telecom	WI	330955
The West Penobscot Telephone and Telegraph Company d/b/a TDS Telecom	ME	100034
Township Telephone Company, Inc. d/b/a TDS Telecom	NY	150129
Winsted Telephone Company d/b/a TDS Telecom	MN	361507

Effective July 1, 2017, the JSI Tariff will govern the provision by the TDS Telecom Companies-Group G of interstate Common Line, 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 G.

Concurrent with this transmittal, the National Exchange Carrier Association (“NECA”) is cancelling these carriers as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 1, 2017. Beginning July 1, 2017, the 30 study areas will no longer participate in the NECA Traffic Sensitive Pool.

The thirty companies comprising the TDS Telecom-Group G will continue to utilize 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 as all of these carriers have selected model based ACAM support and no longer participate in NECA’s Common Line tariff or pool.

TDS Holding Company Relationships

TDS Telecom has 108 incumbent local exchange carrier (“ILEC”) affiliate study areas. In addition to the 30 study areas comprising new TDS Telecom Group G, TDS Telecom has 72 additional TDS study areas

that are issuing carriers for the JSI Tariff or will be issuing carriers for the JSI Tariff effective July 1, 2017. TDS has 6 ILECs that will continue to participate in NECA Traffic Sensitive Pool.

TDS Telecom-Group G which will be entering the JSI Tariff is comprised of the 30 TDS Telecom study areas which will withdraw from the NECA Traffic Sensitive Pool on July 1, 2017 at which time they will become issuing carriers for the JSI Tariff.

Other TDS Study Areas that are Issuing Carriers for the JSI Tariff

Effective June 30, 2007, 4 TDS Telecom ILECs (TDS Telecom-Group A) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff.

Effective July 1, 2014, 15 TDS Telecom ILECs (TDS Telecom-Group B) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 9 TDS Telecom ILECs (TDS Telecom-Group C) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2015, 12 TDS Telecom ILECs (TDS Telecom-Group D) withdrew from the NECA Traffic Sensitive Pool at which time these ILECs became issuing carriers for the JSI Tariff FCC No. 1.

Effective July 1, 2017, 15 TDS Telecom ILECs (TDS Telecom-Group E) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

Effective July 1, 2017, 17 TDS Telecom ILECs (TDS Telecom-Group F) will withdraw from the NECA Traffic Sensitive Pool at which time these ILECs will become issuing carriers for the JSI Tariff.

A separate Description and Justification is also being provided for the each of the following JSI Tariff participants: TDS-Group A, TDS-Group B, TDS-Group C, TDS-Group D, TDS Group E and TDS Group F.

The blending of Special Access rates for TDS Telecom-Group G will be based on the 30 study areas comprising the group and will not reflect any demand or costs for any other TDS ILECs.

Because 6 TDS 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 Rate Ceiling and Holding Company

Maximum ARC Calculations included for filing under this transmittal does not reflect data for the 6 ILECs remaining in the NECA Traffic Sensitive Pool. Moreover, the support for TDS-Groups A, B, C, D, E and F is being presented separately.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also providing as part of this filing, on behalf of TDS Telecom-Group G companies, TRP documents for Special Access, the ARC and Inter-Carrier Compensation ("ICC") rates and forms as prescribed by the Pricing Policy Division. See Material to be Filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (rel. Apr. 24, 2017). In addition, Special Access rates reflect the rate of return reduction from 11.00 percent to 10.75 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

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 Group G 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-Group G 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-Group G companies are offering interstate Switched and Special Access services today. Special Access services include Public Packet Data Network services.

Blended Rates

The TDS Group G 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 G Companies are complying with this section of rules and have filed Switched Access Service rates on an individual company basis in the JSI Tariff.

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

Each individual TDS Group G company has previously detariffed wireline broadband Internet access service (Asymmetric Digital Subscriber Line –ADSL or Symmetric Digital Subscriber Line- SDSL) 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 Group G companies in NECA Tariff FCC No. 5 and neither depooling nor becoming issuing carriers for the JSI Tariff reflect ADSL or SDSL.

2017 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 § 51.909. Section 51.909(a) established caps for both interstate and intrastate Switched Access rate elements. See 47 CFR § 51.909(a).

Section 51.909(g) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2017 that will be transitioned to \$.0007 over the next 3 tariff filing years and is shown in the ICC-CAF data collection

TDS has also attached its TDS Group G ICC-CAF data collection information which include the following:

- ROR ILEC Interstate Rates Eligible Recovery Workbook
- ROR ILEC Intrastate Eligible Recovery Workbook
- ROR ILEC Recip Comp Eligible Recovery Workbook
- ROR ILEC ARC True-up
- Tariff Rate Comparison with ARC Rates
- Holding Company Group G Max ARC Calculations
- TDS Telecom Group G Eligible Recovery Summary
- TDS Telecom Group G ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2017-18 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2017-18 TRP also demonstrates imputation of the ARC on Consumer Broadband-Only Loop (“CBOL”) lines that the carriers would have assessed on voice/data lines for the twelve months from July 1, 2017 through June 30, 2018 based on study area projection.

TDS Group G proposes ARC rate changes effective July 1, 2017 under Section 51.917(e) as shown in the supporting documentation.

2017 Tariff Review Plans

The 2017 TRP supporting data implement the revised cost allocation rules and reassign the allocation of consumer broadband-only loops from the special access category to the new common line CBOL category. The 2017 TRP also demonstrates imputation of the ARC on CBOL lines that the carriers would have assessed on voice/data lines for the annual 12 month period from July 1, 2017 through June 30, 2018 based on study area projections.

Special Access Revenue Requirements rate development includes only Non-DSL Revenue Requirements. The impact of reallocated cost and ARC imputation for CBOL does not impact Special Access rates for any issuing carrier.

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

Following are the documents filed by JSI under Transmittal No. 209 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 17-65, Order, DA 17-386 and Section 61.38 of the Commission's tariff rules for rate-of-return prospective filers together with TRP documents for both the annual filing of access charges and the adjustments to the ARC and ICC rates.

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom Group G Companies	#1-TDSG
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom Group G Companies	#2- TDSG
TRP – Combined TDS Telecom Group G Companies	#3-TDSG
SWA Recurring Rates by Company – Developed Based on Section 51.909 Depooling Rules	#4-TDSG
ICC CAF Certification	#5-TDSG

2017 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2013 to 2016. Based on this historical data, demand trends were developed to project end of year demand for 2017 and 2018. TDS Group G Companies experienced a 20 percent decrease in High Capacity DS1 demand from December 2015 through December 2016. This DS1 demand loss combined with other minor demand changes caused an estimated 12 percent decrease in billing at current rate levels during the same timeframe.

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 TDS Group G experience and observations indicates demand for these services is diminishing at a much slower pace than for High Capacity DS1s.

Channel Mileage Facility (“CMF”) forecasted demand is based on the ratio between CMF and Channel Mileage Terminations (“CMT”) in 2016. 2017 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 2016 demand and 2017 forecasted demand were averaged to determine demand as of July 1, 2017. Next, year-end 2017 and 2018 forecasted demand were averaged to determine July 1, 2018 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

TDS Group G proposes increasing Special Access rates by 8.2 percent as compared with the July 1, 2016 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 and CBOL costs, revenues and rates have been excluded from the rate design.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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 filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Bluffton is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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 holding company code for both Bluffton and Hargray is 200000263. 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. 209.

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. Bluffton 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.

Bluffton, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Bluffton proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with §

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Bluffton proposes an ARC effective July 1, 2017 at the rate of \$3.00 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 and at the rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 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 2017-2018:

- Bluffton 2017 ROR-ILEC-ICC Data
- Bluffton 2017 Tariff Rate Comp CAF
- Hargray Communications Group 2017 True Up*
- Hargray Communications Group 2017 Rate Ceiling CAF*
- Hargray Communications Group 2017-18 Rate of Return ILEC Summary*

*Holding Company

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

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. 209 - 2017 Annual Access Filing
Bluffton Telephone Company, Inc. (SC)

- 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. 209 – 2017 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 filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Citizens is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 209.

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. Citizens is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Citizens Telephone Company d/b/a Comporium Communications (NC)

pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Citizens, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Citizens proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Citizens proposes an ARC effective July 1, 2017 at the rate of \$3.00 per month for each line, other than lines of Lifeline Customers, assessed a primary residential common line charge pursuant to 47 CFR § 69.104 and at the rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Citizens 2017 ROR-ILEC-ICC Data
- Citizens 2017 Tariff Rate Comp CAF

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. 209 - 2017 Annual Access Filing
Citizens Telephone Company d/b/a Comporium Communications (NC)

- Citizens 2017 True Up
- Comporium Communications 2017 Rate Ceiling CAF*
- Comporium Communications 2017-18 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Comporium, Inc.,
SAC 240542 (South Carolina)

Comporium, Inc., (alternatively “Comporium” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Comporium is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 209.

1. DESCRIPTION OF FILING

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Comporium, Inc. (SC)

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

Comporium, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Comporium proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Comporium proposes an ARC effective July 1, 2017 at the rate of \$3.00 per month for each line, other than lines of Lifeline Customers, assessed a primary residential common line charge pursuant to 47 CFR § 69.104 and at the rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM TARIFF REVIEW PLANS

Comporium submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Comporium 2017 ROR-ILEC-ICC Data
- Comporium 2017 Tariff Rate Comp CAF

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. 209 - 2017 Annual Access Filing
Comporium, Inc. (SC)

- Comporium 2017 True Up
- Comporium Communications 2017 Rate Ceiling CAF*
- Comporium Communications 2017-18 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

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

Farmers Telephone Cooperative, Inc., (alternatively “Farmers” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Farmers is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Farmers of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Farmers 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.

Farmers, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Farmers proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Farmers Telephone Cooperative, Inc. (SC)

Under Section 51.917(e), Farmers proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Farmers 2017 ROR-ILEC-ICC Data
- Farmers 2017 Tariff Rate Comp CAF
- Farmers 2017 True Up
- Farmers 2017 Rate Ceiling CAF
- Farmers 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 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 filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fort Mill is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 209.

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. Fort Mill is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fort Mill Telephone Company d/b/a Comporium Communications (SC)

pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Fort Mill, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Fort Mill proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Fort Mill proposes an ARC effective July 1, 2017 at the rate of \$1.68 per month for each line, other than lines of Lifeline Customers, assessed a primary residential common line charge pursuant to 47 CFR § 69.104 and at the rate of \$1.68 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Fort Mill 2017 ROR-ILEC-ICC Data
- Fort Mill 2017 Tariff Rate Comp CAF

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. 209 - 2017 Annual Access Filing
Fort Mill Telephone Company d/b/a Comporium Communications (SC)

- Fort Mill 2017 True Up
- Comporium Communications 2017 Rate Ceiling CAF*
- Comporium Communications 2017-18 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 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 filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Hargray is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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 holding company code for both Hargray and Bluffton is 200000263. 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”).

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. 209.

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. Hargray 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.

Hargray, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Hargray proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with §

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hargray Telephone Company, Inc. (SC)

51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Hargray proposes an ARC effective July 1, 2017 at the rate of \$3.00 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 and at the rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 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 2017-2018:

- Hargray 2017 ROR-ILEC-ICC Data
- Hargray 2017 Tariff Rate Comp CAF
- Hargray Communications Group 2017 True Up*
- Hargray Communications Group 2017 Rate Ceiling CAF*
- Hargray Communications Group 2017-18 Rate of Return ILEC Summary*

*Holding Company

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

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. 209 - 2017 Annual Access Filing
Hargray Telephone Company, Inc. (SC)

- 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. 209 – 2017 Annual Access Filing

Home Telephone ILEC, LLC dba Home Telecom
SAC 240527 (South Carolina)

Home Telephone ILEC, LLC dba Home Telecom, (alternatively “Home Telecom” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Home Telecom is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Home Telecom of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company’s Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Home Telecom, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Home Telecom proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Home Telephone ILEC, LLC dba Home Telecom (SC)

Under Section 51.917(e), Home Telecom proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HOME TELECOM TARIFF REVIEW PLANS

Home Telecom submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Home Telecom 2017 ROR-ILEC-ICC Data
- Home Telecom 2017 Tariff Rate Comp CAF
- Home Telecom 2017 True Up
- Home Telecom 2017 Rate Ceiling CAF
- Home Telecom 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

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

Horry Telephone Cooperative, Inc., (alternatively “Horry” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Horry is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Horry of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Horry 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.

Horry, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Horry proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Horry Telephone Cooperative, Inc. (SC)

Under Section 51.917(e), Horry proposes an ARC effective July 1, 2017 at the rate of \$2.01 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HORRY TARIFF REVIEW PLANS

Horry submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Horry 2017 ROR-ILEC-ICC Data
- Horry 2017 Tariff Rate Comp CAF
- Horry 2017 True Up
- Horry 2017 Rate Ceiling CAF
- Horry 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 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 filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Lancaster is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 209.

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. Lancaster is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Lancaster Telephone Company d/b/a Comporium Communications (SC)

pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

Lancaster, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. Lancaster proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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), Lancaster proposes an ARC effective July 1, 2017 at per month rates specific to exchanges for each line other than lines of Lifeline Customers assessed a primary residential end user common line charge pursuant to 47 CFR § 69.104 and at the rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Lancaster 2017 ROR-ILEC-ICC Data
- Lancaster 2017 Tariff Rate Comp CAF

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. 209 - 2017 Annual Access Filing
Lancaster Telephone Company d/b/a Comporium Communications (SC)

- Lancaster 2017 True Up
- Comporium Communications 2017 Rate Ceiling CAF*
- Comporium Communications 2017-18 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Winnebago Cooperative Telecom Association
SAC 351337-Iowa
SAC 361337-Minnesota

Winnebago Cooperative Telecom Association, (alternatively “WCTA” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). WCTA is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s March 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by WCTA of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. WCTA 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.

WCTA, a 61.38 prospective filer, makes biennial annual filings in even-numbered years. WCTA proposes Special Access rates to reflect the rate of return reduction from 11.0% to 10.75% and submits the required 61.38 ILEC Rate-of-Return @ 10.75 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. The Company also proposes revisions to the Access Recovery Charge consistent with § 51.917(e), and the step down of terminating End Office rates pursuant to § 51.909(g). Therefore, 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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

Under Section 51.917(e), WCTA proposes an ARC effective July 1, 2017 for both study area codes 351337 and 361337 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WCTA TARIFF REVIEW PLANS

WCTA submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- WCTA 2017 ROR-ILEC-ICC Data
- WCTA 2017 Tariff Rate Comp CAF
- WCTA 2017 True Up
- WCTA 2017 Rate Ceiling CAF
- WCTA 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Arkwest Communications, Inc.
SAC 401734 (Arkansas)

Arkwest Communications, Inc., (alternatively “Arkwest” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Arkwest will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Arkwest as an issuing carrier for NECA Tariff F.C.C. No. 5 and Arkwest will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 Arkwest parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) and Consumer Broadband-only Loop (“CBOL”) under NECA Tariff FCC No. 5 rates and regulations for DSL and CBOL. Effective July 1, 2017 the Company will begin offering WBIAS and CBOL on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS or CBOL for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Arkwest Communications, Inc. (Arkansas)

Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Arkwest reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Arkwest 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 39.83 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$352,057. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$492,296, an increase of \$140,239 or 39.83 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Arkwest Communications, Inc. (Arkansas)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Arkwest Communications, Inc. (Arkansas)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Arkwest Communications, Inc. (Arkansas)

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

Arkwest Communications, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Arkwest 2017 ROR-ILEC-ICC Data
- Arkwest 2017 Tariff Rate Comp CAF
- Arkwest 2017 True Up
- Arkwest 2017 Rate Ceiling CAF
- Arkwest 2017-2018 Rate of Return ILEC Summary

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

Arkwest Communications, Inc.

