

## **DESCRIPTION AND JUSTIFICATION**

### **JSI Tariff F.C.C. No. 1 Transmittal No. 224 – 2019 Annual Access Filing**

JSI provides summaries of carriers participating in JSI Transmittal No. 224 at Exhibits A, B and C immediately following:

#### **EXHIBIT A**

Currently effective JSI Issuing Carriers filing annual access rates effective July 2, 2019

#### **EXHIBIT B**

New JSI Issuing Carriers filing annual access rate effective July 2, 2019

#### **EXHIBIT C**

Carriers exiting the JSI Tariff effective July 2, 2019.

A Description and Justification for each carrier filing annual access rates under JSI Transmittal No. 224 follows the foregoing exhibits.

Description and Justification  
EXHIBIT A

CURRENTLY EFFECTIVE CARRIERS	Holding Company	Filing Rules	SAC	State	Mid-Course Filing	Support Category	Common Line Rates	Switched Access Rates	Special Access Rates
Bluffton Telephone Company (SC)	Hargray Communications	61.38	240512	SC		Legacy	NECA Pool	JSI	JSI
Hargray Telephone Company, Inc. (SC)	Hargray Communications	61.38	240523	SC		Legacy	NECA Pool	JSI	JSI
ComSouth Telecommunications, Inc.	Hargray Communications	61.50	220369	GA		A-CAM	JSI	JSI	JSI
Citizens Telephone Company d/b/a Comporium Communications	Comporium Communications	61.38	230473	NC		Legacy	NECA Pool	JSI	JSI
Fort Mill Telephone Company d/b/a Comporium Communications	Comporium Communications	61.38	240521	SC		Legacy	NECA Pool	JSI	JSI
Lancaster Telephone Company d/b/a Comporium Communications	Comporium Communications	61.38	240531	SC		Legacy	NECA Pool	JSI	JSI
Comporium, Inc.	Comporium Communications	61.38	240542	SC		Legacy	NECA Pool	JSI	JSI
Home Telephone ILEC, LLC d/b/a Home Telecom		61.38	240527	SC	X	A-CAM	JSI	JSI	JSI
Horry Telephone Cooperative, Inc.		61.38	240528	SC		Legacy	NECA Pool	JSI	JSI
Farmers Telephone Cooperative, Inc. (SC)		61.38	240520	SC		Legacy	NECA Pool	JSI	JSI
Matanuska Telephone Association		61.38	613015	AK	X	Alaska Plan	JSI	JSI	JSI
Winnebago Cooperative Telecom Association	Winnebago Cooperative Telecom Association	61.38	351337, 361337	IA, MN		Legacy	NECA Pool	JSI	JSI
Winnebago Cooperative Telecom Association-LB	Winnebago Cooperative Telecom Association	61.39	351338	IA		Legacy	JSI	JSI	JSI
Atlantic Telephone Membership Corp. (NC)		61.39	230468	NC		Legacy	NECA Pool	JSI	JSI
Chesnee Telephone Company d/b/a Chesnee Communications	Skyline Telephone Membership Corp.	61.39	240515	SC		Legacy	NECA Pool	JSI	JSI
Skyline Telephone Membership Corp. (NC)	Skyline Telephone Membership Corp.	61.39	230501	NC		Legacy	NECA Pool	JSI	JSI
Gearheart Communications Company, Inc. dba Coalfields Telephone Company		61.39	260408	KY		Legacy	NECA Pool	JSI	JSI
Knology of the Valley, Inc. (GA)	WOW!	61.39	220371	GA		Legacy	JSI	JSI	JSI
Knology Total Communications, Inc.	WOW!	61.39	250295	AL		Legacy	JSI	JSI	JSI
Valley Telephone Co., LLC	WOW!	61.39	220324	GA		Legacy	JSI	JSI	JSI
Millington Telephone Company, Inc. (TN)	Ritter Communications	61.39	290571	TN		Legacy	NECA Pool	JSI	JSI
Tri-County Telephone Company, Inc.	Ritter Communications	61.39	401726	AR		A-CAM	NECA	JSI	JSI
Mt. Horeb Telephone Company (WI)		61.50	330916	WI		A-CAM	JSI	JSI	JSI
Smart City Telecommunications LLC d/b/a Smart City Telecom		61.39	210330	FL		A-CAM	JSI	JSI	JSI
Yadkin Valley Telephone Membership Corp (NC)		61.39	230511	NC		Legacy	NECA Pool	JSI	JSI
Chester Telephone Company d/b/a TruVista	TruVista Communications	61.39	240516	SC		Legacy	NECA Pool	JSI	JSI
Lockhart Telephone Company d/b/a TruVista	TruVista Communications	61.39	240532	SC		Legacy	NECA Pool	JSI	JSI
Ridgeway Telephone Company d/b/a TruVista	TruVista Communications	61.39	240541	SC		Legacy	NECA Pool	JSI	JSI
Tri County Telephone Association, Inc. (WY)		61.39	512296	WY		Legacy	NECA Pool	JSI	JSI
Livingston Telephone Company (TX)		61.39	442107	TX		Legacy	NECA Pool	JSI	JSI
Bixby Telephone Company		61.39	431969	OK		Legacy	NECA Pool	JSI	JSI
Ellijay Telephone Company		61.39	220360	GA		Legacy	NECA Pool	JSI	JSI
Brindlee Telephone LLC	Otelco, Inc.	61.50	250283	AL		A-CAM	JSI	JSI	JSI
Otelco Telephone LLC	Otelco, Inc.	61.50	250312	AL		A-CAM	JSI	JSI	JSI
Saco River Telephone LLC	Otelco, Inc.	61.50 - Competitive SAC	100022	ME		A-CAM	JSI	JSI	JSI
Blountsville Telephone LLC	Otelco, Inc.	61.50	250282	AL		A-CAM	JSI	JSI	JSI
Granby Telephone LLC	Otelco, Inc.	61.50 - Competitive SAC	110036	MA		A-CAM	JSI	JSI	JSI
Hopper Telecommunications LLC	Otelco, Inc.	61.50	250300	AL		A-CAM	JSI	JSI	JSI
Mid-Maine Telecom LLC	Otelco, Inc.	61.50	103315	ME		A-CAM	JSI	JSI	JSI
Otelco Mid-Missouri LLC	Otelco, Inc.	61.50	421917	MO		A-CAM	JSI	JSI	JSI
Pine Tree Telephone LLC	Otelco, Inc.	61.50 - Competitive SAC	100020	ME		A-CAM	JSI	JSI	JSI

Description and Justification  
EXHIBIT A

CURRENTLY EFFECTIVE CARRIERS	Holding Company	Filing Rules	SAC	State	Mid-Course Filing	Support Category	Common Line Rates	Switched Access Rates	Special Access Rates
War Telephone LLC	Otelco, Inc.	61.50	200258	WV		A-CAM	JSI	JSI	JSI
Shoreham Telephone LLC	Otelco, Inc.	61.39	140064	VT		Legacy	JSI	JSI	JSI
Etex Telephone Cooperative, Inc.		61.39	442070	TX		A-CAM	JSI	JSI	JSI
Hancock Rural Telephone Corporation d/b/a NineStar Connect		61.39	320775	IN		Legacy	NECA Pool	JSI	JSI
Moundridge Telephone Company		61.39	411808	KS		A-CAM	NECA	JSI	JSI
Piedmont Rural Telephone Cooperative, Inc.		61.39	240538	SC		Legacy	NECA Pool	JSI	JSI
Pine Telephone Company, Inc.		61.39	432017	OK		Legacy	NECA Pool	JSI	JSI
Ringgold Telephone Company		61.39	220382	GA		Legacy	NECA Pool	JSI	JSI
Star Telephone Membership Corporation		61.39	230502	NC		Legacy	NECA Pool	JSI	JSI
Total Communications, Inc.		61.39	432030	OK		Legacy	NECA Pool	JSI	JSI
Total Communications, Inc.		61.39	412030	KS		A-CAM	NECA	JSI	JSI
The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications		61.39	411817	KS		Legacy	NECA Pool	JSI	JSI
Heartland Telecommunications of Iowa d/b/a Premier Communications	Premier Communications	61.39	351096	IA		Legacy	JSI	JSI	JSI
Mutual Telephone Company	Premier Communications	61.39	351252	IA		Legacy	NECA Pool	JSI	JSI
Northern Iowa Telephone Company	Premier Communications	61.39	351259	IA		Legacy	NECA Pool	JSI	JSI
Webb-Dickens Telephone Corporation	Premier Communications	61.39	351327	IA		Legacy	NECA Pool	JSI	JSI
Cross Tel. Co.		61.50	431985	OK		A-CAM	JSI	JSI	JSI
Blackfoot Telephone Cooperative, Inc.	Blackfoot Telephone Cooperative	61.50	482235 MT 483308 MT	MT		A-CAM	JSI	JSI	JSI
Fremont Telecom Co.	Blackfoot Telephone Cooperative	61.50	472222 ID	ID		A-CAM	JSI	JSI	JSI
Bruce Telephone Company, Inc.	Fail, Inc.	61.50	280447	MS		A-CAM	JSI	JSI	JSI
Chickamauga Telephone Corporation	Fail, Inc.	61.50	220354	GA		A-CAM	JSI	JSI	JSI
Fulton Telephone Company, Inc.	Fail, Inc.	61.50	280455	MS		A-CAM	JSI	JSI	JSI
Mound Bayou Telephone & Communications, Inc.	Fail, Inc.	61.50	280462	MS		A-CAM	JSI	JSI	JSI
Arkwest Communications, Inc.		61.39	401734	AR		Legacy	NECA Pool	JSI	JSI
Chazy & Westport Telephone Corporation		61.39	150079	NY		A-CAM	NECA	JSI	JSI
Eastex Telephone Cooperative, Inc.		61.39	442068	TX		Legacy	NECA Pool	JSI	JSI
Grand River Mutual Telephone Company (IA) (Includes South Central Communications, Inc.)	Grand River Mutual Telephone Company	61.39	351888-IA	IA		Legacy	NECA Pool	JSI	JSI
Grand River Mutual Telephone Company (MO)	Grand River Mutual Telephone Company	61.39	421888-MO	MO		A-CAM	NECA	JSI	JSI
Highland Telephone Cooperative		61.39	190237	VA		A-CAM	JSI	JSI	JSI
Industry Telephone Company		61.39	442093	TX		A-CAM	JSI	JSI	JSI
Lumos Telephone of Botetourt Inc.		61.39	190249	VA		A-CAM	NECA	JSI	JSI
Mark Twain Rural Telephone Company		61.39	421914	MO		A-CAM	JSI	JSI	JSI
Mid-Plains Rural Tel. Coop., Inc.		61.39	442112	TX		A-CAM	JSI	JSI	JSI
Pineland Telephone Cooperative, Inc.		61.39	220377	GA		A-CAM	NECA	JSI	JSI
Smithville Telephone Company, Inc.		61.50	280467	MS		A-CAM	NECA	JSI	JSI
Twin Lakes Telephone Cooperative Corp.		61.39	290579	TN		Legacy	NECA Pool	JSI	JSI
Wilkes Telephone & Electric Company, Inc.		61.39	220394	GA		Legacy	NECA Pool	JSI	JSI
Taylor Telephone Cooperative, Inc.		61.39	442151	TX		A-CAM	JSI	JSI	JSI
Teleguam Holdings LLC		61.39	663800	GU		Legacy	NECA Pool	JSI	JSI

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EXHIBIT A

<b>CURRENTLY EFFECTIVE CARRIERS</b>	<b>Holding Company</b>	<b>Filing Rules</b>	<b>SAC</b>	<b>State</b>	<b>Mid-Course Filing</b>	<b>Support Category</b>	<b>Common Line Rates</b>	<b>Switched Access Rates</b>	<b>Special Access Rates</b>
Valley Telephone Cooperative, Inc.		61.39	442159	TX		Legacy	NECA Pool	JSI	JSI
Arlington Telephone Company	American Broadband Communications	61.39	371517	NE		A-CAM	NECA	JSI	JSI
The Blair Telephone Company	American Broadband Communications	61.39	371524	NE		A-CAM	NECA	JSI	JSI
Eastern Nebraska Tel. Co.	American Broadband Communications	61.39	371542	NE		A-CAM	NECA	JSI	JSI
Rock County Tel. Co.	American Broadband Communications	61.39	371586	NE		A-CAM	NECA	JSI	JSI
<b>TDS Telecom Group A</b>									
Camden Telephone and Telegraph Company, Inc	TDS	61.38	220351	GA		A-CAM	JSI	JSI	JSI
Mt. Vernon Telephone Company, LLC	TDS	61.38	330917	WI		A-CAM	JSI	JSI	JSI
Oklahoma Communication Systems, Inc	TDS	61.38	431984	OK		A-CAM	JSI	JSI	JSI
Tennessee Telephone Company	TDS	61.38	290575	TN		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group B</b>									
Arvig Telephone Company	TDS	61.38	361350	MN		A-CAM	JSI	JSI	JSI
Badger Telecom, LLC	TDS	61.38	330844	WI		A-CAM	JSI	JSI	JSI
Blue Ridge Telephone Company	TDS	61.38	220346	GA		A-CAM	JSI	JSI	JSI
Bridge Water Telephone Company	TDS	61.38	361362	MN		A-CAM	JSI	JSI	JSI
Central State Telephone Company, LLC	TDS	61.38	330859	WI		A-CAM	JSI	JSI	JSI
Concord Telephone Exchange, Inc	TDS	61.38	290559	TN		A-CAM	JSI	JSI	JSI
Mid-Plains Telephone, LLC	TDS	61.38	330881	WI		A-CAM	JSI	JSI	JSI
Mid-State Telephone Company	TDS	61.38	361433	MN		A-CAM	JSI	JSI	JSI
Nelson-Ball Ground Telephone Company	TDS	61.38	220375	GA		A-CAM	JSI	JSI	JSI
Quincy Telephone Company (FL)	TDS	61.38	210338	FL		A-CAM	JSI	JSI	JSI
Quincy Telephone Company (GA)	TDS	61.38	220338	GA		A-CAM	JSI	JSI	JSI
Stockbridge and Sherwood Telephone Company, LLC	TDS	61.38	330954	WI		A-CAM	JSI	JSI	JSI
Strasburg Telephone Company	TDS	61.38	462207	CO		A-CAM	JSI	JSI	JSI
Tellico Telephone Company, Inc	TDS	61.38	290578	TN		A-CAM	JSI	JSI	JSI
UTELCO, LLC	TDS	61.38	330963	WI		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group C</b>		61.38							
Butler Telephone Company, Inc	TDS	61.38	250284	AL		A-CAM	JSI	JSI	JSI
Communications Corporation of Indiana	TDS	61.38	320776	IN		A-CAM	JSI	JSI	JSI
Kearsarge Telephone Company	TDS	61.38	120045	NH		A-CAM	JSI	JSI	JSI
Merrimack County Telephone Company	TDS	61.38	120047	NH		A-CAM	JSI	JSI	JSI
Merrimack County Telephone Company, dba MCTA, Inc.	TDS	61.38	123321	NH		A-CAM	JSI	JSI	JSI
Peoples Telephone Company, Inc	TDS	61.38	250314	AL		A-CAM	JSI	JSI	JSI
Somerset Telephone Company	TDS	61.38	100024	ME		A-CAM	JSI	JSI	JSI
Southwestern Telephone Company	TDS	61.38	452174	AZ		A-CAM	JSI	JSI	JSI
Williston Telephone Company	TDS	61.38	240551	SC		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group D</b>		61.38			X				
Amelia Telephone Corporation	TDS	61.38	190217	VA		A-CAM	JSI	JSI	JSI
Arizona Telephone Company	TDS	61.38	452171	AZ		A-CAM	JSI	JSI	JSI
Delta County Tele-Comm, Inc	TDS	61.38	462184	CO		A-CAM	JSI	JSI	JSI
Leslie County Telephone Company	TDS	61.38	260411	KY		A-CAM	JSI	JSI	JSI

