

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 223 - June 17, 2019

John Staurulakis, Inc. (“JSI”) hereby provides description and justification (“D&J”) for JSI Transmittal No. 223 on behalf of the issuing carriers for JSI Tariff F.C.C. No. 1.

INTRODUCTION

In this transmittal, JSI proposes revisions to JSI Tariff F.C.C. No. 1 for the following:

Title Pages, Table of Contents

Addition of issuing carriers effective July 2, 2019, listed at D&J Exhibit 1 (“New Issuing Carriers”), and removal of carriers exiting the JSI Tariff F.C.C. No. 1 effective July 2, 2019, shown at D&J Exhibit 2 (“Exiting Carriers”).

Section 5 Access Ordering

Ordering of Ethernet Transport Service (“ETS”) Multi-Media Virtual Circuit Channel added to orders for which the Access Order Charge does not apply, and related revisions at Section 16.4, ETS regulations.

Section 16.4 ETS Regulations

- Revisions to ETS DSL Access Service Connections, including application of the Access Order Charge referenced above.
- Updated technical reference
- Update ETS service elements subject to twelve-month minimum period to include ETS Channel Terminations
- Introduce a 500 Mbps ordering increment to the ETS Bandwidth Add-On optional feature for speeds of 1. Gbps, 2.5 Gbps and 10 Gbps. Regulations mirror the National Exchange Carrier Association, Inc. (“NECA”) regulations under which New Issuing Carriers offer service.

Carrier Tables Updated to Include New Issuing Carriers and to Delete Exiting Carriers

Section 7 Special Access

Section 8, Asymmetric Digital Subscriber Line Access Service

Section 16.4, Ethernet Transport Service

DESCRIPTION

The New Issuing Carriers' offerings associated with the above revisions are being filed today under the JSI Tariff F.C.C. No. 1 annual access filing, JSI Transmittal No. 224, for the fifteen (15) carriers listed at Exhibit 1:

- Twelve (12) new issuing carriers are migrating from NECA Tariff F.C.C. No. 5. As noted in Exhibit 1, two of the carriers—Clarity Telecom, LLC and Inter-Community Telephone Company, L.L.C.—are migrating from the NECA Tariff for Special Access; Switched Access services for these carriers will remain in the NECA Tariff.
- Three (3) new issuing carriers are migrating from Moss Adams Tariff F.C.C. No. 1.

A side-by-side comparison of JSI Tariff F.C.C. No. 1 regulations to NECA Tariff F.C.C. No. 5 regulations is attached hereto as D&J Exhibit 3. Moss Adams Tariff F.C.C. No. 5 mirrors those of JSI Tariff F.C.C. No. 1 in all material respects.

No introduction of new rates for issuing carriers are proposed in this filing.

These revisions are necessary to allow seamless transition for New Issuing Carriers concurrent with cancellation as issuing carriers for NECA Tariff F.C.C. No. 5 and Moss Adams Tariff F.C.C. No. 1 effective July 2, 2019, as well as for the Exiting Carriers.

This transmittal is a companion filing to JSI Transmittal No. 224, the required 2019 annual access filing.

CONCLUSION

This transmittal provides for the addition of New Issuing Carriers to JSI Tariff F.C.C. No. 1. Allowing the revisions proposed in JSI Transmittal No. 223 to become effective will facilitate the seamless migration of New Issuing Carriers' services and rates from NECA Tariff F.C.C. No. 5 and Moss Adams Tariff F.C.C. No. 1 to JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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DESCRIPTION AND JUSTIFICATION EXHIBIT 1

**NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. NO. 1
EFFECTIVE WITH JSI TRANSMITTAL NO. 224 TO BE FILED JUNE 17, 2019**

