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**This material is being filed on 15 days'
notice under Section 204(a)(3) of the
Communications Act.**

June 17, 2019

Transmittal No. 224

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The accompanying tariff material issued by John Staurulakis, Inc. ("JSI"), and bearing Tariff F.C.C. No. 1, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended.

The F.C.C. Registration Number ("FRN") for JSI is 0003-7481-42. The FRNs for the issuing carriers for JSI Tariff F.C.C. No. 1 ("JSI Tariff") are provided at Appendix A to this transmittal letter.

The filing, to become effective July 2, 2019, consists of tariff pages as indicated on the following check sheet:

Tariff F.C.C. No. 1

218th Revised Page 0-1

In accordance with the Commission's April 4, 2019 release entitled In the Matter of July 1, 2019 Annual Access Charge Tariff Filings, WC Docket No. 19-47, Order, DA 19-246, the instant filing includes proposed revised rates for the provision of the applicable End User, Special Access, Miscellaneous and Public Packet Data Network services offered by the issuing carriers filing pursuant to Section 61.39 in the JSI Tariff F.C.C. No. 1. Material required pursuant to the Tariff Review Plan Order is included in this filing.¹ In addition to the Description and Justification ("D&J") summary exhibits described below, a D&J is provided for each issuing carrier.

Current Issuing Carriers

The accompanying D&J Exhibit A provides a summary of current issuing carriers for the JSI Tariff, excluding those carriers who will exit the JSI Tariff effective July 2, 2019. The

¹ See *Material to be Filed in Support of 2019 Annual Access Tariff Filings*, WC Docket No. 19-47, Order, DA 19-313 (rel. May 1, 2019) ("*Tariff Review Plan Order*").

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D&J Exhibit A summary indicates the filing rules for each carrier under which rates are being filed. In addition to the required biennial filings for issuing carriers filing subject to Section 61.39 of the Commission's rules, Section 61.38 and Section 61.39 carriers propose under this transmittal revised special access rates to reflect the reduced rate of return of 10.25 percent required by the Rate-of-Return Reform Order.² Of the existing issuing carriers for JSI Tariff F.C.C. No. 1 who make mandatory filings in even-numbered years pursuant to Section 61.38 of the Commission's rules, the following have elected to make mid-course voluntary annual filings: Home Telephone ILEC, LLC dba Home Telecom (SC), Matanuska Telephone Association (AK), and TDS Telecom Groups D, F and G.

Among current issuing carriers, twenty (20) have elected incentive regulation for Business Data Services ("BDS") effective with this filing, and are filing special access rates pursuant to Section 61.50 of the Commission's rules (see D&J Exhibit A).

All carriers propose revised terminating End Office Access Service rates pursuant to Section 51.909(i). Access Recovery Charge ("ARC") rates pursuant to Section 51.917(e) are revised where applicable.

New Issuing Carriers

The accompanying D&J Exhibit B provides a summary of new issuing carriers for the JSI Tariff effective July 2, 2019. Among the new carriers, three (3) have elected incentive regulation for BDS effective with this filing.

Twelve (12) new carriers currently in the National Exchange Carrier Association ("NECA") Traffic Sensitive Pool are being canceled by NECA as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 2, 2019, concurrent with the carriers becoming issuing carriers for JSI Tariff F.C.C. No. 1. Of these carriers, two are exiting the NECA Traffic Sensitive Pool for Special Access and will remain in the NECA Traffic Sensitive Pool for Switched Access (see D&J Exhibit B).

Three (3) new carriers currently in the Moss Adams Tariff F.C.C. No. 1 are being canceled by Moss Adams as issuing carriers for Moss Adams Tariff F.C.C. No. 1 effective July 2, 2019, concurrent with the carriers becoming issuing carriers for JSI Tariff F.C.C. No. 1.

Exiting Carriers

The accompanying D&J Exhibit C provides a summary of four (4) issuing carriers who are exiting the JSI Tariff effective July 2, 2019.

² See *Connect America Fund*; *ETC Annual Reports and Certifications*; *Developing a Unified Intercarrier Compensation Regime*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 16-33, para. 326 (rel. Mar. 30, 2016) ("*Rate-of-Return Reform Order*").

Separations Category Relationships Freeze

None of the JSI issuing carriers, existing or new, that elected to freeze their category relationships in 2001 have elected to opt out of the freeze.

