

John Staurulakis, Inc. Transmittal No. 216 – June 18, 2018
TDS Telecom Companies 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. 216 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the TDS Telecom study areas listed below.

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, LLC d/b/a TDS Telecom	OK	431984
Tennessee Telephone Company d/b/a TDS Telecom	TN	290575

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 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 Merrimack County Telephone Company - Contoocook Valley and 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 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 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

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

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
Perkinsville Telephone Company, Inc. d/b/a TDS Telecom	VT	140062
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
Vernon Telephone Company, Inc. – Oriskany Falls d/b/a TDS Telecom	NY	150114
Winsted Telephone Company d/b/a TDS Telecom	MN	361507

TDS Telecom-Group A files Special Access and Switched Access rates on a blended basis reflective of the four TDS Group A study areas. TDS Telecom-Groups B-G file individual Switched Access rates on a study area basis and Special Access on a blended basis reflective of the study areas within each TDS Group.

The TDS Telecom-Groups A-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 Alternative Connect America Model (“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. 102 of these study areas are currently issuing carriers for the JSI Tariff. TDS has 6 ILECs that will continue to participate in the NECA Traffic Sensitive Pool.

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

The blending of Switched Access 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. *See* Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (“USF/ICC Transformation Order”), *pets. for review denied sub nom. In re: FCC 11-161, 753 F.3d 1015 (10th Cir. 2014).*

Because 6 TDS study areas will continue as issuing carriers for NECA Tariff FCC No. 5 and have provided data respecting the Access Recovery Charge (“ARC”)/Connect America Fund (“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.

1. DESCRIPTION OF FILING

Filing Made in Accordance with 2018 Access Filing Order and 2018 TRP Order

The filing is made in accordance with the 2018 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). *See* [July 1, 2018 Annual Access Charge Tariff Filings](#), WC Docket No. 18-100, Order, DA 18-335 (Released April 5, 2018). JSI is also providing as part of this filing, on behalf of TDS Telecom-Groups A-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 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404 (rel. Apr. 25, 2018). TDS Telecom Groups A-G are making a required filing under 61.38. In addition, Special Access rates reflect the rate of return for the Test Year of 10.50 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016. In addition to the rate of return phase down as required, TDS is providing its information of costs utilizing a Federal income tax rate of 21%, as compared to 35% in years past.

2018 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(h) prescribes a Target Composite Terminating End Office Access rate beginning July 1, 2016 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 Groups A-G ICC-CAF data collection information which includes 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 Groups A-G Max ARC Calculations
- TDS Telecom Groups A-G Eligible Recovery Summary
- TDS Telecom Groups A-G ICC-CAF Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ILEC 2018-19 Summary TRP
- ICC-CAF Certifications

The ICC-CAF 2018-19 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, 2018 through June 30, 2019 based on study area projection. Calculations were done consistent with the Second Order on Reconsideration and Clarification dated February 16, 2018. (FCC

18-13), which could cap imputation on CBOL as provided in the Commissions TRP forms. (See Max ARC Calculation tab).

TDS Groups A-G proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) as shown in the supporting documentation.

2018 Tariff Review Plans

The 2018 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 2018 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, 2018 through June 30, 2019 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 GROUPS A-G COMPANIES COST SUPPORT DOCUMENTS FILED UNDER THIS TRANSMITTAL

Following are the documents filed by JSI under Transmittal No. 216 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 18-100, Order, DA 18-404 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

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

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

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

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

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

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

2018 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 2014 to 2018. Based on this historical data, demand trends were developed to project end of year demand for 2018 and 2019. TDS Groups A-G Companies experienced a 16 percent decrease in High Capacity DS1 demand from December 2016 through December 2017. 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 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 Groups A-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 2017. 2018 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 2017 demand and 2018 forecasted demand were averaged to determine demand as of July 1, 2018. Next, year-end 2018 and 2019 forecasted demand were averaged to determine July 1, 2019 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 Groups A-G propose increasing Special Access rates by a composite amount of 3.4 percent as compared with the July 1, 2017 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 Broadband 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. 216 – 2018 Annual Access Filing

Bluffton Telephone Company, Inc.
SAC 240512 (South Carolina)

Bluffton Telephone Company, (alternatively “Bluffton” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Bluffton is an Issuing Carrier of the JSI Tariff. Bluffton files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Bluffton is one of three wholly-owned subsidiary incumbent local exchange carriers (“ILECs”) in the Hargray Communications Group, Inc. group of companies. The others are Hargray Telephone Company, Inc. (“Hargray”), (SAC 240523) and ComSouth Telecommunications, Inc. (“ComSouth”), (SAC 220369). The holding company code for Bluffton, Hargray and ComSouth is 200000263. Bluffton, Hargray and ComSouth 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 and ComSouth are also issuing carriers for JSI Tariff FCC No. 1 and file their own individual company rates and are filing their own, separate Description and Justifications under Transmittal No. 216.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Bluffton Telephone Company (SC)

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019.

Bluffton CAF-ICC data is represented in a single consolidated file, *Bluffton Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Bluffton 2018 ROR-ILEC-ICC Data
- Bluffton 2018 Tariff Rate Comp CAF
- Bluffton 2018 True Up RoR ILEC
- Bluffton 2018 Rate Ceiling CAF
- Bluffton 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Hargray Communications 2018 Rate Ceiling CAF
- Hargray Communications True Up RoR ILEC

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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).

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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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

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Bluffton Telephone Company (SC)

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development

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Bluffton Telephone Company (SC)

of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a).

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JSI Transmittal No. 216 - 2018 Annual Access Filing
Bluffton Telephone Company (SC)

Freeze – The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 The Company has not elected to be subject to the provisions of
Category Section 36.3(b) which allows for assignment of costs from the Part
Relationships- 32 accounts to the separations categories/sub-categories based on
Section the percentage relationships of the categorized/sub-categorized
36.3(b) costs to their associated Part 32 accounts for the twelve month
period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 14.17% percent across the board increase from current rates. Bluffton's special access rates are increasing by 14.17% due to a decrease in demand. The FCC Form 492 report filed in March 2018 for the calendar year ending 12/31/17 supports the rate increase, showing that Bluffton's Special Access rate of return was only 1.43%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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 individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Citizens is an Issuing Carrier of the JSI Tariff. Citizens files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission's April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

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). No revisions are proposed to the currently effective ARC charges.

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 2018 - 2019 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 2018-2019.

Citizens CAF-ICC data is represented in a single consolidated file, *Citizens Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Citizens 2018 ROR-ILEC-ICC Data
- Citizens 2018 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. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

- Citizens 2018 True Up RoR ILEC
- Citizens 2018 Rate Ceiling CAF
- Citizens 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Comporium Communications 2018 Rate Ceiling CAF
- Comporium Communications True Up RoR ILEC

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company's proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #1
Part 69 - Access Charge DevelopmentAttachment #2
Part 36 – Separations of CostsAttachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #4
Part 69 - Access Charge Development.....Attachment #5
Part 36 – Separations of CostsAttachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company's rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a)

The Company's Part 36 allocations reflect use of the Company's frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission's rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Citizens Telephone Company (NC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 9.2 percent across the board increase from current rates

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

Comporium, Inc. d/b/a Comporium Communications,
SAC 240531 (South Carolina)

Comporium, Inc. d/b/a Comporium Communications, (alternatively “Comporium, Inc.” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Comporium, Inc. is an Issuing Carrier of the JSI Tariff. Comporium, Inc. files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

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. 216.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Comporium, Inc. (SC)

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

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). No revisions are proposed to the currently effective ARC charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM, INC. TARIFF REVIEW PLANS

Comporium, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019.

Comporium, Inc. CAF-ICC data is represented in a single consolidated file, *Comporium, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Comporium, Inc. 2018 ROR-ILEC-ICC Data
- Comporium, Inc. 2018 Tariff Rate Comp CAF
- Comporium, Inc. 2018 True Up RoR ILEC
- Comporium, Inc. 2018 Rate Ceiling CAF
- Comporium, Inc. 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Comporium Communications 2018 Rate Ceiling CAF
- Comporium Communications True Up RoR ILEC

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. 216 - 2018 Annual Access Filing
Comporium, Inc. (SC)

The TRP required of rate of return ILECs subject to section 61.38 of the Commission’s rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #1

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Comporium, Inc. (SC)

Part 69 - Access Charge DevelopmentAttachment #2
Part 36 – Separations of CostsAttachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #4
Part 69 - Access Charge Development.....Attachment #5
Part 36 – Separations of CostsAttachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Comporium, Inc. (SC)

In addition to following the Commission's prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service ("WBIAS") on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), ("Wireline Broadband Order"). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, "WBI," along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company's rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Comporium, Inc. (SC)

Part 36 Traffic Factors Freeze – Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 Category Relationships- Section 36.3(b) The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

6. SPECIAL ACCESS

The Company’s proposed Special Access rates represent a 28.1% decrease in High Capacity rates, a 1.18% decrease in Ethernet rates, and all other rates are decreasing by 13%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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 individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Farmers is an Issuing Carrier of the JSI Tariff. Farmers files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, and the step down of Switched Access terminating End Office rates pursuant to § 51.909(h). Farmers is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Farmers Telephone Company (SC)

with § 51.917 rules.¹ The TY 2018 - 2019 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 2018-2019.

Farmers CAF-ICC data is represented in a single consolidated file, *Farmers Telephone Cooperative, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Farmers 2018 ROR-ILEC-ICC Data
- Farmers 2018 Tariff Rate Comp CAF
- Farmers 2018 True Up RoR ILEC
- Farmers 2018 Rate Ceiling CAF
- Farmers 2018-19 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan

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. 216 - 2018 Annual Access Filing
Farmers Telephone Company (SC)

(“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Farmers Telephone Company (SC)

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Farmers Telephone Company (SC)

Access Service Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors Freeze – Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 Category Relationships-Section The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Farmers Telephone Company (SC)

36.3(b) costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 10% decrease in High Capacity rates, a 17% decrease in Ethernet rates, and all other rates are decreasing by 15.5%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, development of its interstate cost of service and, in turn, rate calculations.

**DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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 individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fort Mill is an Issuing Carrier of the JSI Tariff. Fort Mill files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission's April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

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 3, 2018 at the rate of \$1.73 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 \$1.73 per month for single-line business end user common line charge pursuant to § 69.104.

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019.

