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

August 16, 2019

Transmittal No. 225

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

Attention: Wireline Competition Bureau

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

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

The filing, to become effective August 31, 2019, consists of tariff pages as indicated on the following check sheet:

Tariff F.C.C. No. 1

219th Revised Page 0-1

This filing proposes revisions on behalf of carriers which have elected Alternative Connect America Model II support ("A-CAM II Carriers"), and which have also opted to tariff Common Line rates in JSI Tariff F.C.C. No. 1. NECA pooled Common Line rates for these A-CAM II Carriers are being removed from the NECA Tariff F.C.C. No. 5 effective August 31, 2019. JSI proposes revisions to tariff these Common Line rates for the A-CAM II Carriers concurrent with the August 31, 2019 effective date of NECA's Tariff F.C.C. No. 5 transmittal.

The transition of A-CAM II Carrier NECA pooled Common Line rates to JSI Tariff F.C.C. No. 1 represents no changes to currently effective rates. Proposed Common Line rates for the A-CAM II Carriers are consistent with those rates currently effective for NECA Common Line pool participants. A-CAM II Carriers are identified in the accompanying Description and Justification.

This filing also proposes to introduce regulations and rates on behalf of TeleGuam Holdings, LLC ("TeleGuam") for Synchronous Digital Hierarchy ("SDH"), a hierarchical digital transport structure over optical channel service, with Synchronous Transport

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Module (“STM”) standard data rates of STM-1, STM-4, STM-16 and STM-64. SDH is the international standard equivalent of Synchronous Optical Channel Service (“SOCS”) and is comparable to SOCS both in technology and billing elements. In addition, proposed revisions introduce on behalf of TeleGuam added SOCS capacities of OC48 and OC192, as well as SOCS term discounts under existing regulations. Pursuant to Section 61.39 of the Commission’s Rules, supporting information for rates and charges associated with TeleGuam’s introduction of SDH and added SOCS capacities and term discounts is not attached, but can be provided upon request of the Commission.

For Twin Lakes Telephone Cooperative, Corp. (TN) (“Twin Lakes”), this filing proposes revisions to introduce Ethernet Transport Service (“ETS”) Alternative Volume Discount Plan under existing Section 16.4.5(F) regulations. Pursuant to Section 61.39 of the Commission’s Rules, supporting information is not attached, but can be provided upon request of the Commission.

For Farmers Telephone Cooperative, Inc. (SC) (“Farmers”), revisions are proposed to adjust the Port thresholds for the ETS Alternative Volume Discount Plan. Farmers introduced the ETS Alternative Volume Discount Plan under JSI Transmittal No. 220 with the cost support required pursuant to Section 61.38 of the Commission’s Rules. Revisions under this Transmittal No. 225 are limited to modification of the number of committed ETS Ports associated with the ETS Alternative Volume Discount Plan. Farmers’ customers who currently receive discounts under the ETS Alternative Volume Discount Plan will continue to qualify for those discounts under the modified thresholds. Therefore, these revisions will not impact customers.

Finally, a maintenance revision is proposed to restore the Section 6 Switched Access Service diagram that was missing from the electronic copy of the JSI Tariff at Page 6-6.

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

Sincerely,



John Kuykendall  
Vice President

Enclosures

cc: JSI Issuing Carriers

**JSI Interstate Access Tariff F.C.C. No. 1**  
**Transmittal No. 225 – August 16, 2019**  
**Appendix A**  
**F.C.C. Registration Numbers (“FRNs”)**

John Staurulakis, Inc. FRN 0003-7481-42

**JSI Issuing Carriers FRNs:**

0004061586	0002641181	0003737384	0001743525	0003434958
0003708161	0002723690	0010747657	0002773307	0002648657
0005058151	0001774272	0001683630	0003770591	0002388247
0001775295	0002722155	0003775244	0003784170	0003745791
0001887728	0002639870	0002549228	0003766862	0004327417
0003707775	0001856533	0004362372	0003766896	0002329662
0001961416	0001824689	0001856673	0003727039	0003767449
0001888718	0003767522	0001773670	0003766995	0003767472
0002817823	0001616390	0001857598	0003767308	0002924629
0001858760	0001772805	0001742501	0003767357	0003767613
0005901368	0002716991	0001856483	0003727179	0004382545
0001887025	0001754332	0018713982	0002775823	0002639870
0001889617	0002851251	0018714014	0003767654	0001742618
0001791995	0003666518	0001753557	0003784154	0011458999
0002899060	0004337671	0003770815	0003727385	0001685718
0001886704	0004329496	0006925440	0002926772	0003746542
0003713963	0001755776	0003731791	0003766730	0003738275
0020980116	0003687159	0008702433	0003726940	0003738283
0001886944	0001530237	0017225723	0003766763	0003788309
0003733581	0001888155	0002509040	0003770534	0004924478
0001889245	0002073526	0004997516	0005097910	0001573427
0003738739	0001602663	0020562187	0002926483	0002334407
0003707874	0001617281	0005057328	0003925385	0003740610
0004309548	0003767043	0002594190	0001546720	0023758238
0002719045	0002719482	0002595858	0004811162	0001687557
0002339976	0003767563	0002586998	0001581628	0003723640
0018538512	0002901593	0001731710	0003767134	0003723707
0001887140	0002897064	0002881373	0003767159	0003723665
0001699776	0004333639	0003766805	0003767191	0003723715
0002334795	0002058261	0003687357	0001580380	0003723681
0003707791	0003767720	0003687332	0002719060	0003723723
0001855287	0004329470	0003766961	0003767423	0001886977
0005555925	0005010996	0003727104	0003767506	0003717709
0001952555	0003744463	0003767209	0003435492	0004269809
0005026075	0004341285	0003767399	0003767480	0004269775
0001960962	0002590057	0003767530	0001791458	0004269817
0001855881	0003778594	0001745447	0003727195	0001615665
0003767332	0001646165	0001885771	0002716108	0005070933
0003767274	0005050083	0003767605	0003766920	
0001773779	0004319257	0003767696	0003685013	
0002650240	0001700616	0003686888	0003767266	
0002723559	0004278339	0001724426	0003740222	
0001855261	0002505519	0001582485	0003686821	