401734

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$352,057
102	Projected 2011-12 Pool Settlements without LSS	NECA	492,296
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (140,239)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-39.83%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	39.83%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.067515
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.074252

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$66.07
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$105.74
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$322.16
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,941.64
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$4.71
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$4.71
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$22.07
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$192.29
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$47.31
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$47.31
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$114.52
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$735.39
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$670.97
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$259.04
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000282
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001472
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003713
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.007971
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.008810

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 8 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Arkwest Communications, Inc.

401734

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Atlantic Telephone Membership Corporation (NC)

Under Section 51.917(e), Atlantic proposes an ARC effective July 1, 2017 at the rate of \$0.00 per month for each residential line, other than lines of Lifeline Customers, and \$3.00 for each single-line business line, assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 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 2017-2018:

- Atlantic 2017 ROR-ILEC-ICC Data
- Atlantic 2017 Tariff Rate Comp CAF
- Atlantic 2017 True Up
- Atlantic 2017 Rate Ceiling CAF
- Atlantic 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 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. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Bixby is an Issuing Carrier of the JSI Tariff. Bixby 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Bixby of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Bixby 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bixby Telephone Company (OK)

Under Section 51.917(e), Bixby proposes an ARC effective July 1, 2017 at the rate of \$3.00 per month for each Local Measured Service line and \$2.60 for each Unlimited Service line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BIXBY TARIFF REVIEW PLANS

Bixby submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Bixby 2017 ROR-ILEC-ICC Data
- Bixby 2017 Tariff Rate Comp CAF
- Bixby 2017 True Up
- Bixby 2017 Rate Ceiling CAF
- Bixby 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Blackfoot Telephone Cooperative, Inc.
SAC 482235 (Montana)
SAC 483308 (Montana)

Blackfoot Telephone Cooperative, Inc., (alternatively “Blackfoot” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Blackfoot will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Blackfoot as an issuing carrier for NECA Tariff F.C.C. No. 5 and Blackfoot will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Pursuant to notice filed with the FCC, the Company ceased offering its Wireline Broadband Internet Access Service (“WBIAS”) DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective January 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

The regulations and rate structures applicable to Blackfoot parallel those of NECA Tariff FCC No. 5 in all material respects.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (Montana)

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Blackfoot reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

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

Blackfoot Montana SAC 482235

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 34.37 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$453,702. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$297,771, a reduction of \$155,931, or 34.37 percent.

Blackfoot Montana SAC 483308

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 42.34 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (Montana)

demand produces revenue of \$538,195. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$310,316, a reduction of \$227,879, or 42.34 percent.

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (Montana)

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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ Blackfoot is filing blended Special Access rates for the two Montana study areas, SAC 482235 and SAC 483308. The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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), Blackfoot proposes ARC rates effective July 1, 2017 as shown in the supporting documentation.

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

¹ Section 61.39(b)(1) 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. 209 - 2017 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (Montana)

with § 51.917 rules.² The Test Year (TY) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Blackfoot Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Blackfoot 2017 ROR-ILEC-ICC Data
- Blackfoot 2017 Tariff Rate Comp CAF
- Blackfoot 2017 True Up
- Blackfoot 2017 Rate Ceiling CAF
- Blackfoot 2017-2018 Rate of Return ILEC Summary

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).

Blackfoot Telephone Cooperative, Inc. - BTC

482235

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$453,702
102	Projected 2011-12 Pool Settlements without LSS	NECA	297,771
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 155,931
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	34.37%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-34.37%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.012675
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.034850

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.84
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$28.54
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$86.96
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$793.88
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.27
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.27
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.96
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$51.89
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.77
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.77
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$30.91
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$198.46
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$181.08
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$69.91
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000133
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000691
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001743
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003741
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004135

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 3 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019313
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$27.18
304	Voice Grade 4-Wire Entrance Facility		\$43.48
305	DS-1 Entrance Facility		\$132.49
306	DS-3 Entrance Facility		\$1,209.60
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.94
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.94
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$9.08
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$79.06
311	Voice Grade 2-Wire Direct Trunk Termination		\$19.45
312	Voice Grade 4-Wire Direct Trunk Termination		\$19.45
313	DS-1 Direct Trunk Termination		\$47.10
314	DS-3 Direct Trunk Termination		\$302.39
315	Multiplexing DS3-DS1		\$275.90
316	Multiplexing DS1-Voice		\$106.52
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Blackfoot Telephone Cooperative, Inc. - BTC
482235

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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Blackfoot Telephone Cooperative, Inc. - CFT
483308

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$538,195
102	Projected 2011-12 Pool Settlements without LSS	NECA	310,316
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 227,879
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	42.34%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-42.34%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.008351
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.030617

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$15.67
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$25.07
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$76.39
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$697.44
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.12
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.12
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.24
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$45.58
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$11.21
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$11.21
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$27.16
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$174.35
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$159.08
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$61.42
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000116
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000607
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001531
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003287
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003632

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 3 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$27.18
304	Voice Grade 4-Wire Entrance Facility		\$43.48
305	DS-1 Entrance Facility		\$132.49
306	DS-3 Entrance Facility		\$1,209.60
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.94
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.94
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$9.08
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$79.06
311	Voice Grade 2-Wire Direct Trunk Termination		\$19.45
312	Voice Grade 4-Wire Direct Trunk Termination		\$19.45
313	DS-1 Direct Trunk Termination		\$47.10
314	DS-3 Direct Trunk Termination		\$302.39
315	Multiplexing DS3-DS1		\$275.90
316	Multiplexing DS1-Voice		\$106.52
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Blackfoot Telephone Cooperative, Inc. - CFT
483308

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Fremont Telecom Co.
SAC 472222 (Idaho)

Fremont Telecom Co., (alternatively “Fremont” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Fremont will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Fremont as an issuing carrier for NECA Tariff F.C.C. No. 5 and Fremont will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Pursuant to notice filed with the FCC, the Company ceased offering its Wireline Broadband Internet Access Service (“WBIAS”) DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective January 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

The regulations and rate structures applicable to Fremont parallel those of NECA Tariff FCC No. 5 in all material respects.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fremont Telecom Co. (Idaho)

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Fremont reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Fremont 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 180.36 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$205,478. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$576,081, an increase of \$370,603, or 180.36 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fremont Telecom Co. (Idaho)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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. 209 - 2017 Annual Access Filing
Fremont Telecom Co. (Idaho)

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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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), Fremont proposes ARC rates effective July 1, 2017 as shown in the supporting documentation.

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Fremont Telecom Co. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fremont Telecom Co. (Idaho)

- Fremont 2017 ROR-ILEC-ICC Data
- Fremont 2017 Tariff Rate Comp CAF
- Fremont 2017 True Up
- Fremont 2017 Rate Ceiling CAF
- Fremont 2017-2018 Rate of Return ILEC Summary

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

Fremont Telcom Co
472222

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$205,478
102	Projected 2011-12 Pool Settlements without LSS	NECA	576,081
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (370,603)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-180.36%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	180.36%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.081218
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.148872

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$82.82
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$132.53
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$403.78
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,686.78
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$5.92
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$5.92
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$27.70
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$240.97
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$59.27
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$59.27
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$143.55
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$921.66
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$840.92
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$324.69
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.001214
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.006300
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.015891
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.015981
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.017663

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

End Office

Band 4 / Band 4 / Band 2

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$29.54
304	Voice Grade 4-Wire Entrance Facility		\$47.27
305	DS-1 Entrance Facility		\$144.02
306	DS-3 Entrance Facility		\$1,315.01
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.11
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.11
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$9.88
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$85.95
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.14
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.14
313	DS-1 Direct Trunk Termination		\$51.20
314	DS-3 Direct Trunk Termination		\$328.74
315	Multiplexing DS3-DS1		\$299.94
316	Multiplexing DS1-Voice		\$115.81
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Fremont Telcom Co
472222

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Chazy & Westport Telephone Corporation
SAC 150079 (New York)

Chazy & Westport Telephone Corporation, (alternatively “Chazy Westport” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Chazy Westport will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Chazy Westport as an issuing carrier for NECA Tariff F.C.C. No. 5 and Chazy Westport will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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 Chazy Westport parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2009. Pursuant to notice filed with the FCC, the Company will cease offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective June 30, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chazy & Westport Telephone Corporation (New York)

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Chazy Westport reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Chazy Westport 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 35.79 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$152,140. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$97,690, a reduction of \$54,450 or 35.79 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chazy & Westport Telephone Corporation (New York)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chazy & Westport Telephone Corporation (New York)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.15 per month for each residential line, other than lines of Lifeline Customers, and \$3.00 for each single-line business line, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chazy & Westport Telephone Corporation (New York)

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

Chazy & Westport Telephone Corporation submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Chazy Westport 2017 ROR-ILEC-ICC Data
- Chazy Westport 2017 Tariff Rate Comp CAF
- Chazy Westport 2017 True Up
- Chazy Westport 2017 Rate Ceiling CAF
- Chazy Westport 2017-2018 Rate of Return ILEC Summary

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

Chazy & Westport Telephone Corporation
150079

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$152,140
102	Projected 2011-12 Pool Settlements without LSS	NECA	97,690
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 54,450
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	35.79%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-35.79%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.015500
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.034096

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$19.42
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$31.08
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$94.67
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$864.39
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.38
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.38
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$6.48
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$56.49
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$13.90
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$13.90
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$33.65
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$216.10
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$197.17
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$76.12
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000130
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000676
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001705
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003660
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004045

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 3 / Band 5 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$30.24
304	Voice Grade 4-Wire Entrance Facility		\$48.40
305	DS-1 Entrance Facility		\$147.44
306	DS-3 Entrance Facility		\$1,346.18
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.15
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.15
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$10.09
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$87.98
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.65
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.65
313	DS-1 Direct Trunk Termination		\$52.41
314	DS-3 Direct Trunk Termination		\$336.55
315	Multiplexing DS3-DS1		\$307.06
316	Multiplexing DS1-Voice		\$118.55
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Chazy & Westport Telephone Corporation
150079

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification

JSI Transmittal No. 209 - 2017 Annual Access Filing

Chesnee Telephone Company, Inc. d/b/a Chesnee Communications (SC)

Under Section 51.917(e), Chesnee proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Chesnee 2017 ROR-ILEC-ICC Data
- Chesnee 2017 Tariff Rate Comp CAF
- Chesnee 2017 True Up
- Chesnee 2017 Rate Ceiling CAF
- Chesnee 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Gearheart Communications Company, Inc.
d/b/a Coalfields Telephone Company (KY)

Under Section 51.917(e), Coalfields proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Coalfields 2017 ROR-ILEC-ICC Data
- Coalfields 2017 Tariff Rate Comp CAF
- Coalfields 2017 True Up
- Coalfields 2017 Rate Ceiling CAF
- Coalfields 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

ComSouth Telecommunications, Inc.
SAC 220369 (Georgia)

ComSouth Telecommunications, Inc., (alternatively “ComSouth” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, ComSouth will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel ComSouth as an issuing carrier for NECA Tariff F.C.C. No. 5 and ComSouth will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to ComSouth parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
ComSouth Telecommunications, Inc. (Georgia)

Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for ComSouth reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

ComSouth 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 19.88 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$274,624. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$220,041, a reduction of \$54,583, or 19.88 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
ComSouth Telecommunications, Inc. (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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
ComSouth Telecommunications, Inc. (Georgia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.87 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
ComSouth Telecommunications, Inc. (Georgia)

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

ComSouth Telecommunications, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- ComSouth 2017 ROR-ILEC-ICC Data
- ComSouth 2017 Tariff Rate Comp CAF
- ComSouth 2017 True Up
- ComSouth 2017 Rate Ceiling CAF
- ComSouth 2017-2018 Rate of Return ILEC Summary

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

ComSouth Telecommunications, Inc.
220369

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$274,624
102	Projected 2011-12 Pool Settlements without LSS	NECA	220,041
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 54,583
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	19.88%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-19.88%

July 1, 2017 Recurring Switched Access Service
End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.034816
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.042546
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$37.86
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$60.59
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$184.60
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,685.55
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.70
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.70
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$12.64
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$110.18
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$27.11
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$27.11
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$65.62
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$421.37
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$384.46
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$148.43
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000162
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000844
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.002127
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004567
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.005048

Current Recurring Switched Access Service **NECA BANDS-- LS / LT / TST>**
End Office

Band 7 / Band 8 / Band 1

301 a	Local Switching Premium Rates Terminating	Rates from NECA Tariff based on banded rates	\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.043453
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100
Local Transport			
303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

ComSouth Telecommunications, Inc.

220369

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Consolidated Telecom, Inc.
SAC 371562 (Nebraska)

Consolidated Telecom, Inc., (alternatively “Consolidated Telecom” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Consolidated Telecom will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Consolidated Telecom as an issuing carrier for NECA Tariff F.C.C. No. 5 and Consolidated Telecom will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Consolidated Companies, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Consolidated Telecom in the following Table. 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	Common Line Rates 07/01/2017	Traffic Sensitive Rates 07/01/2017	Included in RateCeiling-CAF.xls
Consolidated Telephone Company	200001500	371532	NE	JSI	JSI	Yes
Consolidated Telecom, Inc.	200001500	371562	NE	JSI	JSI	Yes
Curtis Telephone Company	200001500	371536	NE	JSI	JSI	Yes
Consolidated Telco, Inc.	200001500	371530	NE	JSI	NECA	No

Each of the three carriers filing traffic sensitive rates under JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telecom, Inc. (Nebraska)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Consolidated Telecom parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service ("WBIAS") and Consumer Broadband-only Loop ("CBOL") under NECA Tariff FCC No. 5 rates and regulations for DSL and CBOL. Effective July 1, 2017 the Company will begin offering WBIAS and CBOL on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS or CBOL for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Consolidated Telecom reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telecom, Inc. (Nebraska)

(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.

Consolidated Telecom 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 requires, pursuant to 51.909(a) of the Commission's Rules, Consolidated Telecom to increase all applicable Switched Access charges by 64.72 percent as shown on Exhibit A.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telecom, Inc. (Nebraska)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telecom, Inc. (Nebraska)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.14 per month for each residential line, other than lines of Lifeline Customers, and \$3.00 for each single-line business line, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telecom, Inc. (Nebraska)

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

Consolidated Telecom, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Consolidated Telecom 2017 ROR-ILEC-ICC Data
- Consolidated Telecom 2017 Tariff Rate Comp CAF
- Consolidated Telecom 2017 True Up
- Consolidated Companies Inc. 2017 Rate Ceiling CAF*
- Consolidated Companies Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Consolidated Telecom
371562

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$76,015
102	Projected 2011-12 Pool Settlements without LSS	NECA	125,211
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (49,196)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-64.72%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	64.72%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.079530
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.087466

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$135.02
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$216.06
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$658.25
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$6,010.28
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$9.60
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$9.60
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$45.10
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$392.85
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$96.66
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$96.66
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$233.98
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,502.53
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,370.89
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$529.29
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000713
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.003701
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.009336
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.009389
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.010377

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

End Office

Band 8 / Band 10 / Band 2

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$81.97
304	Voice Grade 4-Wire Entrance Facility		\$131.17
305	DS-1 Entrance Facility		\$399.62
306	DS-3 Entrance Facility		\$3,648.81
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.38
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$238.50
311	Voice Grade 2-Wire Direct Trunk Termination		\$58.68
312	Voice Grade 4-Wire Direct Trunk Termination		\$58.68
313	DS-1 Direct Trunk Termination		\$142.05
314	DS-3 Direct Trunk Termination		\$912.18
315	Multiplexing DS3-DS1		\$832.26
316	Multiplexing DS1-Voice		\$321.33
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Consolidated Telecom
371562

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Consolidated Telephone Company
SAC 371532 (Nebraska)

Consolidated Telephone Company, (alternatively “Consolidated Telephone” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Consolidated Telephone will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Consolidated Telephone as an issuing carrier for NECA Tariff F.C.C. No. 5 and Consolidated Telephone will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Consolidated Companies, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Consolidated Telephone in the following Table. 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	Common Line Rates 07/01/2017	Traffic Sensitive Rates 07/01/2017	Included in RateCeiling-CAF.xls
Consolidated Telephone Company	200001500	371532	NE	JSI	JSI	Yes
Consolidated Telecom, Inc.	200001500	371562	NE	JSI	JSI	Yes
Curtis Telephone Company	200001500	371536	NE	JSI	JSI	Yes
Consolidated Telco, Inc.	200001500	371530	NE	JSI	NECA	No

Each of the three carriers filing traffic sensitive rates under JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telephone Company (Nebraska)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Consolidated Telephone parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service ("WBIAS") and Consumer Broadband-only Loop ("CBOL") under NECA Tariff FCC No. 5 rates and regulations for DSL and CBOL. Effective July 1, 2017 the Company will begin offering WBIAS and CBOL on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS or CBOL for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Consolidated Telephone reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telephone Company (Nebraska)

(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.