Federal Universal Service Contribution Factor

Revisions are proposed on behalf of JSI carriers who are not members of the NECA Common Line Pool and therefore bill common line charges and related Federal Universal Service Charge ("FUSC") charges pursuant to JSI Tariff FCC No. 1. Proposed revisions reflect the increase from the currently effective 18.8% to 24.4% for the third quarter of 2019.³

Confidential Treatment of Rate-of-Return Tariff Review Plans

JSI seeks confidential treatment on behalf of the issuing carriers under the Tariff Streamlining Order⁴ for certain supporting data contained in the required Rate-of-Return Tariff Review Plans ("TRPs"). Confidential TRPs bear on each worksheet "CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE", and redacted versions of the TRPs are also submitted.

Any questions regarding the filing may be directed to me at the address and telephone number listed above, or by email at jkuykendall@jsitel.com. Additionally, questions may be directed to Ms. Marty Kluh, Manager-Regulatory Affairs, at the address and telephone number listed above, or by email at mkluh@jsitel.com. Pursuant to Section 61.14 of the Commission's Rules, this transmittal letter, associated files, Form 159, and filing fee of \$960.00 are being transmitted electronically this date via the Commission's Electronic Tariff Filing System.

Sincerely,



John Kuykendall
Vice President

Enclosures

cc: JSI Issuing Carriers

³ See *Proposed Third Quarter 2019 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice DA 19-559 (rel. June 12, 2019).

⁴ *Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996*, CC Docket No. 96-187, Report and Order, 12 FCC Rcd 2170 (1997) (*Tariff Streamlining Order*). See also *Announcing Procedures for Obtaining Confidential Information for 2019 Annual Access Charge Tariff Filings*, WC Docket No. 19-47, Public Notice DA 19-509 (rel. June 4, 2019).

JSI Interstate Access Tariff F.C.C. No. 1
Transmittal No. 224 – June 17, 2019
Appendix A
F.C.C. Registration Numbers (“FRNs”)

John Staurulakis, Inc. FRN 0003-7481-42

JSI Issuing Carriers FRNs:

0004061586	0001855261	0002393411	0003767696	0003685013
0003708161	0002641181	0001700616	0003686888	0003767266
0005058151	0002723690	0004278339	0001724426	0003740222
0001775295	0001774272	0002505519	0001582485	0003686821
0001887728	0002722155	0003737384	0001743525	0003434958
0003707775	0002639870	0010747657	0002773307	0002648657
0001961416	0001856533	0001683630	0003770591	0002388247
0001888718	0001824689	0003775244	0003784170	0003745791
0002817823	0003767522	0002549228	0003766862	0004327417
0001858760	0001616390	0004362372	0003766896	0002329662
0005901368	0001772805	0001856673	0003727039	0003767449
0001887025	0002716991	0001773670	0003766995	0003767472
0001889617	0001754332	0001857598	0003767308	0002924629
0001791995	0002851251	0001742501	0003767357	0003767613
0002899060	0003666518	0001856483	0003727179	0004382545
0001886704	0004337671	0018713982	0002775823	0002639870
0003713963	0004329496	0018714014	0003767654	0001742618
0020980116	0001755776	0001753557	0003784154	0011458999
0001886944	0003687159	0003770815	0003727385	0001685718
0003733581	0001530237	0006925440	0002926772	0003746542
0001889245	0001888155	0003731791	0003766730	0003738275
0003738739	0002073526	0008702433	0003726940	0003738283
0003707874	0001602663	0017225723	0003766763	0003788309
0004309548	0001617281	0002509040	0003770534	0004924478
0002719045	0003767043	0004997516	0005097910	0001573427
0002339976	0002719482	0020562187	0002926483	0002334407
0018538512	0003767563	0005057328	0003925385	0003740610
0001887140	0002901593	0002594190	0001546720	0023758238
0001699776	0002897064	0002595858	0004811162	0001687557
0002334795	0004333639	0002586998	0001581628	0003723640
0003707791	0002058261	0001731710	0003767134	0003723707
0001855287	0003767720	0002881373	0003767159	0003723665
0005555925	0004329470	0003766805	0003767191	0003723715
0001952555	0005010996	0003687357	0001580380	0003723681
0005026075	0003744463	0003687332	0002719060	0003723723
0001792696	0004341285	0003766961	0003767423	0001886977
0001960962	0002590057	0003727104	0003767506	0003717709
0001855881	0003778594	0003767209	0003435492	0004269809
0003767332	0001646165	0003767399	0003767480	0004269775
0003767274	0005050083	0003767530	0001791458	0004269817
0001773779	0004319257	0001745447	0003727195	
0002650240	0004961272	0001885771	0002716108	
0002723559	0004961231	0003767605	0003766920	