

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 231 - June 16, 2020

John Staurulakis, Inc. ("JSI") hereby provides description and justification ("D&J") for JSI Transmittal No. 231 on behalf of the issuing carriers for JSI Tariff F.C.C. No. 1.

INTRODUCTION

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

Title Pages, Table of Contents

Addition of issuing carriers effective July 1, 2020, listed at D&J Exhibit 1 ("New Issuing Carriers")

Maintenance revision to add Section 16.10 Optical Network Transport Service to the Table of Contents.

Removal of 17.4.8 Public Packet Data Network from Table of Contents for Moundridge Telephone Company, Smithville Telephone Company and Twin Valley Telephone, Inc. Rates and Charges. The foregoing carriers are existing 61.50 carriers and will detariff Public Packet Data Network rates and charges effective July 1, 2020 under JSI's annual access filing Transmittal No. 232.

Section 6 Switched Access Ordering

Maintenance revision at 1st Revised Page 6-100.1 to correct references from Section 6.10.3 to 6.9.3.

Section 7 Special Access Service

Maintenance revision at 1st Revised Page 7-14.3.

Section 16.4 ETS Regulations

Revisions to remove the restriction that an ETS Port cannot be added to or replaced in an existing ETS Term Discount Plan during the last year of the commitment period. These revisions are proposed to mirror the National Exchange Carrier Association, Inc. ("NECA") regulations under which New Issuing Carriers offer service.

Carrier Tables Updated to Include New Issuing Carriers and Maintenance Updates for Existing Carriers

Section 7 Special Access
Section 8 Digital Subscriber Line Access Services
Section 16 Public Packet Data Network

DESCRIPTION

The New Issuing Carriers' offerings associated with the above revisions are being filed today under the JSI Tariff F.C.C. No. 1 2020 annual access filing, JSI Transmittal No. 232, for the fourteen (14) carriers listed at Exhibit 1. All New Issuing Carriers are migrating from NECA Tariff F.C.C. No. 5.

A side-by-side comparison of JSI Tariff F.C.C. No. 1 regulations to NECA Tariff F.C.C. No. 5 regulations is attached hereto as D&J Exhibit 2.

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

These revisions are necessary to allow seamless transition for New Issuing Carriers concurrent with cancellation as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 1, 2020.

This transmittal is a companion filing to JSI Transmittal No. 232, the required 2020 annual access filing.

CONCLUSION

This transmittal provides for the addition of New Issuing Carriers to JSI Tariff F.C.C. No. 1, as well as the maintenance revisions described above. Allowing the revisions proposed in JSI Transmittal No. 231 to become effective will facilitate the seamless migration of New Issuing Carriers' services and rates from NECA Tariff F.C.C. No. 5 to JSI Tariff F.C.C. No. 1 effective July 1, 2020.

JSI TARIFF F.C.C. NO. 1 - TRANSMITTAL NO. 231 – JUNE 16, 2020**DESCRIPTION AND JUSTIFICATION EXHIBIT 1****NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. NO. 1****EFFECTIVE JULY 1, 2020 - JSI TRANSMITTAL NO. 232 TO BE FILED JUNE 16, 2020**

					<i>Effective July 1, 2020</i>		
<i>Company Name</i>	<i>Previous Tariff</i>	<i>Filing Rules</i>	<i>SAC</i>	<i>State</i>	<i>Common Line Rates</i>	<i>Switched Access Rates</i>	<i>Special Access Rates</i>
American Broadband Louisiana							
Cameron Telephone Company-LA	NECA	61.39	270425	LA	NECA	JSI	JSI
Elizabeth Telephone Company	NECA	61.39	270430	LA	NECA	JSI	JSI
American Broadband Missouri							
KLM Telephone Company	NECA	61.39	421900	MO	NECA	JSI	JSI
Holway Telephone Company	NECA	61.39	421929	MO	NECA	JSI	JSI
ITS Telecommunications Systems, Inc.	NECA	61.39	210331	FL	NECA Pool	JSI	JSI
Franklin Telephone Company	NECA	61.50	280454	MS	NECA	NECA	JSI
BEK Communications Cooperative	NECA	61.50	381604	ND	JSI	NECA	JSI
Absaraka Coop Tel. Co.	NECA	61.50	381601	ND	JSI	NECA	JSI
Hiawatha Telephone Company	NECA	61.50	310713	MI	NECA	NECA	JSI
Ontonagon County Telephone Company	NECA	61.50	310717	MI	NECA	NECA	JSI
Midway Telephone Company	NECA	61.50	310711	MI	NECA	NECA	JSI
Hospers Telephone Exchange, Inc.	NECA	61.50	351202	IA	NECA	JSI	JSI
Poka Lambro Rural Telephone Cooperative, Inc.	NECA	61.50	442131	TX	NECA	NECA	JSI
Le-Ru Telephone Company	NECA	61.50	421908	MO	JSI	NECA	JSI