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CURRENTLY EFFECTIVE CARRIERS	Holding Company	Filing Rules	SAC	State	Mid-Course Filing	Support Category	Common Line Rates	Switched Access Rates	Special Access Rates
Midway Telephone Company, LLC	TDS	61.38	330909	WI		A-CAM	JSI	JSI	JSI
Riverside Telecom, LLC	TDS	61.38	330943	WI		A-CAM	JSI	JSI	JSI
Tipton Telephone Company, Inc	TDS	61.38	320829	IN		A-CAM	JSI	JSI	JSI
Tri-County Telephone Company, Inc	TDS	61.38	320830	IN		A-CAM	JSI	JSI	JSI
Union Telephone Company	TDS	61.38	120049	NH		A-CAM	JSI	JSI	JSI
Virginia Telephone Company	TDS	61.38	190253	VA		A-CAM	JSI	JSI	JSI
Waunakee Telephone Company, LLC	TDS	61.38	330968	WI		A-CAM	JSI	JSI	JSI
Wilton Telephone Company, Inc	TDS	61.38	120050	NH		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group E</b>									
Communication Corporation of Michigan	TDS	61.38	310672	MI		A-CAM	JSI	JSI	JSI
Deposit Telephone Company, Inc	TDS	61.38	150089	NY		A-CAM	JSI	JSI	JSI
Hampden Telephone Company	TDS	61.38	100010	ME		A-CAM	JSI	JSI	JSI
Hartland and St Albans Telephone Company	TDS	61.38	100011	ME		A-CAM	JSI	JSI	JSI
Hornitos Telephone Co	TDS	61.38	542322	CA		A-CAM	JSI	JSI	JSI
Ludlow Telephone Company	TDS	61.38	140058	VT		A-CAM	JSI	JSI	JSI
McClellanville Telephone Company, Inc	TDS	61.38	240533	SC		A-CAM	JSI	JSI	JSI
New Castle Telephone Company	TDS	61.38	193029	VA		A-CAM	JSI	JSI	JSI
Port Byron Telephone Company	TDS	61.38	150118	NY		A-CAM	JSI	JSI	JSI
Southeast Mississippi Telephone Company, Inc	TDS	61.38	283301	MS		A-CAM	JSI	JSI	JSI
St. Stephen Telephone Company	TDS	61.38	240544	SC		A-CAM	JSI	JSI	JSI
Sugar Valley Telephone Company	TDS	61.38	170206	PA		A-CAM	JSI	JSI	JSI
Vernon Telephone Company, Inc	TDS	61.38	150133	NY		A-CAM	JSI	JSI	JSI
Warren Telephone Company	TDS	61.38	100031	ME		A-CAM	JSI	JSI	JSI
Winterhaven Telephone Company	TDS	61.38	542323	CA		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group F</b>					X				
Asotin Telephone Company (OR)	TDS	61.38	532404	OR		A-CAM	JSI	JSI	JSI
Asotin Telephone Company (WA)	TDS	61.38	522404	WA		A-CAM	JSI	JSI	JSI
Calhoun City Telephone Company, Inc	TDS	61.38	280448	MS		A-CAM	JSI	JSI	JSI
Chatham Telephone Company	TDS	61.38	310685	MI		A-CAM	JSI	JSI	JSI
Communications Corporation of Southern Indiana	TDS	61.38	320809	IN		A-CAM	JSI	JSI	JSI
Dickeyville Telephone, LLC	TDS	61.38	330875	WI		A-CAM	JSI	JSI	JSI
EastCoast Telecom of Wisconsin, LLC	TDS	61.38	330914	WI		A-CAM	JSI	JSI	JSI
Edwards Telephone Company, Inc	TDS	61.38	150092	NY		A-CAM	JSI	JSI	JSI
Home Telephone Company, Inc Waldron	TDS	61.38	320778	IN		A-CAM	JSI	JSI	JSI
Humphreys County Telephone Company	TDS	61.38	290566	TN		A-CAM	JSI	JSI	JSI
Mid-America Telephone, Inc	TDS	61.38	432010	OK		A-CAM	JSI	JSI	JSI
Myrtle Telephone Company, Inc	TDS	61.38	287449	MS		A-CAM	JSI	JSI	JSI
Potlatch Telephone Company	TDS	61.38	472230	ID		A-CAM	JSI	JSI	JSI
Shiawassee Telephone Company	TDS	61.38	310726	MI		A-CAM	JSI	JSI	JSI
Tenney Telephone Company, LLC	TDS	61.38	330958	WI		A-CAM	JSI	JSI	JSI
The Farmers Telephone Company, LLC	TDS	61.38	330880	WI		A-CAM	JSI	JSI	JSI

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CURRENTLY EFFECTIVE CARRIERS	Holding Company	Filing Rules	SAC	State	Mid-Course Filing	Support Category	Common Line Rates	Switched Access Rates	Special Access Rates
Wolverine Telephone Company	TDS	61.38	310738	MI		A-CAM	JSI	JSI	JSI
<b>TDS Telecom Group G</b>					X				
Arcadia Telephone Company	TDS	61.38	300585	OH		A-CAM	JSI	JSI	JSI
Black Earth Telephone Company, LLC	TDS	61.38	330849	WI		A-CAM	JSI	JSI	JSI
Bonduel Telephone Company, LLC	TDS	61.38	330851	WI		A-CAM	JSI	JSI	JSI
Burlington, Brighton and Wheatland Telephone Company, LLC	TDS	61.38	330856	WI		A-CAM	JSI	JSI	JSI
Camden Telephone Company, Inc	TDS	61.38	320744	IN		A-CAM	JSI	JSI	JSI
Cobbosseecontee Telephone Company	TDS	61.38	100005	ME		A-CAM	JSI	JSI	JSI
Continental Telephone Company	TDS	61.38	300607	OH		A-CAM	JSI	JSI	JSI
Grantland Telecom, LLC	TDS	61.38	330930	WI		A-CAM	JSI	JSI	JSI
Happy Valley Telephone Company	TDS	61.38	542321	CA		A-CAM	JSI	JSI	JSI
Island Telephone Company	TDS	61.38	310677	MI		A-CAM	JSI	JSI	JSI
Lewis River Telephone Company, Inc	TDS	61.38	522427	WA		A-CAM	JSI	JSI	JSI
Lewisport Telephone Company	TDS	61.38	260412	KY		A-CAM	JSI	JSI	JSI
Little Miami Communications Corporation	TDS	61.38	300613	OH		A-CAM	JSI	JSI	JSI
Mahanoy and Mahantango Telephone Company	TDS	61.38	170183	PA		A-CAM	JSI	JSI	JSI
McDaniel Telephone Company	TDS	61.38	522430	WA		A-CAM	JSI	JSI	JSI
MosineeTelephone Company, LLC	TDS	61.38	330915	WI		A-CAM	JSI	JSI	JSI
Northfield Telephone Company	TDS	61.38	140061	VT		A-CAM	JSI	JSI	JSI
Oakwood Telephone Company	TDS	61.38	300645	OH		A-CAM	JSI	JSI	JSI
Perkinsville Telephone Company, Inc	TDS	61.38	140062	VT		A-CAM	JSI	JSI	JSI
Salem Telephone Company	TDS	61.38	260417	KY		A-CAM	JSI	JSI	JSI
Scandinavia Telephone Company, LLC	TDS	61.38	330945	WI		A-CAM	JSI	JSI	JSI
Southeast Telephone Co. of Wisconsin, LLC	TDS	61.38	330952	WI		A-CAM	JSI	JSI	JSI
The Home Telephone Company of Pittsboro, Inc	TDS	61.38	320777	IN		A-CAM	JSI	JSI	JSI
The Island Telephone Company	TDS	61.38	100007	ME		A-CAM	JSI	JSI	JSI
The Merchants and Farmers Telephone Company	TDS	61.38	320788	IN		A-CAM	JSI	JSI	JSI
The State Long Distance Telephone Company, LLC	TDS	61.38	330955	WI		A-CAM	JSI	JSI	JSI
The West Penobscot Telephone and Telegraph Company	TDS	61.38	100034	ME		A-CAM	JSI	JSI	JSI
Township Telephone Company, Inc	TDS	61.38	150129	NY		A-CAM	JSI	JSI	JSI
Vernon Telephone Company, Inc. – Oriskany Falls d/b/a TDS Telecom	TDS	61.38	150114	NY		A-CAM	JSI	JSI	JSI
Winsted Telephone Company	TDS	61.38	361507	MN		A-CAM	JSI	JSI	JSI
<b>CURRENTLY EFFECTIVE CARRIERS - COMMON LINE RATES ONLY</b>									
Dalton Telephone Company - COMMON LINE ONLY			371537	NE		A-CAM	JSI	NECA	NECA
Elsie Communications, Inc. - COMMON LINE ONLY			371518	NE		A-CAM	JSI	NECA	NECA
S&A Telephone Co., Inc. - COMMON LINE ONLY			411829	KS		A-CAM	JSI	NECA	NECA
TDS Telecom Companies – COMMON LINE ONLY									
Norway Telephone Company, Inc.	TDS		240535	SC		A-CAM	JSI	NECA	NECA
Oakman Telephone Company, Inc.	TDS		250311	AL		A-CAM	JSI	NECA	NECA
The Vanlue Telephone Company	TDS		300662	OH		A-CAM	JSI	NECA	NECA
S and W Telephone Company, Inc.	TDS		320816	IN		A-CAM	JSI	NECA	NECA

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<b>CURRENTLY EFFECTIVE CARRIERS</b>	<b>Holding Company</b>	<b>Filing Rules</b>	<b>SAC</b>	<b>State</b>	<b>Mid-Course Filing</b>	<b>Support Category</b>	<b>Common Line Rates</b>	<b>Switched Access Rates</b>	<b>Special Access Rates</b>
West Point Telephone Company, Inc.	TDS		320837	IN		A-CAM	JSI	NECA	NECA
Mid-State Telephone Company – KMP	TDS		361413	MN		A-CAM	JSI	NECA	NECA

Description and Justification  
EXHIBIT B

<b>NEW CARRIERS EFFECTIVE JULY 2, 2019</b>	<b>Holding Company</b>	<b>Previous Tariff</b>	<b>Filing Rules</b>	<b>SAC</b>	<b>State</b>	<b>Support Category</b>	<b>Common Line Rates</b>	<b>Switched Access Rates</b>	<b>Special Access Rates</b>
Inter-Community Telephone Company, L.L.C.- <u>CL and SPA only: SWA stays in NECA</u>		NECA	61.50	381616	ND	A-CAM	JSI	NECA	JSI
Clarity Telecom, LLC- <u>SPA Only: CL and SWA stays in NECA</u>		NECA	61.50	391652	SD	A-CAM	NECA	NECA	JSI
Southwest Texas Telephone Company		NECA	61.39	442135	TX	Legacy	NECA Pool	JSI	JSI
<b>TEC Companies-Alabama</b>									
National Telephone of Alabama, Inc.	Telephone Electronics Corporation (TEC)	NECA	61.39	250286	AL	A-CAM	JSI	JSI	JSI
Roanoke Tel. Co., Inc.	Telephone Electronics Corporation (TEC)	NECA	61.39	250317	AL	A-CAM	JSI	JSI	JSI
<b>TEC Companies-Mississippi</b>									
Bay Springs Telephone Company, Inc.	Telephone Electronics Corporation (TEC)	NECA	61.39	280446	MS	A-CAM	JSI	JSI	JSI
<b>TEC Companies-Tennessee</b>									
Crockett Tel. Co. Inc.	Telephone Electronics Corporation (TEC)	NECA	61.39	290561	TN	A-CAM	JSI	JSI	JSI
Peoples Telephone Company (TN)	Telephone Electronics Corporation (TEC)	NECA	61.39	290576	TN	A-CAM	JSI	JSI	JSI
West Tennessee Tel. Co. Inc.	Telephone Electronics Corporation (TEC)	NECA	61.39	290583	TN	A-CAM	JSI	JSI	JSI
West Carolina Rural Telephone Cooperative, Inc. (SC)		NECA	61.50	240550	SC	A-CAM	JSI	JSI	JSI
PBT Telecom	Comporium Communications	NECA	61.38	240539	SC	Legacy	NECA Pool	JSI	JSI
Twin Valley Telephone, Inc.		NECA	61.39	411840	KS	Legacy	NECA Pool	JSI	JSI
Seneca Telephone Company		Moss Adams	61.39	421945	MO	Legacy	NECA Pool	JSI	JSI
Goodman Telephone Company		Moss Adams	61.39	421886	MO	Legacy	NECA Pool	JSI	JSI
Ozark Telephone Company		Moss Adams	61.39	421866	MO	Legacy	NECA Pool	JSI	JSI



JSI Transmittal No. 224  
June 17, 2019

Description and Justification  
EXHIBIT C

<b>EXITING CARRIERS EFFECTIVE JULY 2, 2019</b>	<b>Holding Company</b>	<b>SAC</b>	<b>State</b>
Consolidated Telecom, Inc.	Consolidated Companies	371562	NE
Consolidated Telephone Company	Consolidated Companies	371532	NE
Curtis Telephone Company	Consolidated Companies	371536	NE
Consolidated Telco, Inc. - COMMON LINE	Consolidated Companies	371530	NE
South Central Rural Telephone Coop		260418	KY

**John Staurulakis, Inc. Transmittal No. 224 – June 17, 2019**  
**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. 224 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the TDS Telecom study areas listed below.

<b>TDS Telecom Companies Group A</b> <b>Study Area Company Name</b>	<b>Study Area State</b>	<b>Study Area Code</b>
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

<b>TDS Telecom Companies-Group B</b> <b>Individual Study Area Company Name</b>	<b>State</b>	<b>Study Area Code</b>
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

<b>TDS Telecom Companies-Group C Individual Study Area Company Name</b>	<b>State</b>	<b>Study Area Code</b>
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	120047
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

<b>TDS Telecom Companies-Group D Individual Study Area Company Name</b>	<b>State</b>	<b>Study Area Code</b>
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

<b>TDS Telecom Companies Group E</b> <b>Study Area Company Name</b>	<b>Study Area</b> <b>State</b>	<b>Study Area</b> <b>Code</b>
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

<b>TDS Telecom Companies Group F</b> <b>Study Area Company Name</b>	<b>Study Area</b> <b>State</b>	<b>Study Area</b> <b>Code</b>
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

<b>TDS Telecom Companies Group G Study Area Company Name</b>	<b>Study Area State</b>	<b>Study Area Code</b>
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 2019 Access Filing Order and 2019 TRP Order**

The filing is made in accordance with the 2019 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). *See* July 1, 2019 Annual Access Charge Tariff Filings, WC Docket No. 19-47, Order, DA 19-246 (Released April 4, 2019). 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 2019 Annual Access Tariff Filings, WC Docket No. 19-47, Order, DA 19-313 (rel. May 1, 2019). TDS Telecom Groups A, B, C, and E are making a filing for Special Access rates to reflect the rate of return reduction from 10.50 percent to 10.25 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016. TDS Telecom Groups D, F, and G are making mid-course filings under 61.38. In addition, Special Access rates reflect the rate of return for the Test Year of 10.25 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

### **2019 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(i) prescribes a 2019 Target Terminating End Office Access rate of \$.0007 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
- CBOL ARC Imputation Calculation
- Mt. Vernon ARC Calculation to ensure ARC does not exceed its Eligible Recovery Group A only
- 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 2019-20 Summary TRP
- ICC-CAF Certifications

TDS Groups A-G proposes ARC rate changes effective July 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

## 2019 Tariff Review Plans

The 2019 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 2019 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 2, 2019 through June 30, 2020 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. 224 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 19-47, Order, DA 19-246 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
TRP – Combined TDS Telecom Group A Companies	#1-TDSA
ICC CAF Certification	#2-TDSA

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

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

## 2019 Special Access Rates

### Development of Projected Special Access Demand

Special Access demand quantities remained at the levels filed on June 18, 2018 in Transmittal No. 216 for TDS Groups A, B, C, and E. For Groups D, F, and G Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2015 to 2018. Based on this historical data, demand trends were developed to project end of year demand for 2019 and 2020. TDS Groups D, F, and G Companies averaged a 9 percent decrease in High Capacity DS1 demand from December 2017 through December 2018. This DS1 demand loss combined with other minor demand changes caused an estimated 2 to 8 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 D, F, and G experience and observations indicate 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 2018. 2019 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 2018 demand and 2019 forecasted demand were averaged to determine demand as of July 1, 2019. Next, year-end 2019 and 2020 forecasted demand were averaged to determine July 1, 2020 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 D, F, and G propose increasing Special Access rates by a composite amount of 6.9 percent as compared with the July 3, 2018 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. 224 – 2019 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. 224 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Bluffton of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Bluffton is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

Bluffton, a 61.38 prospective filer, makes biennial filings in even-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Bluffton Telephone Company (SC)**

61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates.