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. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

Fort Mill CAF-ICC data is represented in a single consolidated file, *Fort Mill Telephone Company 2018 RoR ILEC ICC No CAF TRP*, comprised of the following TRP workbooks:

- Fort Mill 2018 ROR-ILEC-ICC Data
- Fort Mill 2018 Tariff Rate Comp No CAF
- Fort Mill 2018 True Up RoR ILEC
- Fort Mill 2018 Rate Ceiling No CAF
- Fort Mill 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Comporium Communications 2018 Rate Ceiling CAF
- Comporium Communications True Up RoR ILEC

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company's proposed changes to Switched Access is limited to the step down of

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #1
Part 69 - Access Charge DevelopmentAttachment #2
Part 36 – Separations of CostsAttachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #4
Part 69 - Access Charge Development.....Attachment #5
Part 36 – Separations of CostsAttachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

[Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a)

The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fort Mill Telephone Company (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 43.8% decrease in High Capacity rates, a 1.3% decrease in Ethernet rates, and all other rates are decreasing by 15.2%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

Hargray Telephone Company, Inc.
SAC 240523 (South Carolina)

Hargray Telephone Company, (alternatively “Hargray” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Hargray is an Issuing Carrier of the JSI Tariff. Hargray files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

Hargray is one of three wholly-owned subsidiary incumbent local exchange carriers (“ILECs”) in the Hargray Communications Group, Inc. group of companies. The others are Bluffton Telephone Company, Inc. (“Bluffton”), (SAC 240512) and ComSouth Telecommunications, Inc. (“ComSouth”), (SAC 220369). The holding company code for Hargray, Bluffton and ComSouth is 200000263. Hargray, Bluffton and ComSouth 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”).

Bluffton and ComSouth are also issuing carriers for JSI Tariff FCC No. 1 and file their own individual company rates and are filing their own, separate Description and Justifications under Transmittal No. 216.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Hargray Telephone Company (SC)

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019.

Hargray CAF-ICC data is represented in a single consolidated file, *Hargray Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hargray 2018 ROR-ILEC-ICC Data
- Hargray 2018 Tariff Rate Comp CAF
- Hargray 2018 True Up RoR ILEC
- Hargray 2018 Rate Ceiling CAF
- Hargray 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Hargray Communications 2018 Rate Ceiling CAF
- Hargray Communications True Up RoR ILEC

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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. 216 - 2018 Annual Access Filing
Hargray Telephone Company (SC)

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Hargray Telephone Company (SC)

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Hargray Telephone Company (SC)

of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a).

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Hargray Telephone Company (SC)

Freeze – The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 The Company has not elected to be subject to the provisions of
Category Section 36.3(b) which allows for assignment of costs from the Part
Relationships- 32 accounts to the separations categories/sub-categories based on
Section the percentage relationships of the categorized/sub-categorized
36.3(b) costs to their associated Part 32 accounts for the twelve month
period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 5.68% percent across the board increase from current rates. Hargray's special access rates are increasing by 5.68% due to a decrease in demand. The FCC Form 492 report filed in March 2018 for the calendar year ending 12/31/17 supports the rate increase, showing that Hargray's Special Access rate of return was only 4.29%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

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

Home Telephone ILEC, LLC dba Home Telecom, (alternatively “Home” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Home is an Issuing Carrier of the JSI Tariff. Home files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Home Telephone Company (SC)

with § 51.917 rules.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HOME TARIFF REVIEW PLANS

Home submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019.

Home CAF-ICC data is represented in a single consolidated file, *Home SC 2018 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Home 2018 ROR-ILEC-ICC Data
- Home 2018 Tariff Rate Comp CAF
- Home 2018 True Up RoR ILEC
- Home 2018 Rate Ceiling CAF
- Home 2018-19 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

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. 216 - 2018 Annual Access Filing
Home Telephone Company (SC)

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Home Telephone Company (SC)

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Home Telephone Company (SC)

pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36
Traffic
Factors
Freeze –
Section 36.3(a)

The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36
Category
Relationships-
Section
36.3(b)

The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Home Telephone Company (SC)

period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 5.35% across the board decrease from current rates.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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 individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Horry is an Issuing Carrier of the JSI Tariff. Horry files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, and the step down of Switched Access terminating End Office rates pursuant to § 51.909(h). Horry is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Horry Telephone Company (SC)

with § 51.917 rules.¹ The TY 2018 - 2019 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 2018-2019.

Horry CAF-ICC data is represented in a single consolidated file, *Horry 2018 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks

- Horry 2018 ROR-ILEC-ICC Data
- Horry 2018 Tariff Rate Comp CAF
- Horry 2018 True Up RoR ILEC
- Horry 2018 Rate Ceiling CAF
- Horry 2018-19 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan ("TRP") schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

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. 216 - 2018 Annual Access Filing
Horry Telephone Company (SC)

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #4
Part 69 - Access Charge Development.....	Attachment #5
Part 36 – Separations of Costs	Attachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Horry Telephone Company (SC)

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Horry Telephone Company (SC)

Access Service Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors Freeze – Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 Category Relationships-Section The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Horry Telephone Company (SC)

36.3(b) costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 25% decrease in Stand-Alone Broadband Network Transport ethernet rates, and all other rates are decreasing by 7.5%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, development of its interstate cost of service and, in turn, rate calculations.

**DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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 individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Lancaster is an Issuing Carrier of the JSI Tariff. Lancaster files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

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. 216.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Lancaster Telephone Company (SC)

years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, as well as the lower corporate income tax rate that went into effect on January 1, 2018. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(h).

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). No revisions are proposed to the currently effective ARC charges.

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 2018 - 2019 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 2018-2019.

Lancaster CAF-ICC data is represented in a single consolidated file, *Lancaster Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Lancaster 2018 ROR-ILEC-ICC Data
- Lancaster 2018 Tariff Rate Comp CAF
- Lancaster 2018 True Up RoR ILEC
- Lancaster 2018 Rate Ceiling CAF
- Lancaster 2018-19 Rate of Return ILEC Summary

Holding company CAF-ICC data is provided in the following TRP workbooks:

- Comporium Communications 2018 Rate Ceiling CAF
- Comporium Communications True Up RoR ILEC

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. 216 - 2018 Annual Access Filing
Lancaster Telephone Company (SC)

The TRP required of rate of return ILECs subject to section 61.38 of the Commission’s rules is also provided:

- Annual Filing ROR CAF BLS

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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Lancaster Telephone Company (SC)

Part 36 – Separations of CostsAttachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue
RequirementAttachment #4
Part 69 - Access Charge Development.....Attachment #5
Part 36 – Separations of CostsAttachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Lancaster Telephone Company (SC)

Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 The Company’s Part 36 allocations reflect use of the Company’s

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Lancaster Telephone Company (SC)

Traffic Factors Freeze – Section 36.3(a) frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until December 31, 2018.

Part 36 Category Relationships-Section 36.3(b) The Company has not elected to be subject to the provisions of Section 36.3(b) which allows for assignment of costs from the Part 32 accounts to the separations categories/sub-categories based on the percentage relationships of the categorized/sub-categorized costs to their associated Part 32 accounts for the twelve month period ending December 31, 2000.

6. SPECIAL ACCESS

The Company’s proposed Special Access rates represent a 33.8% decrease in High Capacity rates, a 1.38% decrease in Ethernet rates, and all others are decreasing by 14.4%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, the lower corporate income tax rate effective January 1, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

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

Winnebago Cooperative Telecom Association, (alternatively “Winnebago” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its individual rates proposed under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Winnebago is an Issuing Carrier of the JSI Tariff. Winnebago files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules.

1. DESCRIPTION OF FILING

The filing is made in accordance with the Commission’s April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2018. Accordingly, Special Access rates reflect a rate-of-return of 10.5%, and the step down of Switched Access terminating End Office rates pursuant to § 51.909(h). Winnebago is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

with § 51.917 rules.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WINNEBAGO TARIFF REVIEW PLANS

Winnebago submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019.

Winnebago CAF-ICC data is represented in two consolidated files, *Winnebago IA 351337 2018 RoR ILEC ICC CAF TRP* and *Winnebago MN 361337 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Winnebago IA 2018 ROR-ILEC-ICC Data
- Winnebago IA 2018 Tariff Rate Comp CAF
- Winnebago IA 2018 True Up RoR ILEC
- Winnebago IA 2018 Rate Ceiling CAF
- Winnebago IA 2018-19 Rate of Return ILEC Summary

- Winnebago MN 2018 ROR-ILEC-ICC Data
- Winnebago MN 2018 Tariff Rate Comp CAF
- Winnebago MN 2018 True Up RoR ILEC
- Winnebago MN 2018 Rate Ceiling CAF
- Winnebago MN 2018-19 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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

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. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

- 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

5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT

In addition to the summary information provided herein, the traditional cost support data associated with this filing comprising, in addition to the Tariff Review Plan (“TRP”) schedules, Attachments #1-7. The Certification of the cost support data for this filing is shown in Attachment #8 included separately.

Consistent with the requirements of Section 51.909(h), discussed above, the Company’s proposed changes to Switched Access is limited to the step down of terminating End Office rates. Therefore, the following review of cost support is limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

TYCOS Cost Support

In accordance with Section 61.38(b)(1)(ii) of the Commission’s rules and regulations, a projection of the Company’s costs has been made for a representative year based on the fiscal year ending June 30, 2019 (also referred to herein as the July 1, 2018-June 30, 2019 Test Year Cost of Service or “TYCOS” or “2019 TYCOS”). The costs for the twelve (12) month period ending June 30, 2019 have been based on financial estimates and projections, and are summarized as follows:

Summary Development of Traffic Sensitive Revenue Requirement	Attachment #1
Part 69 - Access Charge Development	Attachment #2
Part 36 – Separations of Costs	Attachment #3

PYCOS Cost Support

In accordance with Section 61.38(b)(1)(i) of the Commission’s rules and regulations, attached is a cost of service study for the most recent twelve (12) month period ending December 31, 2017, identified as follows (also referred to herein as the 2017 Prior Year Cost of Service or “PYCOS”):

Summary Development of Traffic Sensitive Revenue
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Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

RequirementAttachment #4
Part 69 - Access Charge Development.....Attachment #5
Part 36 – Separations of CostsAttachment #6

Additionally, the Company has included as Attachment #7 schedules analyzing revenue impacts of the filing.

Interstate Rate Development Process

The Company follows the Commission’s multi-step process to identify the cost of providing interstate Special Access service by an incumbent local exchange carrier (“ILEC”). First, the rules require an ILEC to record all of its expenses, investments, and revenues in accordance with accounting rules set forth in our regulations [Uniform System of Accounts, Part 32 of the FCC’s rules, 47 CFR §§ 32.1-.9000]. Second, the rules divide these costs between those associated with regulated telecommunications services and those associated with nonregulated activities [The Part 64 Cost Allocation Rules, 47 CFR §§ 64.901-.904]. Third, the rules determine the fraction of the incumbent LEC’s regulated expenses and investment that should be allocated to the interstate jurisdiction [Part 36 of the FCC’s rules, 47 CFR §§ 36.1-.641]. After the total amount of interstate cost is identified, the access charge rules translate these interstate costs into charges for the specific interstate Special Access services and rate elements. Part 69 specifies in detail the rate structure for recovering those costs [47 CFR §§ 69.1-.612]. That is, the rules tell ILECs the precise manner in which they may assess charges on interexchange carriers and end users. The Company refers to the Part 36 and Part 69 cost studies collectively as the “cost study.”