Consolidated Telephone 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 requires, pursuant to 51.909(a) of the Commission's Rules, Consolidated Telephone to increase all applicable Switched Access charges by 71.60 percent as shown on Exhibit A.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telephone Company (Nebraska)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telephone Company (Nebraska)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.14 per month for each residential line, other than lines of Lifeline Customers, and \$3.00 for each single-line business line, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Consolidated Telephone Company (Nebraska)

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

Consolidated Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Consolidated Telephone 2017 ROR-ILEC-ICC Data
- Consolidated Telephone 2017 Tariff Rate Comp CAF
- Consolidated Telephone 2017 True Up
- Consolidated Companies Inc. 2017 Rate Ceiling CAF*
- Consolidated Companies Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Consolidated Telephone Company
371532

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$187,909
102	Projected 2011-12 Pool Settlements without LSS	NECA	322,456
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (134,547)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-71.60%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	71.60%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.041425
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.091121

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$81.08
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$129.77
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$395.35
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,609.93
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$5.78
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$5.78
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$27.08
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$235.97
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$58.05
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$58.05
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$140.54
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$902.46
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$823.40
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$317.89
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000743
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.003856
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.009726
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.009781
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.010811

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 3 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Consolidated Telephone Company
371532

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Cross Telephone Company
SAC 431985

Cross Telephone Company, (alternatively “Cross” or “Company”), through its consultant John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Cross will exit the National Exchange Carrier Association, Inc. (NECA) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Cross as an issuing carrier for NECA Tariff F.C.C. No. 5 and Cross will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Cross parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (WBIAS) under NECA Tariff FCC No. 5 rates and regulations for DSL and for Consumer Broadband-Only Loop (“CBOL”). Pursuant to notice filed with the FCC, effective July 1, 2017 the Company will begin offering DSL and CBOL 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Cross Telephone Company

Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Cross reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Cross 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 39.27 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$517,609. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$314,321, a reduction of \$203,288 or 39.27 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Cross Telephone Company

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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. 209 - 2017 Annual Access Filing
Cross Telephone Company

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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹

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, 2017 at the maximum rate of \$3.00 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 Section 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104. 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Cross Telephone Company

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

Cross Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Cross-2017 ROR-ILEC-ICC
- Cross- 2017 Tariff Rate Comp CAF
- Cross-2017 True Up Final BRI-RES
- Cross-2017 True Up Final BRI-SLB
- Cross-2017 Rate Ceiling CAF
- Cross-2017-2018 Rate of Return ILEC Summary

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

Cross Telephone Co.
431985

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$517,609
102	Projected 2011-12 Pool Settlements without LSS	NECA	314,321
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 203,288
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	39.27%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-39.27%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.014659
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.032245

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$37.25
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$59.61
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$181.61
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,658.20
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.65
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.65
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$12.44
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$108.38
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$26.67
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$26.67
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$64.56
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$414.54
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$378.22
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$146.03
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000263
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001365
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003442
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003461
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003826

Current Recurring Switched Access Service NECA BANDs-- LS / LT / TST>

3 / 9 / 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Cross Telephone Co.

431985

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Curtis Telephone Company
SAC 371536 (Nebraska)

Curtis Telephone Company, (alternatively “Curtis” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Curtis will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Curtis as an issuing carrier for NECA Tariff F.C.C. No. 5 and Curtis will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Consolidated Companies, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Curtis in the following Table. 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	Common Line Rates 07/01/2017	Traffic Sensitive Rates 07/01/2017	Included in RateCeiling-CAF.xls
Consolidated Telephone Company	200001500	371532	NE	JSI	JSI	Yes
Consolidated Telecom, Inc.	200001500	371562	NE	JSI	JSI	Yes
Curtis Telephone Company	200001500	371536	NE	JSI	JSI	Yes
Consolidated Telco, Inc.	200001500	371530	NE	JSI	NECA	No

Each of the three carriers filing traffic sensitive rates under JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Curtis Telephone Company (Nebraska)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Curtis parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service ("WBIAS") and Consumer Broadband-only Loop ("CBOL") under NECA Tariff FCC No. 5 rates and regulations for DSL and CBOL. Effective July 1, 2017 the Company will begin offering WBIAS and CBOL on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS or CBOL for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Curtis reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Curtis Telephone Company (Nebraska)

(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.

Curtis 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 requires, pursuant to 51.909(a) of the Commission's Rules, Curtis to increase all applicable Switched Access charges by 219.21 percent as shown on Exhibit A.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Curtis Telephone Company (Nebraska)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Curtis Telephone Company (Nebraska)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.14 per month for each residential line, other than lines of Lifeline Customers, and \$3.00 for each single-line business line, assessed a primary residential or single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Curtis Telephone Company (Nebraska)

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

Curtis Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Curtis 2017 ROR-ILEC-ICC Data
- Curtis 2017 Tariff Rate Comp CAF
- Curtis 2017 True Up
- Consolidated Companies Inc. 2017 Rate Ceiling CAF*
- Consolidated Companies Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Curtis Telephone
371536

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$49,222
102	Projected 2011-12 Pool Settlements without LSS	NECA	157,122
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (107,900)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-219.21%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	219.21%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.123292
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.169501

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$134.55
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$215.24
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$655.88
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$5,988.75
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$9.58
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$9.58
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$44.91
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$391.45
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$96.34
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$96.34
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$233.15
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,497.13
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,366.03
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$527.37
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.001382
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.007173
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.018093
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.018195
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.020110

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

End Office

Band 6 / Band 7 / Band 2

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.038624
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.15
304	Voice Grade 4-Wire Entrance Facility		\$67.43
305	DS-1 Entrance Facility		\$205.47
306	DS-3 Entrance Facility		\$1,876.11
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.07
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$122.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.18
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.18
313	DS-1 Direct Trunk Termination		\$73.04
314	DS-3 Direct Trunk Termination		\$469.01
315	Multiplexing DS3-DS1		\$427.94
316	Multiplexing DS1-Voice		\$165.21
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Curtis Telephone
371536

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Eastex Telephone Cooperative, Inc.
SAC 442068 (Texas)

Eastex Telephone Cooperative, Inc., (alternatively “Eastex” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Eastex will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Eastex as an issuing carrier for NECA Tariff F.C.C. No. 5 and Eastex will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 Eastex parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2017 the Company will begin offering 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Eastex Telephone Cooperative, Inc. (Texas)

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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Eastex reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Eastex 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 12.30 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$1,250,837. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$1,404,684, an increase of \$153,847 or 12.30 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Eastex Telephone Cooperative, Inc. (Texas)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Eastex Telephone Cooperative, Inc. (Texas)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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 ARC rates effective July 1, 2017 as shown in the supporting documentation.

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Eastex Telephone Cooperative, Inc. (Texas)

Eastex Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Eastex 2017 ROR-ILEC-ICC Data
- Eastex 2017 Tariff Rate Comp CAF
- Eastex 2017 True Up
- Eastex 2017 Rate Ceiling CAF
- Eastex 2017-2018 Rate of Return ILEC Summary

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

Eastex Telephone Cooperative, Inc.
442068

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$1,250,837
102	Projected 2011-12 Pool Settlements without LSS	NECA	1,404,684
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (153,847)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-12.30%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	12.30%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.037954
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.059631

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$33.17
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$53.08
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$161.73
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,476.75
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.37
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.37
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$11.10
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$96.52
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$23.74
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$23.74
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$57.50
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$369.17
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$336.83
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$130.05
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000486
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.002523
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.006365
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.006401
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007075

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 5 / Band 4 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.033797
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$29.54
304	Voice Grade 4-Wire Entrance Facility		\$47.27
305	DS-1 Entrance Facility		\$144.02
306	DS-3 Entrance Facility		\$1,315.01
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.11
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.11
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$9.88
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$85.95
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.14
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.14
313	DS-1 Direct Trunk Termination		\$51.20
314	DS-3 Direct Trunk Termination		\$328.74
315	Multiplexing DS3-DS1		\$299.94
316	Multiplexing DS1-Voice		\$115.81
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Eastex Telephone Cooperative, Inc.

442068

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Ellijay is an Issuing Carrier of the JSI Tariff. Ellijay 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Ellijay of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Ellijay 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Ellijay Telephone Company (GA)

Under Section 51.917(e), Ellijay proposes an ARC effective July 1, 2017 at the rate of \$0.87 per month for each residential line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and at the rate of \$3.00 for each single-line business line assessed an end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. ELLIJAY TARIFF REVIEW PLANS

Ellijay submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Ellijay 2017 ROR-ILEC-ICC Data
- Ellijay 2017 Tariff Rate Comp CAF
- Ellijay 2017 True Up
- Ellijay 2017 Rate Ceiling CAF
- Ellijay 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Etex Telephone Cooperative, Inc.
SAC 442070 (Texas)

Etex Telephone Cooperative, Inc., (alternatively “Etex” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Etex is an Issuing Carrier of the JSI Tariff. Etex 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Etex of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company’s Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Etex Telephone Cooperative, Inc. (TX)

Under Section 51.917(e), Etex proposes an ARC effective July 1, 2017 at the rate of \$2.71 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. ETEX TARIFF REVIEW PLANS

Etex submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Etex 2017 ROR-ILEC-ICC Data
- Etex 2017 Tariff Rate Comp CAF
- Etex 2017 True Up
- Etex 2017 Rate Ceiling CAF
- Etex 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Bruce Telephone Company, Inc.
SAC 280447 (Mississippi)

Bruce Telephone Company, Inc., (alternatively “Bruce” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Bruce will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Bruce as an issuing carrier for NECA Tariff F.C.C. No. 5 and Bruce will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Fail, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Bruce in the following Table. 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
Bruce Telephone Company, Inc.	200000274	280447	MS	JSI	Yes
Chickamauga Telephone Corporation	200000274	220354	GA	JSI	Yes
Fulton Telephone Company, Inc.	200000274	280455	MS	JSI	Yes
Mound Bayou Telephone & Communications, Inc.	200000274	280462	MS	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bruce Telephone Company, Inc. (Mississippi)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Bruce parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include DSL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Bruce reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bruce Telephone Company, Inc. (Mississippi)

Bruce 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 63.35 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$176,299. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$64,617, a reduction of \$111,682 or 63.35 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bruce Telephone Company, Inc. (Mississippi)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bruce Telephone Company, Inc. (Mississippi)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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), Bruce proposes ARC rates effective July 1, 2017 as shown in the supporting documentation.

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Bruce Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Bruce Telephone Company, Inc. (Mississippi)

- Bruce 2017 ROR-ILEC-ICC Data
- Bruce 2017 Tariff Rate Comp CAF
- Fail, Inc. 2017 True Up*
- Fail, Inc. 2017 Rate Ceiling CAF*
- Fail, Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Bruce Telephone Company, Inc.
280447

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$176,299
102	Projected 2011-12 Pool Settlements without LSS	NECA	64,617
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 111,682
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	63.35%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-63.35%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.005308
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.019462

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.32
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$27.72
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$84.44
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$771.03
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.24
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.24
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.78
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$50.40
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.40
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.40
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$30.02
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$192.75
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$175.87
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$67.90
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000074
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000386
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.000973
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002089
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002309

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Bruce Telephone Company, Inc.

280447

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Chickamauga Telephone Corporation
SAC 220354 (Georgia)

Chickamauga Telephone Corporation, (alternatively “Chickamauga” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Chickamauga will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Chickamauga as an issuing carrier for NECA Tariff F.C.C. No. 5 and Chickamauga will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Fail, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Chickamauga in the following Table. 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
Bruce Telephone Company, Inc.	200000274	280447	MS	JSI	Yes
Chickamauga Telephone Corporation	200000274	220354	GA	JSI	Yes
Fulton Telephone Company, Inc.	200000274	280455	MS	JSI	Yes
Mound Bayou Telephone & Communications, Inc.	200000274	280462	MS	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chickamauga Telephone Corporation (Georgia)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Chickamauga parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include DSL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Chickamauga reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chickamauga Telephone Corporation (Georgia)

Chickamauga 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 32.02 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$240,606. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$163,552, a reduction of \$77,054 or 32.02 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chickamauga Telephone Corporation (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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chickamauga Telephone Corporation (Georgia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.58 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Chickamauga Telephone Corporation (Georgia)

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

Chickamauga Telephone Corporation submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Chickamauga 2017 ROR-ILEC-ICC Data
- Chickamauga 2017 Tariff Rate Comp CAF
- Fail, Inc. 2017 True Up*
- Fail, Inc. 2017 Rate Ceiling CAF*
- Fail, Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Chickamauga Telephone Corporation
220354

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$240,606
102	Projected 2011-12 Pool Settlements without LSS	NECA	163,552
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 77,054
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	32.02%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-32.02%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.019692
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.036095

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$41.70
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$66.72
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$203.29
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,856.16
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.97
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.97
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$13.93
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$121.32
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$29.85
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$29.85
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$72.26
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$464.03
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$423.38
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$163.46
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000137
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000716
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001805
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003875
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004282

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 4 / Band 9 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Chickamauga Telephone Corporation
220354

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Fulton Telephone Company, Inc.
SAC 280455 (Mississippi)

Fulton Telephone Company, Inc., (alternatively “Fulton” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Fulton will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Fulton as an issuing carrier for NECA Tariff F.C.C. No. 5 and Fulton will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Fail, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Fulton in the following Table. 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
Bruce Telephone Company, Inc.	200000274	280447	MS	JSI	Yes
Chickamauga Telephone Corporation	200000274	220354	GA	JSI	Yes
Fulton Telephone Company, Inc.	200000274	280455	MS	JSI	Yes
Mound Bayou Telephone & Communications, Inc.	200000274	280462	MS	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fulton Telephone Company, Inc. (Mississippi)

rates pursuant to Part 51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Fulton parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include DSL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Fulton reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fulton Telephone Company, Inc. (Mississippi)

Fulton 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 31.27 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$220,142. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$151,303, a reduction of \$68,839 or 31.27 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fulton Telephone Company, Inc. (Mississippi)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fulton Telephone Company, Inc. (Mississippi)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Fulton Telephone Company, Inc. (Mississippi)

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

Fulton Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Fulton 2017 ROR-ILEC-ICC Data
- Fulton 2017 Tariff Rate Comp CAF
- Fail, Inc. 2017 True Up*
- Fail, Inc. 2017 Rate Ceiling CAF*
- Fail, Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Fulton Telephone Company, Inc.
280455

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$220,142
102	Projected 2011-12 Pool Settlements without LSS	NECA	151,303
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 68,839
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	31.27%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-31.27%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.016591
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.036495

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$28.97
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$46.34
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$141.22
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,289.45
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.06
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.06
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.67
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$84.28
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$20.74
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$20.74
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$50.20
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$322.35
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$294.12
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$113.55
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000139
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000724
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001825
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003918
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004330

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 3 / Band 7 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.15
304	Voice Grade 4-Wire Entrance Facility		\$67.43
305	DS-1 Entrance Facility		\$205.47
306	DS-3 Entrance Facility		\$1,876.11
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.07
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$122.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.18
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.18
313	DS-1 Direct Trunk Termination		\$73.04
314	DS-3 Direct Trunk Termination		\$469.01
315	Multiplexing DS3-DS1		\$427.94
316	Multiplexing DS1-Voice		\$165.21
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Fulton Telephone Company, Inc.