In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i). Note that the premium terminating Local Switching rate remains unchanged as the currently effective rate is below the target \$0.0007. However, the Non-Premium Local Switching rate reflects a reduction to implement a corrected rate.

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Bluffton CAF-ICC data is represented in a single consolidated file, *Bluffton 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Bluffton 2019 ROR-ILEC-ICC Data
- Bluffton 2019 Tariff Rate Comp CAF
- Bluffton 2019 True Up RoR ILEC
- Bluffton 2019 Rate Ceiling CAF
- Bluffton 2019-20 Rate of Return ILEC Summary

**4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL**

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Bluffton Telephone Company (SC)**

- 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. 224 – 2019 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. 224 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	JSI	Yes

Each of the five 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Citizens of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Citizens is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Citizens Telephone Company (NC)**

Citizens, a 61.38 prospective filer, makes biennial filings in even-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Citizens CAF-ICC data is represented in a single consolidated file, *Citizens Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Citizens 2019 ROR-ILEC-ICC Data
- Citizens 2019 Tariff Rate Comp CAF
- Citizens 2019 True Up RoR ILEC
- Citizens 2019 Rate Ceiling CAF
- Citizens 2019-20 Rate of Return ILEC Summary

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

- Comporium 2019 Rate Ceiling CAF – *Comporium 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Citizens Telephone Company (NC)**

**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. 224 – 2019 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. 224 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	JSI	Yes

Each of the five 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Comporium of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Comporium is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Comporium, Inc. (SC)**

Comporium, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Comporium, Inc. CAF-ICC data is represented in a single consolidated file, *Comporium, Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Comporium, Inc. 2019 ROR-ILEC-ICC Data
- Comporium, Inc. 2019 Tariff Rate Comp CAF
- Comporium, Inc. 2019 True Up RoR ILEC
- Comporium, Inc. 2019 Rate Ceiling CAF
- Comporium, Inc. 2019-20 Rate of Return ILEC Summary

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

- Comporium 2019 Rate Ceiling CAF – *Comporium 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Comporium, Inc. (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

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 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	JSI	Yes

Each of the five 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Fort Mill of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Fort Mill is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Fort Mill Telephone Company (SC)**

Fort Mill, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Fort Mill CAF-ICC data is represented in a single consolidated file, *Fort Mill Telephone Company 2019 RoR ILEC ICC No CAF TRP*, comprised of the following TRP workbooks:

- Fort Mill 2019 ROR-ILEC-ICC Data
- Fort Mill 2019 Tariff Rate Comp CAF
- Fort Mill 2019 True Up RoR ILEC
- Fort Mill 2019 Rate Ceiling CAF
- Fort Mill 2019-20 Rate of Return ILEC Summary

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

- Comporium 2019 Rate Ceiling CAF – *Comporium 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Fort Mill 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

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 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	JSI	Yes

Each of the five 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Lancaster of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Lancaster is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Lancaster Telephone Company (SC)**

Lancaster, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Lancaster CAF-ICC data is represented in a single consolidated file, *Lancaster Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Lancaster 2019 ROR-ILEC-ICC Data
- Lancaster 2019 Tariff Rate Comp CAF
- Lancaster 2019 True Up RoR ILEC
- Lancaster 2019 Rate Ceiling CAF
- Lancaster 2019-20 Rate of Return ILEC Summary

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

- Comporium 2019 Rate Ceiling CAF – *Comporium 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Lancaster 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

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 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. 224.

**1. DESCRIPTION OF FILING**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Hargray of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Hargray is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

Hargray, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Hargray CAF-ICC data is represented in a single consolidated file, *Hargray 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hargray 2019 ROR-ILEC-ICC Data
- Hargray 2019 Tariff Rate Comp CAF
- Hargray 2019 True Up RoR ILEC
- Hargray 2019 Rate Ceiling CAF
- Hargray 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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

Home, a Section 61.38 prospective filer, makes biennial annual filings in even-numbered years. Home is making a mid-course filing under Section 61.38. Pursuant to Section 61.38, supporting documentation accompanies this filing consistent with the Commission’s TRP Order. This mid-course filing is precipitated by a decrease in demand and the inability of Home to achieve its authorized rate of return. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 ARC rate changes are proposed in this filing.

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. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

with § 51.917 rules.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Home CAF-ICC data is represented in a single consolidated file, *Home SC 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Home 2019 ROR-ILEC-ICC Data
- Home 2019 Tariff Rate Comp CAF
- Home 2019 True Up RoR ILEC
- Home 2019 Rate Ceiling CAF
- Home 2019-120 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

**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

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

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, 2020 (also referred to herein as the July 1, 2019-June 30, 2020 Test Year Cost of Service or "TYCOS" or "2020 TYCOS"). The costs for the twelve (12) month period ending June 30, 2020 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, 2018, identified as follows (also referred to herein as the 2018 Prior Year Cost of Service or "2018 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].

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

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.

<b>Common Line</b>	This filing does not include rates for Common Line rate elements such as End User Common Line charges. The Company 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
<b>Traffic Sensitive</b>	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.
<b>Wireline Broadband Internet Access Service</b>	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-



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

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 December 17, 2018. See *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Report and Order and Waiver, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024 (*2018 Separations Freeze Extension Order*). The Company did not elect to opt out of the freeze as provided for in the 2018 Separations Freeze Order.

**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. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

**6. SPECIAL ACCESS RATE CHANGES**

The Company's proposed Special Access rates represent a 9 percent rate increase for TDM (DS1/DS3/VG) services, and a 1 percent decrease for Ethernet related rate elements as compared to current rates. The increase in rates will allow the Company to move from the 4.26 percent realized rate of return for the 2018 PYCOS to a projected 10.25 percent rate of return for the June 30, 2020 TYCOS (twelve months ending June 30, 2020). Special Access demand for the PYCOS and through the time of the instant filing has decreased from the level projected for the June 30, 2019 TYCOS for the 2018 annual filing. In their July, 2018 filing, Home actually reduced all special access rates (both Ethernet and TDM) by approximately 5 percent. Despite this reduction in rates, Home experienced significant revenue loss in special access revenues in 2018 as compared to 2017, which for the most part occurred after their annual filing was completed in June of 2018.

The company is making this filing in response to a dramatic reduction in overall special access revenues during the 2018 historic period as compared to previous periods. Special access revenue requirements have not dramatically changed, as in many cases TDM circuits have been replaced by Ethernet circuits that generate relatively lower revenues, while costs associated with these circuits are not reduced proportionately.

	Description	Source	PROSPECTIVE 06_30_19 per 2018 FILING TRP	HISTORIC per 2019 FILING TRP	% De- crease	PRO- SPECTIVE per 2019 FILING TRP	% Change from Historic
			7/18-6/19	1/18-12/18		7/19 - 6/20	
1	Special Access Revenue	TRP COS-1(P) or (H), Row 100	\$1,448,839	\$1,324,410	-8.6%	\$1,500,877	13.3%
2	Total Special Access Revenue Requirement	TRP COS-1(P) or (H), Row 300	\$1,487,099	\$1,461,889	2%	\$1,500,877	2.6%
3	Rate of Return	TRP COS-1 (P) or (H) Row 430	10.50%	4.26%		10.25%	

**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 2019 annual access filing are reasonable in all respects and supported by both the historical and projected demand and cost. Moreover, the Company has

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Home Telephone Company (SC)**

complied with all prescriptions regarding 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Horry of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Horry is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

Horry, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects revisions to the Access Recovery Charge and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Horry Telephone Company (SC)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Horry CAF-ICC data is represented in a single consolidated file, *Horry 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks

- Horry 2019 ROR-ILEC-ICC Data
- Horry 2019 Tariff Rate Comp CAF
- Horry 2019 True Up RoR ILEC
- Horry 2019 Rate Ceiling CAF
- Horry 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Matanuska Telephone Association**  
**SAC 613015 (AK)**

Matanuska Telephone Association, (alternatively “MTA” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). MTA is an Issuing Carrier of the JSI Tariff. The Company files interstate access rates on a prospective basis pursuant to Section 61.38 of the Commission’s rules. The filing is made in accordance with the Commission’s 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313 (“TRP Order”).

**1. DESCRIPTION OF FILING**

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

MTA, a Section 61.38 prospective filer, makes biennial annual filings in even-numbered years. MTA is making a mid-course filing under Section 61.38. Pursuant to Section 61.38, supporting documentation accompanies this filing consistent with the Commission’s TRP Order. This mid-course filing is precipitated by a decrease in demand and the inability of MTA to achieve its authorized rate of return.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Matanuska Telephone Association (AK)**

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.<sup>1</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. MTA TARIFF REVIEW PLANS**

MTA submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. CAF-ICC data is comprised of the following TRP workbooks:

- MTA 2019 ROR-ILEC-ICC Data
- MTA 2019 Tariff Rate Comp CAF
- MTA 2019 True Up
- MTA 2019 Rate Ceiling CAF
- MTA 2019-20 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

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Matanuska Telephone Association (AK)**

**5. JUSTIFICATION for COST SUPPORT and RATE DEVELOPMENT**

In addition to the information provided with this filing described above, cost support for the mid-course filing for Special Access rates includes the following: the Tariff Review Plan (“TRP”) schedule and Attachments #1-7 as described below. The Certification of the cost support data for the mid-course Special Access filing is shown in Attachment #8 included separately.

Other than the step down of Switched Access terminating End Office rates pursuant to § 51.909(i), discussed above, the Company is not proposing any changes in Switched Access, and thus the following review of cost support is limited in effect to Special Access.

**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, 2020 (also referred to herein as the July 1, 2019-June 30, 2020 Test Year Cost of Service or “TYCOS” or “2020 TYCOS”). The costs for the twelve (12) month period ending June 30, 2020 have been based on financial estimates and projections of MTA, 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, 2018, identified as follows (also referred to herein as the 2018 Prior Year Cost of Service or “2018 PYCOS”):

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



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Matanuska Telephone Association (AK)**

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") under rate-of-return. 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 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

**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. Consistent with the requirements of Section 51.909(a)(1), discussed above, the Company's revisions to

**Description and Justification**  
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**Matanuska Telephone Association (AK)**

Switched Access is limited to the end office target rate pursuant to § 51.909(i) and thus the following review of cost support is limited in effect to Special Access.

**Wireline  
Broadband  
Internet  
Access Service** Effective July 1, 2015, 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. Effective January 3, 2017, the Company elected to provide Consumer Broadband-Only Loop (“CBOL”) on a permissively detariffed, common-carriage basis. The Company made these elections 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 December 17, 2018. See *Jurisdictional Separations and Referral to the Federal-*

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**Matanuska Telephone Association (AK)**

*State Joint Board*, CC Docket No. 80-286, Report and Order and Waiver, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024 (*2018 Separations Freeze Extension Order*). The Company did not elect to opt out of the freeze as provided for in the 2018 Separations Freeze Order.

**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 RATE CHANGES

The Company's proposed Special Access rates represent a 27 percent across the board increase from current rates. The increase in rates will allow the Company to move from the -1.7 percent realized rate of return for the 2018 PYCOS to a projected 10.25 percent rate of return for the June 30, 2020 TYCOS (twelve months ending June 30, 2020). Special Access demand for the PYCOS and through the time of the instant filing has decreased from the level projected for the June 30, 2019 TYCOS for the 2018 annual filing.

The following table shows data from the TRP for the 2018 annual filing together with data for the instant annual filing for 2019. The table uses interstate Special Access High Capacity Channel Terminations as a representative statistic to show the declining demand for interstate Special Access.

	Description	Source	TYCOS 6_30_2019	HISTORIC per 2018 FILING TRP	% De- crease	PRO- SPECTIVE per 2019 FILING TRP	% De- crease from Historic
			7/18-6/19	1/18-12/18		7/19 - 6/20	
1	High Capacity Channel Terminations - Annual Demand	DMD-2 Row 150	2,856.10	2,331.24	-18%	1,976.04	-15%
2	Average Monthly CTs	Row 1 / 12	238	195	-18%	165	-15%

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Matanuska Telephone Association (AK)**

3	Special Access Revenue	TRP COS-1(P) or (H),Row 100	\$7,306,846	\$4,534,433	-37.9%	\$5,453,890	+20.3%
4	Total Special Access Expenses and Taxes	TRP COS-1(P) or (H),Row 260	\$6,009,217	\$4,715,234	+21.5%	\$4,374,256	-7.2%
5	Return	Ln 2 - Ln3	\$1,297,629	\$-180,801	-113.9%	\$1,079,634	-3.8%
6	Average Rate Base	TRP COS-1(P) or (H),Row 410	\$12,358,372	\$10,563,419	-14.5%	\$10,533,026	-0.3%
7	Rate of Return	Row 430 or Ln 4 / Ln 5	10.5%	-1.7%		10.25%	

Note: TYCOS 6/30/2019 Data includes DSL Voice Data values, which are not included in the 12/31/2018 Actual or Projected 6/30/2020 columns. See the following chart for a more explanatory comparison of tariffed special access revenue and cost data.

Special Access- Only Cost and Demand					
	TYCOS 6_30_2019	Actual 2018	% Difference	TYCOS 6_30_2020	% Difference
Special Access Revenue Requirement Authorized ROR	\$4,676,458	\$5,837,597	24.8%	\$5,453,890	-6.5%
Special Access Projected/Actual Revenues	\$4,676,458	\$4,534,433	-3.03%	\$5,453,890	20.28%

As shown in the chart above, the Actual 2018 (PYCOS) revenue requirement for special access services (without CBOL or DSL/Voice Data Included) is significantly higher than the TYCOS 6/30/2019 revenue requirement from the 2018 Annual filing. Use of this revenue requirement in the 2018 Annual Filing resulted in a rate decrease of approximately 12% for all special access services. However, after careful review, MTA has determined that these revenue requirements appear to be insufficient and in fact do not follow historical trends. As shown below, the 2018 Revenue Requirement (PYCOS 12/31/2018) is much closer in line with Historic trends and results:

2015 Special Access Revenue Requirement: \$5,834,560  
2016 Special Access Revenue Requirement: \$6,008,390  
2017 Special Access Revenue Requirement: \$4,817,745 (PYCOS 2018 Filing)

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Matanuska Telephone Association (AK)**

YE 6/30/2019 TYCOS (2018 Filing) Rev. Req: \$4,676,458  
2018 PYCOS Special Access Revenue Requirement: \$5,837,597  
YE 6/30/2020 TYCOS Special Access Revenue Req: \$5,453,890

As the shown above, both the 2017 PYCOS and the 6/30/2019 TYCOS revenue requirements are reasonable when compared to both prior and subsequent periods. Based on these comparisons, MTA has come to the conclusion that the revenue requirements used in the 2018 Annual Filings were inappropriate and are not representative of 2018 actual and projected Year ending 6/30/2019 results. As a result, achieved earnings for 2018, as discussed above, were below 0%. This mid-course filing is necessary to correct this situation and produce the authorized returns for MTA.