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DESCRIPTION AND JUSTIFICATION EXHIBIT 2

TARIFF COMPARISON – NECA to JSI

<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
1. Application of Tariff	1. Application of Tariff	JSI Tariff FCC No. 1 Section 1 is reflective of NECA Tariff FCC No. 5 Section 1.
2. General Regulations	2. General Regulations	JSI Tariff FCC No. 1 Section 2 is reflective of NECA Tariff FCC No. 5 Section 2.
3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port and Consumer Broadband-Only Loop Charge	3. Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port and Consumer Broadband-Only Loop Charge	JSI Tariff FCC No. 1 Section 3 is reflective of NECA Tariff FCC No. 5 Section 3.
4. End User Access Service	4. End User Access Service	JSI Tariff FCC No. 1 Section 4 is reflective of NECA Tariff FCC No. 5 Section 4.
5. Access Ordering	5. Access Ordering	JSI Tariff FCC No. 1 Section 5 is reflective of NECA Tariff FCC No. 5 Section 5 with the exception that references to Synchronous Optical Channel Service capacities under the JSI Tariff are expanded to include OC48 and OC192.
6. Switched Access Service	6. Switched Access Service	JSI Tariff FCC No. 1 Section 6 is reflective of NECA Tariff FCC No. 5 Section 6.
7. Special Access Service	7. Special Access Service	JSI Tariff FCC No. 1 Section 7, is reflective of NECA Tariff FCC No. 5 Section 7 with the following additional subsection for regulations applicable to optional offerings for election by individual issuing carriers for JSI Tariff FCC

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		No. 1.
7.11.3 Synchronous Optical Channel (SOCS) Optional Features and Functions	7.11.3 SOCS Rate Regs. I – CT Without Mileage Charges	Optional offering reflective of NECA 7.11.3 SOCS Optional Features and Functions. New issuing carriers offer SOCS Optional Features and Functions under these regulations. As noted above, references to Synchronous Optical Channel Service capacities under the JSI Tariff are expanded to include OC48 and OC192.
	7.11.4 SOCS Rate Regs. II - CT With Mileage Charges	Optional offering, not offered by new issuing carriers.
	7.11.5 Synchronous Digital Hierarchy	Optional offering, not offered by new issuing carriers.
7.2.8(B) SOCS Optional Rate Plan	7.2.9(A) SOCS Optional Rate Plan A	Optional offering reflective of NECA Optional Rate Plan which provides for term discounts. New issuing carriers with SOCS offerings provide SOCS term discounts under these regulations.
	7.2.9(B) SOCS Optional Rate Plan B	Optional offering, not offered by new issuing carriers.
	7.12 Digital Access Cross Connect Service (DACCS)	Optional offering, not offered by new issuing carriers
8. Digital Subscriber Line (DSL) Access Services	8. Digital Subscriber Line Access Services	<p>All new issuing carriers have elected to permissively detariff DSL services effective July 1, 2020, or have previously detariffed DSL services. Therefore, Section 8 DSL regulations do not apply to new issuing carriers.</p> <p>Note: Prior to certain carriers exiting the NECA Traffic</p>

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		Sensitive Pool in 2007, JSI Tariff FCC No. 1 did not have any regulations in Section 8. JSI added Digital Subscriber Line Access Services to Section 8 reflective of NECA Tariff FCC No. 5 regulations for the benefit of the new issuing carriers for JSI Tariff FCC No. 1. For those issuing carriers offering DSL Access Service of any kind pursuant to JSI Tariff FCC No. 1 at the beginning of 2007, such carriers did so pursuant to either JSI Tariff FCC No. 1 Section 16.2, Asymmetrical Digital Subscriber Line (ADSL) Service, Section 16.3, Symmetrical Digital Subscriber Line (SDSL) Access Service or Section 16.6 High Speed Internet (HSI) Access Service.
9. Directory Assistance Service	9. Reserved for Future Use	No current JSI Tariff FCC No. 1 issuing carriers or new issuing carriers provide interstate directory assistance service. Therefore, JSI Tariff FCC No. 1 does not contain regulations for interstate directory assistance service. DA listings are provided to IXC's and other ILEC's under contract.
10. Special Federal Government Access Services	10. Special Federal Government Access Services	JSI Tariff FCC No. 1 Section 10 is reflective of NECA Tariff FCC No. 5 Section 10.
11. Special Facilities Routing of Access Services	11. Special Facilities Routing of Access Services	JSI Tariff FCC No. 1 Section 11 is reflective of NECA Tariff FCC No. 5 Section 11.
12. Specialized Service Or Arrangements	12. Specialized Service Or Arrangements	JSI Tariff FCC No. 1 Section 12 is reflective of NECA Tariff FCC No. 5 Section 12.
13. Additional Engineering	13. Additional Engineering	JSI Tariff FCC No. 1 Section 13 is reflective of NECA Tariff FCC No. 5 Section 13.