Major Elections and Interpretations Applied

In addition to following the Commission’s prescribed rules, carriers reflect various Commission orders in development of interstate access revenue requirements. Further, certain options, elections or interpretations may apply. Following is a summary of major prescriptions, elections or interpretations reflected in development of the interstate access revenue requirement and, in turn, interstate access rates for the Company.

Common Line This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company is a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

Traffic Sensitive The Company is not a member of the NECA Traffic Sensitive Pool and thus files rates for Traffic Sensitive (Switched Access), Special Access and Miscellaneous Charges as an issuing carrier for JSI Tariff FCC No. 1.

Wireline Broadband Internet Access Service The Company elected to provide Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed, common-carriage basis under Title II of the Communications Act, as Amended. 47 U.S.C § 151-161. The Company made the election pursuant to Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sep 23, 2005), (“Wireline Broadband Order”). Because WBIAS is a common-carriage service, apportionment of costs to WBIAS are based on Part 36 and Part 69. For Part 36, WBIAS plant investment is assigned to interstate. For Part 69, WBIAS plant investment is assigned to a new element in the access cost study, “WBI,” along with expenses identified as WBIAS-specific and apportioned expenses. Supporting cost study and TRP materials indicate the new category WBI.

The Company’s rate development for this filing excludes the WBIAS revenue requirement otherwise identified in the cost support. The WBIAS revenue requirement is recovered through charges to users of the WBIAS services pursuant to generally available rates, terms and conditions offered on a common-carriage basis.

Part 36 Traffic Factors Freeze – Section 36.3(a) The Company’s Part 36 allocations reflect use of the Company’s frozen traffic factors based on the 2000 separations study pursuant to Section 36.3(a) of the Commission’s rules. 47 C.F.R. § 36.3(a). The Commission adopted Section 36.3(a) in the *2001 Separations Freeze Order*. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, 16 FCC Rcd 11382, FCC 01-162 (rel. May 22, 2001). Since the original Separations Freeze Order, the Commission has adopted a series of orders extending the *Separations Freeze Order*. The FCC released the most recent of these extensions on May 15, 2017. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order, FCC 17-55 (rel. May 15, 2017), extending the separations freeze until

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)

December 31, 2018.

Part 36 The Company has not elected to be subject to the provisions of
Category Section 36.3(b) which allows for assignment of costs from the Part
Relationships- 32 accounts to the separations categories/sub-categories based on
Section the percentage relationships of the categorized/sub-categorized
36.3(b) costs to their associated Part 32 accounts for the twelve month
 period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 3% decrease to Ethernet rates, and all other rates are decreasing by 8%.

7. CONCLUSION

Based on the Description and Justification herein together with the accompanying Tariff Review Plan and Attachments 1 through 7, the Company believes the proposed rates for its 2018 Annual Access Filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has complied with all prescriptions regarding the rate of return of 10.5% effective July 3, 2018, development of its interstate cost of service and, in turn, rate calculations.

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

American Broadband Nebraska

American Broadband Nebraska, (alternatively “ABB” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 3, 2018, ABB will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel ABB for NECA Tariff F.C.C. No. 5 and ABB will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 3, 2018. The four ABB 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>
Arlington Telephone Company	200000392	NE	371517
The Blair Telephone Company	200000392	NE	371524
Eastern Nebraska Telephone Company	200000392	NE	371542
Rock County Telephone Company	200000392	NE	371586

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 3, 2018, the Company will file interstate Special Access services, including Public Packet Data Network, 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. ABB elected to have Common Line and End User rates tariffed by NECA.

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
American Broadband Nebraska

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) and Consumer Broadband-Only Loop (“CBOL”) on a detariffed basis. Pursuant to notices filed April 27, 2018, effective July 1, 2018, the Company will cease offering its DSL and Consumer Broadband-Only Loop broadband Internet transmission service as separate components of its broadband Internet access service.¹ As such, the transmission component will not be provided as a separate regulated service and will only be provided as part of the complete broadband Internet access service that the Company offers to end user customers within its Nebraska serving area. Thus, the instant filing will not include rates for WBIAS for the Company.

Filing Made in Accordance with 2018 Access Filing Order and 2018 TRP Order

The filing is made in accordance with the 2018 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335 (Released April 5, 2018). 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. See Material to be filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404 (Released April 25, 2018). Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 3, 2018. Accordingly, Special Access rates filed for ABB reflect a rate-of-return of 10.50% and the lower corporate income tax rate that went into effect on January 1, 2018.

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.

¹ See Arlington Telephone Company, The Blair Telephone Company, Eastern Nebraska Telephone Company, and Rock County Telephone Company notices filed April 27, 2018, in GN Docket No. 14-28, WC Docket No. 10-90, and CC Docket No. 01-92.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
American Broadband Nebraska

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

Arlington Telephone Company

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 20.50 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$40,954. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$ 49,348, an increase of \$8,394 or 20.50 percent.

The Blair Telephone Company

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 46.86 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$282,702. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$150,240, a reduction of \$132,462 or 46.86 percent.

Eastern Nebraska Telephone Company

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 71.92 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$180,641. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$310,561, an increase of \$129,920 or 71.92 percent.

Rock County Telephone Company

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 35.00 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$64,654. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$42,023, a reduction of \$22,631 or 35.00 percent.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
American Broadband 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(h)</p> <p>Each Rate-of-Return Carrier shall calculate its 2018 Target Composite Terminating End Office Access Rate. The 2018 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus one-third 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. 216 - 2018 Annual Access Filing
American Broadband 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 216 effective July 3, 2018</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 3, 2018 have been determined based on Section 61.39(b)(1)(i) of the Commission’s rules. See 47 CFR § 61.39(b)(1)(i).² ABB is filing blended Special Access rates for the four Nebraska study areas that comprise American Broadband Nebraska. 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).

The Company proposes ARC rates effective July 3, 2018 under Section 51.917(e) 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.³ The Test Year (TY) 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

² 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.

³ 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. 216 - 2018 Annual Access Filing
American Broadband Nebraska

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

American Broadband Nebraska submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file for each of the Nebraska study areas, comprised of the following TRP workbooks:

- Arlington Telephone Company 2018 ROR-ILEC-ICC Data
- Arlington Telephone Company 2018 Tariff Rate Comp CAF
- Arlington Telephone Company 2018 True Up
- Arlington Telephone Company 2018 Rate Ceiling CAF
- Arlington Telephone Company 2018 Rate of Return ILEC Summary

- The Blair Telephone Company 2018 ROR-ILEC-ICC Data
- The Blair Telephone Company 2018 Tariff Rate Comp CAF
- The Blair Telephone Company 2018 True Up
- The Blair Telephone Company 2018 Rate Ceiling CAF
- The Blair Telephone Company 2018 Rate of Return ILEC Summary

- Eastern Nebraska Telephone Company 2018 ROR-ILEC-ICC Data
- Eastern Nebraska Telephone Company 2018 Tariff Rate Comp CAF
- Eastern Nebraska Telephone Company 2018 True Up
- Eastern Nebraska Telephone Company 2018 Rate Ceiling CAF
- Eastern Nebraska Telephone Company 2018 Rate of Return ILEC Summary

- Rock County Telephone Company 2018 ROR-ILEC-ICC Data
- Rock County Telephone Company 2018 Tariff Rate Comp CAF
- Rock County Telephone Company 2018 True Up
- Rock County Telephone Company 2018 Rate Ceiling CAF
- Rock County Telephone Company 2018 Rate of Return ILEC Summary

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
American Broadband Nebraska

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

Arlington Telephone Company
 371517

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$40,954
102	Projected 2011-12 Pool Settlements without LSS	NECA	49,348
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (8,394)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-20.50%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	20.50%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.052945
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.064706

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$51.36
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$82.15
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$250.35
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,285.93
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$3.65
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$3.65
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$17.15
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$149.42
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$36.78
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$36.78
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$89.00
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$571.47
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$521.42
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$201.30
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000246
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001283
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003235
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.006989
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.007712

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

Band 7 / Band 7 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.043939
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$42.62
304	Voice Grade 4-Wire Entrance Facility		\$68.18
305	DS-1 Entrance Facility		\$207.77
306	DS-3 Entrance Facility		\$1,897.10
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.03
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.03
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.23
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$124.00
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.52
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.52
313	DS-1 Direct Trunk Termination		\$73.86
314	DS-3 Direct Trunk Termination		\$474.26
315	Multiplexing DS3-DS1		\$432.73
316	Multiplexing DS1-Voice		\$167.06
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001065
319	Tandem Switching		\$0.002685
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Arlington Telephone Company
371517

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
Step-Down Calculation			
402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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
405	Rate Effective Date July 2018	Line 401 + (Line 402)+(Line 404)	\$0.002133

The Blair Telephone Company
 371524

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$282,702
102	Projected 2011-12 Pool Settlements without LSS	NECA	150,240
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 132,462
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	46.86%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-46.86%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.007783
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.028538

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$16.25
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$26.01
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$79.23
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$723.42
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.15
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.15
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.42
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$47.28
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$11.63
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$11.63
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$28.17
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$180.86
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$165.01
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$63.71
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000108
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000566
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001427
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003082
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003401

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		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.014645
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$30.58
304	Voice Grade 4-Wire Entrance Facility		\$48.94
305	DS-1 Entrance Facility		\$149.09
306	DS-3 Entrance Facility		\$1,361.24
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.17
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.17
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$10.20
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$88.96
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.89
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.89
313	DS-1 Direct Trunk Termination		\$53.00
314	DS-3 Direct Trunk Termination		\$340.32
315	Multiplexing DS3-DS1		\$310.50
316	Multiplexing DS1-Voice		\$119.88
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001065
319	Tandem Switching		\$0.002685
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

The Blair Telephone Company
371524

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
Step-Down Calculation			
402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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
405	Rate Effective Date July 2018	Line 401 + (Line 402)+(Line 404)	\$0.002133

Eastern Nebraska Telephone Company
 371542

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$180,641
102	Projected 2011-12 Pool Settlements without LSS	NECA	310,561
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (129,920)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-71.92%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	71.92%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.025178
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.092322

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$82.14
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$131.47
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$400.53
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,657.12
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$5.86
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$5.86
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$27.44
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$239.06
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$58.81
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$58.81
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$230.56
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$914.24
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$834.16
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$322.04
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000351
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001831
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.004616
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.009971
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.011003

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		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.014645
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.78
304	Voice Grade 4-Wire Entrance Facility		\$76.47
305	DS-1 Entrance Facility		\$232.97
306	DS-3 Entrance Facility		\$2,127.20
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.96
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.05
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.21
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.21
313	DS-1 Direct Trunk Termination		\$134.11
314	DS-3 Direct Trunk Termination		\$531.78
315	Multiplexing DS3-DS1		\$485.20
316	Multiplexing DS1-Voice		\$187.32
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001065
319	Tandem Switching		\$0.002685
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Eastern Nebraska Telephone Company

371542

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - 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 2018	Line 401 + (Line 402)+(Line 404)	\$0.002133
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Rock County Tel. Co.
 371586

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$64,654
102	Projected 2011-12 Pool Settlements without LSS	NECA	42,023
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 22,631
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	35.00%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-35.00%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.009519
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.034903