**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 2019 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 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. 224 – 2019 Annual Access Filing**

**PBT Telecom, Inc.**  
**SAC 240539 (South Carolina)**

PBT Telecom, Inc., (alternatively “PBT” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, PBT will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel PBT as an issuing carrier for NECA Tariff F.C.C. No. 5 and PBT will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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	JSI	Yes

Each of the five 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. 224.

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 2, 2019, the Company will file interstate Special Access services, including Public Packet Data Network, on a prospective basis under Section 61.38 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 § 61.38.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**PBT Telecom (South Carolina)**

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 PBT parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. The Company provides Consumer Broadband-Only Loop (“CBOL”) under NECA Tariff FCC No. 5 rates and regulations for CBOL. Thus, the instant filing will not include rates for WBIAS or CBOL for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for PBT reflect a rate-of-return of 10.25%.

**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.

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

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**PBT Telecom (South Carolina)**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 36.78 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$579,120. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$366,136, a decrease of \$212,984 or 36.78 percent.

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></p> <p>The Association shall calculate the difference between each exiting Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support and the Rate-of-Return Carrier's projected switched access pool settlements excluding Local Switching Support for the same period with a net contribution amount being treated as a positive amount and a net recipient amount being treated as a negative amount. The Association shall divide the calculated difference by the Rate-of-Return Carrier's 2011-2012 tariff year projected interstate switched access revenues excluding Local Switching Support to produce a percent net contribution or net receipt factor.</p>	<i>See Exhibit A, Lines 101 through 104</i>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></p> <p>The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]</p>	<i>See Exhibit A, Line 105</i>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></p> <p>[...] and then proportionately adjust the Association's capped switched access rates as of the date preceding the effective date of the exiting Rate-of-Return Carrier's next annual tariff filing by this percentage. A Rate-of-Return Carrier that was a net contributor to the pool will have rate caps that are lower than the Association's switched access rate caps, while a net recipient will have switched access rate caps that are higher than the Association's switched access rate caps;</p>	<i>See Exhibit A, Lines 203 through 221</i>
<b>4</b>	<p><b>51.909(i)</b></p> <p>Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute</p>	<i>See Exhibit A, Lines 401 through 405</i>



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**PBT Telecom (South Carolina)**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>5</b>	<b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b>  The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2, 2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b>  [...] 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 2, 2019 have been determined based on based on Section 61.38(b)(1)(i) of the Commission's rules. See 47 CFR § 61.38(b)(1)(i).<sup>1</sup> The Company submits the 2019 Annual Filing ROR CAF-BLS 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**PBT Telecom (South Carolina)**

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

PBT submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020:

- PBT Telecom, Inc. 2019 ROR-ILEC-ICC Data
- PBT Telecom, Inc. 2019 Tariff Rate Comp CAF
- PBT Telecom, Inc. 2019 True Up
- PBT Telecom, Inc. 2019 Rate Ceiling CAF
- PBT Telecom, Inc. 2019 Rate of Return ILEC Summary

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

- Comporium 2019 Rate Ceiling CAF – *Comporium 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

**PBT Telecom, Inc.**  
240539

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$579,120
102	Projected 2011-12 Pool Settlements without LSS	NECA	366,136
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 212,984
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	36.78%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-36.78%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.009280
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.034014

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$27.00
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$43.20
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$131.65
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,202.06
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.92
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.92
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$9.02
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$78.57
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$19.34
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$19.34
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$46.80
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$300.50
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$274.19
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$105.85
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000278
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001440
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.003632
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003667
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004046

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

**Band 1 / Band 7 / Band 2**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.014678
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$42.71
304	Voice Grade 4-Wire Entrance Facility		\$68.33
305	DS-1 Entrance Facility		\$208.23
306	DS-3 Entrance Facility		\$1,901.31
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.04
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.04
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.26
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$124.28
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.59
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.59
313	DS-1 Direct Trunk Termination		\$74.02
314	DS-3 Direct Trunk Termination		\$475.31
315	Multiplexing DS3-DS1		\$433.69
316	Multiplexing DS1-Voice		\$167.43
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000439
318	Tandem Switched Termination		\$0.002277
319	Tandem Switching		\$0.005744
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*

**PBT Telecom, Inc.**  
240539

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Winnebago of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Winnebago is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

Winnebago, a 61.38 prospective filer, makes biennial filings. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 (“ARC”) pursuant to 51.917(e) and to receive CAF-ICC recovery pursuant to 51.917(f). No ARC rate changes are proposed in this filing.

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. 224 - 2019 Annual Access Filing**  
**Winnebago Cooperative Telecom Association (IA and MN)**

with § 51.917 rules.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Winnebago CAF-ICC data is represented in two consolidated files, *Winnebago IA 351337 2019 RoR ILEC ICC CAF TRP* and *Winnebago MN 361337 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Winnebago IA 2019 ROR-ILEC-ICC Data
- Winnebago IA 2019 Tariff Rate Comp CAF
- Winnebago IA 2019 True Up RoR ILEC
- Winnebago IA 2019 Rate Ceiling CAF
- Winnebago IA 2019-20 Rate of Return ILEC Summary
  
- Winnebago MN 2019 ROR-ILEC-ICC Data
- Winnebago MN 2019 Tariff Rate Comp CAF
- Winnebago MN 2019 True Up RoR ILEC
- Winnebago MN 2019 Rate Ceiling CAF
- Winnebago MN 2019-20 Rate of Return ILEC Summary

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

- Winnebago 2019 Rate Ceiling CAF – *Winnebago 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

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<sup>1</sup> 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. 224 - 2019 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

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). 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

ABB is an Issuing Carrier of the JSI Tariff. ABB 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by ABB 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. ABB elected to have Common Line and End User rates tariffed by NECA.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**American Broadband Nebraska (NE)**

10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan ("TRP") in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. ABB TARIFF REVIEW PLANS**

ABB submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in single consolidated files for each ABB carrier:

*Arlington Telephone Company 2019 RoR ILEC ICC CAF TRP*  
*The Blair Telephone Company 2019 RoR ILEC ICC CAF TRP*  
*Eastern Nebraska Telephone Company 2019 RoR ILEC ICC CAF TRP*  
*Rock County 2019 RoR ILEC ICC CAF TRP*

The foregoing TRPs are comprised of the following TRP workbooks:

- 2019 ROR-ILEC-ICC Data
- 2019 Tariff Rate Comp CAF
- 2019 True Up
- 2019 Rate Ceiling CAF
- 2019-20 Rate of Return ILEC Summary

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**American Broadband Nebraska (NE)**

**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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 ARC rate changes are proposed in this filing.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Arkwest Communications, Inc. (AR)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Arkwest 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Arkwest 2019 ROR-ILEC-ICC Data
- Arkwest 2019 Tariff Rate Comp CAF
- Arkwest 2019 True Up
- Arkwest 2019 Rate Ceiling CAF
- Arkwest 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Atlantic 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Atlantic TMC 2019 ROR-ILEC-ICC Data
- Atlantic TMC 2019 Tariff Rate Comp CAF
- Atlantic TMC 2019 True Up
- Atlantic TMC 2019 Rate Ceiling CAF
- Atlantic TMC 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Bixby Telephone Company (OK)**

The Company proposes ARC rate changes effective July 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Bixby 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Bixby 2019 ROR-ILEC-ICC Data
- Bixby 2019 Tariff Rate Comp CAF
- Bixby 2019 True Up
- Bixby 2019 Rate Ceiling CAF
- Bixby 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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, Chazy & Westport accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND**

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Chazy & Westport Telephone Corporation (NY)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Chazy & Westport 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chazy & Westport 2019 ROR-ILEC-ICC Data
- Chazy & Westport 2019 Tariff Rate Comp CAF
- Chazy & Westport 2019 True Up
- Chazy & Westport 2019 Rate Ceiling CAF
- Chazy & Westport 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Chesnee of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Chesnee is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Chesnee 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chesnee 2019 ROR-ILEC-ICC Data
- Chesnee 2019 Tariff Rate Comp CAF
- Chesnee 2019 True Up
- Chesnee 2019 Rate Ceiling CAF
- Chesnee 2019-20 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)

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<sup>1</sup> 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. 224 - 2019 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Eastex Telephone Cooperative, 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Eastex 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Eastex 2019 ROR-ILEC-ICC Data
- Eastex 2019 Tariff Rate Comp CAF
- Eastex 2019 True Up
- Eastex 2019 Rate Ceiling CAF
- Eastex 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Ellijay Telephone Company (GA)**

The Company proposes ARC rate changes effective July 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Ellijay Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ellijay 2019 ROR-ILEC-ICC Data
- Ellijay 2019 Tariff Rate Comp CAF
- Ellijay 2019 True Up
- Ellijay 2019 Rate Ceiling CAF
- Ellijay 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

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

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Etex Telephone Cooperative, 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Etex 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Etex 2019 ROR-ILEC-ICC Data
- Etex 2019 Tariff Rate Comp CAF
- Etex 2019 True Up
- Etex 2019 Rate Ceiling CAF
- Etex 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

JSI Tariff No. 1 governs the provision by Farmers of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network Services. Farmers is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bill End User Common Line (“EUCL”) charges pursuant to NECA Tariff F.C.C. No. 5 notwithstanding being an issuing carrier for JSI Tariff F.C.C. No. 1.

Farmers, a 61.38 prospective filer, makes biennial filings in even-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to Special Access rates that reflect a rate-of-return of 10.25% and submits the required 61.38 ILEC Rate-of-Return @ 10.25 Tariff Review Plan (“TRP”) in support of proposed Special Access rates. In addition, this filing reflects the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 ARC rate changes are proposed under this filing.

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. 224 - 2019 Annual Access Filing**  
**Farmers Telephone Company (SC)**

with § 51.917 rules.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

Farmers CAF-ICC data is represented in a single consolidated file, *Farmers Telephone Cooperative, Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Farmers 2019 ROR-ILEC-ICC Data
- Farmers 2019 Tariff Rate Comp CAF
- Farmers 2019 True Up RoR ILEC
- Farmers 2019 Rate Ceiling CAF
- Farmers 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Gearheart dba Coalfields 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Gearheart 2019 ROR-ILEC-ICC Data
- Gearheart 2019 Tariff Rate Comp CAF
- Gearheart 2019 True Up
- Gearheart 2019 Rate Ceiling CAF
- Gearheart 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Goodman Telephone Company, Inc.**  
**SAC 421886 (Missouri)**

Goodman Telephone Company, Inc., (alternatively “Goodman” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Goodman will exit the Moss Adams Tariff F.C.C. No. 1. Concurrent with exiting the Moss Adams Tariff F.C.C. No. 1, Moss Adams will cancel Goodman as an issuing carrier for Moss Adams Tariff F.C.C. No. 1 and Goodman will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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 2, 2019, 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 Goodman parallel those of Moss Adams Tariff FCC No. 1 in all material respects.

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Goodman Telephone Company, Inc. (Missouri)**

The Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for Goodman reflect a rate-of-return of 10.25%. In addition, Switched Access terminating End Office rates reflect the stepdown pursuant to § 51.909(i).

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

Traffic sensitive switched access rates comply 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. Switched access rates for the Company reflect the capped interstate rates pursuant to 51.909(a)(1), and the target terminating End Office per minute rate of \$0.0007.

**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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> The Company submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed Special Access rates.

The significant increase in all tariffed Special Access Rates can be attributed to the determination that the previous rates were developed incorrectly. Those rates, which were filed in 2017, reflected a substantial decrease as compared to the rates that were previously in effect. The foregoing error dramatically overstated the billed revenues generated by the historic demand. The rates in this filing serve to correct that error as well as to update for 2018 and 2017 historic costs and demand.

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Goodman Telephone Company, Inc. (Missouri)**

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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Goodman Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. Goodman CAF-ICC data is represented in a single consolidated file, *Goodman 2019 RoR ILEC ICC CAF TRP*, comprised of the following workbooks.

- Goodman 2019 ROR-ILEC-ICC Data
- Goodman 2019 Tariff Rate Comp CAF
- Goodman 2019 True Up
- Goodman 2019 Rate Ceiling CAF
- Goodman 2019-20 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

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<sup>2</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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).

No changes are proposed to 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in single consolidated files, *Grand River Mutual Telephone Company IA 351888 2019 RoR ILEC ICC CAF TRP* and *Grand River Mutual Telephone Company MO 421888 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Grand River IA 2019 ROR-ILEC-ICC Data
- Grand River IA 2019 Tariff Rate Comp CAF
- Grand River IA 2019 True Up
- Grand River IA 2019 Rate Ceiling CAF
- Grand River IA 2019-20 Rate of Return ILEC Summary
  
- Grand River MO 2019 ROR-ILEC-ICC Data
- Grand River MO 2019 Tariff Rate Comp CAF
- Grand River MO 2019 True Up
- Grand River MO 2019 Rate Ceiling CAF
- Grand River MO 2019-20 Rate of Return ILEC Summary

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<sup>1</sup> 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. 224 - 2019 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Hancock RTC dba NineStar Connect 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hancock 2019 ROR-ILEC-ICC Data
- Hancock 2019 Tariff Rate Comp CAF
- Hancock 2019 True Up
- Hancock 2019 Rate Ceiling CAF
- Hancock 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Highland 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Highland 2019 ROR-ILEC-ICC Data
- Highland 2019 Tariff Rate Comp CAF
- Highland 2019 True Up
- Highland 2019 Rate Ceiling CAF
- Highland 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Industry Telephone Company (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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Industry Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Industry 2019 ROR-ILEC-ICC Data
- Industry 2019 Tariff Rate Comp CAF
- Industry 2019 True Up
- Industry 2019 Rate Ceiling CAF
- Industry 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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.

This filing proposes revised Special Access rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Knology of the Valley, Inc. (GA)**

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

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Knology of the Valley 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology 2019 ROR-ILEC-ICC Data
- Knology 2019 Tariff Rate Comp CAF
- Knology 2019 True Up
- Knology 2019 Rate Ceiling CAF
- Knology 2019-20 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

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Knology of the Valley, Inc. (GA)**

- 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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.

This filing proposes revised Special Access rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Knology Total Communications, Inc. (AL)**

the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 ARC revisions are proposed in this filing.

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Knology Total 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology Total 2019 ROR-ILEC-ICC Data
- Knology Total 2019 Tariff Rate Comp CAF
- Knology Total 2019 True Up
- Knology Total 2019 Rate Ceiling CAF
- Knology Total 2019-20 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

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Knology Total Communications, Inc. (AL)**

- 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Livingston of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Livingston is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Livingston Telephone Company (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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Livingston 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Livingston 2019 ROR-ILEC-ICC Data
- Livingston 2019 Tariff Rate Comp CAF
- Livingston 2019 True Up
- Livingston 2019 Rate Ceiling CAF
- Livingston 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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, Lumos accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Lumos Telephone of Botetourt, Inc. (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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Lumos Telephone of Botetourt 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Lumos 2019 ROR-ILEC-ICC Data
- Lumos 2019 Tariff Rate Comp CAF
- Lumos 2019 True Up
- Lumos 2019 Rate Ceiling CAF
- Lumos 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Mark Twain Rural Telephone Company (MO)**

The Company proposes ARC rate changes effective July 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single combined file, *Mark Twain 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mark Twain 2019 ROR-ILEC-ICC Data
- Mark Twain 2019 Tariff Rate Comp CAF
- Mark Twain 2019 True Up
- Mark Twain 2019 Rate Ceiling CAF
- Mark Twain 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Mid-Plains Rural Tel. Coop., 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Mid-Plains Rural Telephone Coop. Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mid-Plains 2019 ROR-ILEC-ICC Data
- Mid-Plains 2019 Tariff Rate Comp CAF
- Mid-Plains 2019 True Up
- Mid-Plains 2019 Rate Ceiling CAF
- Mid-Plains 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes Special Access and Public Packet Data Network Rates consistent with requirements under 61.39 for biennial filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

- Moundridge 2019 ROR-ILEC-ICC Data
- Moundridge 2019 Tariff Rate Comp CAF
- Moundridge 2019 True Up
- Moundridge 2019 Rate Ceiling CAF
- Moundridge 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Ozark Telephone Company, Inc.**  
**SAC 421866 (Missouri)**

Ozark Telephone Company, Inc., (alternatively “Ozark” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Ozark will exit the Moss Adams Tariff F.C.C. No. 1. Concurrent with exiting the Moss Adams Tariff F.C.C. No. 1, Moss Adams will cancel Ozark as an issuing carrier for Moss Adams Tariff F.C.C. No. 1 and Ozark will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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 2, 2019, 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 Ozark parallel those of Moss Adams Tariff FCC No. 1 in all material respects.