280455

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Mound Bayou Telephone & Communications, Inc.
SAC 280462 (Mississippi)

Mound Bayou Telephone & Communications, Inc., (alternatively “Mound Bayou” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Mound Bayou will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Mound Bayou as an issuing carrier for NECA Tariff F.C.C. No. 5 and Mound Bayou will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Fail, Inc. is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Mound Bayou in the following Table. 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
Bruce Telephone Company, Inc.	200000274	280447	MS	JSI	Yes
Chickamauga Telephone Corporation	200000274	220354	GA	JSI	Yes
Fulton Telephone Company, Inc.	200000274	280455	MS	JSI	Yes
Mound Bayou Telephone & Communications, Inc.	200000274	280462	MS	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 the Company will file interstate Special Access, including Public Packet Data Network, services on a

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (Mississippi)

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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Mound Bayou parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include DSL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Mound Bayou reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (Mississippi)

Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Mound Bayou 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 61.20 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$42,573. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$16,517, a reduction of \$26,056 or 61.20 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (Mississippi)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (Mississippi)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (Mississippi)

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

Mound Bayou Telephone & Communications, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Mound Bayou 2017 ROR-ILEC-ICC Data
- Mound Bayou 2017 Tariff Rate Comp CAF
- Mound Bayou 2017 True Up
- Fail, Inc. 2017 Rate Ceiling CAF*
- Fail, Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Mound Bayou Telephone & Communications, Inc.

280462

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$42,573
102	Projected 2011-12 Pool Settlements without LSS	NECA	16,517
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 26,056
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	61.20%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-61.20%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.005619
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.020601

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$11.73
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$18.78
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$57.20
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$522.28
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.83
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.83
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$3.91
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$34.13
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$8.40
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$8.40
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$20.33
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$130.57
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$119.13
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$45.99
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000078
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000409
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001030
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002211
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002444

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 5 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$30.24
304	Voice Grade 4-Wire Entrance Facility		\$48.40
305	DS-1 Entrance Facility		\$147.44
306	DS-3 Entrance Facility		\$1,346.18
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.15
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.15
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$10.09
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$87.98
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.65
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.65
313	DS-1 Direct Trunk Termination		\$52.41
314	DS-3 Direct Trunk Termination		\$336.55
315	Multiplexing DS3-DS1		\$307.06
316	Multiplexing DS1-Voice		\$118.55
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Mound Bayou Telephone & Communications, Inc.

280462

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

GRAND RIVER MUTUAL TELEPHONE COMPANY

**SAC 351888 (Iowa) Comprised of Grand River Mutual Telephone Company
and South Central Communications, Inc.**

SAC 421888 (Missouri)

Grand River Mutual Telephone Company, (alternatively “Grand River” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Grand River will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Grand River as an issuing carrier for NECA Tariff F.C.C. No. 5 and Grand River will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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.

Grand River Iowa SAC 351888 remains as a member of the NECA Common Line Pool. Grand River Missouri SAC 421888 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017

Grand River Missouri SAC 421888 elected to have Common Line and End User rates tariffed by NECA. 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 Grand River parallel those of NECA Tariff FCC No. 5 in all material respects.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Grand River Mutual Telephone Company (Iowa and Missouri)

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL and Consumer Broadband-Only Loop (“CBOL”). Effective July 1, 2017 Grand River Iowa SAC 351888 will begin offering WBIAS on a permissively detariffed common carriage basis. Effective July 1, 2017, Grand River Missouri SAC 421888 will cease offering its DSL and CBOL broadband Internet transmission service as a separate component of its broadband Internet access service. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Grand River reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

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

Grand River Iowa SAC 351888

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 35.52 percent reduction in Switched Access charges to carriers. Application of the current

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Grand River Mutual Telephone Company (Iowa and Missouri)

NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$329,646. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$212,563, a reduction of \$117,083 or 35.52 percent.

Grand River Missouri SAC 421888

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 24.92 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$853,961. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$641,115, a reduction of \$212,846 or 24.92 percent.

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</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Grand River Mutual Telephone Company (Iowa and Missouri)

Step	FCC Rule	Cross-Reference to Exhibit A
	than the Association's switched access rate caps;	
4	51.909(g) Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.	<i>See Exhibit A, Lines 401 through 405</i>
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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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).

¹ Section 61.39(b)(1) 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. 209 - 2017 Annual Access Filing
Grand River Mutual Telephone Company (Iowa and Missouri)

Under Section 51.917(e), the Company proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Grand River Mutual Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Grand River –IA 2017 ROR-ILEC-ICC Data
- Grand River –MO 2017 ROR-ILEC-ICC Data
- Grand River –IA 2017 Tariff Rate Comp CAF
- Grand River –MO 2017 Tariff Rate Comp CAF
- Grand River Corp. 2017 True Up*
- Grand River Corp. 2017 Rate Ceiling CAF*
- Grand River Corp. 2017-2018 Rate of Return ILEC Summary*

*Holding company

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

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Grand River Mutual Telephone Company (Iowa and Missouri)

- 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

Grand River Mutual - IA

351888

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$329,646
102	Projected 2011-12 Pool Settlements without LSS	NECA	212,563
103	Net Pool Contributions	Ln 101 - Ln 102	<u>\$ 117,083</u>
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	35.52%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-35.52%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.018680
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.034240

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$30.47
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$48.76
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$148.56
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,356.49
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.17
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.17
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$10.18
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$88.67
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$21.81
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$21.81
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$52.81
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$339.11
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$309.40
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$119.45
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000130
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000679
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001712
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003675
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004062

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 4 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Grand River Mutual - IA

351888

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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Grand River Mutual - MO
421888

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$853,961
102	Projected 2011-12 Pool Settlements without LSS	NECA	641,115
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 212,846
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	24.92%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-24.92%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.021749
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.039865

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$46.05
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$73.69
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$224.52
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,050.05
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$3.28
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$3.28
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$15.38
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$133.99
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$32.97
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$32.97
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$79.81
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$512.50
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$467.60
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$180.53
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000325
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001687
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.004255
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004279
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004730

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 4 / Band 9 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Grand River Mutual - MO

421888

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Hancock Rural Telephone Corporation d/b/a NineStar Connect
SAC 320775 (Indiana)

Hancock Rural Telephone Corporation d/b/a NineStar Connect, (alternatively “NineStar” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). NineStar is an Issuing Carrier of the JSI Tariff. NineStar 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by NineStar of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, NineStar 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hancock Rural Telephone Corporation d/b/a NineStar Connect (IN)

Under Section 51.917(e), NineStar proposes an ARC effective July 1, 2017 at the rate of \$0.00 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. NINESTAR TARIFF REVIEW PLANS

NineStar submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- NineStar 2017 ROR-ILEC-ICC Data
- NineStar 2017 Tariff Rate Comp CAF
- NineStar 2017 True Up
- NineStar 2017 Rate Ceiling CAF
- NineStar 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Highland Telephone Cooperative
SAC 190237 (Virginia)

Highland Telephone Cooperative, (alternatively “Highland” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Highland will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Highland as an issuing carrier for NECA Tariff F.C.C. No. 5 and Highland will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Highland parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Pursuant to notice filed with the FCC, the Company will cease offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for DSL Wireline Broadband Internet Access Service for the Company.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Highland Telephone Cooperative (Virginia)

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Highland reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Highland 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 40.72 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$139,951. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$82,968, a reduction of \$56,983, or 40.72 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Highland Telephone Cooperative (Virginia)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Highland Telephone Cooperative (Virginia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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, 2017 have been determined based on Section 61.39(b)(2) of the Commission's rules. See 47 CFR § 61.39(b)(2).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.00 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and at the rate of \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Highland Telephone Cooperative (Virginia)

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

Highland Telephone Cooperative submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Highland 2017 ROR-ILEC-ICC Data
- Highland 2017 Tariff Rate Comp CAF
- Highland 2017 True Up
- Highland 2017 Rate Ceiling CAF
- Highland 2017-2018 Rate of Return ILEC Summary

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

Highland Telephone Cooperative
190237

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$139,951
102	Projected 2011-12 Pool Settlements without LSS	NECA	82,968
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 56,983
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	40.72%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-40.72%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.025761
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.031480

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$28.01
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$44.83
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$136.58
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,247.13
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.00
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.00
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.35
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$81.52
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$20.06
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$20.06
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$48.55
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$311.77
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$284.46
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$109.82
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000257
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001332
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003360
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003379
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003735

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 7 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.043453
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Highland Telephone Cooperative
190237

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Industry Telephone Company
SAC 442093 (Texas)

Industry Telephone Company, (alternatively “Industry” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Industry will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Industry as an issuing carrier for NECA Tariff F.C.C. No. 5 and Industry will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Industry parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2017 the Company will begin offering WBIAS on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Industry Telephone Company (Texas)

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Industry reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Industry 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 156.43 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$80,683. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$206,894, an increase of \$126,211, or 156.43 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Industry Telephone Company (Texas)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Industry Telephone Company (Texas)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Industry Telephone Company (Texas)

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

Industry Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Industry 2017 ROR-ILEC-ICC Data
- Industry 2017 Tariff Rate Comp CAF
- Industry 2017 True Up
- Industry 2017 Rate Ceiling CAF
- Industry 2017-2018 Rate of Return ILEC Summary

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

Industry Telephone Company
442093

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$80,683
102	Projected 2011-12 Pool Settlements without LSS	NECA	206,894
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (126,211)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-156.43%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	156.43%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.033567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.123809
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.136163

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$210.19
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$336.36
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$1,024.74
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$9,356.58
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$14.95
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$14.95
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$70.21
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$611.58
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$150.47
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$150.47
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$364.26
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$2,339.09
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$2,134.15
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$823.98
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.001110
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.005762
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.014534
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.014616
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.016155

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 8 / Band 10 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.050000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$81.97
304	Voice Grade 4-Wire Entrance Facility		\$131.17
305	DS-1 Entrance Facility		\$399.62
306	DS-3 Entrance Facility		\$3,648.81
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.38
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$238.50
311	Voice Grade 2-Wire Direct Trunk Termination		\$58.68
312	Voice Grade 4-Wire Direct Trunk Termination		\$58.68
313	DS-1 Direct Trunk Termination		\$142.05
314	DS-3 Direct Trunk Termination		\$912.18
315	Multiplexing DS3-DS1		\$832.26
316	Multiplexing DS1-Voice		\$321.33
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Industry Telephone Company
442093

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.050000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.049300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.016433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.033567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

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

Knology of the Valley, Inc., (alternatively “Knology of the Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Knology of the Valley is an Issuing Carrier of the JSI Tariff. Knology of the 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Knology of the Valley, Inc.	200000314	220371	GA	JSI	Yes
Knology Total Communications, Inc.	200000314	250295	AL	JSI	Yes
Valley Telephone Co., LLC	200000314	220324	GA	JSI	Yes

Each of the WOW! issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Knology of the Valley of interstate Common Line, Federal Universal Service Charge, Switched Access, Special Access and Miscellaneous services. Knology of the Valley is not a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and therefore bills Common Line charges pursuant to JSI Tariff FCC No. 1.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Knology of the Valley, Inc. (GA)

This filing proposes revised Special Access rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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 of the Valley proposes an ARC effective July 1, 2017 at the rate of \$1.74 per month for each Alabama exchange line and \$1.59 for each Georgia exchange line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line or trunk assessed a single-line business End User Common Line pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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. 209 - 2017 Annual Access Filing
Knology of the Valley, Inc. (GA)

3. KNOLOGY OF THE VALLEY TARIFF REVIEW PLANS

Knology of the Valley submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Knology of the Valley 2017 ROR-ILEC-ICC Data
- Knology of the Valley 2017 Tariff Rate Comp CAF
- WOW! 2017 True Up*
- WOW! 2017 Rate Ceiling CAF*
- WOW! 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Knology Total Communications, Inc.
SAC 250295 (Alabama)

Knology Total Communications, Inc., (alternatively “Knology Total” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Knology Total will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Knology Total as an issuing carrier for NECA Tariff F.C.C. No. 5 and Knology Total will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Knology of the Valley, Inc.	200000314	220371	GA	JSI	Yes
Knology Total Communications, Inc.	200000314	250295	AL	JSI	Yes
Valley Telephone Co., LLC	200000314	220324	GA	JSI	Yes

Each of the WOW! issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Knology Total Communications, Inc. (Alabama)

The Company has elected to exit the NECA Common Line Pool. The Company's Common Line rates are tariffed by JSI effective July 1, 2017.

The regulations and rate structures applicable to Knology Total parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company currently offers Wireline Broadband Internet Access Service (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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Knology Total reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Knology Total 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 46.22 percent reduction in Switched Access charges to carriers. Application of the current

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Knology Total Communications, Inc. (Alabama)

NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$280,275. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$150,731, a reduction of \$129,544, or 46.22 percent.

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Knology Total Communications, Inc. (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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 47 CFR § 69.104.

¹ Section 61.39(b)(1) 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. 209 - 2017 Annual Access Filing
Knology Total Communications, Inc. (Alabama)

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Knology Total Communications, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Knology Total 2017 ROR-ILEC-ICC Data
- Knology Total 2017 Tariff Rate Comp CAF
- WOW! Total 2017 True Up
- WOW! 2017 Rate Ceiling CAF*
- WOW! 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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).

Knology Total Communications, Inc.
250295

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$280,275
102	Projected 2011-12 Pool Settlements without LSS	NECA	150,731
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 129,544
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	46.22%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-46.22%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.010386
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.028557

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$32.99
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$52.79
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$160.83
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,468.53
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.35
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.35
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$11.02
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$95.99
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$23.62
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$23.62
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$57.17
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$367.13
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$334.96
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$129.32
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000109
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000566
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001428
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003065
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003388

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 9 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019313
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Knology Total Communications, Inc.

250295

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Valley Telephone Co., LLC
SAC 220324 (Georgia)

Valley Telephone Co., LLC, (alternatively “Valley Telephone” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Valley Telephone will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Valley Telephone as an issuing carrier for NECA Tariff F.C.C. No. 5 and Valley Telephone will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Knology of the Valley, Inc.	200000314	220371	GA	JSI	Yes
Knology Total Communications, Inc.	200000314	250295	AL	JSI	Yes
Valley Telephone Co., LLC	200000314	220324	GA	JSI	Yes

Each of the WOW! issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 has elected to exit the NECA Common Line Pool. The Company’s Common Line rates are tariffed by JSI effective July 1, 2017.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Valley Telephone Co., LLC (Georgia)

The regulations and rate structures applicable to Valley Telephone parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company currently offers Wireline Broadband Internet Access Service (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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Valley Telephone reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Valley Telephone 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 71.67 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$118,419. Application of the rates for Switched Access

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Valley Telephone Co., LLC (Georgia)

proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$33,551, a reduction of \$84,868, or 71.67 percent.