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$53.88
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$86.21
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$262.65
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,398.15
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$3.83
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$3.83
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$18.00
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$156.75
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$38.57
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$38.57
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$93.36
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$599.52
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$546.99
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$211.19
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000285
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001477
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003725
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003770
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004160

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

Band 1 / Band 10 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.014645
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$82.89
304	Voice Grade 4-Wire Entrance Facility		\$132.64
305	DS-1 Entrance Facility		\$404.09
306	DS-3 Entrance Facility		\$3,689.64
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.90
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.90
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.69
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$241.17
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.34
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.34
313	DS-1 Direct Trunk Termination		\$143.64
314	DS-3 Direct Trunk Termination		\$922.39
315	Multiplexing DS3-DS1		\$841.57
316	Multiplexing DS1-Voice		\$324.93
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000438
318	Tandem Switched Termination		\$0.002272
319	Tandem Switching		\$0.005731
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Rock County Tel. Co.
371586

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.005000
Step-Down Calculation			
402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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
405	Rate Effective Date July 2018	Line 401 + (Line 402)+(Line 404)	\$0.002133

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Arkwest is an Issuing Carrier of the JSI Tariff. Arkwest 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Arkwest, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Arkwest Communications, Inc. (AR)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. ARKWEST TARIFF REVIEW PLANS

Arkwest submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Arkwest 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Arkwest 2018 ROR-ILEC-ICC Data
- Arkwest 2018 Tariff Rate Comp CAF
- Arkwest 2018 True Up
- Arkwest 2018 Rate Ceiling CAF
- Arkwest 2018-19 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. 216 – 2018 Annual Access Filing

Atlantic Telephone Membership Corporation
SAC 230468 (North Carolina)

Atlantic Telephone Membership Corporation, (alternatively “Atlantic TMC” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Atlantic TMC is an Issuing Carrier of the JSI Tariff. Atlantic TMC 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Atlantic TMC, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Atlantic TMC is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Atlantic Telephone Membership Corporation (NC)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. ATLANTIC TMC TARIFF REVIEW PLANS

Atlantic TMC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Atlantic 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Atlantic TMC 2018 ROR-ILEC-ICC Data
- Atlantic TMC 2018 Tariff Rate Comp CAF
- Atlantic TMC 2018 True Up
- Atlantic TMC 2018 Rate Ceiling CAF
- Atlantic TMC 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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, the Company 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.

Bixby, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Bixby Telephone Company (OK)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Bixby 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Bixby 2018 ROR-ILEC-ICC Data
- Bixby 2018 Tariff Rate Comp CAF
- Bixby 2018 True Up
- Bixby 2018 Rate Ceiling CAF
- Bixby 2018-19 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. 216 – 2018 Annual Access Filing

Blackfoot Telephone Cooperative, Inc.
SAC 482235 and 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Blackfoot is an Issuing Carrier of the JSI Tariff. Blackfoot 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Blackfoot of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Blackfoot, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Blackfoot is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (MT)

Blackfoot Study Area Code 482235

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) as shown in the supporting documentation.

Blackfoot Study Area Code 483308

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BLACKFOOT TARIFF REVIEW PLANS

Blackfoot submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in single consolidated files, *Blackfoot Telephone Cooperative, Inc. BTC 482235 2018 RoR ILEC ICC CAF TRP* and *Blackfoot Telephone Cooperative, Inc. CFT 483308 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Blackfoot BTC 482235 2018 ROR-ILEC-ICC Data
- Blackfoot BTC 482235 2018 Tariff Rate Comp CAF
- Blackfoot BTC 482235 2018 True Up
- Blackfoot BTC 482235 2018 Rate Ceiling CAF
- Blackfoot BTC 482235 2018-19 Rate of Return ILEC Summary

- Blackfoot CFT 483308 2018 ROR-ILEC-ICC Data
- Blackfoot CFT 483308 2018 Tariff Rate Comp CAF
- Blackfoot CFT 483308 2018 True Up
- Blackfoot CFT 483308 2018 Rate Ceiling CAF
- Blackfoot CFT 483308 2018-19 Rate of Return ILEC Summary

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. 216 - 2018 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. (MT)

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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Chazy & Westport is an Issuing Carrier of the JSI Tariff. Chazy & Westport 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Chazy & Westport, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Chazy & Westport Telephone Corporation (NY)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CHAZY & WESTPORT TARIFF REVIEW PLANS

Chazy & Westport submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Chazy & Westport 2018 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Chazy & Westport 2018 ROR-ILEC-ICC Data
- Chazy & Westport 2018 Tariff Rate Comp CAF
- Chazy & Westport 2018 True Up
- Chazy & Westport 2018 Rate Ceiling CAF
- Chazy & Westport 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

Chesnee is a wholly-owned subsidiary incumbent local exchange carrier (“ILEC”) of Skyline Telephone Membership Corp. (“Skyline”), SAC 230501. Skyline is also an issuing carrier for JSI Tariff FCC No. 1 and files its own individual company rates and is filing its own separate Description and Justification under Transmittal No. 216.

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.

Chesnee, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Chesnee Telephone Company, Inc. d/b/a Chesnee Communications (SC)

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Chesnee 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chesnee 2018 ROR-ILEC-ICC Data
- Chesnee 2018 Tariff Rate Comp CAF
- Chesnee 2018 True Up
- Chesnee 2018 Rate Ceiling CAF
- Chesnee 2018-19 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. 216 - 2018 Annual Access Filing
Chesnee Telephone Company, Inc. d/b/a Chesnee Communications (SC)

- 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). ComSouth is an Issuing Carrier of the JSI Tariff. ComSouth 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

ComSouth is one of three wholly-owned subsidiary incumbent local exchange carriers (“ILECs”) in the Hargray Communications Group, Inc. group of companies. The others are Bluffton Telephone Company, Inc. (“Bluffton”), (SAC 240512), and Hargray Telephone Company, Inc. (“Hargray”), (SAC 240523). The holding company code for ComSouth, Bluffton, and Hargray is 200000263. ComSouth, 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”).

Bluffton and Hargray are also issuing carriers for JSI Tariff FCC No. 1 and file their own individual company rates and are filing their own, separate Description and Justifications under Transmittal No. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by ComSouth of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

ComSouth, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
ComSouth Telecommunications, Inc. (GA)

return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMSOUTH TARIFF REVIEW PLANS

ComSouth submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *ComSouth 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- ComSouth 2018 ROR-ILEC-ICC Data
- ComSouth 2018 Tariff Rate Comp CAF
- ComSouth 2018 True Up
- ComSouth 2018 Rate Ceiling CAF
- ComSouth 2018-19 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. 216 - 2018 Annual Access Filing
ComSouth Telecommunications, Inc. (GA)

- 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. 216 – 2018 Annual Access Filing

Consolidated Telecom, Inc.
SAC 371562 (Nebraska)

Consolidated Telecom, Inc., (alternatively “Consolidated” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Consolidated is an Issuing Carrier of the JSI Tariff. Consolidated 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Consolidated of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Consolidated, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Consolidated Telecom, Inc. (NE)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CONSOLIDATED TARIFF REVIEW PLANS

Consolidated submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019:

- 371562 Consolidated Telcom 2018 ROR-ILEC-ICC Data
- 371562 Consolidated Telcom 2018 Tariff Rate Comp CAF
- 371562 Consolidated Telcom 2018 True Up
- Consolidated Companies 2018 Rate Ceiling CAF*
- Consolidated Companies 2018-19 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

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. 216 – 2018 Annual Access Filing

Consolidated Telephone Company
SAC 371532 (Nebraska)

Consolidated Telephone Company, (alternatively “Consolidated” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Consolidated is an Issuing Carrier of the JSI Tariff. Consolidated 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Consolidated of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Consolidated, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Consolidated Telephone Company (NE)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CONSOLIDATED TARIFF REVIEW PLANS

Consolidated submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019:

- 371521 Consolidated Telephone 2018 ROR-ILEC-ICC Data
- 371521 Consolidated Telephone 2018 Tariff Rate Comp CAF
- 371521 Consolidated Telephone 2018 True Up
- Consolidated Companies 2018 Rate Ceiling CAF*
- Consolidated Companies 2018-19 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

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. 216 – 2018 Annual Access Filing

Cross Tel. Co.
SAC 431985 (Oklahoma)

Cross Tel. Co., (alternatively “Cross” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Cross is an Issuing Carrier of the JSI Tariff. Cross 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Cross of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Cross, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Cross Tel. Co. (OK)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CROSS TARIFF REVIEW PLANS

Cross submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Cross Telephone Company, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Cross 2018 ROR-ILEC-ICC Data
- Cross 2018 Tariff Rate Comp CAF
- Cross 2018 True Up
- Cross 2018 Rate Ceiling CAF
- Cross 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Curtis is an Issuing Carrier of the JSI Tariff. Curtis 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Curtis of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Curtis, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Curtis Telephone Company (NE)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CURTIS TARIFF REVIEW PLANS

Curtis submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019:

- Curtis 2018 ROR-ILEC-ICC Data
- Curtis 2018 Tariff Rate Comp CAF
- Curtis 2018 True Up
- Consolidated Companies 2018 Rate Ceiling CAF*
- Consolidated Companies 2018-19 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

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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Eastex is an Issuing Carrier of the JSI Tariff. Eastex 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Eastex, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Eastex is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Eastex Telephone Cooperative, Inc. (TX)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. EASTEX TARIFF REVIEW PLANS

Eastex submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Eastex 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Eastex 2018 ROR-ILEC-ICC Data
- Eastex 2018 Tariff Rate Comp CAF
- Eastex 2018 True Up
- Eastex 2018 Rate Ceiling CAF
- Eastex 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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, the Company 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.