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Ozark Telephone Company, Inc. (Missouri)**

The Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for Ozark reflect a rate-of-return of 10.25%. In addition, Switched Access terminating End Office rates reflect the stepdown pursuant to § 51.909(i).

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

Traffic sensitive switched access rates comply 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. Switched access rates for the Company reflect the capped interstate rates pursuant to 51.909(a)(1), and the target terminating End Office per minute rate of \$0.0007.

**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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

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<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Ozark Telephone Company, Inc. (Missouri)**

Ozark Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. Ozark CAF-ICC data is represented in a single consolidated file, *Ozark 2019 RoR ILEC ICC CAF TRP*, comprised of the following workbooks.

- Ozark 2019 ROR-ILEC-ICC Data
- Ozark 2019 Tariff Rate Comp CAF
- Ozark 2019 True Up
- Ozark 2019 Rate Ceiling CAF
- Ozark 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Piedmont of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Piedmont is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Piedmont Rural Telephone Cooperative, Inc. (SC)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Piedmont Rural Telephone Cooperative, Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Piedmont 2019 ROR-ILEC-ICC Data
- Piedmont 2019 Tariff Rate Comp CAF
- Piedmont 2019 True Up
- Piedmont 2019 Rate Ceiling CAF
- Piedmont 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Pine of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Pine is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Pine Telephone Company (OK)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

- Pine 2019 ROR-ILEC-ICC Data
- Pine 2019 Tariff Rate Comp CAF
- Pine 2019 True Up
- Pine 2019 Rate Ceiling CAF
- Pine 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Pineland Telephone Cooperative, Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Pineland 2019 ROR-ILEC-ICC Data
- Pineland 2019 Tariff Rate Comp CAF
- Pineland 2019 True Up
- Pineland 2019 Rate Ceiling CAF
- Pineland 2019-20 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)

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<sup>1</sup> 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. 224 - 2019 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Pioneer of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Pioneer is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications (KS)**

The Company proposes ARC rate changes effective July 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

- Pioneer 2019 ROR-ILEC-ICC Data
- Pioneer 2019 Tariff Rate Comp CAF
- Pioneer 2019 True Up
- Pioneer 2019 Rate Ceiling CAF
- Pioneer 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**1. DESCRIPTION OF FILING**

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.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Heartland Telecommunications Company of Iowa d/b/a Premier**  
**Communications (IA)**

Heartland is not a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to JSI Tariff FCC No. 1.

This filing proposes revised Special Access rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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**

Heartland submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Heartland 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Heartland Telecommunications Company of Iowa d/b/a Premier**  
**Communications (IA)**

- Heartland 2019 ROR-ILEC-ICC Data
- Heartland 2019 Tariff Rate Comp CAF
- Heartland 2019 True Up
- Heartland 2019 Rate Ceiling CAF
- Heartland 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Mutual Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Mutual Telephone Company (IA)**

- Mutual 2019 ROR-ILEC-ICC Data
- Mutual 2019 Tariff Rate Comp CAF
- Mutual 2019 True Up
- Mutual 2019 Rate Ceiling CAF
- Mutual 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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. 224 - 2019 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Northern Iowa Telephone Co. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Northern Iowa 2019 ROR-ILEC-ICC Data
- Northern Iowa 2019 Tariff Rate Comp CAF
- Northern Iowa 2019 True Up
- Northern Iowa 2019 Rate Ceiling CAF

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Northern Iowa Telephone Company (IA)**

- Northern Iowa 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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. 224 - 2019 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Webb Dickens 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Webb-Dickens 2019 ROR-ILEC-ICC Data
- Webb-Dickens 2019 Tariff Rate Comp CAF
- Webb-Dickens 2019 True Up
- Webb-Dickens 2019 Rate Ceiling CAF

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Webb-Dickens Telephone Corporation (IA)**

- Webb-Dickens 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Ringgold Telephone Company (GA)**

Revisions are proposed to residential Access Recovery Charges as shown in 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Ringgold Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ringgold 2019 ROR-ILEC-ICC Data
- Ringgold 2019 Tariff Rate Comp CAF
- Ringgold 2019 True Up
- Ringgold 2019 Rate Ceiling CAF
- Ringgold 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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 Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Millington Telephone Company d/b/a Ritter Communications (TN)**

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

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 to the Access Recovery Charge are proposed in this filing.

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Millington Telephone Company, Inc. 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Millington 2019 ROR-ILEC-ICC Data
- Millington 2019 Tariff Rate Comp CAF
- Millington 2019 True Up
- Millington 2019 Rate Ceiling CAF
- Millington 2019-20 Rate of Return ILEC Summary

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Millington Telephone Company d/b/a Ritter Communications (TN)**

**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. 224 – 2019 Annual Access Filing**

**Seneca Telephone Company, Inc.**  
**SAC 421945 (Missouri)**

Seneca Telephone Company, Inc., (alternatively “Seneca” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Seneca will exit the Moss Adams Tariff F.C.C. No. 1. Concurrent with exiting the Moss Adams Tariff F.C.C. No. 1, Moss Adams will cancel Seneca as an issuing carrier for Moss Adams Tariff F.C.C. No. 1 and Seneca will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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 2, 2019, 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 Seneca parallel those of Moss Adams Tariff FCC No. 1 in all material respects.

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

The Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for Seneca

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Seneca Telephone Company, Inc. (Missouri)**

reflect a rate-of-return of 10.25%. In addition, Switched Access terminating End Office rates reflect the stepdown pursuant to § 51.909(i).

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

Traffic sensitive switched access rates comply 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. Switched access rates for the Company reflect the capped interstate rates pursuant to 51.909(a)(1), and the target terminating End Office per minute rate of \$0.0007.

**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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

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<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Seneca Telephone Company, Inc. (Missouri)**

Seneca Telephone Company, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. Seneca CAF-ICC data is represented in a single consolidated file, *Seneca 2019 RoR ILEC ICC CAF TRP*, comprised of the following workbooks.

- Seneca 2019 ROR-ILEC-ICC Data
- Seneca 2019 Tariff Rate Comp CAF
- Seneca 2019 True Up
- Seneca 2019 Rate Ceiling CAF
- Seneca 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020:

- Skyline TMC 2019 ROR-ILEC-ICC Data
- Skyline TMC 2019 Tariff Rate Comp CAF
- Skyline TMC 2019 True Up
- Skyline TMC 2019 Rate Ceiling CAF
- Skyline TMC 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Smart City Telecom, LLC 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Smart City 2019 ROR-ILEC-ICC Data
- Smart City 2019 Tariff Rate Comp CAF
- Smart City 2019 True Up
- Smart City 2019 Rate Ceiling CAF
- Smart City 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Southwest Texas Telephone Company**  
**SAC 442135 (Texas)**

Southwest Texas Telephone Company, (alternatively “Southwest” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Southwest will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Southwest as an issuing carrier for NECA Tariff F.C.C. No. 5 and Southwest will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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 2, 2019, 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 Southwest 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 2, 2019, 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 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Southwest Texas Telephone Company (Texas)**

Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for Southwest reflect a rate-of-return of 10.25%.

**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.

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

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 38.3 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$129,302. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$178,827, an increase of \$49,525 or 38.3 percent.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Southwest Texas Telephone Company (Texas)**

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></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>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></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>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></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>
<b>4</b>	<p><b>51.909(i)</b></p> <p>Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>
<b>5</b>	<p><b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b></p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2,</i></p>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Southwest Texas Telephone Company (Texas)**

Step	FCC Rule	Cross-Reference to Exhibit A
	justify the revised interstate switched access rate caps, [...].	<b>2019</b>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b>  [...] 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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Southwest Texas Telephone Company submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for

<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Southwest Texas Telephone Company (Texas)**

tariff year 2019-2020 in a single consolidated file, *Southwest Texas Telephone Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following workbooks:

- Southwest Texas 2019 ROR-ILEC-ICC Data
- Southwest Texas 2019 Tariff Rate Comp CAF
- Southwest Texas 2019 True Up
- Southwest Texas 2019 Rate Ceiling CAF
- Southwest Texas 2019 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

## Southwest Texas Communications

442135

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$129,302
102	Projected 2011-12 Pool Settlements without LSS	NECA	178,827
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (49,525)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-38.30%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>38.30%</b>

### July 1, 2019 Recurring Switched Access Service

#### End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000700
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.060904
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.074406

#### Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$66.23
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$105.99
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$322.92
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,948.48
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$4.73
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$4.73
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$22.13
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$192.74
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$47.42
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$47.42
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$114.79
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$737.09
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$672.53
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$259.65
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000607
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.003149
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.007944
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.008022
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.008851

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

Band 7 / Band 8 / Band 2

#### End Office

301 a	Local Switching Premium Rates Terminating		\$0.002133
301 b	Local Switching Premium Rates Originating		\$0.044037
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

#### Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$47.89
304	Voice Grade 4-Wire Entrance Facility		\$76.64
305	DS-1 Entrance Facility		\$233.49
306	DS-3 Entrance Facility		\$2,131.92
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$16.00
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.36
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.29
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.29
313	DS-1 Direct Trunk Termination		\$83.00
314	DS-3 Direct Trunk Termination		\$532.96
315	Multiplexing DS3-DS1		\$486.28
316	Multiplexing DS1-Voice		\$187.74
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000439
318	Tandem Switched Termination		\$0.002277
319	Tandem Switching		\$0.005744
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*

**Southwest Texas Communications**

442135

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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. 224 - 2019 Annual Access Filing**  
**Star Telephone Membership Corp. (NC)**

The Company proposes ARC rate changes effective July 2, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Star 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Star TMC 2019 ROR-ILEC-ICC Data
- Star TMC 2019 Tariff Rate Comp CAF
- Star TMC 2019 True Up
- Star TMC 2019 Rate Ceiling CAF
- Star TMC 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Taylor Telephone Cooperative, Inc.**  
**SAC 442151 (TX)**

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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Taylor is an Issuing Carrier of the JSI Tariff. Taylor Telephone Cooperative, Inc. 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Taylor 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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Taylor 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.<sup>1</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. TAYLOR TARIFF REVIEW PLANS**

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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Taylor 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Taylor 2019 ROR-ILEC-ICC Data
- Taylor 2019 Tariff Rate Comp CAF
- Taylor 2019 True Up
- Taylor 2019 Rate Ceiling CAF
- Taylor 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**TEC Companies-Alabama**

**National Telephone of Alabama, Inc., SAC 250286**  
**Roanoke Tel. Co., Inc., SAC 250317**

TEC Companies-Alabama, (alternatively “TEC-Alabama” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, TEC-Alabama will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel TEC-Alabama as an issuing carrier for NECA Tariff F.C.C. No. 5 and TEC-Alabama will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

The two TEC-Alabama 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>
National Telephone of Alabama, Inc.	200000053	AL	250286
Roanoke Tel. Co., Inc.	200000053	AL	250317

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 2, 2019, 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. Effective July 2, 2019, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Alabama (AL)**

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

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for TEC-Alabama reflect a rate-of-return of 10.25%.

**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.

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

**National Telephone of Alabama, Inc.**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 24.27 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$107,894. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$81,713, a decrease of \$26,181 or 24.27 percent.

**Roanoke Tel. Co., Inc.**

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Alabama (AL)**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 49.39 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$208,746. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$105,639, a decrease of \$103,107 or 49.39 percent.

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></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>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></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>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></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>
<b>4</b>	<p><b>51.909(i)</b></p> <p>Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Alabama (AL)**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
	\$0.0007 per minute	
<b>5</b>	<b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b> The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2, 2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b> [...] 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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> TEC-Alabama is filing blended Special Access rates for the two Alabama study areas. 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 2, 2019 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

<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**TEC Companies-Alabama (AL)**

with § 51.917 rules.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

TEC Companies-Alabama submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for each TEC Companies-Alabama carrier, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- National Telephone of Alabama 2019 ROR-ILEC-ICC Data
- National Telephone of Alabama 2019 Tariff Rate Comp CAF
- National Telephone of Alabama 2019 True Up
- National Telephone of Alabama 2019 Rate Ceiling CAF
- National Telephone of Alabama 2019 Rate of Return ILEC Summary
  
- Roanoke Tel Co. Inc. 2019 ROR-ILEC-ICC Data
- Roanoke Tel Co. Inc. 2019 Tariff Rate Comp CAF
- Roanoke Tel Co. Inc. 2019 True Up
- Roanoke Tel Co. Inc. 2019 Rate Ceiling CAF
- Roanoke Tel Co. Inc. 2019 Rate of Return ILEC Summary

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

- TEC 2019 Rate Ceiling CAF – *TEC 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

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<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**TEC Companies-Alabama (AL)**

- 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



**National Telephone of Alabama, Inc.**

250286

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$107,894
102	Projected 2011-12 Pool Settlements without LSS	NECA	81,713
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 26,181
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	24.27%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-24.27%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.025940
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.040745

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$32.35
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$51.75
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$157.70
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,439.95
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.30
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.30
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$10.80
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$94.12
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$23.17
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$23.17
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$56.06
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$359.97
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$328.45
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$126.80
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000154
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000808
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.002038
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004393
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004847

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

Band 5 / Band 7 / Band 1

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.034251
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$42.71
304	Voice Grade 4-Wire Entrance Facility		\$68.33
305	DS-1 Entrance Facility		\$208.23
306	DS-3 Entrance Facility		\$1,901.31
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.04
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.04
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$14.26
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$124.28
311	Voice Grade 2-Wire Direct Trunk Termination		\$30.59
312	Voice Grade 4-Wire Direct Trunk Termination		\$30.59
313	DS-1 Direct Trunk Termination		\$74.02
314	DS-3 Direct Trunk Termination		\$475.31
315	Multiplexing DS3-DS1		\$433.69
316	Multiplexing DS1-Voice		\$167.43
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**National Telephone of Alabama, Inc.**

250286

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**Roanoke Tel. Co., Inc.**  
250317

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$208,746
102	Projected 2011-12 Pool Settlements without LSS	NECA	105,639
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 103,107
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	49.39%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-49.39%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.007428
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.027226

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$24.24
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$38.78
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$118.16
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,078.89
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.73
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.73
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$8.10
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$70.53
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$17.35
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$17.35
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$42.00
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$269.71
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$246.09
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$95.01
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000103
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000540
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001362
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002935
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003239

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

**Band 1 / Band 8 / Band 1**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.014678
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$47.89
304	Voice Grade 4-Wire Entrance Facility		\$76.64
305	DS-1 Entrance Facility		\$233.49
306	DS-3 Entrance Facility		\$2,131.92
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$16.00
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.36
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.29
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.29
313	DS-1 Direct Trunk Termination		\$83.00
314	DS-3 Direct Trunk Termination		\$532.96
315	Multiplexing DS3-DS1		\$486.28
316	Multiplexing DS1-Voice		\$187.74
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**Roanoke Tel. Co., Inc.**  
250317

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 Annual Access Filing**

**TEC Companies-Mississippi**

**Bay Springs Telephone Company, Inc., SAC 280446**

TEC Companies-Mississippi, (alternatively “TEC-Mississippi” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, TEC-Mississippi will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel TEC-Mississippi as an issuing carrier for NECA Tariff F.C.C. No. 5 and TEC-Mississippi will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

TEC-Mississippi is comprised of the study area listed below:

<i>Study Area Company Name</i>	<i>Holding Company Code</i>	<i>Study Area State</i>	<i>Study Area Code</i>
Bay Springs Telephone Company, Inc.	200000053	MS	280446

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 2, 2019, 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. Effective July 2, 2019, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

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

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Mississippi (MS)**

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for TEC-Mississippi reflect a rate-of-return of 10.25%.