<i>Company Name</i>	<i>State</i>	<i>Study Area Code</i>	<i>Previous Tariff</i>	<i>Effective July 2, 2019</i>			
				<i>Common Line Tariff</i>	<i>Switched Access Tariff</i>	<i>Special Access Tariff</i>	<i>Filing Rules</i>
Clarity Telecom, LLC	SD	391652	NECA	NECA	NECA	JSI	61.50
Inter-Community Telephone Company, L.L.C.	ND	381616	NECA	JSI	NECA	JSI	61.50
PBT Telecom, Inc.	SC	240539	NECA	NECA Pool	JSI	JSI	61.38
Southwest Texas Telephone Company	TX	442135	NECA	NECA Pool	JSI	JSI	61.39
TEC Companies-Alabama							
National Telephone of Alabama, Inc.	AL	250286	NECA	JSI	JSI	JSI	61.39
Roanoke Tel. Co., Inc.	AL	250317	NECA	JSI	JSI	JSI	61.39
TEC Companies-Mississippi							
Bay Springs Telephone Company, Inc.	MS	280446	NECA	JSI	JSI	JSI	61.39
TEC Companies-Tennessee							
Crockett Tel. Co., Inc.	TN	290561	NECA	JSI	JSI	JSI	61.39
Peoples Telephone Company	TN	290576	NECA	JSI	JSI	JSI	61.39

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				<i>Effective July 2, 2019</i>			
<i>Company Name</i>	<i>State</i>	<i>Study Area Code</i>	<i>Previous Tariff</i>	<i>Common Line Tariff</i>	<i>Switched Access Tariff</i>	<i>Special Access Tariff</i>	<i>Filing Rules</i>
West Tennessee Tel. Co., Inc.	TN	290583	NECA	JSI	JSI	JSI	61.39
West Carolina Rural Telephone Cooperative, Inc.	SC	240550	NECA	JSI	JSI	JSI	61.50
Seneca Telephone Company	MO	421945	Moss Adams	NECA Pool	JSI	JSI	61.39
Goodman Telephone Company	MO	421886	Moss Adams	NECA Pool	JSI	JSI	61.39
Ozark Telephone Company	MO	421866	Moss Adams	NECA Pool	JSI	JSI	61.39
Twin Valley Telephone, Inc.	KS	411840	NECA	NECA Pool	JSI	JSI	61.39

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DESCRIPTION AND JUSTIFICATION EXHIBIT 2

**EXITING CARRIERS FOR JSI TARIFF F.C.C. No. 1
EFFECTIVE WITH JSI TRANSMITTAL NO. 224 TO BE FILED JUNE 17, 2019**

<i>Company Name</i>	<i>State</i>	<i>Study Area Code</i>
Consolidated Telco, Inc.	NE	371530
Consolidated Telecom, Inc.	NE	371562
Consolidated Telephone Company	NE	371532
Curtis Telephone Company	NE	371536
South Central Rural Telephone Coop	KY	260418

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TARIFF COMPARISON – NECA to JSI

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
1. Application of Tariff	1. Application of Tariff	JSI Tariff FCC No. 1 Section 1 is reflective of NECA Tariff FCC No. 5 Section 1.
2. General Regulations	2. General Regulations	JSI Tariff FCC No. 1 Section 2 is reflective of NECA Tariff FCC No. 5 Section 2.
3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port and Consumer Broadband-Only Loop Charge	3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port and Consumer Broadband-Only Loop Charge	JSI Tariff FCC No. 1 Section 3 is reflective of NECA Tariff FCC No. 5 Section 3.
4. End User Access Service	4. End User Access Service	JSI Tariff FCC No. 1 Section 4 is reflective of NECA Tariff FCC No. 5 Section 4.
5. Access Ordering	5. Access Ordering	JSI Tariff FCC No. 1 Section 5 is reflective of NECA Tariff FCC No. 5 Section 5.
6. Switched Access Service	6. Switched Access Service	JSI Tariff FCC No. 1 Section 6 is reflective of NECA Tariff FCC No. 5 Section 6.
7. Special Access Service	7. Special Access Service	JSI Tariff FCC No. 1 Section 7, is reflective of NECA Tariff FCC No. 5 Section 7 with the following additional subsection for regulations applicable to optional offerings for election by individual issuing carriers for JSI Tariff FCC No. 1.

