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

June 16, 2020

Transmittal No. 232

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

Attention: Wireline Competition Bureau

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

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

The filing, to become effective July 1, 2020, consists of tariff pages as indicated on the following check sheet:

Tariff F.C.C. No. 1

226th Revised Page 0-1

In accordance with the Commission's April 15, 2020 release entitled In the Matter of July 1, 2020 Annual Access Charge Tariff Filings, WC Docket No. 20-55, Order, DA 20-413, the instant filing includes proposed revised rates for the provision of the applicable End User, Special Access, Miscellaneous and Public Packet Data Network services offered by the issuing carriers filing pursuant to Section 61.38 in the JSI Tariff F.C.C. No. 1. Material required pursuant to the Tariff Review Plan Order is included in this filing.¹ In addition to the Description and Justification ("D&J") summary exhibits described below, a D&J is provided for each issuing carrier.

¹ See *Material to be Filed in Support of 2020 Annual Access Tariff Filings*, WC Docket No. 20-55, Order, DA 20-502 (rel. May 12, 2020) ("*Tariff Review Plan Order*").

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Current Issuing Carriers

The accompanying D&J Exhibit A provides a summary of current issuing carriers for the JSI Tariff. The D&J Exhibit A summary indicates the filing rules for each carrier under which rates are being filed. In addition to the required biennial filings for issuing carriers filing subject to Section 61.38 of the Commission's rules, Section 61.38 and Section 61.39 carriers propose under this transmittal revised special access rates to reflect the reduced rate of return of 10.0 percent required by the Rate-of-Return Reform Order.² Of the existing issuing carriers for JSI Tariff F.C.C. No. 1 who make mandatory filings in odd-numbered years pursuant to Section 61.39 of the Commission's rules, none have elected to make mid-course voluntary annual filings.

Among current issuing carriers, twenty-six (26) elected incentive regulation for Business Data Services ("BDS") effective July 2, 2019. Ten (10) issuing carriers elected incentive regulation for BDS Services effective July 1, 2020. These carriers are filing special access rates pursuant to Section 61.50 of the Commission's rules (see D&J Exhibit A).

All carriers who file switched access rates under the JSI Tariff propose revised terminating End Office Access Service rates pursuant to Section 51.909(j). Access Recovery Charge ("ARC") rates pursuant to Section 51.917(e) are revised where applicable.

New Issuing Carriers

The accompanying D&J Exhibit B provides a summary of fourteen (14) new issuing carriers for the JSI Tariff effective July 1, 2020. Among the new carriers, nine (9) have elected incentive regulation for BDS effective with this filing.

All of these new carriers are currently in the National Exchange Carrier Association ("NECA") Traffic Sensitive Pool and are being canceled by NECA as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 1, 2020, concurrent with the carriers becoming issuing carriers for JSI Tariff F.C.C. No. 1. Of these carriers, eight (8) are exiting the NECA Traffic Sensitive Pool for Special Access and will remain in the NECA Traffic Sensitive Pool for Switched Access (see D&J Exhibit B).

Separations Category Relationships Freeze

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

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

Federal Universal Service Contribution Factor

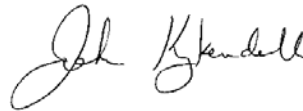
Revisions are proposed on behalf of JSI carriers who are not members of the National Exchange Carrier Association Common Line Pool and therefore bill common line charges and related Federal Universal Service Charge charges pursuant to JSI Tariff FCC No. 1. Proposed revisions reflect the increase from the currently effective 19.6% to 25.6% for the third quarter of 2020.³

Confidential Treatment of Rate-of-Return Tariff Review Plans

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

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

Sincerely,



John Kuykendall
Vice President

Enclosures

cc: JSI Issuing Carriers

³ See *Proposed Third Quarter 2020 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice DA 20-617 (rel. June 12, 2020).

⁴ *Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996*, CC Docket No. 96-187, Report and Order, 12 FCC Rcd 2170 (1997) (*Tariff Streamlining Order*). See also *Announcing Procedures for Obtaining Confidential Information for 2020 Annual Access Charge Tariff Filings*, WC Docket No. 20-55, Public Notice DA 20-604 (rel. June 9, 2020).

JSI Interstate Access Tariff F.C.C. No. 1
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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	0001715937
0001773779	0004319257	0003767696	0003685013	0003731114
0002650240	0001700616	0003686888	0003767266	0003772274
0002723559	0004278339	0001724426	0003740222	0004746863
0001855261	0002505519	0001582485	0003686821	0003731734

JSI Issuing Carriers FRNs (Cont'd)
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0001742170
0002477636
0003741949
0002776599
0004334611
0004334629
0002587707
0004384517
0002490472