**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.

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

**Bay Springs Telephone Company, Inc.**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 17.74 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$517,356. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$425,553, a decrease of \$91,803 or 17.74 percent.

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<b>51.909(a)(4)(ii)(A)</b> The Association shall calculate the difference between each	<i>See Exhibit A, Lines 101 through 104</i>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Mississippi (MS)**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
	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.	
<b>2</b>	<b>51.909(a)(5)(i) – [Step 2 portion of rule]</b> The Rate-of-Return Carrier shall multiply the factor determined in paragraph (a)(4)(ii)(A) of this section by negative one [...]	<i>See Exhibit A, Line 105</i>
<b>3</b>	<b>51.909(a)(5)(i) – [Step 3 portion of rule]</b> [...] 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;	<i>See Exhibit A, Lines 203 through 221</i>
<b>4</b>	<b>51.909(i)</b> Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute	<i>See Exhibit A, Lines 401 through 405</i>
<b>5</b>	<b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b> The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2, 2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b> [...] the Access Recovery Charges that will be assessed, and	<i>See below</i>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Mississippi (MS)**

Step	FCC Rule	Cross-Reference to Exhibit A
	the amount of Connect America Fund ICC support the carrier will be eligible to receive.	

**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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

TEC Companies-Mississippi submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for the TEC Companies-Mississippi carrier, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Bay Springs Tel. Co. Inc. 2019 ROR-ILEC-ICC Data

<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**TEC Companies-Mississippi (MS)**

- Bay Springs Tel. Co. Inc. 2019 Tariff Rate Comp CAF
- Bay Springs Tel. Co. Inc. 2019 True Up
- Bay Springs Tel. Co. Inc. 2019 Rate Ceiling CAF
- Bay Springs Tel. Co. Inc. 2019 Rate of Return ILEC Summary

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

- TEC 2019 Rate Ceiling CAF – *TEC 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

**Bay Springs Telephone Company, Inc.**  
280446

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$517,356
102	Projected 2011-12 Pool Settlements without LSS	NECA	425,553
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 91,803
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	17.74%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-17.74%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.016099
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.044253

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$68.33
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$109.34
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$333.13
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$3,041.66
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$4.86
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$4.86
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$22.83
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$198.82
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$48.92
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$48.92
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$118.41
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$760.40
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$743.55
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$287.07
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000361
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001873
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.004725
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004771
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.005264

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

**Band 2 / Band 10 / Band 2**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.019572
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$83.07
304	Voice Grade 4-Wire Entrance Facility		\$132.93
305	DS-1 Entrance Facility		\$404.99
306	DS-3 Entrance Facility		\$3,697.83
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.75
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$241.71
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.47
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.47
313	DS-1 Direct Trunk Termination		\$143.96
314	DS-3 Direct Trunk Termination		\$924.44
315	Multiplexing DS3-DS1		\$903.95
316	Multiplexing DS1-Voice		\$349.00
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000439
318	Tandem Switched Termination		\$0.002277
319	Tandem Switching		\$0.005744
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*

**Bay Springs Telephone Company, Inc.**

280446

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 Annual Access Filing**

**TEC Companies-Tennessee**

**Crockett Tel. Co., Inc., SAC 290561**  
**Peoples Telephone Company, SAC 290576**  
**West Tennessee Tel. Co., Inc., SAC 290583**

TEC Companies-Tennessee, (alternatively “TEC-Tennessee” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, TEC-Tennessee will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel TEC-Tennessee as an issuing carrier for NECA Tariff F.C.C. No. 5 and TEC-Tennessee will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

The three TEC-Tennessee 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>
Crockett Tel. Co., Inc.	200000053	TN	290561
Peoples Telephone Company	200000053	TN	290576
West Tennessee Tel. Co., Inc.	200000053	TN	290583

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 2, 2019, 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. Effective

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Tennessee (TN)**

July 2, 2019, the Company's Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

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

The Company provides Wireline Broadband Internet Access Service ("WBIAS") on a permissively detariffed common carriage basis. Thus, the instant filing will not include rates for WBIAS for the Company.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for TEC-Tennessee reflect a rate-of-return of 10.25%.

**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.

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

**Crockett Tel. Co., Inc.**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 52.25 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$104,229. Application of the rates for Switched Access

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Tennessee (TN)**

proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$49,765, a decrease of \$54,464 or 52.25 percent.

**Peoples Telephone Company**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 51.21 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$194,147. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$94,724, a decrease of \$99,423 or 51.21 percent.

**West Tennessee Tel. Co., Inc.**

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 34.55 percent decrease in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$128,030. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$83,797, a decrease of \$44,233 or 34.55 percent.

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></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>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></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>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></p> <p>[...] and then proportionately adjust the Association's capped</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TEC Companies-Tennessee (TN)**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
	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;	
<b>4</b>	<b>51.909(i)</b> Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute	<i>See Exhibit A, Lines 401 through 405</i>
<b>5</b>	<b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b> The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to justify the revised interstate switched access rate caps, [...].	<i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2, 2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b> [...] 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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> TEC-Tennessee is filing blended Special Access rates for the three Tennessee study areas. 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**

<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**TEC Companies-Tennessee (TN)**

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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

TEC Companies-Tennessee submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for each TEC Companies-Tennessee carrier, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Crockett Tel., Inc. 2019 ROR-ILEC-ICC Data
- Crockett Tel., Inc. 2019 Tariff Rate Comp CAF
- Crockett Tel., Inc. 2019 True Up
- Crockett Tel., Inc. 2019 Rate Ceiling CAF
- Crockett Tel., Inc. 2019 Rate of Return ILEC Summary
  
- Peoples Telephone Co., Inc. 2019 ROR-ILEC-ICC Data
- Peoples Telephone Co., Inc. 2019 Tariff Rate Comp CAF
- Peoples Telephone Co., Inc. 2019 True Up
- Peoples Telephone Co., Inc. 2019 Rate Ceiling CAF
- Peoples Telephone Co., Inc. 2019 Rate of Return ILEC Summary
  
- West Tennessee Tel. Co., Inc. 2019 ROR-ILEC-ICC Data
- West Tennessee Tel. Co., Inc. 2019 Tariff Rate Comp CAF

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<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**TEC Companies-Tennessee (TN)**

- West Tennessee Tel. Co., Inc. 2019 True Up
- West Tennessee Tel. Co., Inc. 2019 Rate Ceiling CAF
- West Tennessee Tel. Co., Inc. 2019 Rate of Return ILEC Summary

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

- TEC 2019 Rate Ceiling CAF – *TEC 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

**Crockett Tel. Co., Inc.**  
290561

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$104,229
102	Projected 2011-12 Pool Settlements without LSS	NECA	49,765
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 54,464
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	52.25%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-52.25%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.009345
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.025687

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$39.66
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$63.47
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$193.37
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,765.56
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$2.82
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$2.82
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$13.25
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$115.41
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$28.39
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$28.39
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$68.73
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$441.38
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$431.60
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$166.63
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000097
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000509
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001285
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002769
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003056

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

**Band 2 / Band 10 / Band 1**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.019572
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$83.07
304	Voice Grade 4-Wire Entrance Facility		\$132.93
305	DS-1 Entrance Facility		\$404.99
306	DS-3 Entrance Facility		\$3,697.83
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.75
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$241.71
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.47
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.47
313	DS-1 Direct Trunk Termination		\$143.96
314	DS-3 Direct Trunk Termination		\$924.44
315	Multiplexing DS3-DS1		\$903.95
316	Multiplexing DS1-Voice		\$349.00
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**Crockett Tel. Co., Inc.**  
290561

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**Peoples Telephone Company**  
290576

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$194,147
102	Projected 2011-12 Pool Settlements without LSS	NECA	94,724
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 99,423
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	51.21%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-51.21%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.007161
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.026249

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$23.37
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$37.39
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$113.92
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$1,040.16
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.67
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.67
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$7.81
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$67.99
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$16.73
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$16.73
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$40.50
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$260.03
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$237.26
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$91.60
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000100
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000521
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001313
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.002830
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003123

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

**Band 1 / Band 8 / Band 1**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.014678
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$47.89
304	Voice Grade 4-Wire Entrance Facility		\$76.64
305	DS-1 Entrance Facility		\$233.49
306	DS-3 Entrance Facility		\$2,131.92
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$16.00
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.36
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.29
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.29
313	DS-1 Direct Trunk Termination		\$83.00
314	DS-3 Direct Trunk Termination		\$532.96
315	Multiplexing DS3-DS1		\$486.28
316	Multiplexing DS1-Voice		\$187.74
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**Peoples Telephone Company**  
290576

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**West Tennessee Tel. Co., Inc.**  
290583

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$128,030
102	Projected 2011-12 Pool Settlements without LSS	NECA	83,797
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 44,233
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	34.55%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-34.55%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.016012
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.035213

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$54.37
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$87.00
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$265.07
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,420.27
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$3.87
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$3.87
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$18.16
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$158.20
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$38.92
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$38.92
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$94.22
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$605.06
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$552.04
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$213.14
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000134
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000698
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001761
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003796
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004189

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

**Band 3 / Band 10 / Band 1**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.024464
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$83.07
304	Voice Grade 4-Wire Entrance Facility		\$132.93
305	DS-1 Entrance Facility		\$404.99
306	DS-3 Entrance Facility		\$3,697.83
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.75
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$241.71
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.47
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.47
313	DS-1 Direct Trunk Termination		\$143.96
314	DS-3 Direct Trunk Termination		\$924.44
315	Multiplexing DS3-DS1		\$843.44
316	Multiplexing DS1-Voice		\$325.65
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**West Tennessee Tel. Co., Inc.**  
290583

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). TeleGuam is an Issuing Carrier of the JSI Tariff. TeleGuam 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by TeleGuam of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, TeleGuam is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**TeleGuam Holdings LLC (Guam)**

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.<sup>1</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. TELEGUAM TARIFF REVIEW PLANS**

TeleGuam submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file, *TeleGuam Holdings LLC 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- TeleGuam 2019 ROR-ILEC-ICC Data
- TeleGuam 2019 Tariff Rate Comp CAF
- TeleGuam 2019 True Up
- TeleGuam 2019 Rate Ceiling CAF
- TeleGuam 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

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

Common Line – Totah SAC 412030 (Kansas)

With respect to Common Line, Totah SAC 412030 (Kansas) accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. Totah SAC 412030 elected to have Common Line and End User rates tariffed by NECA.

Common Line – Totah SAC 432030 (Oklahoma)

Totah SAC 432030 (Oklahoma) is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5.

Therefore, for both Totah SAC 412030 (Kansas) and Totah SAC 432030 (Oklahoma), rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes Special Access and Public Packet Data Network Rates consistent with requirements under 61.39 for biennial filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Totah Communications, Inc. (OK) (KS)**

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

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020.

- Totah 412030 2019 ROR-ILEC-ICC Data
- Totah 432030 2019 ROR-ILEC-ICC Data
- Totah 2019 Tariff Rate Comp CAF
- Totah 2019 True Up
- Totah 2019 Rate Ceiling CAF
- Totah 2019-20 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

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<sup>1</sup> 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. 224 - 2019 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Tri County of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Tri County is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Tri County Telephone Association, Inc. (WY)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Tri County WY 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Tri County 2019 ROR-ILEC-ICC Data
- Tri County 2019 Tariff Rate Comp CAF
- Tri County 2019 True Up
- Tri County 2019 Rate Ceiling CAF
- Tri County 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**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 accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Tri-County Telephone Company, Inc. (AR)**

February 1, 2017. The Company elected to have Common Line and End User rates tariffed by NECA. Therefore, rate sections in JSI Tariff F.C.C. No. 1 for end user charges, including End User Common Line, ISDN, DS1 Channel Service and the Federal Universal Service Charge (FUSC) reference NECA Tariff F.C.C No. 5 rates for the respective services.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

## **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, 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Tri-County Telephone Company, Inc. AR 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Tri-County 2019 ROR-ILEC-ICC Data
- Tri-County 2019 Tariff Rate Comp CAF

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Tri-County Telephone Company, Inc. (AR)**

- Tri-County 2019 True Up
- Tri-County 2019 Rate Ceiling CAF
- Tri-County 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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. 224 - 2019 Annual Access Filing**  
**TruVista Communications Companies (SC)**

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in single consolidated files for each TruVista carrier: *Chester 2019 RoR ILEC ICC CAF TRP*, *Lockhart 2019 RoR ILEC ICC CAF TRP*, and *Ridgeway 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chester 2019 ROR-ILEC-ICC Data
- Chester 2019 Tariff Rate Comp CAF
- Chester 2019 True Up
- Chester 2019 Rate Ceiling CAF
- Chester 2019-20 Rate of Return ILEC Summary
- Lockhart 2019 ROR-ILEC-ICC Data

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**TruVista Communications Companies (SC)**

- Lockhart 2019 Tariff Rate Comp CAF
- Lockhart 2019 True Up
- Lockhart 2019 Rate Ceiling CAF
- Lockhart 2019-20 Rate of Return ILEC Summary
  
- Ridgeway 2019 ROR-ILEC-ICC Data
- Ridgeway 2019 Tariff Rate Comp CAF
- Ridgeway 2019 True Up
- Ridgeway 2019 Rate Ceiling CAF
- Ridgeway 2019-20 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Twin Lakes Cooperative Corp. (TN)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Twin Lakes - 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Twin Lakes 2019 ROR-ILEC-ICC Data
- Twin Lakes 2019 Tariff Rate Comp CAF
- Twin Lakes 2019 True Up
- Twin Lakes 2019 Rate Ceiling CAF
- Twin Lakes 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

**Twin Valley Telephone, Inc.**  
**SAC 411840 (Kansas)**

Twin Valley Telephone, Inc., (alternatively “Twin Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Twin Valley will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Twin Valley as an issuing carrier for NECA Tariff F.C.C. No. 5 and Twin Valley will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019.

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 2, 2019, 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 Twin Valley parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company provides Wireline Broadband Internet Access Service (“WBIAS”) on a permissively detariffed common carriage basis.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Twin Valley Telephone, Inc. (Kansas)**

Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 2, 2019. Accordingly, Special Access rates filed for Twin Valley reflect a rate-of-return of 10.25%.

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

In order to establish traffic sensitive switched access rates in compliance with the Commission's Transitional Access Service Pricing rules at Part 51, Subpart J of the Commission's rules, 47 CFR Part 51, Subpart J, the Company has followed, with the assistance of and in concert with NECA, the rules for exiting the NECA Traffic Sensitive Pool during the transition period. The table below cross-references the specific rules pertaining to both NECA and the incumbent local exchange carrier (ILEC) for exiting of the pool and the calculations executed by NECA and the Company to develop switched access rates for the Company to be filed in the JSI Tariff.