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
7.11.3 Synchronous Optical Channel (SOCS) Optional Features and Functions	7.11.3 SOCS Rate Regs. I – CT Without Mileage Charges	Optional offering reflective of NECA 7.11.3 SOCS Optional Features and Functions. New issuing carriers offer SOCS Optional Features and Functions under these regulations
	7.11.4 SOCS Rate Regs. II - CT With Mileage Charges	Optional offering, not offered by new issuing carriers.
7.2.8(B) SOCS Optional Rate Plan	7.2.9(A) SOCS Optional Rate Plan A	Optional offering reflective of NECA Optional Rate Plan which provides for term discounts. New issuing carriers with SOCS offerings provide SOCS term discounts under these regulations.
	7.2.9(B) SOCS Optional Rate Plan B	Optional offering, not offered by new issuing carriers.
	7.12 Digital Access Cross Connect Service (DACCS)	Optional offering, not offered by new issuing carriers
8. Digital Subscriber Line (DSL) Access Services	8. Digital Subscriber Line Access Services	<p>All new issuing carriers have elected to permissively detariff DSL services effective July 3, 2019, or have previously detariffed DSL services. Therefore, Section 8 DSL regulations do not apply to new issuing carriers.</p> <p>Note: Prior to certain carriers exiting the NECA Traffic Sensitive Pool in 2007, JSI Tariff FCC No. 1 did not have any regulations in Section 8. JSI added Digital Subscriber Line Access Services to Section 8 reflective of NECA Tariff FCC No. 5 regulations for the benefit of the new issuing carriers for JSI Tariff FCC No. 1. For those issuing carriers offering DSL Access Service of any kind pursuant to JSI Tariff FCC No. 1 at the beginning of 2007, such carriers did</p>

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		so pursuant to either JSI Tariff FCC No. 1 Section 16.2, Asymmetrical Digital Subscriber Line (ADSL) Service, Section 16.3, Symmetrical Digital Subscriber Line (SDSL) Access Service or Section 16.6 High Speed Internet (HSI) Access Service.
9. Directory Assistance Service	9. Reserved for Future Use	No current JSI Tariff FCC No. 1 issuing carriers or new issuing carriers provide interstate directory assistance service. Therefore, JSI Tariff FCC No. 1 does not contain regulations for interstate directory assistance service. DA listings are provided to IXC's and other ILECs under contract.
10. Special Federal Government Access Services	10. Special Federal Government Access Services	JSI Tariff FCC No. 1 Section 10 is reflective of NECA Tariff FCC No. 5 Section 10.
11. Special Facilities Routing of Access Services	11. Special Facilities Routing of Access Services	JSI Tariff FCC No. 1 Section 11 is reflective of NECA Tariff FCC No. 5 Section 11.
12. Specialized Service Or Arrangements	12. Specialized Service Or Arrangements	JSI Tariff FCC No. 1 Section 12 is reflective of NECA Tariff FCC No. 5 Section 12.
13. Additional Engineering	13. Additional Engineering	JSI Tariff FCC No. 1 Section 13 is reflective of NECA Tariff FCC No. 5 Section 13.
14. Exceptions to Access Service Offerings	14. Reserved for Future Use	There are no exceptions applicable to current or new issuing carriers for JSI Tariff FCC No. 1.
15. Access Service Interfaces and Transmission Specifications	15. Access Service Interfaces and Transmission Specifications	JSI Tariff FCC No. 1 Section 15 is reflective of NECA Tariff FCC No. 5 Section 15.