Ellijay, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Ellijay Telephone Company (GA)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Ellijay Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ellijay 2018 ROR-ILEC-ICC Data
- Ellijay 2018 Tariff Rate Comp CAF
- Ellijay 2018 True Up
- Ellijay 2018 Rate Ceiling CAF
- Ellijay 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Etex of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Etex, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Etex is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Etex Telephone Cooperative, Inc. (TX)

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Etex 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Etex 2018 ROR-ILEC-ICC Data
- Etex 2018 Tariff Rate Comp CAF
- Etex 2018 True Up
- Etex 2018 Rate Ceiling CAF
- Etex 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Bruce is an Issuing Carrier of the JSI Tariff. Bruce 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Bruce of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, the Company accepted Alternative Connect America Model

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Bruce Telephone Company, Inc. (MS)

support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Bruce, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BRUCE TARIFF REVIEW PLANS

Bruce submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Bruce Telephone Company, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Bruce 2018 ROR-ILEC-ICC Data
- Bruce 2018 Tariff Rate Comp CAF
- Bruce 2018 True Up

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. 216 - 2018 Annual Access Filing
Bruce Telephone Company, Inc. (MS)

- Bruce 2018 Rate Ceiling CAF
- Bruce 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Chickamauga is an Issuing Carrier of the JSI Tariff. Chickamauga 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Chickamauga Telephone Corporation (GA)

Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company's Common Line rates are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Chickamauga, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. CHICKAMAUGA TARIFF REVIEW PLANS

Chickamauga submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Chickamauga Telephone Corporation 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chickamauga 2018 ROR-ILEC-ICC Data
- Chickamauga 2018 Tariff Rate Comp CAF
- Chickamauga 2018 True Up

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. 216 - 2018 Annual Access Filing
Chickamauga Telephone Corporation (GA)

- Chickamauga 2018 Rate Ceiling CAF
- Chickamauga 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fulton is an Issuing Carrier of the JSI Tariff. Fulton 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Fulton Telephone Company, Inc. (MS)

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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Fulton, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. FULTON TARIFF REVIEW PLANS

Fulton submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Fulton Telephone Company, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Fulton 2018 ROR-ILEC-ICC Data
- Fulton 2018 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. 216 - 2018 Annual Access Filing
Fulton Telephone Company, Inc. (MS)

- Fulton 2018 True Up
- Fulton 2018 Rate Ceiling CAF
- Fulton 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mound Bayou is an Issuing Carrier of the JSI Tariff. Mound Bayou 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (MS)

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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Mound Bayou, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MOUND BAYOU TARIFF REVIEW PLANS

Mound Bayou submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Mound Bayou Telephone & Communications, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mound Bayou 2018 ROR-ILEC-ICC Data
- Mound Bayou 2018 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. 216 - 2018 Annual Access Filing
Mound Bayou Telephone & Communications, Inc. (MS)

- Mound Bayou 2018 True Up
- Mound Bayou 2018 Rate Ceiling CAF
- Mound Bayou 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

Fremont Telcom Co.
SAC 472222 (Idaho)

Fremont Telcom Co., (alternatively “Fremont” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fremont is an Issuing Carrier of the JSI Tariff. Fremont 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Fremont of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Fremont, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Fremont Telecom Co. (ID)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. FREMONT TARIFF REVIEW PLANS

Fremont submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Fremont Telecom Co 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Fremont 2018 ROR-ILEC-ICC Data
- Fremont 2018 Tariff Rate Comp CAF
- Fremont 2018 True Up
- Fremont 2018 Rate Ceiling CAF
- Fremont 2018-19 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. 216 – 2018 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 “Gearheart” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Gearheart is an Issuing Carrier of the JSI Tariff. Gearheart 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Gearheart, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Gearheart Communications Company Inc. (KY)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. GEARHEART TARIFF REVIEW PLANS

Gearheart submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Gearheart dba Coalfields 2018 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Gearheart 2018 ROR-ILEC-ICC Data
- Gearheart 2018 Tariff Rate Comp CAF
- Gearheart 2018 True Up
- Gearheart 2018 Rate Ceiling CAF
- Gearheart 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Grand River is an Issuing Carrier of the JSI Tariff. Grand 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

With respect to Common Line, 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, and elected to have Common Line and End User rates tariffed by NECA.

Grand River, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Grand River Communications, Inc. (IA) (MO)

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. GRAND RIVER TARIFF REVIEW PLANS

Grand River submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in single consolidated files, *Grand River Mutual Telephone Company IA 351888 2018 RoR ILEC ICC CAF TRP* and *Grand River Mutual Telephone Company MO 421888 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Grand River IA 2018 ROR-ILEC-ICC Data
- Grand River IA 2018 Tariff Rate Comp CAF
- Grand River IA 2018 True Up
- Grand River IA 2018 Rate Ceiling CAF
- Grand River IA 2018-19 Rate of Return ILEC Summary

- Grand River MO 2018 ROR-ILEC-ICC Data
- Grand River MO 2018 Tariff Rate Comp CAF
- Grand River MO 2018 True Up
- Grand River MO 2018 Rate Ceiling CAF
- Grand River MO 2018-19 Rate of Return ILEC Summary

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. 216 - 2018 Annual Access Filing
Grand River Communications, Inc. (IA) (MO)

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. 216 – 2018 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 “Hancock” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Hancock is an Issuing Carrier of the JSI Tariff. Hancock 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Hancock, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Hancock Rural Telephone Corporation d/b/a NineStar Connect (IN)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HANCOCK TARIFF REVIEW PLANS

Hancock submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Hancock RTC dba NineStar Connect 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hancock 2018 ROR-ILEC-ICC Data
- Hancock 2018 Tariff Rate Comp CAF
- Hancock 2018 True Up
- Hancock 2018 Rate Ceiling CAF
- Hancock 2018-19 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. 216 – 2018 Annual Access Filing

Highland Telephone Cooperative
SAC 190237 (VA)

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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Highland is an Issuing Carrier of the JSI Tariff. Highland Telephone Cooperative 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Highland of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Highland Telephone Cooperative, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Highland is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Highland Telephone Cooperative (VA)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HIGHLAND TARIFF REVIEW PLANS

Highland Telephone Cooperative submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Highland 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Highland 2018 ROR-ILEC-ICC Data
- Highland 2018 Tariff Rate Comp CAF
- Highland 2018 True Up
- Highland 2018 Rate Ceiling CAF
- Highland 2018-19 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. 216 – 2018 Annual Access Filing

Industry Telephone Company
SAC 442093 (TX)

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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Industry is an Issuing Carrier of the JSI Tariff. Industry 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Industry of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Industry, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Industry Telephone Company (TX)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. INDUSTRY TARIFF REVIEW PLANS

Industry submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Industry 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Industry 2018 ROR-ILEC-ICC Data
- Industry 2018 Tariff Rate Comp CAF
- Industry 2018 True Up
- Industry 2018 Rate Ceiling CAF
- Industry 2018-19 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. 216 – 2018 Annual Access Filing

Knology of the Valley, Inc.
SAC 220371 (Georgia)

Knology of the Valley, Inc., (alternatively “Knology” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Knology is an Issuing Carrier of the JSI Tariff. Knology 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1, 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. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Knology of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Knology is not a member of the National Exchange Carrier Association (NECA) Common Line Pool and therefore bills common line charges and related FUSC charges pursuant to JSI Tariff FCC No. 1.

Knology, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Knology of the Valley, Inc. (GA)

include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. KNOLOGY TARIFF REVIEW PLANS

Knology submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Knology of the Valley 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology 2018 ROR-ILEC-ICC Data
- Knology 2018 Tariff Rate Comp CAF
- Knology 2018 True Up
- Knology 2018 Rate Ceiling CAF
- Knology 2018-19 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. 216 - 2018 Annual Access Filing
Knology of the Valley, Inc. (GA)

- 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Knology Total is an Issuing Carrier of the JSI Tariff. Knology Total 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1, 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. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Knology Total of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Knology Total is not a member of the National Exchange Carrier Association (NECA) Common Line Pool and therefore bills common line charges and related FUSC charges pursuant to JSI Tariff FCC No. 1.

Knology Total, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Knology Total Communications, Inc. (AL)

year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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). The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. KNOLOGY TOTAL TARIFF REVIEW PLANS

Knology Total submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Knology Total 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology Total 2018 ROR-ILEC-ICC Data
- Knology Total 2018 Tariff Rate Comp CAF
- Knology Total 2018 True Up
- Knology Total 2018 Rate Ceiling CAF
- Knology Total 2018-19 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. 216 - 2018 Annual Access Filing
Knology Total Communications, Inc. (AL)

- 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. 216 – 2018 Annual Access Filing

Valley Telephone Co., LLC
SAC 220324 (Georgia)

Valley Telephone Co., LLC, (alternatively “Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Valley is an Issuing Carrier of the JSI Tariff. 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the WOW! incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1, 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. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Valley of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Valley is not a member of the National Exchange Carrier Association (NECA) Common Line Pool and therefore bills common line charges and related FUSC charges pursuant to JSI Tariff FCC No. 1.

Valley, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Valley Telephone Co., LLC (GA)

include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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). No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. VALLEY TARIFF REVIEW PLANS

Valley submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Valley Telephone 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Valley 2018 ROR-ILEC-ICC Data
- Valley 2018 Tariff Rate Comp CAF
- Valley 2018 True Up
- Valley 2018 Rate Ceiling CAF
- Valley 2018-19 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. 216 - 2018 Annual Access Filing
Valley Telephone Co., LLC (GA)

- 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Livingston, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Livingston Telephone Company (TX)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Livingston 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Livingston 2018 ROR-ILEC-ICC Data
- Livingston 2018 Tariff Rate Comp CAF
- Livingston 2018 True Up
- Livingston 2018 Rate Ceiling CAF
- Livingston 2018-19 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. 216 – 2018 Annual Access Filing

Lumos Telephone of Botetourt, Inc.
SAC 190249 (Virginia)

Lumos Telephone of Botetourt, Inc., (alternatively “Lumos” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Lumos is an Issuing Carrier of the JSI Tariff. Lumos 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Lumos a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Lumos Telephone of Botetourt, Inc. (VA)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. LUMOS TARIFF REVIEW PLANS

Lumos submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *R&B Telephone of Botetourt (Lumos) 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Lumos 2018 ROR-ILEC-ICC Data
- Lumos 2018 Tariff Rate Comp CAF
- Lumos 2018 True Up
- Lumos 2018 Rate Ceiling CAF
- Lumos 2018-19 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. 216 – 2018 Annual Access Filing

Mark Twain Rural Telephone Company
SAC 421914 (MO)

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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mark Twain is an Issuing Carrier of the JSI Tariff. Mark Twain 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mark Twain of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Mark Twain, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Mark Twain Rural Telephone Company (MO)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MARK TWAIN TARIFF REVIEW PLANS

Mark Twain submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single combined file, *Mark Twain 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mark Twain 2018 ROR-ILEC-ICC Data
- Mark Twain 2018 Tariff Rate Comp CAF
- Mark Twain 2018 True Up
- Mark Twain 2018 Rate Ceiling CAF
- Mark Twain 2018-19 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. 216 – 2018 Annual Access Filing

Mid-Plains Rural Tel. Coop., Inc.
SAC 442112 (TX)

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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mid-Plains is an Issuing Carrier of the JSI Tariff. Mid-Plains 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mid-Plains of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Mid-Plans Rural Tel. Coop., Inc., a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Mid-Plains is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Mid-Plains Rural Tel. Coop., Inc. (TX)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MID-PLAINS TARIFF REVIEW PLANS

Mid-Plains submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Mid-Plains Rural Telephone Coop. Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mid-Plains 2018 ROR-ILEC-ICC Data
- Mid-Plains 2018 Tariff Rate Comp CAF
- Mid-Plains 2018 True Up
- Mid-Plains 2018 Rate Ceiling CAF
- Mid-Plains 2018-19 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. 216 – 2018 Annual Access Filing

Millington Telephone Company d/b/a Ritter Communications
SAC 290571 (Tennessee)

Millington Telephone Company 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

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. 216 - 2018 Annual Access Filing
Millington Telephone Company 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.