Twin Valley 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 49.69 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$666,952. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$997,838, an increase of \$331,246 or 49.69 percent.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Twin Valley Telephone, Inc. (Kansas)**

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></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>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></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>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></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>
<b>4</b>	<p><b>51.909(i)</b></p> <p>Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>
<b>5</b>	<p><b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b></p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2,</i></p>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Twin Valley Telephone, Inc. (Kansas)**

Step	FCC Rule	Cross-Reference to Exhibit A
	justify the revised interstate switched access rate caps, [...].	<i>2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b>  [...] 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 2, 2019 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).<sup>1</sup> 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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Twin Valley Telephone, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020:

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<sup>1</sup> 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.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Twin Valley Telephone, Inc. (Kansas)**

- Twin Valley 2019 ROR-ILEC-ICC Data
- Twin Valley 2019 Tariff Rate Comp CAF
- Twin Valley 2019 True Up
- Twin Valley 2019 Rate Ceiling CAF
- Twin Valley 2019 Rate of Return ILEC Summary

**4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL**

- Certification of Designation of JSI as Carrier Agent, signed by Company Officer
- Certification of Officer as to Accuracy of the CAF ICC Data Reported
- Certification by Officer that Company has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f)
- Certification by Officer that Reporting Carrier is not Seeking Duplicative Recovery in the State Jurisdiction for any Eligible Recovery

**Twin Valley Telephone**  
Study Area Code 411840

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$ 666,592
102	Projected 2011-12 Pool Settlements without LSS	NECA	997,838
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (331,246)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-49.69%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	49.69%

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 407	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 401b	\$0.073245
202	Information Surcharge Originating (shown as Per MOU)	Line 402	\$0.000805

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$124.35
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$198.99
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$430.37
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$5,535.37
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$8.85
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$8.85
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$41.54
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$361.82
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$89.02
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$89.02
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$215.50
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,383.82
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,262.57
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$487.47
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000657
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.003408
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.008598
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.008682
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.009580

**Current Recurring Switched Access Service**

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>	NECA BANDs--	LS / LT / TST>	8/10/1	\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>				\$0.048930
302	Information Surcharge Originating (shown as Per MOU)				\$0.000538

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$83.07
304	Voice Grade 4-Wire Entrance Facility		\$132.93
305	DS-1 Entrance Facility		\$287.50
306	DS-3 Entrance Facility		\$3,697.83
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.91
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.75
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$241.71
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.47
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.47
313	DS-1 Direct Trunk Termination		\$143.96
314	DS-3 Direct Trunk Termination		\$924.44
315	Multiplexing DS3-DS1		\$843.44
316	Multiplexing DS1-Voice		\$325.65
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000439
318	Tandem Switched Termination		\$0.002277
319	Tandem Switching		\$0.005744
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*

**Twin Valley Telephone**  
Study Area Code 411840

SOURCE

**Composite Rates Interstate Rates for July 1, 2018 - Before Step Down Calculation**

401 a	<b>Local Switching Premium Rates Terminating</b>	Line 301a + (Line 301a * Line 105)	\$0.003193
401 b	<b>Local Switching Premium Rates Originating</b>	Line 301b + (Line 301b * Line 105)	\$0.073245
402	Information Surcharge Originating (shown as Per MOU)	Line 302 + (Line 302 * Line 105)	\$0.000805
403	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 401a	\$0.003193

**Step-Down Calculation**

404	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
405	Difference In Unified Rate and July 1st 2016 Rate	Line 404 - Line 403	N / A
406	Transition to Rate on Line 2 in equal 1/3 Steps	Line 405 / 3 (if Line 405 is negative), otherwise \$0.00	N / A
407	<b>Rate Effective Date July 2019</b>	Line 403 + (Line 406*2)	<b>\$0.000700</b>

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 Annual Access Filing**

**Valley Telephone Cooperative, Inc.**  
**SAC 442159 (Texas)**

Valley Telephone Cooperative, Inc., (alternatively “Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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. With respect to Common Line, Valley is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Valley 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Valley 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Valley 2019 ROR-ILEC-ICC Data
- Valley 2019 Tariff Rate Comp CAF
- Valley 2019 True Up
- Valley 2019 Rate Ceiling CAF
- Valley 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the Access Recovery Charge consistent with 51.917(e), and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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 2, 2019 under Section 51.917(e) as shown in the supporting documentation.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Wilkes Telephone & Electric Company, Inc. (GA)**

The 2011 Rate-of-Return Base Period Revenue established in the 2012 access tariff filing was found by the Commission to be reasonably determined and in compliance with § 51.917 rules.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Wilkes Telephone & Electric Company 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Wilkes 2019 ROR-ILEC-ICC Data
- Wilkes 2019 Tariff Rate Comp CAF
- Wilkes 2019 True Up
- Wilkes 2019 Rate Ceiling CAF
- Wilkes 2019-20 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

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<sup>1</sup> 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. 224 – 2019 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. 224 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 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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.

This filing proposes revised Special Access rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Winnebago LB 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Winnebago-LB 2019 ROR-ILEC-ICC Data
- Winnebago-LB 2019 Tariff Rate Comp CAF
- Winnebago-LB 2019 True Up
- Winnebago-LB 2019 Rate Ceiling CAF
- Winnebago-LB 2019-20 Rate of Return ILEC Summary

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

- Winnebago 2019 Rate Ceiling CAF – *Winnebago 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

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<sup>1</sup> 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. 224 - 2019 Annual Access Filing**  
**Winnebago Cooperative Telecom Association-LB (IA)**

**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. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Yadkin is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by Yadkin of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Yadkin is a member of the National Exchange Carrier Association, Inc. (“NECA”) Common Line Pool and accordingly bills End User Common Line (“EUCL”) charges pursuant to NECA Tariff FCC No. 5 notwithstanding being an issuing carrier for JSI Tariff FCC No. 1.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. The Company submits the required 61.39 ILEC Special Access Reallocation Tariff Review Plan (“TRP”) in support of proposed rates.

Revisions also include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**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.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Yadkin Valley Telephone Membership Corporation (NC)**

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.<sup>1</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Yadkin 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks

- Yadkin 2019 ROR-ILEC-ICC Data
- Yadkin 2019 Tariff Rate Comp CAF
- Yadkin 2019 True Up
- Yadkin 2019 Rate Ceiling CAF
- Yadkin 2019-20 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

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<sup>1</sup> 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. 224 – 2019 Annual Access Filing**

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

**Fremont Telcom Co.**  
**SAC 472222 (Idaho)**

Blackfoot Telephone Cooperative, Inc. (“Blackfoot”) and Fremont Telcom Co. (“Fremont”) (alternatively “Blackfoot Carriers” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for filings under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

The table below comprises the Blackfoot Carriers 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”).

Blackfoot Carriers have participated in the past as 61.39 historic filers. As shown in the table, both Blackfoot Carriers are authorized Alternative Connect America Model (“A-CAM”) Carriers. As discussed further below, the Companies have elected incentive regulation for Business Data Services (“BDS”) effective with this filing.

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule Effective 07/02/19
Blackfoot Telephone Cooperative, Inc.	200000277	482235 483308	MT	A-CAM	61.50
Fremont Telcom Co.	200000277	47222	ID	A-CAM	61.50

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by the Blackfoot Carriers of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Blackfoot and Fremont each file their own individual company rates. The Blackfoot Carriers accepted A-CAM support and were removed from the NECA Common Line Pool effective February 1, 2017. Common Line rates for these companies were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (MT and ID)**

The Blackfoot Carriers propose revisions to reflect the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

Blackfoot and Fremont have elected to convert to incentive regulation for BDS effective July 2, 2019.<sup>1</sup> Therefore, the Blackfoot Carriers propose revisions to BDS rates pursuant to Section 61.50 of the Commission's rules.

The Blackfoot Carriers submit the required Incentive-Based BDS Tariff Review Plans ("TRPs") in support of proposed rates.

Study Areas Not Deemed Competitive

None of the Blackfoot Carriers' study areas were deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed ("TDM") transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission's Report and Order, FCC 18-146 released October 24, 2018.

**2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND**

The Blackfoot Carriers elected in the 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).

ARC rate changes effective July 2, 2019 under Section 51.917(e) are proposed for Blackfoot SAC 482235 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

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<sup>1</sup> See Letter from Stacey Mueller, Chief Financial Officer, Blackfoot, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed May 1, 2019.



**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (MT and ID)**

with § 51.917 rules.<sup>2</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. BLACKFOOT CARRIERS CAF-ICC TARIFF REVIEW PLANS**

The Blackfoot Carriers each submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for each carrier by name, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- 2019 ROR-ILEC-ICC Data
- 2019 Tariff Rate Comp CAF
- 2019 True Up
- 2019 Rate Ceiling CAF
- 2019-20 Rate of Return ILEC Summary

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

- Blackfoot Holding Company 2019 Rate Ceiling CAF – *Blackfoot 2019 Holding Company Test for Limitation on Imputed CBOL ARC*

**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

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<sup>2</sup> 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. 224 – 2019 Annual Access Filing**

**Clarity Telecom, LLC**  
**SAC 391652 (South Dakota)**

Clarity Telecom, LLC, (alternatively “Clarity” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, Clarity will exit the National Exchange Carrier Association, Inc. (“NECA”) Special Access Traffic Sensitive tariff. Concurrent with exiting the NECA for Special Access services, NECA will cancel Clarity as a carrier tariffing Special Access rates under NECA Tariff F.C.C. No. 5 and those rates will be tariffed under the JSI Tariff F.C.C. No. 1 effective July 2, 2019. The Special Access regulations and rate structures applicable to Clarity parallel those of NECA Tariff FCC No. 5 in all material respects.

Clarity remains in the NECA Tariff F.C.C. No. 5 for Common Line and End User rates, and remains in the NECA Traffic Sensitive Pool for Switched Access services. The Company accepted Alternative Connect America Model support, 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. With respect to Wireline Broadband Internet Access Service, the Company provides DSL and Consumer Broadband-Only Loop transmission as part of the complete retail service offered to end user customers.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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<sup>1</sup> See Letter from Jim Gleason, CEO, Clarity Telecom, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 8, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Clarity Telecom, LLC (South Dakota)**

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

As noted above, Switched Access Rates remain tariffed in NECA Tariff F.C.C. No. 5.

**2. SPECIAL ACCESS RATES**

The Company has elected to convert to incentive regulation for BDS effective July 2, 2019.

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission.

As a carrier exiting the NECA traffic-sensitive tariff pool, appropriate adjustments were made to account for exiting the NECA Special Access Traffic Sensitive Pool effective July 2, 2019, for initial lower capacity time division multiplexed (“TDM”) transport and end user channel termination lower capacity (at or below DS3) BDS rate levels. These initial rates were then adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change.

Higher capacity (above DS3) TDM or packet-based BDS permissively tariffed rates will remain frozen for six (6) months, and will transition to a detariffed regime within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018. These rates apply to existing customers as of the July 2, 2019 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis.

**3. ACCESS RECOVERY CHARGE AND TRPs FOR CAF-ICC**

The Company’s Switched Access services remain in the NECA Tariff F.C.C. No. 5 Switched Access Traffic-Sensitive Pool. Therefore, Access Recovery Charges, CAF-ICC TRPs and related certifications for the Company are being submitted with NECA’s annual access tariff transmittal.

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). ComSouth is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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. 224.

**1. DESCRIPTION OF FILING**

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

ComSouth has participated as a 61.39 historic filer in the past. However, the Company has elected to convert to incentive regulation for Business Data Services

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**ComSouth Telecommunications, Inc. (GA)**

(“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules. In addition, proposed revisions include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 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 2, 2019 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.<sup>2</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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<sup>1</sup> See Letter from Aubrey E. Judy, Director-Regulatory, ComSouth Telecommunications, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed May 1, 2019.

<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**ComSouth Telecommunications, Inc. (GA)**

**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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *ComSouth 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- ComSouth 2019 ROR-ILEC-ICC Data
- ComSouth 2019 Tariff Rate Comp CAF
- ComSouth 2019 True Up
- ComSouth 2019 Rate Ceiling CAF
- ComSouth 2019-20 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. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Cross is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

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

Cross has participated as a 61.39 historic filer in the past. However, the Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules. In addition, proposed revisions include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport and end user channel termination services reflect tariffed rates in

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<sup>1</sup> See Letter from V. David Miller II, President, Cross Tel. Co., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 17, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Cross Tel. Co. (OK)**

effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission's Report and Order, FCC 18-146 released October 24, 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).

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.<sup>2</sup> 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Cross 2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Cross 2019 ROR-ILEC-ICC Data
- Cross 2019 Tariff Rate Comp CAF
- Cross 2019 True Up
- Cross 2019 Rate Ceiling CAF

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<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Cross Tel. Co. (OK)**

- Cross 2019-20 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. 224 – 2019 Annual Access Filing**

**Fail, Inc. Carriers**

Fail, Inc., (alternatively “Fail, Inc. Carriers” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for filings under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Fail, Inc. is the holding company for the below-listed issuing carriers of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

The table below comprises the Fail, Inc. Carriers 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”).

Fail, Inc. Carriers have participated in the past as 61.39 historic filers. As shown in the table, all four Fail, Inc. carriers are authorized Alternative Connect America Model (“A-CAM”) Carriers. As discussed further below, the Companies have elected incentive regulation for Business Data Services (“BDS”) effective with this filing.

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule Effective 07/02/19
Bruce Telephone Company, Inc.	200000274	280447	MS	A-CAM	61.50
Chickamauga Telephone Corporation	200000274	220354	GA	A-CAM	61.50
Fulton Telephone Company, Inc.	200000274	280455	MS	A-CAM	61.50
Mound Bayou Telephone & Communications, Inc.	200000274	280462	MS	A-CAM	61.50

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by the Fail, Inc. Carriers of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Each of the Fail, Inc. Carriers files its own individual company rates. The Fail, Inc. Carriers accepted A-CAM support and were removed from the NECA Common Line Pool effective February 1, 2017. Common Line rates for these companies were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

All Fail, Inc. Carriers propose revisions to reflect the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Fail, Inc. (Holding Company)**

**A. A-CAM BDS – 61.50 Filing Rules**

All of the Fail, Inc. affiliated rate-of-return carriers have elected to convert to incentive regulation for BDS effective July 2, 2019.<sup>1</sup> Therefore, the below carriers propose revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules.

<b>Carrier</b>	<b>SAC</b>	<b>State</b>
Bruce Telephone Company, Inc.	280447	MS
Chickamauga Telephone Corporation	220354	GA
Fulton Telephone Company, Inc.	280455	MS
Mound Bayou Telephone & Communications, Inc.	280462	MS

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Areas Not Deemed Competitive

None of the Fail, Inc. study areas were deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018.

**2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND**

The Fail, Inc. Carriers elected in the 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).

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<sup>1</sup> See Letter from Christa L. Alexander, Vice President of Operations, Fail Telecommunications Corporation., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 30, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Fail, Inc. (Holding Company)**

The Companies propose ARC rate changes effective July 2, 2019 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.<sup>2</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. FAIL, INC. CARRIERS CAF-ICC TARIFF REVIEW PLANS**

The Fail, Inc. Carriers each submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for each carrier by name, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- 2019 ROR-ILEC-ICC Data
- 2019 Tariff Rate Comp CAF
- 2019 True Up
- 2019 Rate Ceiling CAF
- 2019-20 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

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<sup>2</sup> 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. 224 – 2019 Annual Access Filing**

**Inter-Community Telephone Company, L.L.C.**  
**SAC 381616 (North Dakota)**

Inter-Community Telephone Company, L.L.C., (alternatively “ICTC” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, ICTC will exit the National Exchange Carrier Association, Inc. (“NECA”) Common Line and Special Access Traffic Sensitive tariff. Concurrent with exiting the NECA for Common Line and Special Access services, NECA will cancel ICTC as a carrier tariffing Common Line and Special Access rates under NECA Tariff F.C.C. No. 5 and those rates will be tariffed under the JSI Tariff F.C.C. No. 1 effective July 2, 2019. The Common Line and Special Access regulations and rate structures applicable to ICTC parallel those of NECA Tariff FCC No. 5 in all material respects.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. Effective July 2, 2019, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

ICTC remains in the NECA Traffic Sensitive Pool for Switched Access services. With respect to Wireline Broadband Internet Access Service, the Company provides DSL and Consumer Broadband-Only Loop transmission as part of the complete retail service offered to end user customers.

ICTC is a wholly-owned subsidiary of BEK Communications Cooperative, a legacy-support issuing carrier of NECA Tariff F.C.C. No. 5.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

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<sup>1</sup> See Letter from Brandon Vaughan, Secretary/Treasurer, BEK, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 8, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Inter-Community Telephone Company, L.L.C. (North Dakota)**

**DESCRIPTION OF FILING**

**1. SWITCHED ACCESS RATES**

As noted above, Switched Access Rates remain tariffed in NECA Tariff F.C.C. No. 5.