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</p>	<p><i>Rates determined</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Valley Telephone Co., LLC (Georgia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$2.96 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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

¹ Section 61.39(b)(1) 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. 209 - 2017 Annual Access Filing
Valley Telephone Co., LLC (Georgia)

with § 51.917 rules.² The Test Year (TY) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Valley Telephone Co., LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Valley Telephone 2017 ROR-ILEC-ICC Data
- Valley Telephone 2017 Tariff Rate Comp CAF
- WOW! 2017 True Up*
- WOW! 2017 Rate Ceiling CAF*
- WOW! 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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).

Valley Telephone Co, LLC
220324

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$118,419
102	Projected 2011-12 Pool Settlements without LSS	NECA	33,551
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 84,868
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	71.67%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-71.67%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.004103
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.015045

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$11.94
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$19.10
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$58.21
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$531.55
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.85
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.85
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$3.99
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$34.74
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$8.55
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$8.55
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$20.69
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$132.88
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$121.25
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$46.81
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000057
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000298
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.000752
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.001615
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.001785

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 7 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.15
304	Voice Grade 4-Wire Entrance Facility		\$67.43
305	DS-1 Entrance Facility		\$205.47
306	DS-3 Entrance Facility		\$1,876.11
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.07
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$122.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.18
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.18
313	DS-1 Direct Trunk Termination		\$73.04
314	DS-3 Direct Trunk Termination		\$469.01
315	Multiplexing DS3-DS1		\$427.94
316	Multiplexing DS1-Voice		\$165.21
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Valley Telephone Co, LLC
220324

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Livingston Telephone Company (TX)

Under Section 51.917(e), Livingston proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 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 2017-2018:

- Livingston 2017 ROR-ILEC-ICC Data
- Livingston 2017 Tariff Rate Comp CAF
- Livingston 2017 True Up
- Livingston 2017 Rate Ceiling CAF
- Livingston 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Lumos Telephone of Botetourt Inc.
SAC 190249 (Virginia)

Lumos Telephone of Botetourt Inc., (alternatively “Lumos R&B” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Lumos R&B will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Lumos R&B as an issuing carrier for NECA Tariff F.C.C. No. 5 and Lumos R&B will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Lumos R&B is filing its Access Recovery Charge (“ARC”) under this transmittal on a single study area, stand-alone basis. Lumos R&B is one of two study areas with an association with Lumos Networks Corp. holding company code 200000226. The other one, Lumos Telephone, Inc., SAC 190266, is an issuing carrier for ICORE Inc. Tariff FCC No. 2, and will file ARC rates effective July 1, 2017 in the ICORE Tariff. ARC rates effective July 1, 2017 for Lumos R&B under Section 51.917(e) are described in item 2, following.

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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 Lumos R&B parallel those of NECA Tariff FCC No. 5 in all material respects.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Lumos Telephone of Botetourt Inc. (Virginia)

Pursuant to notice filed with the FCC, the Company will cease offering its DSL and Consumer Broadband-Only Loop ("CBOL") broadband Internet transmission services as separate components of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for DSL or CBOL Wireline Broadband Internet Access Service for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Lumos R&B reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Lumos R&B 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 43.74 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$420,042. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$236,296, a reduction of \$183,746 or 43.74 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Lumos Telephone of Botetourt Inc. (Virginia)

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>	<i>See Exhibit A, Lines 101 through 104</i>
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>	<i>See Exhibit A, Line 105</i>
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>	<i>See Exhibit A, Lines 203 through 221</i>
4	<p>51.909(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<i>See Exhibit A, Lines 401 through 405</i>
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>	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff</i>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Lumos Telephone of Botetourt Inc. (Virginia)

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 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$1.15 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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

¹ Section 61.39(b)(1) 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. 209 - 2017 Annual Access Filing
Lumos Telephone of Botetourt Inc. (Virginia)

with § 51.917 rules.² The Test Year (TY) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Lumos Telephone of Botetourt Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Lumos R&B 2017 ROR-ILEC-ICC Data
- Lumos R&B 2017 Tariff Rate Comp CAF
- Lumos R&B 2017 True Up
- Lumos R&B 2017 Rate Ceiling CAF
- Lumos R&B 2017-2018 Rate of Return ILEC Summary

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).

Lumos Tel. of Botetourt
190249

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$420,042
102	Projected 2011-12 Pool Settlements without LSS	NECA	236,296
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 183,746
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	43.74%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-43.74%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.010865
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.029872

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$26.58
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$42.54
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$129.61
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,183.42
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.90
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.90
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$8.88
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$77.36
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$19.03
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$19.03
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$46.07
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$295.85
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$269.93
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$104.21
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000114
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000592
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001494
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003207
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003544

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019313
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Lumos Tel. of Botetourt
190249

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Mark Twain Rural Telephone Company
SAC 421914 (Missouri)

Mark Twain Rural Telephone Company, (alternatively “Mark Twain” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Mark Twain will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Mark Twain as an issuing carrier for NECA Tariff F.C.C. No. 5 and Mark Twain will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line rates tariffed by JSI effective July 1, 2017. Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Mark Twain parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mark Twain Rural Telephone Company (Missouri)

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Mark Twain reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Mark Twain 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 36.04 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$188,676. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$120,682, a reduction of \$67,994 or 36.04 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mark Twain Rural Telephone Company (Missouri)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mark Twain Rural Telephone Company (Missouri)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mark Twain Rural Telephone Company (Missouri)

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

Mark Twain Rural Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Mark Twain 2017 ROR-ILEC-ICC Data
- Mark Twain 2017 Tariff Rate Comp CAF
- Mark Twain 2017 True Up
- Mark Twain 2017 Rate Ceiling CAF
- Mark Twain 2017-2018 Rate of Return ILEC Summary

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

Mark Twain Rural Telephone Company
421914

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$188,676
102	Projected 2011-12 Pool Settlements without LSS	NECA	120,682
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 67,994
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	36.04%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-36.04%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.012353
202	Information Surcharge Originating (shown as Per 100 MOU)	Line 302 + (Line 302 * Line 105)	\$0.033964

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$30.22
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$48.37
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$147.36
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,345.55
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.16
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.16
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$10.09
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$87.95
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$21.64
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$21.64
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$52.39
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$336.38
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$306.91
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$118.49
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000129
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000674
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001698
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003646
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004030

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019313
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Mark Twain Rural Telephone Company

421914

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Mid-Plains Rural Tel. Coop., Inc.
SAC 442112 (Texas)

Mid-Plains Rural Tel. Coop., Inc., (alternatively “Mid-Plains” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Mid-Plains will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Mid-Plains as an issuing carrier for NECA Tariff F.C.C. No. 5 and Mid-Plains will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, 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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company has elected to have Common Line and End User rates tariffed by JSI effective July 1, 2017. End user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Mid-Plains parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2017 Mid-Plains will begin offering 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Plains Rural Tel. Coop., Inc. (Texas)

Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Mid-Plains reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Mid-Plains 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 97.46 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$140,405. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$277,246, an increase of \$136,841, or 97.46 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Plains Rural Tel. Coop., Inc. (Texas)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Plains Rural Tel. Coop., Inc. (Texas)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Plains Rural Tel. Coop., Inc. (Texas)

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

Mid-Plains Rural Tel. Coop., Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Mid-Plains 2017 ROR-ILEC-ICC Data
- Mid-Plains 2017 Tariff Rate Comp CAF
- Mid-Plains 2017 True Up
- Mid-Plains 2017 Rate Ceiling CAF
- Mid-Plains 2017-2018 Rate of Return ILEC Summary

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

Mid-Plains Rural Telephone Cooperative, Inc.

442112

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$140,405
102	Projected 2011-12 Pool Settlements without LSS	NECA	277,246
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (136,841)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-97.46%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	97.46%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.085803
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.104852

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$83.23
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$133.15
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$405.72
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,704.60
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$5.92
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$5.92
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$27.78
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$242.15
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$59.59
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$59.59
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$144.23
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$926.11
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$845.02
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$326.23
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000855
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.004437
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.011192
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.011255
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.012440

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 7 / Band 7 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.043453
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.15
304	Voice Grade 4-Wire Entrance Facility		\$67.43
305	DS-1 Entrance Facility		\$205.47
306	DS-3 Entrance Facility		\$1,876.11
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.07
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$122.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.18
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.18
313	DS-1 Direct Trunk Termination		\$73.04
314	DS-3 Direct Trunk Termination		\$469.01
315	Multiplexing DS3-DS1		\$427.94
316	Multiplexing DS1-Voice		\$165.21
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Mid-Plains Rural Telephone Cooperative, Inc.

442112

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Millington Telephone Company, Inc. d/b/a Ritter Communications
SAC 290571 (Tennessee)

Millington Telephone Company, Inc. d/b/a Ritter Communications, (alternatively “Millington” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

E. Ritter Communications, Inc. is the holding company of three wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Millington in the following Table. 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
Millington Telephone Company	200000025	290571	TN	JSI	Yes
Tri-County Telephone Company, Inc.	200000025	401726	AR	JSI	Yes
E. Ritter Tel. Co.	200000025	401722	AR	NECA	No

Each of the two carriers filing traffic sensitive rates under JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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

Description and Justification

JSI Transmittal No. 209 - 2017 Annual Access Filing

Millington Telephone Company, Inc. d/b/a Ritter Communications (TN)

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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 an ARC effective July 1, 2017 at the rate of \$2.50 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Millington 2017 ROR-ILEC-ICC Data
- Millington 2017 Tariff Rate Comp CAF

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. 209 - 2017 Annual Access Filing
Millington Telephone Company, Inc. d/b/a Ritter Communications (TN)

- E. Ritter Communications 2017 True Up*
- E. Ritter Communications 2017 Rate Ceiling CAF*
- E. Ritter Communications 2017-2018 Rate of Return ILEC Summary*

*Holding company

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. 209 – 2017 Annual Access Filing

Moundridge Telephone Company
SAC 411808 (Kansas)

Moundridge Telephone Company, (alternatively “Moundridge” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Moundridge is an Issuing Carrier of the JSI Tariff. Moundridge 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Moundridge of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Moundridge accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Moundridge Telephone Company (KS)

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), Moundridge proposes an ARC effective July 1, 2017 at the rates shown in the supporting documentation for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MOUNDRIDGE TARIFF REVIEW PLANS

Moundridge submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Moundridge 2017 ROR-ILEC-ICC Data
- Moundridge 2017 Tariff Rate Comp CAF
- Moundridge 2017 True Up
- Moundridge 2017 Rate Ceiling CAF
- Moundridge 2017-18 Rate of Return ILEC Summary

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)

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. 209 - 2017 Annual Access Filing
Moundridge Telephone Company (KS)

- 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. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mt. Horeb of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company’s Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mt. Horeb Telephone Co. (WI)

Under Section 51.917(e), Mt. Horeb proposes an ARC effective July 1, 2017 at the rate of \$0.00 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Mt. Horeb 2017 ROR-ILEC-ICC Data
- Mt. Horeb 2017 Tariff Rate Comp CAF
- Mt. Horeb 2017 True Up
- Mt. Horeb 2017 Rate Ceiling CAF
- Mt. Horeb 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Blountsville Telephone LLC
SAC 250282 (Alabama)

Blountsville Telephone LLC, (alternatively “Blountsville” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Blountsville will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Blountsville as an issuing carrier for NECA Tariff F.C.C. No. 5 and Blountsville will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blountsville Telephone LLC (Alabama)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Blountsville parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company has previously offered Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 10, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Blountsville reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blountsville Telephone LLC (Alabama)

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.

Blountsville 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 33.63 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$165,498. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$109,838, a reduction of \$55,660, or 33.63 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blountsville 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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blountsville Telephone LLC (Alabama)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.09 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Blountsville Telephone LLC (Alabama)

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

Blountsville Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Blountsville 2017 ROR-ILEC-ICC Data
- Blountsville 2017 Tariff Rate Comp CAF
- Otelco, Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Blountsville Telephone LLC
250282

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$165,498
102	Projected 2011-12 Pool Settlements without LSS	NECA	109,838
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 55,660
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	33.63%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-33.63%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.022430
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.035242

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$40.71
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$65.15
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$198.48
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,812.28
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.90
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.90
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$13.60
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$118.45
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$29.15
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$29.15
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$70.56
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$453.06
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$413.37
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$159.60
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000134
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000699
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001762
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003783
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004181

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 5 / Band 9 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.033797
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Blountsville Telephone LLC
250282

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Brindlee Mountain Telephone LLC
SAC 280283 (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. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Brindlee is an Issuing Carrier of the JSI Tariff. Brindlee 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Brindlee Mountain Telephone LLC (AL)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Brindlee of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates

Revisions also include revisions to the Access Recovery Charge ("ARC") consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), Brindlee proposes an ARC effective July 1, 2017 at the rate of \$1.24 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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. 209 - 2017 Annual Access Filing
Brindlee Mountain Telephone LLC (AL)

3. BRINDLEE TARIFF REVIEW PLANS

Brindlee submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Brindlee 2017 ROR-ILEC-ICC Data
- Brindlee 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Hopper Telecommunications LLC
SAC 250300 (Alabama)

Hopper Telecommunications LLC, (alternatively “Hopper” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Hopper will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Hopper as an issuing carrier for NECA Tariff F.C.C. No. 5 and Hopper will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hopper Telecommunications LLC (Alabama)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Hopper parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company has previously offered Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 10, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Hopper reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hopper Telecommunications LLC (Alabama)

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.

Hopper 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 20.16 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$270,976. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$216,356, a reduction of \$54,620, or 20.16 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hopper Telecommunications 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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hopper Telecommunications LLC (Alabama)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.09 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Hopper Telecommunications LLC (Alabama)

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

Hopper Telecommunications LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Hopper 2017 ROR-ILEC-ICC Data
- Hopper 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Hopper Telecommunications LLC

250300

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$270,976
102	Projected 2011-12 Pool Settlements without LSS	NECA	216,356
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 54,620
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	20.16%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-20.16%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.034694
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.042397

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$27.01
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$43.22
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$131.68
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,202.22
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.92
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.92
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.03
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$78.58
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$19.32
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$19.32
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$46.80
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$300.55
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$274.21
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$105.87
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000161
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000841
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.002120
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004551
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.005030

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 7 / Band 6 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.043453
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$33.83
304	Voice Grade 4-Wire Entrance Facility		\$54.13
305	DS-1 Entrance Facility		\$164.92
306	DS-3 Entrance Facility		\$1,505.72
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.40
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.40
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$11.31
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$98.42
311	Voice Grade 2-Wire Direct Trunk Termination		\$24.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$24.20
313	DS-1 Direct Trunk Termination		\$58.62
314	DS-3 Direct Trunk Termination		\$376.42
315	Multiplexing DS3-DS1		\$343.44
316	Multiplexing DS1-Voice		\$132.60
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Hopper Telecommunications LLC

250300

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Otelco Mid-Missouri LLC
SAC 421917 (Missouri)

Otelco Mid-Missouri LLC, (alternatively “Otelco Mid-Missouri” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Otelco Mid-Missouri will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Otelco Mid-Missouri as an issuing carrier for NECA Tariff F.C.C. No. 5 and Otelco Mid-Missouri will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Mid-Missouri Telephone Company (Missouri)

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Otelco Mid-Missouri parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2011. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 10, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Otelco Mid-Missouri reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Mid-Missouri Telephone Company (Missouri)

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 Mid-Missouri 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 24.40 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$305,313. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$230,807, a reduction of \$74,506 or 24.40 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Mid-Missouri Telephone Company (Missouri)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Mid-Missouri Telephone Company (Missouri)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Mid-Missouri Telephone Company (Missouri)

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

Otelco Mid-Missouri LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Otelco Mid-Missouri 2017 ROR-ILEC-ICC Data
- Otelco Mid-Missouri 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Otelco Mid-Missouri LLC
421917