Millington, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Millington Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Millington 2018 ROR-ILEC-ICC Data
- Millington 2018 Tariff Rate Comp CAF
- Millington 2018 True Up

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. 216 - 2018 Annual Access Filing
Millington Telephone Company d/b/a Ritter Communications (TN)

- Millington 2018 Rate Ceiling CAF
- Millington 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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, 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.

Moundridge, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019.

- Moundridge 2018 ROR-ILEC-ICC Data
- Moundridge 2018 Tariff Rate Comp CAF
- Moundridge 2018 True Up
- Moundridge 2018 Rate Ceiling CAF
- Moundridge 2018-19 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. 216 – 2018 Annual Access Filing

Mt. Horeb Telephone Company
SAC 330916 (Wisconsin)

Mt. Horeb Telephone Company, (alternatively “Mt. Horeb” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mt. Horeb of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Mt. Horeb, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Mt. Horeb Telephone Company (WI)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Mt. Horeb 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mt. Horeb 2018 ROR-ILEC-ICC Data
- Mt. Horeb 2018 Tariff Rate Comp CAF
- Mt. Horeb 2018 True Up
- Mt. Horeb 2018 Rate Ceiling CAF
- Mt. Horeb 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Otelco Mid-Missouri is an Issuing Carrier of the JSI Tariff. Otelco Mid-Missouri 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Otelco Mid-Missouri LLC (MO)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Otelco Mid-Missouri of interstate 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.

Otelco Mid-Missouri, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. OTELCO MID-MISSOURI TARIFF REVIEW PLANS

Otelco Mid-Missouri submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Otelco Mid-Missouri LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Otelco Mid-Missouri LLC (MO)

- Otelco Mid-Missouri 2018 ROR-ILEC-ICC Data
- Otelco Mid-Missouri 2018 Tariff Rate Comp CAF
- Otelco Mid-Missouri 2018 True Up
- Otelco Mid-Missouri 2018 Rate Ceiling CAF
- Otelco Mid-Missouri 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Blountsville is an Issuing Carrier of the JSI Tariff. Blountsville 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Blountsville Telephone LLC (AL)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Blountsville of interstate 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.

Blountsville, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BLOUNTSVILLE TARIFF REVIEW PLANS

Blountsville submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Blountsville Telephone LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Blountsville Telephone LLC (AL)

- Blountsville 2018 ROR-ILEC-ICC Data
- Blountsville 2018 Tariff Rate Comp CAF
- Blountsville 2018 True Up
- Blountsville 2018 Rate Ceiling CAF
- Blountsville 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

Brindlee Mountain Telephone LLC
SAC 250283 (Alabama)

Brindlee Mountain Telephone LLC, (alternatively “Brindlee Mountain” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Brindlee Mountain is an Issuing Carrier of the JSI Tariff. Brindlee Mountain 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Brindlee Mountain Telephone LLC (AL)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Brindlee Mountain of interstate 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.

Brindlee Mountain, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. BRINDLEE MOUNTAIN TARIFF REVIEW PLANS

Brindlee Mountain submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Brindlee Mountain 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Brindlee Mountain Telephone LLC (AL)

- Brindlee Mountain 2018 ROR-ILEC-ICC Data
- Brindlee Mountain 2018 Tariff Rate Comp CAF
- Brindlee Mountain 2018 True Up
- Brindlee Mountain 2018 Rate Ceiling CAF
- Brindlee Mountain 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Granby is an Issuing Carrier of the JSI Tariff. Granby 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Granby Telephone LLC (MA)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Granby of interstate 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.

Granby, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. GRANBY TELEPHONE TARIFF REVIEW PLANS

Granby submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Granby Telephone LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Granby Telephone LLC (MA)

- Granby 2018 ROR-ILEC-ICC Data
- Granby 2018 Tariff Rate Comp CAF
- Granby 2018 True Up
- Granby 2018 Rate Ceiling CAF
- Granby 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Hopper is an Issuing Carrier of the JSI Tariff. Hopper 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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-Alabama 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Hopper Telecommunications LLC (AL)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Hopper of interstate 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.

Hopper, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HOPPER TARIFF REVIEW PLANS

Hopper submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Hopper Telephone LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Hopper Telecommunications LLC (AL)

- Hopper 2018 ROR-ILEC-ICC Data
- Hopper 2018 Tariff Rate Comp CAF
- Hopper 2018 True Up
- Hopper 2018 Rate Ceiling CAF
- Hopper 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mid-Maine is an Issuing Carrier of the JSI Tariff. Mid-Maine 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Mid-Maine Telecom LLC (ME)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Mid-Maine of interstate 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.

Mid-Maine, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018. Mid-Maine qualified for a lower than standard corporate income tax rate under the new tax rate that went into effect on January 1, 2018, resulting in special access rate increases.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MID-MAINE TARIFF REVIEW PLANS

Mid-Maine submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All

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. 216 - 2018 Annual Access Filing
Mid-Maine Telecom LLC (ME)

CAF-ICC data is represented in a single consolidated file, *Mid-Maine Telecom LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mid-Maine 2018 ROR-ILEC-ICC Data
- Mid-Maine 2018 Tariff Rate Comp CAF
- Mid-Maine 2018 True Up
- Mid-Maine 2018 Rate Ceiling CAF
- Mid-Maine 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 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 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.

Otelco Telephone, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Otelco Telephone LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Otelco Telephone LLC (AL)

- Otelco Telephone 2018 ROR-ILEC-ICC Data
- Otelco Telephone 2018 Tariff Rate Comp CAF
- Otelco Telephone 2018 True Up
- Otelco Telephone 2018 Rate Ceiling CAF
- Otelco Telephone 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Pine Tree is an Issuing Carrier of the JSI Tariff. Pine Tree 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Pine Tree Telephone LLC (ME)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Pine Tree of interstate 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.

Pine Tree, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. PINE TREE TARIFF REVIEW PLANS

Pine Tree submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Pine Tree 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Pine Tree Telephone LLC (ME)

- Pine Tree 2018 ROR-ILEC-ICC Data
- Pine Tree 2018 Tariff Rate Comp CAF
- Pine Tree 2018 True Up
- Pine Tree 2018 Rate Ceiling CAF
- Pine Tree 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 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 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.

Saco River, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Saco River 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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. 216 - 2018 Annual Access Filing
Saco River Telephone LLC (ME)

- Saco River 2018 ROR-ILEC-ICC Data
- Saco River 2018 Tariff Rate Comp CAF
- Saco River 2018 True Up
- Saco River 2018 Rate Ceiling CAF
- Saco River 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Shoreham is an Issuing Carrier of the JSI Tariff. Shoreham 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Shoreham Telephone LLC (VT)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Shoreham of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Shoreham 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. Shoreham, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SHOREHAM TARIFF REVIEW PLANS

Shoreham submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Shoreham Telephone LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Shoreham 2018 ROR-ILEC-ICC Data
- Shoreham 2018 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. 216 - 2018 Annual Access Filing
Shoreham Telephone LLC (VT)

- Shoreham 2018 True Up
- Shoreham 2018 Rate Ceiling CAF
- Shoreham 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

War Telephone LLC
SAC 200258 (West Virginia)

War Telephone LLC, (alternatively “War Telephone” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). War Telephone is an Issuing Carrier of the JSI Tariff. War 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

The following Table comprises the Otelco, Inc. incumbent local exchange carrier companies (“ILECs”) that are issuing carriers for JSI Tariff FCC No. 1 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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
War Telephone LLC (WV)

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by War Telephone of interstate 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.

War Telephone, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

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).

No revisions are proposed to currently effective residential, single-line business or multi-line business Access Recovery Charges. An additional calling plan, the Comm Plus Plan, has been added at \$0.00 residential 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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WAR TELEPHONE TARIFF REVIEW PLANS

War Telephone submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All

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. 216 - 2018 Annual Access Filing
War Telephone LLC (WV)

CAF-ICC data is represented in a single consolidated file, *War 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- War Telephone 2018 ROR-ILEC-ICC Data
- War Telephone 2018 Tariff Rate Comp CAF
- War Telephone 2018 True Up
- War Telephone 2018 Rate Ceiling CAF
- War Telephone 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Piedmont, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Piedmont is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Piedmont Rural Telephone Cooperative, Inc. (SC)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Piedmont Rural Telephone Cooperative, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Piedmont 2018 ROR-ILEC-ICC Data
- Piedmont 2018 Tariff Rate Comp CAF
- Piedmont 2018 True Up
- Piedmont 2018 Rate Ceiling CAF
- Piedmont 2018-19 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. 216 – 2018 Annual Access Filing

Pine Telephone Company
SAC 432017 (Oklahoma)

Pine Telephone Company (alternatively “Pine” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Pine, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Pine Telephone Company (OK)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019.

- Pine 2018 ROR-ILEC-ICC Data
- Pine 2018 Tariff Rate Comp CAF
- Pine 2018 True Up
- Pine 2018 Rate Ceiling CAF
- Pine 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Pineland is an Issuing Carrier of the JSI Tariff. Pineland 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Pineland of interstate 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 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.

Pineland, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Pineland is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Pineland Telephone Cooperative, Inc. (GA)

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. PINELAND TARIFF REVIEW PLANS

Pineland submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Pineland Telephone Cooperative, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Pineland 2018 ROR-ILEC-ICC Data
- Pineland 2018 Tariff Rate Comp CAF
- Pineland 2018 True Up
- Pineland 2018 Rate Ceiling CAF
- Pineland 2018-19 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. 216 - 2018 Annual Access Filing
Pineland Telephone Cooperative, Inc. (GA)

- 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. 216 – 2018 Annual Access Filing

The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications
d/b/a Pioneer Communications
SAC 411817 (Kansas)

The 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Pioneer, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications (KS)

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019.

- Pioneer 2018 ROR-ILEC-ICC Data
- Pioneer 2018 Tariff Rate Comp CAF
- Pioneer 2018 True Up
- Pioneer 2018 Rate Ceiling CAF
- Pioneer 2018-19 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. 216 – 2018 Annual Access Filing

Heartland Telecommunications Company of Iowa
d/b/a Premier Communications
SAC 351096 (Iowa)

Heartland Telecommunications Company of Iowa (alternatively “Heartland” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

Description and Justification

JSI Transmittal No. 216 - 2018 Annual Access Filing

Heartland Telecommunications Company of Iowa d/b/a Premier Communications (IA)

JSI Tariff F.C.C. No. 1 governs the provision by Heartland of interstate 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.

Heartland a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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), Heartland proposes an ARC effective July 3, 2018 at the rate of \$0.37 per month for each line, other than lines of Lifeline Customers, assessed a primary residential end user common line charge. No revision is proposed to the currently effective Single Line Business ARC or the Multiline Business 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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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.