**2. SPECIAL ACCESS RATES**

The Company has elected to convert to incentive regulation for BDS effective July 2, 2019.

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission.

As a carrier exiting the NECA traffic-sensitive tariff pool, appropriate adjustments were made to account for exiting the NECA Special Access Traffic Sensitive Pool effective July 2, 2019, for initial lower capacity time division multiplexed (“TDM”) transport and end user channel termination lower capacity (at or below DS3) BDS rate levels. These initial rates were then adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change.

Higher capacity (above DS3) TDM or packet-based BDS permissively tariffed rates will remain frozen for six (6) months, and will transition to a detariffed regime within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018. These rates apply to existing customers as of the July 2, 2019 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis.

**3. ACCESS RECOVERY CHARGE AND TRPs FOR CAF-ICC**

The Company’s Switched Access services remain in the NECA Tariff F.C.C. No. 5 Switched Access Traffic-Sensitive Pool. Therefore, Access Recovery Charges, CAF-ICC TRPs and related certifications for the Company are being submitted with NECA’s annual access tariff transmittal.

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mt. Horeb is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**1. DESCRIPTION OF FILING**

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

Mt. Horeb has participated as a 61.39 historic filer in the past. However, the Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules. In addition, proposed revisions include the Access Recovery Charge and the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

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<sup>1</sup> See Letter from John Klarer, Secretary/General Manager, Mount Horeb Telephone Company, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 8, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Mt. Horeb Telephone Company (WI)**

The Company's study area was not deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed ("TDM") transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. . No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission's Report and Order, FCC 18-146 released October 24, 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 2, 2019 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.<sup>2</sup> 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Mt. Horeb 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Mt. Horeb 2019 ROR-ILEC-ICC Data
- Mt. Horeb 2019 Tariff Rate Comp CAF
- Mt. Horeb 2019 True Up
- Mt. Horeb 2019 Rate Ceiling CAF

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<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Mt. Horeb Telephone Company (WI)**

- Mt. Horeb 2019-20 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. 224 – 2019 Annual Access Filing**

**Otelco, Inc. Carriers**

Otelco, Inc., (alternatively “Otelco, Inc. Carriers” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for filings under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Otelco, Inc. is the holding company for the below-listed issuing carriers of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

The table below comprises the Otelco, Inc. Carriers 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”).

Otelco, Inc. Carriers have participated in the past as 61.39 historic filers. As shown in the table, all but one of the 11 Otelco, Inc. carriers are authorized Alternative Connect America Model (“A-CAM”) Carriers. As discussed further below, the ten Otelco, Inc. A-CAM Carriers have elected incentive regulation for Business Data Services (“BDS”) effective with this filing.

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule Effective 07/02/19
Brindlee Mountain Telephone LLC	200005312	250283	AL	A-CAM	61.50
Blountsville Telephone LLC	200005312	250282	AL	A-CAM	61.50
Granby Telephone LLC	200005312	110036	MA	A-CAM	61.50
Hopper Telecommunications LLC	200005312	250300	AL	A-CAM	61.50
Mid-Maine Telecom LLC	200005312	103315	ME	A-CAM	61.50
Otelco Mid-Missouri LLC	200005312	421917	MO	A-CAM	61.50
Otelco Telephone LLC	200005312	250312	AL	A-CAM	61.50
Pine Tree Telephone LLC	200005312	100020	ME	A-CAM	61.50
Saco River Telephone LLC	200005312	100022	ME	A-CAM	61.50
Shoreham Telephone LLC	200005312	140064	VT	Legacy	61.39
War Telephone LLC	200005312	200258	WV	A-CAM	61.50

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Otelco, Inc. (Holding Company)**

**1. DESCRIPTION OF FILING**

JSI Tariff F.C.C. No. 1 governs the provision by the Otelco, Inc. Carriers of interstate Common Line, Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. Each of the Otelco, Inc. Carriers files its own individual company rates.

The Otelco, Inc. Carriers shown in the table below at A., following, accepted A-CAM support and were removed from the NECA Common Line Pool effective February 1, 2017. Common Line rates for these companies were tariffed by JSI effective February 1, 2017, at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

All Otelco, Inc. Carriers propose revisions to reflect the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

All of the Otelco, Inc. affiliated rate-of-return carriers authorized to receive A-CAM support have elected to convert to incentive regulation for BDS effective July 2, 2019.<sup>1</sup> Therefore, the below carriers propose revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules.

<b>Carrier</b>	<b>SAC</b>	<b>State</b>	
Brindlee Mountain Telephone LLC	250283	AL	
Blountsville Telephone LLC	250282	AL	
Granby Telephone LLC	110036	MA	Deemed Competitive
Hopper Telecommunications LLC	250300	AL	
Mid-Maine Telecom LLC	103315	ME	
Otelco Mid-Missouri LLC	421917	MO	
Otelco Telephone LLC	250312	AL	
Pine Tree Telephone LLC	100020	ME	Deemed Competitive
Saco River Telephone LLC	100022	ME	Deemed Competitive
War Telephone LLC	200258	WV	

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change.

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<sup>1</sup> See Letter from Dennis Andrews, Senior Vice President, Otelco, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 15, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Otelco, Inc. (Holding Company)**

Study Areas Not Deemed Competitive

For study areas not deemed competitive by the Commission, proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018.

Study Areas Deemed Competitive

For the three study areas deemed competitive by the Commission, proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous cost changes. No revisions are proposed to currently effective rates for lower capacity TDM end user channel termination services or to higher capacity (above DS3) TDM or packet-based BDS with the exception of the added notation described above to provide for the transition from these permissively tariffed services to provision on a contractual basis within 36 months.

**B. LEGACY – 61.39 Filing Rules**

The following Otelco, Inc. carrier receives legacy support, is a 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 Telephone, LLC (“Shoreham”) proposes revised Special Access rates consistent with requirements under 61.39 for biennial annual filings in odd-numbered years. Special Access rates reflect the rate of return reduction from 10.50% to 10.25%. Shoreham submits the required 61.39 ILEC Special Access Reallocation TRP in support of proposed rates.

CARRIER	SAC	State
Shoreham Telephone LLC	140064	VT

**2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND**

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Otelco, Inc. (Holding Company)**

The Otelco, Inc. Carriers elected in the 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 Companies propose ARC rate changes effective July 2, 2019 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.<sup>2</sup> The TY 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

**3. OTELCO, INC. CARRIERS CAF-ICC TARIFF REVIEW PLANS**

The Otelco, Inc. Carriers each submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file for each carrier by name, *2019 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- 2019 ROR-ILEC-ICC Data
- 2019 Tariff Rate Comp CAF
- 2019 True Up
- 2019 Rate Ceiling CAF
- 2019-20 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

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<sup>2</sup> 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. 224 – 2019 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. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Smithville is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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 accepted Alternative Connect America Model support, 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.

Smithville has participated as a 61.39 historic filer in the past. However, the Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules. In addition, proposed revisions include the step down of Switched Access terminating End Office rates pursuant to § 51.909(i).

**A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) time division multiplexed (“TDM”) transport and end user channel termination services reflect tariffed rates in effect on January 1, 2019, adjusted for the X-factor, inflation factor, and exogenous

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<sup>1</sup> See Letter from Roger V. Thompson, President, Smithville Telephone Company, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 4, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**Smithville Telephone Company, Inc. (MS)**

cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change. No revisions are proposed to currently effective rates for higher capacity (above DS3) TDM or packet-based BDS with the exception of an added notation that rates and charges for those higher capacity TDM and packet-based services apply to existing customers as of the July 2, 2019 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a contractual basis within 36 months pursuant to the Commission's Report and Order, FCC 18-146 released October 24, 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).

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.<sup>2</sup> The TY 2019 - 2020 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 2019-2020. All CAF-ICC data is represented in a single consolidated file, *Smithville Telephone Company 2019 RoR ILEC ICC CAF TRP* comprised of the following TRP workbooks

- Smithville 2019 ROR-ILEC-ICC Data
- Smithville 2019 Tariff Rate Comp CAF
- Smithville 2019 True Up
- Smithville 2019 Rate Ceiling CAF
- Smithville 2019-20 Rate of Return ILEC Summary

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<sup>2</sup> 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. 224 - 2019 Annual Access Filing**  
**Smithville Telephone Company, Inc. (MS)**

**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. 224 – 2019 Annual Access Filing**

**West Carolina Rural Telephone Cooperative, Inc.**  
**SAC 240550 (South Carolina)**

West Carolina Rural Telephone Cooperative, Inc., (alternatively “West Carolina” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 224 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 2, 2019, West Carolina will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel West Carolina as an issuing carrier for NECA Tariff F.C.C. No. 5 and West Carolina will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 2, 2019. The regulations and rate structures applicable to West Carolina parallel those of NECA Tariff FCC No. 5 in all material respects.

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 2, 2019, the Company will file Switched Access rates pursuant to Part 51, Subpart J of the Commission’s rules pertaining to transitional access pricing.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. Effective July 2, 2019, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Currently, the Company provides Wireline Broadband Internet Access Service (“WBIAS”) under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 2, 2019, 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.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.<sup>1</sup> Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

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<sup>1</sup> See Letter from Lance A. Tade, Chief Financial Officer, West Carolina Rural Telephone Cooperative, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 16, 2019.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**West Carolina Rural Telephone Cooperative, Inc. (South Carolina)**

**Filing Made in Accordance with 2019 Access Filing Order and 2019 TRP Order**

The filing is made 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, and the May 1, 2019 release entitled In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing, WC Docket No. 19-47, Order, DA 19-313.

**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.

West Carolina 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 93.91 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2019-2020 demand produces revenue of \$618,767. Application of the rates for Switched Access proposed under this transmittal to 2019-2020 Test Year demand produces revenue of \$37,666, a reduction of \$581,101 or 93.91 percent.

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**West Carolina Rural Telephone Cooperative, Inc. (South Carolina)**

**Mapping of FCC Part 51, Subpart J Pool Exiting Procedures to Calculations**

<b>Step</b>	<b>FCC Rule</b>	<b>Cross-Reference to Exhibit A</b>
<b>1</b>	<p><b>51.909(a)(4)(ii)(A)</b></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>
<b>2</b>	<p><b>51.909(a)(5)(i) – [Step 2 portion of rule]</b></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>
<b>3</b>	<p><b>51.909(a)(5)(i) – [Step 3 portion of rule]</b></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>
<b>4</b>	<p><b>51.909(i)</b></p> <p>Each Rate-of-Return Carrier shall calculate its 2019 Target Terminating End Office Access Rate. The 2019 Target Terminating End Office Access Rate means a rate not to exceed \$0.0007 per minute</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>
<b>5</b>	<p><b>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</b></p> <p>The interstate switched access rate caps determined pursuant to paragraph (a)(5)(i) of this section shall be the new capped interstate switched access rates of the exiting Rate-of-Return Carrier for purposes of § 51.909(a). An exiting Rate-of-Return Carrier shall provide support in its annual access tariff filing to</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 224 effective July 2,</i></p>

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**West Carolina Rural Telephone Cooperative, Inc. (South Carolina)**

Step	FCC Rule	Cross-Reference to Exhibit A
	justify the revised interstate switched access rate caps, [...].	<i>2019</i>
<b>6</b>	<b>51.909(a)(5)(ii) [Step 5 Portion of the Rule]</b>  [...] 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 has elected to convert to incentive regulation for BDS effective July 2, 2019.

### **A. A-CAM BDS – 61.50 Filing Rules**

The Company submits the required Incentive-Based BDS Tariff Review Plan (“TRP”) in support of proposed rates.

#### Study Area Not Deemed Competitive

The Company’s study area was not deemed competitive by the Commission.

As a carrier exiting the NECA traffic-sensitive tariff pool, appropriate adjustments were made to account for exiting the NECA Special Access Traffic Sensitive Pool effective July 2, 2019, for initial lower capacity time division multiplexed (“TDM”) transport and end user channel termination lower capacity (at or below DS3) BDS rate levels. These initial rates were then adjusted for the X-factor, inflation factor, and exogenous cost changes. No adjustments were made to account for carriers unfreezing separations category relationships, as no carriers elected to make that change.

Higher capacity (above DS3) TDM or packet-based BDS permissively tariffed rates will remain frozen for six (6) months, and will transition to a detariffed regime within 36 months pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018. These rates apply to existing customers as of the July 2, 2019 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 2, 2019 will be offered on a contractual basis.

## **3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND**

**Description and Justification**  
**JSI Transmittal No. 224 - 2019 Annual Access Filing**  
**West Carolina Rural Telephone Cooperative, Inc. (South Carolina)**

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 2, 2019 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.<sup>2</sup> The Test Year (TY) 2019 - 2020 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

West Carolina Rural Telephone Cooperative, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2019-2020. All CAF-ICC data is represented in a single consolidated file, *West Carolina RTC 2019 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- West Carolina 2019 ROR-ILEC-ICC Data
- West Carolina 2019 Tariff Rate Comp CAF
- West Carolina 2019 True Up
- West Carolina 2019 Rate Ceiling CAF
- West Carolina 2019 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

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<sup>2</sup> 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).

**West Carolina Rural Tel. COOP.**

240550

		SOURCE	
<b>CALCULATION OF DEPOOLING ADJUSTMENT FACTOR</b>			
101	Projected 2011-12 Interstate Billed Access Revenues ( Includes Transport)	NECA	\$618,767
102	Projected 2011-12 Pool Settlements without LSS	NECA	37,666
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 581,101
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	93.91%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	<b>-93.91%</b>

**July 1, 2019 Recurring Switched Access Service**

**End Office**

201 a	<b>Local Switching Premium Rates Terminating</b>	Line 405	\$0.000700
201 b	<b>Local Switching Premium Rates Originating</b>	Line 301 + (Line 301 * Line 105)	\$0.000893
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.003275

**Local Transport**

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$2.92
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$4.67
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$14.21
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$129.78
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$0.21
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$0.21
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$0.97
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$8.48
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$2.09
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$2.09
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$5.05
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$32.44
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$29.60
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$11.43
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000012
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000065
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.000164
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.000353
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.000390

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

Band 1 / Band 8 / Band 1

**End Office**

301 a	<b>Local Switching Premium Rates Terminating</b>		\$0.002133
301 b	<b>Local Switching Premium Rates Originating</b>		\$0.014678
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053800

**Local Transport**

303	Voice Grade 2-Wire Entrance Facility		\$47.89
304	Voice Grade 4-Wire Entrance Facility		\$76.64
305	DS-1 Entrance Facility		\$233.49
306	DS-3 Entrance Facility		\$2,131.92
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$3.42
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$16.00
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$139.36
311	Voice Grade 2-Wire Direct Trunk Termination		\$34.29
312	Voice Grade 4-Wire Direct Trunk Termination		\$34.29
313	DS-1 Direct Trunk Termination		\$83.00
314	DS-3 Direct Trunk Termination		\$532.96
315	Multiplexing DS3-DS1		\$486.28
316	Multiplexing DS1-Voice		\$187.74
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000204
318	Tandem Switched Termination		\$0.001067
319	Tandem Switching		\$0.002691
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*

**West Carolina Rural Tel. COOP.**

240550

SOURCE

**Composite Rates Interstate Rates for July 1, 2019 - Before Step Down Calculation for Terminating Local Switching**

401	<b>Local Switching Premium Rates Terminating Prior to Step Down</b>	Line 301a	\$0.002133
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**Step-Down Calculation**

402	Effective Rate July 1st 2019 - FCC Order	FCC Order	<b>\$0.000700</b>
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403	Difference In Unified Rate and July 1st 2019 Rate	Line 402 - Line 401	-\$0.001433
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404	Transition to Rate on Line 401 in 1 Steps	Line 403 / 1 (if Line 403 is negative), otherwise \$0.00	-\$0.001433
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405	<b>Rate Effective Date July 2019</b>	Line 401 + (Line 404)+(Line 404)	<b>\$0.000700</b>
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