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
14. Exceptions to Access Service Offerings	14. Reserved for Future Use	There are no exceptions applicable to current or new issuing carriers for JSI Tariff FCC No. 1.
15. Access Service Interfaces and Transmission Specifications	15. Access Service Interfaces and Transmission Specifications	JSI Tariff FCC No. 1 Section 15 is reflective of NECA Tariff FCC No. 5 Section 15.
16. Public Packet Data Network	16. Public Packet Data Network	See Below:
16.1 Frame Relay Access Service	16.1 Frame Relay Access Service	JSI Tariff FCC No. 1 Section 16.1 is reflective of NECA Tariff FCC No. 5 Section 16.1.
	16.2 Asymmetrical Digital Subscriber Line (ADSL) Service	JSI Tariff FCC No. 1 includes ADSL regulations at Section 16.2 based on earlier versions of NECA Tariff FCC No. 5 Section 8.2. None of the new issuing carriers offer ADSL service under tariff (see note under Section 8 preceding).
	16.3 Symmetrical Digital Subscriber Line (SDSL) Access Service	JSI Tariff FCC No. 1 contains SDSL regulations at Section 16.3 similar to earlier versions of NECA SDSL regulations. None of the new issuing carriers offer SDSL service under tariff (see note under Section 8 preceding).
16.2 Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS)	16.7 Asynchronous Transfer Mode Cell Relay Access Service	JSI Tariff FCC No. 1 Section 16.7 is reflective of NECA Tariff FCC No. 5 Section 16.2 with the addition of one optional feature and function not available in NECA Tariff FCC No. 5. That feature is Inverse Multiplexing Over ATM (IMA) tariffed at Section 16.7.4(A)(4)(c) of JSI Tariff FCC No. 1. New issuing carriers do not offer this optional feature.
16.3 Ethernet Transport Service	16.4 Ethernet Transport Service	JSI Tariff FCC No. 1 Section 16.4 is reflective of NECA Tariff FCC No. 5 Section 16.3 with the following

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		exceptions: (1) DSL Access Service Connection Optional Feature <u>Two-Way</u> ETS MM-VCC; (2) ETS E-Rate Option.
	16.4.4(A)(5)(b) VLAN Service (ETS Virtual Local Area Network)	NECA Tariff FCC No. 5 does not include ETS VLAN Service at this time. New issuing carriers do not offer ETS VLAN service.
	16.4.4(A)(6) ETS Meet Point Interface (ETS-MPI)	NECA Tariff FCC No. 5 does not include ETS Meet Point Interface at this time. New issuing carriers do not offer ETS MPI.
	16.4.5(F) ETS Alternative Volume Discount Plan 16.4.6(E) ETS Port Term Discount Plan Alternative Volume Discount Plan	NECA Tariff FCC No. 5 does not include the ETS Alternative Volume Discount Plan or the ETS Port Term Discount Plan Alternative Volume Discount Plan at this time. New issuing carriers do not offer these alternative discount plans.
16.4 Internet Protocol Gateway (IPG) Access Service	16.9 Internet Protocol Gateway Access Service	JSI Tariff FCC No. 1 is reflective of NECA Tariff FCC No. 5 Section 16.4.
	16.5 Metro Ethernet Service (Metro Ethernet)	Metro Ethernet is the Ethernet Transport Service for the Comporium Companies (issuing carriers for JSI Tariff FCC No. 1, who tariffed Ethernet prior to NECA Tariff FCC No. 5). This service is not offered by new issuing carriers.
	16.6 High Speed Internet (HSI) Access Service	HSI is the wireline broadband Internet access transport offering for a single issuing carrier for JSI Tariff FCC No. 1 (Mt. Horeb Telephone Company). This service is not offered by new issuing carriers.
	16.8 Stand-Alone Broadband Network	SABNT allows provision of combinations of Ethernet

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
	Transport (SABNT)	technology with IP technologies delivered over High Capacity circuits, providing the same virtual connections as Ethernet Transport Services. Two issuing carriers for JSI Tariff FCC No. 1 offer SABNT in lieu of Ethernet Transport Service - Horry Telephone Cooperative, Inc. and Atlantic Telephone Membership Corporation. This service is not offered by new issuing carriers.
	16.10 Optical Transport Network Service	Optical Transport Network Service (OTN) is a protocol which provides a means to multiplex different services on to optical light paths. OTN, also known as digital wrapper, provides an additional layer of security when carrying data packets over point-to-point circuits. This service is not offered by new issuing carriers.