3. HEARTLAND TARIFF REVIEW PLANS

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. 216 - 2018 Annual Access Filing

Heartland Telecommunications Company of Iowa d/b/a Premier Communications (IA)

Heartland submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Heartland 2018 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Heartland 2018 ROR-ILEC-ICC Data
- Heartland 2018 Tariff Rate Comp CAF
- Heartland 2018 True Up
- Heartland 2018 Rate Ceiling CAF
- Heartland 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mutual is an Issuing Carrier of the JSI Tariff. Mutual 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Mutual Telephone Company (IA)

1. DESCRIPTION OF FILING

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

Mutual a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. MUTUAL TARIFF REVIEW PLANS

Mutual submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Mutual Telephone*

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. 216 - 2018 Annual Access Filing
Mutual Telephone Company (IA)

Company 2018 RoR ILEC ICC CAF TRP, comprised of the following TRP workbooks:

- Mutual 2018 ROR-ILEC-ICC Data
- Mutual 2018 Tariff Rate Comp CAF
- Mutual 2018 True Up
- Mutual 2018 Rate Ceiling CAF
- Mutual 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Northern Iowa is an Issuing Carrier of the JSI Tariff. Northern Iowa 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Northern Iowa of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Northern Iowa is a member of the National Exchange

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Northern Iowa Telephone Company (IA)

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.

Northern Iowa a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

In addition, the Tandem Switching rate reduction found on Page 17-4453 reflects a correction to the 2017 Annual Access Filing Section 51.909 calculation of depooling adjustment factor from \$0.071731 to \$0.007173.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. NORTHERN IOWA TARIFF REVIEW PLANS

Northern Iowa submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Northern Iowa Telephone Co. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Northern Iowa 2018 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. 216 - 2018 Annual Access Filing
Northern Iowa Telephone Company (IA)

- Northern Iowa 2018 Tariff Rate Comp CAF
- Northern Iowa 2018 True Up
- Northern Iowa 2018 Rate Ceiling CAF
- Northern Iowa 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Webb-Dickens is an Issuing Carrier of the JSI Tariff. Webb-Dickens 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

1. DESCRIPTION OF FILING

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Webb-Dickens Telephone Corporation (IA)

services. With respect to Common Line, Webb-Dickens 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.

Webb-Dickens a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WEBB-DICKENS TARIFF REVIEW PLANS

Webb-Dickens submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Webb Dickens 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Webb-Dickens 2018 ROR-ILEC-ICC Data
- Webb-Dickens 2018 Tariff Rate Comp CAF
- Webb-Dickens 2018 True Up

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. 216 - 2018 Annual Access Filing
Webb-Dickens Telephone Corporation (IA)

- Webb-Dickens 2018 Rate Ceiling CAF
- Webb-Dickens 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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, the Company 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.

Ringgold, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Ringgold Telephone Company (GA)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Ringgold Telephone Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ringgold 2018 ROR-ILEC-ICC Data
- Ringgold 2018 Tariff Rate Comp CAF
- Ringgold 2018 True Up
- Ringgold 2018 Rate Ceiling CAF
- Ringgold 2018-19 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. 216 – 2018 Annual Access Filing

Skyline Telephone Membership Corp.
SAC 230501 (North Carolina)

Skyline Telephone Membership Corp., (alternatively “Skyline TMC” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Skyline TMC is an Issuing Carrier of the JSI Tariff. Skyline TMC 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

Skyline wholly owns incumbent local exchange carrier (“ILEC”) Chesnee Telephone Company (“Chesnee”), SAC 240515. Chesnee is also an issuing carrier for JSI Tariff FCC No. 1 and files its own individual company rates and is filing its own separate Description and Justification under Transmittal No. 216.

1. DESCRIPTION OF FILING

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

Skyline TMC, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Skyline TMC is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Skyline Telephone Membership Corp. (NC)

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SKYLINE TMC TARIFF REVIEW PLANS

Skyline TMC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Skyline NC 2018 MA Combined*, comprised of the following TRP workbooks:

- Skyline TMC 2018 ROR-ILEC-ICC Data
- Skyline TMC 2018 Tariff Rate Comp CAF
- Skyline TMC 2018 True Up
- Skyline TMC 2018 Rate Ceiling CAF
- Skyline TMC 2018-19 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. 216 - 2018 Annual Access Filing
Skyline Telephone Membership Corp. (NC)

- 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Smart City of interstate 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 are tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Smart City, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Smart City Telecommunications LLC d/b/a Smart City Telecom (FL)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Smart City Telecom, LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Smart City 2018 ROR-ILEC-ICC Data
- Smart City 2018 Tariff Rate Comp CAF
- Smart City 2018 True Up
- Smart City 2018 Rate Ceiling CAF
- Smart City 2018-19 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. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Smithville is an Issuing Carrier of the JSI Tariff. Smithville 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Smithville a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Smithville Telephone Company, Inc. (MS)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SMITHVILLE TARIFF REVIEW PLANS

Smithville submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Smithville Telephone Company Inc. 2018 RoR ILEC ICC CAF TRP* comprised of the following TRP workbooks

- Smithville 2018 ROR-ILEC-ICC Data
- Smithville 2018 Tariff Rate Comp CAF
- Smithville 2018 True Up
- Smithville 2018 Rate Ceiling CAF
- Smithville 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

South Central, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. South Central is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
South Central Rural Telephone Cooperative (KY)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *South Central 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- South Central 2018 ROR-ILEC-ICC Data
- South Central 2018 Tariff Rate Comp CAF
- South Central 2018 True Up
- South Central 2018 Rate Ceiling CAF
- South Central 2018-19 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. 216 – 2018 Annual Access Filing

Star Telephone Membership Corp.
SAC 230502 (North Carolina)

Star Telephone Membership Corp., (alternatively “Star TMC” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Star TMC is an Issuing Carrier of the JSI Tariff. Star TMC 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Star TMC, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Star TMC is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Star Telephone Membership Corp. (NC)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. STAR TMC TARIFF REVIEW PLANS

Star TMC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Star 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Star TMC 2018 ROR-ILEC-ICC Data
- Star TMC 2018 Tariff Rate Comp CAF
- Star TMC 2018 True Up
- Star TMC 2018 Rate Ceiling CAF
- Star TMC 2018-19 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. 216 – 2018 Annual Access Filing

Taylor Telephone Cooperative, Inc.
SAC 442151 (Texas)

Taylor Telephone Cooperative, Inc., (alternatively “Taylor” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 3, 2018, Taylor will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Taylor as an issuing carrier for NECA Tariff F.C.C. No. 5 and Taylor will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 3, 2018.

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 3, 2018, the Company will file interstate Special Access services, including Public Packet Data Network, 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.

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 will be tariffed by JSI effective July 3, 2018, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

The regulations and rate structures applicable to Taylor 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 3, 2018, 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 2018 Access Filing Order and 2018 TRP Order

The filing is made in accordance with the 2018 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Taylor Telephone Cooperative, Inc. (Texas)

Division (WCB-PPD). See July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335 (Released April 5, 2018). 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. See Material to be filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404 (Released April 25, 2018). Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 3, 2018. Accordingly, Special Access rates filed for Taylor reflect a rate-of-return of 10.50%. Taylor is a tax-exempt organization; the Company's rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

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.

Taylor 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 63.73 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$111,581. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$40,465, a reduction of \$71,116 or 63.73 percent.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Taylor 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(h)</p> <p>Each Rate-of-Return Carrier shall calculate its 2018 Target Composite Terminating End Office Access Rate. The 2018 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus one-third 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. 216 - 2018 Annual Access Filing
Taylor Telephone Cooperative, Inc. (Texas)

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 216 effective July 3, 2018</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 3, 2018 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 3, 2018 at the rate of \$1.87 per month for each residential line, other than lines of Lifeline Customers, and \$1.87 for each single-line business line, assessed a primary residential or single-line business end user common line charge, \$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. 216 - 2018 Annual Access Filing
Taylor Telephone Cooperative, Inc. (Texas)

with § 51.917 rules.² The Test Year (TY) 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Taylor Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Taylor Telephone Cooperative, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Taylor 2018 ROR-ILEC-ICC Data
- Taylor 2018 Tariff Rate Comp CAF
- Taylor 2018 True Up
- Taylor 2018 Rate Ceiling CAF
- Taylor 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).

Taylor Telephone Cooperative, Inc.
 442151

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$111,581
102	Projected 2011-12 Pool Settlements without LSS	NECA	40,465
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 71,116
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	63.73%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-63.73%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.005311
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.019474

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.33
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$27.73
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$84.49
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$771.43
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)	\$5.79
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$50.43
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.41
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.41
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$30.03
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$192.85
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$175.96
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$67.93
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)	\$0.000974
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002103
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.002321

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		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.014645
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.78
304	Voice Grade 4-Wire Entrance Facility		\$76.47
305	DS-1 Entrance Facility		\$232.97
306	DS-3 Entrance Facility		\$2,127.20
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.96
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.05
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.21
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.21
313	DS-1 Direct Trunk Termination		\$82.82
314	DS-3 Direct Trunk Termination		\$531.78
315	Multiplexing DS3-DS1		\$485.20
316	Multiplexing DS1-Voice		\$187.32
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001065
319	Tandem Switching		\$0.002685
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Taylor Telephone Cooperative, Inc.

442151

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation for Terminating Local Switching

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

Step-Down Calculation

402 Effective Rate July 1st 2019 - FCC Order FCC Order **\$0.000700**

403 Difference In Unified Rate and July 1st 2019 Rate Line 402 - Line 401 -\$0.004300

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

405 **Rate Effective Date July 2018** Line 401 + (Line 404)+(Line 404) **\$0.002133**

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

TeleGuam Holdings LLC
SAC 663800 (Guam)

TeleGuam Holdings LLC, (alternatively “TeleGuam” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 3, 2018, TeleGuam will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel TeleGuam as an issuing carrier for NECA Tariff F.C.C. No. 5 and TeleGuam will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 3, 2018.

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 3, 2018, the Company will file interstate Special Access services, including Public Packet Data Network, 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 TeleGuam 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 3, 2018, 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 2018 Access Filing Order and 2018 TRP Order

The filing is made in accordance with the 2018 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335 (Released April 5, 2018). JSI is also

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
TeleGuam Holdings LLC (Guam)

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. See Material to be filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404 (Released April 25, 2018). Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 3, 2018. Accordingly, Special Access rates filed for TeleGuam reflect a rate-of-return of 10.50% and the lower corporate income tax rate that went into effect on January 1, 2018.

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.

TeleGuam 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 44.39 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$3,402,715. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$ 1,892,374, a reduction of \$ 1,510,341 or 44.39 percent.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
TeleGuam Holdings LLC (Guam)

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(h)</p> <p>Each Rate-of-Return Carrier shall calculate its 2018 Target Composite Terminating End Office Access Rate. The 2018 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus one-third 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. 216 - 2018 Annual Access Filing
TeleGuam Holdings LLC (Guam)

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 216 effective July 3, 2018</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 3, 2018 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).