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$305,313
102	Projected 2011-12 Pool Settlements without LSS	NECA	230,807
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 74,506
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	24.40%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-24.40%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.014783
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.040142

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$25.57
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$40.92
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$124.67
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,138.28
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.81
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.81
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$8.55
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$74.40
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$18.29
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$18.29
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$44.31
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$284.56
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$259.63
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$100.24
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000327
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001699
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.004285
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004309
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004763

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 7 / Band 6 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019555
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$33.83
304	Voice Grade 4-Wire Entrance Facility		\$54.13
305	DS-1 Entrance Facility		\$164.92
306	DS-3 Entrance Facility		\$1,505.72
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.40
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.40
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$11.31
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$98.42
311	Voice Grade 2-Wire Direct Trunk Termination		\$24.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$24.20
313	DS-1 Direct Trunk Termination		\$58.62
314	DS-3 Direct Trunk Termination		\$376.42
315	Multiplexing DS3-DS1		\$343.44
316	Multiplexing DS1-Voice		\$132.60
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Otelco Mid-Missouri LLC

421917

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Otelco Telephone LLC
SAC 250312 (Alabama)

Otelco Telephone LLC, (alternatively “Otelco Telephone” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Otelco Telephone is an Issuing Carrier of the JSI Tariff. Otelco Telephone 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Otelco Telephone LLC (AL)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Otelco Telephone of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates

Revisions also include revisions to the Access Recovery Charge ("ARC") consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), Otelco Telephone proposes an ARC effective July 1, 2017 at the rate of \$1.24 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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. 209 - 2017 Annual Access Filing
Otelco Telephone LLC (AL)

3. OTELCO TELEPHONE TARIFF REVIEW PLANS

Otelco Telephone submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Otelco Telephone 2017 ROR-ILEC-ICC Data
- Otelco Telephone 2017 Tariff Rate Comp CAF
- Otelco Telephone 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Saco River Telephone LLC
SAC 100022 (Maine)

Saco River Telephone LLC, (alternatively “Saco River” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Saco River is an Issuing Carrier of the JSI Tariff. Saco River 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Saco River Telephone LLC (ME)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Saco River of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

Revisions also include revisions to the Access Recovery Charge ("ARC") consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), Saco River proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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. 209 - 2017 Annual Access Filing
Saco River Telephone LLC (ME)

3. SACO RIVER TARIFF REVIEW PLANS

Saco River submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Saco River 2017 ROR-ILEC-ICC Data
- Saco River 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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. 209 – 2017 Annual Access Filing

Granby Telephone LLC
SAC 110036 (Massachusetts)

Granby Telephone LLC, (alternatively “Granby” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Granby will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Granby as an issuing carrier for NECA Tariff F.C.C. No. 5 and Granby will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Granby Telephone LLC (Massachusetts)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Granby parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company has previously offered Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 10, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Granby reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Granby Telephone LLC (Massachusetts)

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.

Granby 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 45.06 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$103,669. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$56,951, a reduction of \$46,718, or 45.06 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Granby Telephone LLC (Massachusetts)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Granby Telephone LLC (Massachusetts)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Granby Telephone LLC (Massachusetts)

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

Granby Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Granby 2017 ROR-ILEC-ICC Data
- Granby 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Granby Telephone LLC
110036

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$103,669
102	Projected 2011-12 Pool Settlements without LSS	NECA	56,951
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 46,718
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	45.06%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-45.06%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.013261
202	Information Surcharge Originating (shown as Per 100 Originating Access Min.)	Line 302 + (Line 302 * Line 105)	\$0.029171

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$12.40
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$19.86
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$60.49
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$552.41
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.88
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.88
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$4.14
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$36.11
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$8.88
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$8.88
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$21.51
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$138.10
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$126.00
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$48.64
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000111
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000578
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001459
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003131
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003461

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 3 / Band 2 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$22.58
304	Voice Grade 4-Wire Entrance Facility		\$36.15
305	DS-1 Entrance Facility		\$110.12
306	DS-3 Entrance Facility		\$1,005.56
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$7.54
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$65.73
311	Voice Grade 2-Wire Direct Trunk Termination		\$16.16
312	Voice Grade 4-Wire Direct Trunk Termination		\$16.16
313	DS-1 Direct Trunk Termination		\$39.15
314	DS-3 Direct Trunk Termination		\$251.38
315	Multiplexing DS3-DS1		\$229.36
316	Multiplexing DS1-Voice		\$88.54
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Granby Telephone LLC
110036

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Mid-Maine Telecom LLC
SAC 103315 (Maine)

Mid-Maine Telecom LLC, (alternatively “Mid-Maine” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Mid-Maine will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Mid-Maine as an issuing carrier for NECA Tariff F.C.C. No. 5 and Mid-Maine will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Maine Telecom LLC (Maine)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Mid-Maine parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company has previously offered Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis. Pursuant to notice filed with the FCC, the Company ceased offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective May 10, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Mid-Maine reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Maine Telecom LLC (Maine)

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.

Mid-Maine 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 38.29 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$192,461. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$118,762, a reduction of \$73,700, or 38.29 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Maine Telecom LLC (Maine)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Maine Telecom LLC (Maine)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mid-Maine Telecom LLC (Maine)

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

Mid-Maine Telecom LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Mid-Maine 2017 ROR-ILEC-ICC Data
- Mid-Maine 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Mid-Maine Telecom, LLC
103315

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$192,462
102	Projected 2011-12 Pool Settlements without LSS	NECA	118,762
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 73,700
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	38.29%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-38.29%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.014896
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.032766

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$13.93
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$22.31
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$67.95
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$620.50
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.99
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.99
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$4.65
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$40.56
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$9.97
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$9.97
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$24.16
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$155.12
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$141.53
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$54.64
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000125
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000650
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001638
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003517
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003888

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 3 / Band 2 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.024140
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$22.58
304	Voice Grade 4-Wire Entrance Facility		\$36.15
305	DS-1 Entrance Facility		\$110.12
306	DS-3 Entrance Facility		\$1,005.56
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$7.54
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$65.73
311	Voice Grade 2-Wire Direct Trunk Termination		\$16.16
312	Voice Grade 4-Wire Direct Trunk Termination		\$16.16
313	DS-1 Direct Trunk Termination		\$39.15
314	DS-3 Direct Trunk Termination		\$251.38
315	Multiplexing DS3-DS1		\$229.36
316	Multiplexing DS1-Voice		\$88.54
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Mid-Maine Telecom, LLC
103315

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Pine Tree Telephone LLC
SAC 100020 (Maine)

Pine Tree Telephone LLC, (alternatively “Pine Tree” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Pine Tree will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Pine Tree as an issuing carrier for NECA Tariff F.C.C. No. 5 and Pine Tree will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Tree Telephone LLC (Maine)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Pine Tree parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company currently offers Wireline Broadband Internet Access Service (WBIAS) under NECA Tariff F.C.C. No. 5. Pursuant to notice filed with the FCC, the Company will cease offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Pine Tree reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Tree Telephone LLC (Maine)

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.

Pine Tree 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 33.47 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$268,523. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$178,649, a reduction of \$89,874, or 33.47 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Tree Telephone LLC (Maine)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Tree Telephone LLC (Maine)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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, 2017 have been determined based on Section 61.39(b)(2) of the Commission's rules. See 47 CFR § 61.39(b)(2).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Tree Telephone LLC (Maine)

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

Pine Tree Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Pine Tree 2017 ROR-ILEC-ICC Data
- Pine Tree 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Pine Tree Telephone LLC
100020

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$268,523
102	Projected 2011-12 Pool Settlements without LSS	NECA	178,649
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 89,874
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	33.47%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-33.47%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.019273
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.035328

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$31.44
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$50.31
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$153.28
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,399.57
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.24
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.24
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$10.50
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$91.49
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$22.51
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$22.51
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$54.49
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$349.88
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$319.23
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$123.25
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000288
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001495
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003771
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003792
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004191

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 4 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Pine Tree Telephone LLC
100020

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Shoreham Telephone LLC
SAC 140064 (Vermont)

Shoreham Telephone LLC, (alternatively “Shoreham” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Shoreham will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Shoreham as an issuing carrier for NECA Tariff F.C.C. No. 5 and Shoreham will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Shoreham Telephone Company (Vermont)

Tariff F.C.C. No. 1. Beginning July 1, 2017 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 has elected to exit the NECA Common Line Pool. The Company's Common Line rates are tariffed by JSI effective July 1, 2017.

The regulations and rate structures applicable to Shoreham parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Shoreham reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Shoreham Telephone Company (Vermont)

Shoreham 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 42.62 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$317,103. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$181,938, a reduction of \$135,165 or 42.62 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Shoreham Telephone Company (Vermont)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Shoreham Telephone Company (Vermont)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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, 2017 have been determined based on Section 61.39(b)(2) of the Commission's rules. See 47 CFR § 61.39(b)(2).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Shoreham Telephone Company (Vermont)

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

Shoreham Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Shoreham 2017 ROR-ILEC-ICC Data
- Shoreham 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

Shoreham Telephone LLC
140064

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$317,103
102	Projected 2011-12 Pool Settlements without LSS	NECA	181,938
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 135,165
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	42.62%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-42.62%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.008310
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.030466

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$27.11
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$43.39
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$132.19
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,206.98
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.93
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.93
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.05
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$78.90
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$19.41
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$19.41
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$46.99
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$301.74
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$275.30
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$106.29
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000248
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001289
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003252
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003270
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003615

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Shoreham Telephone LLC

140064

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

War Telephone LLC
SAC 200258 (West Virginia)

War Telephone LLC, (alternatively “War” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, War will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel War as an issuing carrier for NECA Tariff F.C.C. No. 5 and War will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that will be issuing carriers for JSI Tariff FCC No. 1 as of July 1, 2017, and 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
Brindlee Mountain Telephone LLC	200005312	250283	AL	JSI	Yes
Blountsville Telephone LLC	200005312	250282	AL	JSI	Yes
Granby Telephone LLC	200005312	110036	MA	JSI	Yes
Hopper Telecommunications LLC	200005312	250300	AL	JSI	Yes
Mid-Maine Telecom LLC	200005312	103315	ME	JSI	Yes
Otelco Mid-Missouri LLC	200005312	421917	MO	JSI	Yes
Otelco Telephone LLC	200005312	250312	AL	JSI	Yes
Pine Tree Telephone LLC	200005312	100020	ME	JSI	Yes
Saco River Telephone LLC	200005312	100022	ME	JSI	Yes
Shoreham Telephone LLC	200005312	140064	VT	JSI	Yes
War Telephone LLC	200005312	200258	WV	JSI	Yes

Each of the Otelco, Inc. issuing carriers for JSI Tariff FCC No. 1 listed in the above table files its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

As an issuing carrier for JSI Tariff F.C.C. No. 1, the Company will provide services and bill Common Line, Switched Access, Special Access, Miscellaneous Services and Public Packet Data Network services pursuant to the rates, terms and conditions

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
War Telephone LLC (West Virginia)

established in JSI Tariff F.C.C. No. 1. Beginning July 1, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to War parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company currently offers Wireline Broadband Internet Access Service (WBIAS) under NECA Tariff F.C.C. No. 5. Pursuant to notice filed with the FCC, the Company will cease offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for War reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
War Telephone LLC (West Virginia)

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.

War 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 56.73 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$218,296. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$94,453, a reduction of \$123,843, or 56.73 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
War Telephone LLC (West Virginia)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
War Telephone LLC (West Virginia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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, 2017 have been determined based on Section 61.39(b)(2) of the Commission's rules. See 47 CFR § 61.39(b)(2).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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), War proposes ARC rates effective July 1, 2017 as shown in the supporting documentation.

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

War Telephone LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
War Telephone LLC (West Virginia)

- War 2017 ROR-ILEC-ICC Data
- War 2017 Tariff Rate Comp CAF
- Otelco Inc. 2017 True Up*
- Otelco Inc. 2017 Rate Ceiling CAF*
- Otelco Inc. 2017-2018 Rate of Return ILEC Summary*

*Holding Company

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

War Telephone LLC
200258

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$218,296
102	Projected 2011-12 Pool Settlements without LSS	NECA	94,453
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 123,843
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	56.73%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-56.73%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.006267
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.022975

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$20.44
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$32.72
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$99.69
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$910.22
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.46
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.46
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$6.83
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$59.50
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$14.64
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$14.64
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$35.44
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$227.55
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$207.61
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$80.15
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000087
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000456
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001149
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002466
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002726

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 8 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

War Telephone LLC
200258

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Piedmont Rural Telephone Cooperative, Inc.
SAC 240538 (South Carolina)

Piedmont Rural Telephone Cooperative, Inc., (alternatively “Piedmont” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Piedmont is an Issuing Carrier of the JSI Tariff. Piedmont 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Piedmont of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Piedmont 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Piedmont Rural Telephone Cooperative, Inc. (SC)

Under Section 51.917(e), Piedmont proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. PIEDMONT TARIFF REVIEW PLANS

Piedmont submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Piedmont 2017 ROR-ILEC-ICC Data
- Piedmont 2017 Tariff Rate Comp CAF
- Piedmont 2017 True Up
- Piedmont 2017 Rate Ceiling CAF
- Piedmont 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Pine Telephone Company, Inc.
SAC 432017 (Oklahoma)

Pine Telephone Company, Inc., (alternatively “Pine” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Pine is an Issuing Carrier of the JSI Tariff. Pine 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Pine of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Pine 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pine Telephone Company, Inc. (OK)

Under Section 51.917(e), Pine proposes an ARC effective July 1, 2017 at the rates as shown in the supporting documentation. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. PINE TARIFF REVIEW PLANS

Pine submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Pine 2017 ROR-ILEC-ICC Data
- Pine 2017 Tariff Rate Comp CAF
- Pine 2017 True Up
- Pine 2017 Rate Ceiling CAF
- Pine 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Pineland Telephone Cooperative, Inc.
SAC 220377 (Georgia)

Pineland Telephone Cooperative, Inc., (alternatively “Pineland” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Pineland will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Pineland as an issuing carrier for NECA Tariff F.C.C. No. 5 and Pineland will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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 Pineland parallel those of NECA Tariff FCC No. 5 in all material respects.

Pursuant to notice filed with the FCC, the Company will cease offering its DSL and Consumer Broadband-Only Loop (“CBOL”) broadband Internet transmission services as separate components of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for DSL or CBOL Wireline Broadband Internet Access Service for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pineland Telephone Cooperative, Inc. (Georgia)

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Pineland reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Pineland 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 40.89 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$488,735. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$288,909, a reduction of \$199,826 or 40.89 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pineland Telephone Cooperative, Inc. (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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pineland Telephone Cooperative, Inc. (Georgia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$1.69 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, \$3.00 per month for each single-line assessed a business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pineland Telephone Cooperative, Inc. (Georgia)

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

Pineland Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Pineland 2017 ROR-ILEC-ICC Data
- Pineland 2017 Tariff Rate Comp CAF
- Pineland 2017 True Up
- Pineland 2017 Rate Ceiling CAF
- Pineland 2017-2018 Rate of Return ILEC Summary

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

Pineland Telephone Cooperative, Inc.
220377

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$488,735
102	Projected 2011-12 Pool Settlements without LSS	NECA	288,909
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 199,826
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	40.89%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-40.89%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.008561
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.031389

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$27.93
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$44.70
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$136.19
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,243.55
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.99
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.99
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.33
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$81.29
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$20.00
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$20.00
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$48.41
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$310.88
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$283.64
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$109.51
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000256
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001328
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003351
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003369
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003724

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Pineland Telephone Cooperative, Inc.

