

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 219

Matanuska Telephone Association
SAC 613015 (Alaska)

JSI hereby provides a Description and Justification for rates proposed under Transmittal No. 219 of JSI Tariff F.C.C. No. 1 on behalf of Matanuska Telephone Association (“MTA”). MTA is filing as a rate-of-return carrier subject to Section 61.38 of the Commission’s rules.

DESCRIPTION OF FILING

Effective November 1, 2018, MTA will become an issuing carrier for the JSI Tariff F.C.C. No. 1 (“JSI Tariff”). Concurrent with this filing, Moss Adams LLP will cancel MTA as an issuing carrier for Moss Adams Tariff F.C.C. No. 1.

The filing to add MTA as an issuing carrier for JSI Tariff FCC No. 1 does not change any rate; all rates charged by MTA under the JSI Tariff effective November 1, 2018 will be the same as the rates currently charged under Moss Adams Tariff FCC No. 1. All services currently offered under Moss Adams Tariff FCC No. 1 will be offered by MTA under the JSI Tariff. No new services with respect to those offered by MTA will be introduced in this filing.

The JSI Tariff parallels the Moss Adams Tariff F.C.C. No. 1 in all material respects as it applies to MTA interstate access services.

Revisions associated with the addition of MTA as a JSI Tariff issuing carrier are proposed to the following JSI Tariff sections:

Title Pages

Table of Contents

Section 3 Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port and Consumer Broadband-Only Loop Charge – Table of carriers providing services under Section 3.

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

Section 16 Public Packet Data Network Services - Carrier tables at:

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

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CONCLUSION

Based on the foregoing, JSI believes that the revisions proposed in this transmittal for the addition of MTA as an issuing carrier for JSI Tariff FCC No. 1 are reasonable and the Commission should permit this transmittal to become effective on November 1, 2018.