The Company proposes ARC rates effective July 3, 2018 under Section 51.917(e) 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) 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

TeleGuam Holdings LLC submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 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. 216 - 2018 Annual Access Filing
TeleGuam Holdings LLC (Guam)

2019. All CAF-ICC data is represented in a single consolidated file, *TeleGuam Holdings LLC 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- TeleGuam 2018 ROR-ILEC-ICC Data
- TeleGuam 2018 Tariff Rate Comp CAF
- TeleGuam 2018 True Up
- TeleGuam 2018 Rate Ceiling CAF
- TeleGuam 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

Teleguam Holdings, LLC
 663800

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$3,402,715
102	Projected 2011-12 Pool Settlements without LSS	NECA	1,892,374
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 1,510,341
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	44.39%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-44.39%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.008145
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.029865

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.01
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$27.22
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$82.91
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$757.04
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.21
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.21
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.67
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$49.47
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.17
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.17
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$29.48
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$189.26
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$172.68
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$66.67
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000244
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001264
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003187
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003226
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003559

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

Band 1 / Band 5 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.014645
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$30.58
304	Voice Grade 4-Wire Entrance Facility		\$48.94
305	DS-1 Entrance Facility		\$149.09
306	DS-3 Entrance Facility		\$1,361.24
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.17
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.17
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$10.20
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$88.96
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.89
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.89
313	DS-1 Direct Trunk Termination		\$53.00
314	DS-3 Direct Trunk Termination		\$340.32
315	Multiplexing DS3-DS1		\$310.50
316	Multiplexing DS1-Voice		\$119.88
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000438
318	Tandem Switched Termination		\$0.002272
319	Tandem Switching		\$0.005731
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Teleguam Holdings, LLC
663800

SOURCE

Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation for Terminating Local Switching

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

Step-Down Calculation

402 Effective Rate July 1st 2019 - FCC Order FCC Order **\$0.000700**

403 Difference In Unified Rate and July 1st 2019 Rate Line 402 - Line 401 -\$0.004300

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

405 **Rate Effective Date July 2018** Line 401 + (Line 404)+(Line 404) **\$0.002133**

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 Annual Access Filing

Totah Communications, Inc.
SAC 432030 and 412030 (Oklahoma and Kansas)

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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Totah, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Totah Communications, Inc. (OK) (KS)

reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019.

- Totah 412030 2018 ROR-ILEC-ICC Data
- Totah 432030 2018 ROR-ILEC-ICC Data
- Totah 2018 Tariff Rate Comp CAF
- Totah 2018 True Up
- Totah 2018 Rate Ceiling CAF
- Totah 2018-19 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

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. 216 - 2018 Annual Access Filing
Total Communications, Inc. (OK) (KS)

- 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Tri County, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h), and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Tri County Telephone Association, Inc. (WY)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Tri County Telephone Association, Inc. 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Tri County 2018 ROR-ILEC-ICC Data
- Tri County 2018 Tariff Rate Comp CAF
- Tri County 2018 True Up
- Tri County 2018 Rate Ceiling CAF
- Tri County 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. 216.

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

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Tri-County Telephone Company, Inc. (AR)

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

Tri-County a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

The Company proposes ARC rate changes effective July 3, 2018 under Section 51.917(e) 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.¹ The TY 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Tri-County Telephone Company AR 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Tri-County 2018 ROR-ILEC-ICC Data
- Tri-County 2018 Tariff Rate Comp CAF
- Tri-County 2018 True Up
- Tri-County 2018 Rate Ceiling 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. 216 - 2018 Annual Access Filing
Tri-County Telephone Company, Inc. (AR)

- Tri-County 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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, TruVista 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.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
TruVista Communications Companies (SC)

TruVista, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in single consolidated files for each TruVista carrier, *Chester 2018 RoR ILEC ICC CAF TRP, Lockhart 2018 RoR ILEC ICC CAF TRP, and Ridgeway 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chester 2018 ROR-ILEC-ICC Data
- Chester 2018 Tariff Rate Comp CAF
- Chester 2018 True Up
- Chester 2018 Rate Ceiling CAF
- Chester 2018-19 Rate of Return ILEC Summary

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. 216 - 2018 Annual Access Filing
TruVista Communications Companies (SC)

- Lockhart 2018 ROR-ILEC-ICC Data
- Lockhart 2018 Tariff Rate Comp CAF
- Lockhart 2018 True Up
- Lockhart 2018 Rate Ceiling CAF
- Lockhart 2018-19 Rate of Return ILEC Summary

- Ridgeway 2018 ROR-ILEC-ICC Data
- Ridgeway 2018 Tariff Rate Comp CAF
- Ridgeway 2018 True Up
- Ridgeway 2018 Rate Ceiling CAF
- Ridgeway 2018-19 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

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Twin Lakes is an Issuing Carrier of the JSI Tariff. Twin Lakes 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Twin Lakes, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Twin Lakes is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Twin Lakes Cooperative Corp. (TN)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TWIN LAKES TARIFF REVIEW PLANS

Twin Lakes submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Twin Lakes - 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Twin Lakes 2018 ROR-ILEC-ICC Data
- Twin Lakes 2018 Tariff Rate Comp CAF
- Twin Lakes 2018 True Up
- Twin Lakes 2018 Rate Ceiling CAF
- Twin Lakes 2018-19 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. 216 – 2018 Annual Access Filing

Valley Telephone Cooperative, Inc.
SAC 442159 (Texas)

Valley Telephone Cooperative, Inc., (alternatively “VTCI” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 3, 2018, VTCI will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel VTCI as an issuing carrier for NECA Tariff F.C.C. No. 5 and VTCI will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 3, 2018.

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 3, 2018, the Company will file interstate Special Access services, including Public Packet Data Network, 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 VTCI 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 3, 2018, 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 2018 Access Filing Order and 2018 TRP Order

The filing is made in accordance with the 2018 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). See July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335 (Released April 5, 2018). JSI is also

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Valley 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. See Material to be filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404 (Released April 25, 2018). Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 3, 2018. Accordingly, Special Access rates filed for VTCI reflect a rate-of-return of 10.50%. VTCI is a tax-exempt organization; the Company's rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

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.

VTCI 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 107.84 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2018-2019 demand produces revenue of \$168,887. Application of the rates for Switched Access proposed under this transmittal to 2018-2019 Test Year demand produces revenue of \$351,016, an increase of \$ 182,129 or 107.84 percent.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Valley 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(h)</p> <p>Each Rate-of-Return Carrier shall calculate its 2018 Target Composite Terminating End Office Access Rate. The 2018 Target Composite Terminating End Office Access Rate means \$0.0007 per minute plus one-third 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. 216 - 2018 Annual Access Filing
Valley 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 216 effective July 3, 2018</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 3, 2018 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).

The Company proposes ARC rates effective July 3, 2018 under Section 51.917(e) 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) 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Valley Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for

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. 216 - 2018 Annual Access Filing
Valley Telephone Cooperative, Inc. (Texas)

tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Valley TX 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- VTCI 2018 ROR-ILEC-ICC Data
- VTCI 2018 Tariff Rate Comp CAF
- VTCI 2018 True Up
- VTCI 2018 Rate Ceiling CAF
- VTCI 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

Valley Telephone Cooperative, Inc
 442159

SOURCE

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$168,887
102	Projected 2011-12 Pool Settlements without LSS	NECA	351,016
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (182,129)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-107.84%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	107.84%

July 1, 2018 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.002133
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.101472
202	Information Surcharge Originating (shown as Per 100 Originating MOU)	Line 302 + (Line 302 * Line 105)	\$0.111610

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$99.31
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$158.94
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$484.21
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$4,421.19
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$7.09
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$7.09
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$33.17
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$289.00
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$71.10
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$71.10
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$172.13
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,105.26
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,008.44
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$389.33
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000424
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.002214
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.005581
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.012055
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.013302

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		\$0.003567
301 b	Local Switching Premium Rates Originating		\$0.048822
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053700

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.78
304	Voice Grade 4-Wire Entrance Facility		\$76.47
305	DS-1 Entrance Facility		\$232.97
306	DS-3 Entrance Facility		\$2,127.20
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.41
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$15.96
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.05
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.21
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.21
313	DS-1 Direct Trunk Termination		\$82.82
314	DS-3 Direct Trunk Termination		\$531.78
315	Multiplexing DS3-DS1		\$485.20
316	Multiplexing DS1-Voice		\$187.32
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001065
319	Tandem Switching		\$0.002685
320	800 Data Base Access Service Queries, Per Query - Basic		\$0.005800
321	800 Data Base Access Service Queries, Per Query - Vertical Feature		\$0.006400

Rates from NECA Tariff based on banded rates

Valley Telephone Cooperative, Inc
442159

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
Step-Down Calculation			
402	Effective Rate July 1st 2019 - FCC Order	FCC Order	\$0.000700
403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.004300
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
405	Rate Effective Date July 2018	Line 401 + (Line 404) +(Line 404)	\$0.002133

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 216 – 2018 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. 216 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Wilkes is an Issuing Carrier of the JSI Tariff. Wilkes 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

1. DESCRIPTION OF FILING

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

Wilkes a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5% and the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Wilkes Telephone & Electric Company, Inc. (GA)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WILKES TARIFF REVIEW PLANS

Wilkes submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Wilkes Telephone & Electric Company 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Wilkes 2018 ROR-ILEC-ICC Data
- Wilkes 2018 Tariff Rate Comp CAF
- Wilkes 2018 True Up
- Wilkes 2018 Rate Ceiling CAF
- Wilkes 2018-19 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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. Winnebago-LB 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.

Winnebago-LB a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5 Winnebago-LB is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Description and Justification
JSI Transmittal No. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association-LB (IA)

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).

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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.

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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Winnebago LB 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Winnebago-LB 2018 ROR-ILEC-ICC Data
- Winnebago-LB 2018 Tariff Rate Comp CAF
- Winnebago-LB 2018 True Up
- Winnebago-LB 2018 Rate Ceiling CAF
- Winnebago-LB 2018-19 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

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. 216 - 2018 Annual Access Filing
Winnebago Cooperative Telecom Association-LB (IA)

- 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. 216 – 2018 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. 216 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 April 5, 2018 release entitled In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, WC Docket No. 18-100, Order, DA 18-335, and the April 25, 2018 release entitled In the Matter of Material to be Filed in Support of 2018 Annual Access Tariff Filing, WC Docket No. 18-100, Order, DA 18-404.

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.

Yadkin, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(h) and Special Access rates that reflect the rate of return reduction from 10.75% to 10.5%. Yadkin is a tax-exempt organization; the Company’s rates are not impacted by the lower corporate income tax rate that went into effect on January 1, 2018.

The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

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. 216 - 2018 Annual Access Filing
Yadkin Valley Telephone Membership Corporation (NC)

No revisions are proposed to residential, single-line business or multi-line business Access Recovery Charges.

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 2018 - 2019 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 2018-2019. All CAF-ICC data is represented in a single consolidated file, *Yadkin 2018 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Yadkin 2018 ROR-ILEC-ICC Data
- Yadkin 2018 Tariff Rate Comp CAF
- Yadkin 2018 True Up
- Yadkin 2018 Rate Ceiling CAF
- Yadkin 2018-19 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).