220377

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Pioneer Telephone Association, Inc. d/b/a Pioneer Communications
SAC 411817 (Kansas)

Pioneer Telephone Association, Inc. d/b/a Pioneer Communications, (alternatively “Pioneer” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Pioneer is an Issuing Carrier of the JSI Tariff. Pioneer 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Pioneer of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Pioneer 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Pioneer Telephone Association, Inc. d/b/a Pioneer Communications (KS)

Under Section 51.917(e), Pioneer proposes an ARC effective July 1, 2017 at the rates shown in the supporting documentation for the sixth implementation period of the ARC.

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 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. PIONEER TARIFF REVIEW PLANS

Pioneer submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Pioneer 2017 ROR-ILEC-ICC Data
- Pioneer 2017 Tariff Rate Comp CAF
- Pioneer 2017 True Up
- Pioneer 2017 Rate Ceiling CAF
- Pioneer 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Heartland Telecommunications Company of Iowa
d/b/a Premier Communications
SAC 351096 (Iowa)

Heartland Telecommunications Company of Iowa d/b/a Premier Communications, (alternatively “Heartland” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Heartland is an Issuing Carrier of the JSI Tariff. Heartland 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

The following Table comprises the Premier 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”). Heartland became an issuing carrier of the JSI Tariff under Transmittal No. 201 effective November 1, 2016. Effective July 1, 2017, Mutual Telephone Company, Northern Iowa Telephone Company and Webb-Dickens Telephone Corporation will become issuing carriers of the JSI Tariff.

ILEC	Holding Company Code	Study Area Code	State	Tariff for which ILEC is Issuing Carrier	Included in RateCeiling-CAF.xls
Mutual Telephone Company	200001252	351252	IA	JSI	Yes
Northern Iowa Telephone Company	200001252	351259	IA	JSI	Yes
Webb-Dickens Telephone Corp.	200001252	351327	IA	JSI	Yes
Heartland Telecommunications Company of Iowa	200001252	351096	IA	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Heartland Telecommunications Company of Iowa d/b/a Premier
Communications (SC)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Heartland of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Heartland is not a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

Heartland is a rate-of-return regulated carrier for purposes of CAF-ICC Eligible Recovery. However, the Company is a recipient of CAF Phase II support and as such does not receive CAF-BLS support.

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), Heartland proposes an ARC effective July 1, 2017 at the rate of \$0.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Heartland Telecommunications Company of Iowa d/b/a Premier
Communications (SC)

with § 51.917 rules.¹ The TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HEARTLAND TARIFF REVIEW PLANS

Heartland submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Heartland 2017 ROR-ILEC-ICC Data
- Heartland 2017 Tariff Rate Comp CAF
- Heartland 2017 True Up
- Heartland 2017 Rate Ceiling CAF
- Heartland 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Mutual Telephone Company
SAC 351252 (Iowa)

Mutual Telephone Company, (alternatively “Mutual” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Mutual will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Mutual as an issuing carrier for NECA Tariff F.C.C. No. 5 and Mutual will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

Mutual is the holding company of three wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Mutual in the following Table. Together, all four companies comprise what is known as “Premier 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
Mutual Telephone Company	200001252	351252	IA	JSI	Yes
Northern Iowa Telephone Company	200001252	351259	IA	JSI	Yes
Webb-Dickens Telephone Corp.	200001252	351327	IA	JSI	Yes
Heartland Telecommunications Company of Iowa	200001252	351096	IA	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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, 2017 the Company will file interstate Special

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mutual Telephone Company (Iowa)

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 Mutual parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2015. Effective July 1, 2017 the Company will offer Consumer Broadband-Only Loop ("CBOL") on a permissively detariffed common carriage basis. Thus, the instant filing will not include DSL or CBOL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Mutual reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mutual Telephone Company (Iowa)

(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.

Mutual 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 26.55 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$344,132. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$435,515, an increase of \$91,383 or 26.55 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mutual Telephone Company (Iowa)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mutual Telephone Company (Iowa)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Mutual Telephone Company (Iowa)

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

Mutual Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Mutual 2017 ROR-ILEC-ICC Data
- Mutual 2017 Tariff Rate Comp CAF
- Mutual 2017 True Up
- Mutual 2017 Rate Ceiling CAF
- Mutual 2017-2018 Rate of Return ILEC Summary

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

Mutual Telephone Company
351252

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)1	NECA	\$344,132
102	Projected 2011-12 Pool Settlements without LSS	NECA	435,515
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (91,383)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-26.55%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	26.55%

1 NECA Rate Adjustment Calculated based on composite factor for 3 Premier Study Areas.

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.018329
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.067201

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$28.58
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$45.75
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$139.36
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,272.58
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.04
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.04
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.54
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$83.18
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$20.45
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$20.45
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$49.55
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$318.13
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$290.27
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$112.05
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000256
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001333
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003360
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.007214
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007973

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 2 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$22.58
304	Voice Grade 4-Wire Entrance Facility		\$36.15
305	DS-1 Entrance Facility		\$110.12
306	DS-3 Entrance Facility		\$1,005.56
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$1.61
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$7.54
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$65.73
311	Voice Grade 2-Wire Direct Trunk Termination		\$16.16
312	Voice Grade 4-Wire Direct Trunk Termination		\$16.16
313	DS-1 Direct Trunk Termination		\$39.15
314	DS-3 Direct Trunk Termination		\$251.38
315	Multiplexing DS3-DS1		\$229.36
316	Multiplexing DS1-Voice		\$88.54
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Mutual Telephone Company
351252

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Northern Iowa Telephone Company
SAC 351259 (Iowa)

Northern Iowa Telephone Company, (alternatively “Northern Iowa” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Northern Iowa will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Northern Iowa as an issuing carrier for NECA Tariff F.C.C. No. 5 and Northern Iowa will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Premier 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
Mutual Telephone Company	200001252	351252	IA	JSI	Yes
Northern Iowa Telephone Company	200001252	351259	IA	JSI	Yes
Webb-Dickens Telephone Corp.	200001252	351327	IA	JSI	Yes
Heartland Telecommunications Company of Iowa	200001252	351096	IA	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Northern Iowa Telephone Company (Iowa)

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 Northern Iowa parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering DSL Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Effective July 1, 2017 the Company will offer Consumer Broadband-Only Loop ("CBOL") on a permissively detariffed common carriage basis. Thus, the instant filing will not include DSL or CBOL rates for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Northern Iowa reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Northern Iowa Telephone Company (Iowa)

Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Northern Iowa 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 26.55 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$344,132. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$435,515, an increase of \$91,383 or 26.55 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Northern Iowa Telephone Company (Iowa)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Northern Iowa Telephone Company (Iowa)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Northern Iowa Telephone Company (Iowa)

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

Northern Iowa Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Northern Iowa 2017 ROR-ILEC-ICC Data
- Northern Iowa 2017 Tariff Rate Comp CAF
- Northern Iowa 2017 True Up*
- Northern Iowa 2017 Rate Ceiling CAF*
- Northern Iowa 2017-2018 Rate of Return ILEC Summary*

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

Northern Iowa Telephone Company
351259

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)1	NECA	\$344,132
102	Projected 2011-12 Pool Settlements without LSS	NECA	435,515
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (91,383)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-26.55%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	26.55%

1 NECA Rate Adjustment Calculated based on composite factor for 3 Premier Study Areas.

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.061103
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.067201

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$77.63
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$124.23
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$378.47
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,455.76
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$5.53
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$5.53
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$25.93
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$225.87
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$55.58
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$55.58
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$134.54
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$863.93
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$788.23
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$304.33
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000548
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.002844
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.071731
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.007214
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007973

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 8 / Band 9 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$61.34
304	Voice Grade 4-Wire Entrance Facility		\$98.16
305	DS-1 Entrance Facility		\$299.06
306	DS-3 Entrance Facility		\$2,730.65
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$4.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$20.49
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$178.48
311	Voice Grade 2-Wire Direct Trunk Termination		\$43.92
312	Voice Grade 4-Wire Direct Trunk Termination		\$43.92
313	DS-1 Direct Trunk Termination		\$106.31
314	DS-3 Direct Trunk Termination		\$682.65
315	Multiplexing DS3-DS1		\$622.84
316	Multiplexing DS1-Voice		\$240.47
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.056680
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Northern Iowa Telephone Company
351259

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Webb-Dickens Telephone Corporation
SAC 351327 (Iowa)

Webb-Dickens Telephone Corporation, (alternatively “Webb-Dickens” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Webb-Dickens will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Webb-Dickens as an issuing carrier for NECA Tariff F.C.C. No. 5 and Webb-Dickens will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

The following Table comprises the Premier 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
Mutual Telephone Company	200001252	351252	IA	JSI	Yes
Northern Iowa Telephone Company	200001252	351259	IA	JSI	Yes
Webb-Dickens Telephone Corp.	200001252	351327	IA	JSI	Yes
Heartland Telecommunications Company of Iowa	200001252	351096	IA	JSI	Yes

Each of the four issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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, 2017 the Company will file interstate Special Access, including Public Packet Data Network, services on a historic basis under

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Webb-Dickens Telephone Corporation (Iowa)

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 Webb-Dickens parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service ("WBIAS") under NECA Tariff FCC No. 5 rates and regulations for DSL and Consumer Broadband-Only Loop. Effective July 1, 2017 the Company will begin offering 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Webb-Dickens reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Webb-Dickens Telephone Corporation (Iowa)

Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Webb-Dickens 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 26.55 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$344,132. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$435,515, an increase of \$91,383 or 26.55 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Webb-Dickens Telephone Corporation (Iowa)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Webb-Dickens Telephone Corporation (Iowa)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Webb-Dickens Telephone Corporation (Iowa)

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

Webb-Dickens Telephone Corporation submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Webb-Dickens 2017 ROR-ILEC-ICC Data
- Webb-Dickens 2017 Tariff Rate Comp CAF
- Webb-Dickens 2017 True Up
- Webb-Dickens 2017 Rate Ceiling CAF
- Webb-Dickens 2017-2018 Rate of Return ILEC Summary

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

Webb-Dickens Telephone Corporation
351327

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)1	NECA	\$344,132
102	Projected 2011-12 Pool Settlements without LSS	NECA	435,515
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (91,383)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-26.55%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	26.55%
1 NECA Rate Adjustment Calculated based on composite factor for 3 Premier Study Areas.			
July 1, 2017 Recurring Switched Access Service			
End Office			
201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.061103
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.067201
Local Transport			
203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$103.74
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$166.00
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$505.74
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$4,617.74
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$7.38
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$7.38
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$34.65
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$301.83
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$74.26
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$74.26
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$179.77
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,154.41
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,053.26
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$406.66
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000256
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001333
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003360
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.007214
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007973

Current Recurring Switched Access Service		NECA BANDs-- LS / LT / TST>	Band 8 / Band 10 / Band 1
End Office			
301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100
Local Transport			
303	Voice Grade 2-Wire Entrance Facility		\$81.97
304	Voice Grade 4-Wire Entrance Facility		\$131.17
305	DS-1 Entrance Facility		\$399.62
306	DS-3 Entrance Facility		\$3,648.81
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.38
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$238.50
311	Voice Grade 2-Wire Direct Trunk Termination		\$58.68
312	Voice Grade 4-Wire Direct Trunk Termination		\$58.68
313	DS-1 Direct Trunk Termination		\$142.05
314	DS-3 Direct Trunk Termination		\$912.18
315	Multiplexing DS3-DS1		\$832.26
316	Multiplexing DS1-Voice		\$321.33
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Webb-Dickens Telephone Corporation

351327

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Ringgold Telephone Company
SAC 220382 (Georgia)

Ringgold Telephone Company, (alternatively “Ringgold” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Ringgold is an Issuing Carrier of the JSI Tariff. Ringgold 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Ringgold of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Ringgold 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), Ringgold proposes an ARC effective July 1, 2017 at the rates as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Ringgold Telephone Company (GA)

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 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. RINGGOLD TARIFF REVIEW PLANS

Ringgold submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Ringgold 2017 ROR-ILEC-ICC Data
- Ringgold 2017 Tariff Rate Comp CAF
- Ringgold 2017 True Up
- Ringgold 2017 Rate Ceiling CAF
- Ringgold 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Skyline Telephone Membership Corp.
SAC 230501 (North Carolina)

Skyline Telephone Membership Corp., (alternatively “Skyline” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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. 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates. Revisions are proposed to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

Revisions also reflect Skyline’s permissive detariffing of common carriage Wireline Broadband Internet Access Service effective July 1, 2017 pursuant to notice filed with the FCC May 31, 2017 in CC Docket No. 02-33.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Skyline Telephone Membership Corp. (NC)

Under Section 51.917(e), Skyline proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Skyline 2017 ROR-ILEC-ICC Data
- Skyline 2017 Tariff Rate Comp CAF
- Skyline 2017 True Up
- Skyline 2017 Rate Ceiling CAF
- Skyline 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 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” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Smart City is an Issuing Carrier of the JSI Tariff. Smart City 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Smart City of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company’s Common Line rates were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Smart City Telecommunications LLC d/b/a Smart City Telecom (FL)

Under Section 51.917(e), Smart City proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SMART CITY TARIFF REVIEW PLANS

Smart City submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Smart City 2017 ROR-ILEC-ICC Data
- Smart City 2017 Tariff Rate Comp CAF
- Smart City 2017 True Up
- Smart City 2017 Rate Ceiling CAF
- Smart City 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Smithville Telephone Company, Inc.
SAC 280467 (Mississippi)

Smithville Telephone Company, Inc., (alternatively “Smithville” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Smithville will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Smithville as an issuing carrier for NECA Tariff F.C.C. No. 5 and Smithville will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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 Smithville parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (WBIAS) under NECA Tariff FCC No. 5 rates and regulations for DSL. Pursuant to notice filed with the FCC, the Company will cease offering its DSL broadband Internet transmission service as a separate component of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Smithville Telephone Company, Inc. (Mississippi)

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Smithville reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Smithville 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 25.11 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$38,921. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$48,694, an increase of \$9,773 or 25.11 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Smithville Telephone Company, Inc. (Mississippi)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Smithville Telephone Company, Inc. (Mississippi)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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, 2017 have been determined based on Section 61.39(b)(2) of the Commission's rules. See 47 CFR § 61.39(b)(2).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of **\$3.00** 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Smithville Telephone Company, Inc. (Mississippi)

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

Smithville Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Smithville 2017 ROR-ILEC-ICC Data
- Smithville 2017 Tariff Rate Comp CAF
- Smithville 2017 True Up
- Smithville 2017 Rate Ceiling CAF
- Smithville 2017-2018 Rate of Return ILEC Summary

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

Smithville Telephone Company, Inc.
280467

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$38,921
102	Projected 2011-12 Pool Settlements without LSS	NECA	48,694
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (9,773)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-25.11%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	25.11%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.060406
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.066433

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$59.11
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$94.61
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$288.24
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,631.89
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$4.22
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$4.22
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$19.74
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$172.04
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$42.32
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$42.32
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$102.46
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$657.95
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$600.31
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$231.77
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000542
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.002811
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.007091
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.007131
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007882

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 8 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.048282
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Smithville Telephone Company, Inc.
280467

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
South Central Rural Telephone Cooperative (KY)

Under Section 51.917(e), South Central proposes ARC rates effective July 1, 2017 as shown in the supporting documentation. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- South Central 2017 ROR-ILEC-ICC Data
- South Central 2017 Tariff Rate Comp CAF
- South Central 2017 True Up
- South Central 2017 Rate Ceiling CAF
- South Central 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Star Telephone Membership Corporation
SAC 230502 (North Carolina)

Star Telephone Membership Corporation, (alternatively “Star” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Star is an Issuing Carrier of the JSI Tariff. Star 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Star of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Star 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Star Telephone Membership Corporation (NC)

Under Section 51.917(e), Star proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. STAR TARIFF REVIEW PLANS

Star submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Star 2017 ROR-ILEC-ICC Data
- Star 2017 Tariff Rate Comp CAF
- Star 2017 True Up
- Star 2017 Rate Ceiling CAF
- Star 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Totah Communications, Inc.
SAC 412030 (Kansas)
SAC 432030 (Oklahoma)

Totah Communications, Inc., (alternatively “Totah” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Totah is an Issuing Carrier of the JSI Tariff. Totah 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Totah of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services.