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
16. Public Packet Data Network	16. Public Packet Data Network	See Below:
16.1 Frame Relay Access Service	16.1 Frame Relay Access Service	JSI Tariff FCC No. 1 Section 16.1 is reflective of NECA Tariff FCC No. 5 Section 16.1.
	16.2 Asymmetrical Digital Subscriber Line (ADSL) Service	JSI Tariff FCC No. 1 includes ADSL regulations at Section 16.2 based on earlier versions of NECA Tariff FCC No. 5 Section 8.2. None of the new issuing carriers offer ADSL service under tariff (see note under Section 8 preceding).
	16.3 Symmetrical Digital Subscriber Line (SDSL) Access Service	JSI Tariff FCC No. 1 contains SDSL regulations at Section 16.3 similar to earlier versions of NECA SDSL regulations. None of the new issuing carriers offer SDSL service under tariff (see note under Section 8 preceding).
16.2 Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS)	16.7 Asynchronous Transfer Mode Cell Relay Access Service	JSI Tariff FCC No. 1 Section 16.7 is reflective of NECA Tariff FCC No. 5 Section 16.2 with the addition of one optional feature and function not available in NECA Tariff FCC No. 5. That feature is Inverse Multiplexing Over ATM (IMA) tariffed at Section 16.7.4(A)(4)(c) of JSI Tariff FCC No. 1. New issuing carriers do not offer this optional feature.
16.3 Ethernet Transport Service	16.4 Ethernet Transport Service	JSI Tariff FCC No. 1 Section 16.4 is reflective of NECA Tariff FCC No. 5 Section 16.3 with the following exceptions: (1) DSL Access Service Connection Optional Feature Two-Way ETS MM-VCC; (2) ETS E-Rate Option. None of the new issuing carriers offer the Two-Way ETS MM-VCC or the ETS E-Rate Option. In the event a JSI carrier receives a bona fide request for these services, JSI

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		will take steps to add it to the tariff.
	16.4.4(A)(5)(b) VLAN Service (ETS Virtual Local Area Network)	NECA Tariff FCC No. 5 does not include ETS VLAN Service at this time. New issuing carriers do not offer ETS VLAN service.
	16.4.4(A)(6) ETS Meet Point Interface (ETS-MPI)	NECA Tariff FCC No. 5 does not include ETS Meet Point Interface at this time. New issuing carriers do not offer ETS MPI.
	16.4.5(F) ETS Alternative Volume Discount Plan 16.4.6(E) ETS Port Term Discount Plan Alternative Volume Discount Plan	NECA Tariff FCC No. 5 does not include the ETS Alternative Volume Discount Plan or the ETS Port Term Discount Plan Alternative Volume Discount Plan at this time. New issuing carriers do not offer these alternative discount plans.
16.4 Internet Protocol Gateway (IPG) Access Service	16.9 Internet Protocol Gateway Access Service	JSI Tariff FCC No. 1 is reflective of NECA Tariff FCC No. 5 Section 16.4.
	16.5 Metro Ethernet Service (Metro Ethernet)	Metro Ethernet is the Ethernet Transport Service for the Comporium Companies (issuing carriers for JSI Tariff FCC No. 1, who tariffed Ethernet prior to NECA Tariff FCC No. 5). This service is not offered by new issuing carriers.
	16.6 High Speed Internet (HSI) Access Service	HSI is the wireline broadband Internet access transport offering for a single issuing carrier for JSI Tariff FCC No. 1 (Mt. Horeb Telephone Company). This service is not offered by new issuing carriers.
	16.8 Stand-Alone Broadband Network Transport (SABNT)	SABNT allows provision of combinations of Ethernet technology with IP technologies delivered over High

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		Capacity circuits, providing the same virtual connections as Ethernet Transport Services. Two issuing carriers for JSI Tariff FCC No. 1 offer SABNT in lieu of Ethernet Transport Service - Horry Telephone Cooperative, Inc. and Atlantic Telephone Membership Corporation. This service is not offered by new issuing carriers.