Common Line – Totah SAC 412030 (Kansas)

With respect to Common Line, Totah SAC 412030 (Kansas) accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. Totah SAC 412030 elected to have Common Line and End User rates tariffed by NECA.

Common Line – Totah SAC 432030 (Oklahoma)

Totah SAC 432030 (Oklahoma) 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.

Therefore, for both Totah SAC 412030 (Kansas) and Totah SAC 432030 (Oklahoma), 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) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Totah Communications, Inc. (KS and OK)

Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), Totah proposes an ARC effective July 1, 2017 at the rates as shown in the supporting documentation. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TOTAH TARIFF REVIEW PLANS

Totah submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Totah 2017 ROR-ILEC-ICC Data
- Totah 2017 Tariff Rate Comp CAF
- Totah 2017 True Up
- Totah 2017 Rate Ceiling CAF
- Totah 2017-18 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer

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. 209 - 2017 Annual Access Filing
Totah Communications, Inc. (KS and OK)

- 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. 209 – 2017 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. 209 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri County Telephone Association, Inc. (WY)

Under Section 51.917(e), Tri County proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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, and at the maximum rate of \$3.00 per month for single-line business end user common line charge pursuant to § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2017-2018:

- Tri County 2017 ROR-ILEC-ICC Data
- Tri County 2017 Tariff Rate Comp CAF
- Tri County 2017 True Up
- Tri County 2017 Rate Ceiling CAF
- Tri County 2017-18 Rate of Return ILEC Summary

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. 209 – 2017 Annual Access Filing

Tri-County Telephone Company, Inc.
SAC 401726 (Arkansas)

Tri-County Telephone Company, 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. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Tri-County will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Tri-County as an issuing carrier for NECA Tariff F.C.C. No. 5 and Tri-County will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

E. Ritter Communications, Inc. is the holding company of three wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Tri-County in the following Table. 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
Millington Telephone Company	200000025	290571	TN	JSI	Yes
Tri-County Telephone Company, Inc.	200000025	401726	AR	JSI	Yes
E. Ritter Tel. Co.	200000025	401722	AR	NECA	No

Each of the two carriers filing traffic sensitive rates under JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.39 and is filing its own, separate Description and Justification under Transmittal No. 209.

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, 2017 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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri-County Telephone Company, Inc. (Arkansas)

51, Subpart J of the Commission's rules pertaining to transitional access pricing. See 47 CFR § 61.39.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, 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 Tri-County parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company began offering Wireline Broadband Internet Access Service (WBIAS) on a permissively detariffed common carriage basis effective July 1, 2016. Pursuant to notice filed with the FCC, the Company will cease offering its DSL and Consumer Broadband-Only Loop ("CBOL") broadband Internet transmission services as separate components of its broadband Internet access service effective July 1, 2017. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission's Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Tri-County reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri-County Telephone Company, Inc. (Arkansas)

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.

Tri-County 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 45.13 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$444,006. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$243,633, a reduction of \$200,373 or 45.13 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri-County Telephone Company, Inc. (Arkansas)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri-County Telephone Company, Inc. (Arkansas)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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), Tri-County proposes ARC rates effective July 1, 2017 as shown in the supporting documentation.

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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Tri-County Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Tri-County Telephone Company, Inc. (Arkansas)

- Tri-County 2017 ROR-ILEC-ICC Data
- Tri-County 2017 Tariff Rate Comp CAF
- E. Ritter Communications 2017 True Up*
- E. Ritter Communications 2017 Rate Ceiling CAF*
- E. Ritter Communications 2017-2018 Rate of Return ILEC Summary*

*Holding company

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

Tri-County Telephone Company, Inc.
401726

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$444,006
102	Projected 2011-12 Pool Settlements without LSS	NECA	243,633
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 200,373
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	45.13%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-45.13%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.015896
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.029137

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$44.98
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$71.98
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$219.28
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,002.16
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$3.20
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$3.20
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$15.02
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$130.87
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$32.20
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$32.20
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$77.95
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$500.53
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$456.67
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$176.32
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000111
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000578
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001457
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003128
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003457

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 4 / Band 10 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.028969
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$81.97
304	Voice Grade 4-Wire Entrance Facility		\$131.17
305	DS-1 Entrance Facility		\$399.62
306	DS-3 Entrance Facility		\$3,648.81
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.83
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.38
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$238.50
311	Voice Grade 2-Wire Direct Trunk Termination		\$58.68
312	Voice Grade 4-Wire Direct Trunk Termination		\$58.68
313	DS-1 Direct Trunk Termination		\$142.05
314	DS-3 Direct Trunk Termination		\$912.18
315	Multiplexing DS3-DS1		\$832.26
316	Multiplexing DS1-Voice		\$321.33
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000202
318	Tandem Switched Termination		\$0.001053
319	Tandem Switching		\$0.002655
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Tri-County Telephone Company, Inc.
401726

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

TruVista Communications Companies

TruVista Communications Companies, (alternatively “TruVista” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. 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.

<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

TruVista is an Issuing Carrier of the JSI Tariff. 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

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, the three TruVista study areas are members 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
TruVista Communications Companies (SC)

Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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), TruVista proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TRUVISTA TARIFF REVIEW PLANS

TruVista submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

Chester Telephone Company d/b/a TruVista Communications

- 2017 ROR-ILEC-ICC Data
- 2017 Tariff Rate Comp CAF
- 2017 True Up

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

- 2017 ROR-ILEC-ICC Data

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. 209 - 2017 Annual Access Filing
TruVista Communications Companies (SC)

- 2017 Tariff Rate Comp CAF
- 2017 True Up

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

- 2017 ROR-ILEC-ICC Data
- 2017 Tariff Rate Comp CAF
- 2017 True Up

TruVista Communications*

- TruVista Communications 2017 Rate Ceiling CAF*
- TruVista Communications 2017-18 Rate of Return ILEC Summary*

*Holding company

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. 209 – 2017 Annual Access Filing

Twin Lakes Telephone Cooperative Corp.
SAC 290579 (Tennessee)

Twin Lakes Telephone Cooperative Corp., (alternatively “Twin Lakes” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Twin Lakes will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Twin Lakes as an issuing carrier for NECA Tariff F.C.C. No. 5 and Twin Lakes will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 Twin Lakes parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2017 the Company will begin offering 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Twin Lakes Telephone Cooperative Corp. (Tennessee)

Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). 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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Twin Lakes reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Twin Lakes 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 61.99 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$1,958,614. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$744,392, a reduction of \$1,214,222 or 61.99 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Twin Lakes Telephone Cooperative Corp. (Tennessee)

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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Twin Lakes Telephone Cooperative Corp. (Tennessee)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Twin Lakes Telephone Cooperative Corp. (Tennessee)

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

Twin Lakes Telephone Cooperative Corp. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Twin Lakes 2017 ROR-ILEC-ICC Data
- Twin Lakes 2017 Tariff Rate Comp CAF
- Twin Lakes 2017 True Up
- Twin Lakes 2017 Rate Ceiling CAF
- Twin Lakes 2017-2018 Rate of Return ILEC Summary

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

Twin Lakes Telephone Cooperative Corp.
290579

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$1,958,614
102	Projected 2011-12 Pool Settlements without LSS	NECA	744,392
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 1,214,222
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	61.99%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-61.99%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.005504
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.020181

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$16.02
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$25.63
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$78.09
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$713.04
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.14
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.14
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.35
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$46.61
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$11.46
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$11.46
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$27.76
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$178.25
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$162.64
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$62.79
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000165
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000854
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.002154
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002166
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002394

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 1 / Band 7 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.014483
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.15
304	Voice Grade 4-Wire Entrance Facility		\$67.43
305	DS-1 Entrance Facility		\$205.47
306	DS-3 Entrance Facility		\$1,876.11
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.00
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.07
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$122.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.16
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.16
313	DS-1 Direct Trunk Termination		\$73.04
314	DS-3 Direct Trunk Termination		\$469.01
315	Multiplexing DS3-DS1		\$427.94
316	Multiplexing DS1-Voice		\$165.21
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Twin Lakes Telephone Cooperative Corp.
290579

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Wilkes Telephone & Electric Company, Inc.
SAC 220394 (Georgia)

Wilkes Telephone & Electric Company, Inc., (alternatively “Wilkes” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2017, Wilkes will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Wilkes as an issuing carrier for NECA Tariff F.C.C. No. 5 and Wilkes will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2017.

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, 2017 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 Wilkes parallel those of NECA Tariff FCC No. 5 in all material respects.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2017 the Company will begin offering 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 2017 Access Filing Order and 2017 TRP Order

The filing is made in accordance with the 2017 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258 (Released March 16, 2017). JSI is also

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Wilkes Telephone & Electric Company, Inc. (Georgia)

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. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2017. Accordingly, Special Access rates filed for Wilkes reflect a rate-of-return of 10.75%. See Material to be filed in Support of 2017 Annual Access Tariff Filings, WC Docket No. 17-65, Order, DA 17-386 (Released April 24, 2017).

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.

Wilkes 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 36.81 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2017-2018 demand produces revenue of \$500,305. Application of the rates for Switched Access proposed under this transmittal to 2017-2018 Test Year demand produces revenue of \$316,128, a reduction of \$184,177 or 36.81 percent.

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Wilkes Telephone & Electric Company, Inc. (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(g)</p> <p>Each Rate-of-Return Carrier shall calculate its 2017 Target Composite Terminating End Office Access Rate. The 2017 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus two-thirds of any difference between that carrier's 2016 Target Composite Terminating End Office Access Rate and \$0.0007 per minute.</p>	<p><i>See Exhibit A, Lines 401 through 405</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</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under</i></p>

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Wilkes Telephone & Electric Company, Inc. (Georgia)

Step	FCC Rule	Cross-Reference to Exhibit A
	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>JSI Transmittal 209 effective July 1, 2017</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 carrier. Accordingly, the proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2017 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

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, 2017 at the rate of \$0.87 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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) 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

¹ Section 61.39(b)(1) 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.

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Wilkes Telephone & Electric Company, Inc. (Georgia)

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

Wilkes Telephone & Electric Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Wilkes 2017 ROR-ILEC-ICC Data
- Wilkes 2017 Tariff Rate Comp CAF
- Wilkes 2017 True Up
- Wilkes 2017 Rate Ceiling CAF
- Wilkes 2017-2018 Rate of Return ILEC Summary

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

Wilkes Telephone & Electric Co.
220394

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$500,305
102	Projected 2011-12 Pool Settlements without LSS	NECA	316,128
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 184,177
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	36.81%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-36.81%

July 1, 2017 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.003567
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.012203
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.033552

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$29.86
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$47.78
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$145.58
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,329.24
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.13
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.13
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.97
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$86.89
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$21.38
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$21.38
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$51.75
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$332.30
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$303.19
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$117.05
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000274
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001420
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003581
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003602
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003981

Current Recurring Switched Access Service NECA BANDS-- LS / LT / TST>

Band 2 / Band 8 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.005000
301 b	Local Switching Premium Rates Originating		\$0.019313
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053100

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.25
304	Voice Grade 4-Wire Entrance Facility		\$75.62
305	DS-1 Entrance Facility		\$230.39
306	DS-3 Entrance Facility		\$2,103.66
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.37
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.78
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$137.51
311	Voice Grade 2-Wire Direct Trunk Termination		\$33.83
312	Voice Grade 4-Wire Direct Trunk Termination		\$33.83
313	DS-1 Direct Trunk Termination		\$81.90
314	DS-3 Direct Trunk Termination		\$525.90
315	Multiplexing DS3-DS1		\$479.83
316	Multiplexing DS1-Voice		\$185.25
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000433
318	Tandem Switched Termination		\$0.002247
319	Tandem Switching		\$0.005668
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005700
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006300

Rates from NECA Tariff based on banded rates

Wilkes Telephone & Electric Co.
220394

SOURCE

Composite Rates Interstate Rates for July 1, 2017 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
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Step-Down Calculation

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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404	Transition to Rate on Line 2 in equal 1/3 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	Rate Effective Date July 2017	Line 403 + (Line 406)	\$0.003567
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 209 – 2017 Annual Access Filing

Winnebago Cooperative Telecom Association-LB
SAC 351338. (Iowa)

Winnebago Cooperative Telecom Association-LB, (alternatively “Winnebago-LB” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Winnebago-LB is an Issuing Carrier of the JSI Tariff. Winnebago-LB 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

Winnebago-LB is commonly owned by Winnebago Cooperative Telecom Association, an issuing carrier in JSI Tariff F.C.C. No. 1, study area code 351337 (IA) and study area code 361337 (MN). Winnebago-LB, study area code 351338, is comprised of acquired Bancroft and Lakota, Iowa, exchanges and maintains separate rates distinct from Winnebago Cooperative Telecom Association.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Winnebago-LB of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Winnebago-LB 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Winnebago Cooperative Telecom Association-LB (IA)

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

Winnebago-LB is a rate-of-return regulated carrier for purposes of CAF-ICC Eligible Recovery. However, the Company is a recipient of CAF Phase II support and as such does not receive CAF-BLS support.

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), Winnebago-LB proposes an ARC effective July 1, 2017 at the rate of \$1.50 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge, and \$3.00 per month for each line assessed a single-line business end user common line charge pursuant to 47 CFR § 69.104 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WINNEBAGO-LB TARIFF REVIEW PLANS

Winnebago-LB submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Winnebago-LB 2017 ROR-ILEC-ICC Data
- Winnebago-LB 2017 Tariff Rate Comp CAF
- Winnebago-LB 2017 True Up
- Winnebago-LB 2017 Rate Ceiling CAF
- Winnebago-LB 2017-18 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer

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. 209 - 2017 Annual Access Filing
Winnebago Cooperative Telecom Association-LB (IA)

- 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. 209 – 2017 Annual Access Filing

Yadkin Valley Telephone Membership Corporation
SAC 230511 (North Carolina)

Yadkin Valley Telephone Membership Corporation, (alternatively “Yadkin” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 209 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Yadkin is an Issuing Carrier of the JSI Tariff. Yadkin 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 16, 2017 release entitled In the Matter of July 1, 2017 Annual Access Charge Tariff Filings, WC Docket No. 17-65, Order, DA 17-258, and the April 24, 2017 release entitled In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filing, WC Docket No. 17-65, Order, DA 17-386.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Yadkin of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Yadkin 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 11.0% to 10.75%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates

Revisions also include revisions to the Access Recovery Charge (“ARC”) consistent with § 51.917(e)(6) and the step down of Switched Access terminating End Office rates pursuant to § 51.909(g).

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).

Description and Justification
JSI Transmittal No. 209 - 2017 Annual Access Filing
Yadkin Valley Telephone Membership Corporation (NC)

Under Section 51.917(e), Yadkin proposes an ARC effective July 1, 2017 at the maximum rate of \$3.00 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 for the sixth implementation period of the ARC. No revision is proposed to the currently effective \$3.00 per month ARC for each multi-line business end user common line charge assessed pursuant to 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 TY 2017 - 2018 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. YADKIN TARIFF REVIEW PLANS

Yadkin submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2017-2018:

- Yadkin 2017 ROR-ILEC-ICC Data
- Yadkin 2017 Tariff Rate Comp CAF
- Yadkin 2017 True Up
- Yadkin 2017 Rate Ceiling CAF
- Yadkin 2017-18 Rate of Return ILEC Summary

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).