

DESCRIPTION AND JUSTIFICATION

JSI Tariff F.C.C. No. 1

Transmittal No. 232 – 2020 Annual Access Filing

JSI provides summaries of carriers participating in JSI Transmittal No. 232 at Exhibits A and B immediately following:

EXHIBIT A

Currently effective JSI Issuing Carriers filing annual access rates effective July 1, 2020

EXHIBIT B

New JSI Issuing Carriers filing annual access rate effective July 1, 2020

A Description and Justification for each carrier filing annual access rates under JSI Transmittal No. 232 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
PBT Telecom	Comporium Communications	61.38	240539	SC		Legacy	NECA Pool	JSI	JSI
Home Telephone ILEC, LLC d/b/a Home Telecom		61.50	240527	SC		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		61.50	613015	AK		Alaska Plan	JSI	JSI	JSI
Winnebago Cooperative Telecom Association	Winnebago Cooperative Telecom Association	61.50	351337, 361337	IA, MN		A-CAM II	JSI	JSI	JSI
Winnebago Cooperative Telecom Association-LB	Winnebago Cooperative Telecom Association	61.50	351338	IA		CAF II	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		A-CAM II	NECA	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

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
Pine Tree Telephone LLC	Otelco, Inc.	61.50 - Competitive SAC	100020	ME		A-CAM	JSI	JSI	JSI
War Telephone LLC	Otelco, Inc.	61.50	200258	WV		A-CAM	JSI	JSI	JSI
Shoreham Telephone LLC	Otelco, Inc.	61.50	140064	VT		A-CAM II	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		61.50 Packet-Based and Higher Capacity TDM BDS Detariffed Eff 07/01/2020	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
Totah Communications, Inc.		61.39	432030	OK		Legacy	NECA Pool	JSI	JSI
Totah 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	Mutual Telephone Company	61.50	351096	IA		CAF II	JSI	JSI	JSI
Mutual Telephone Company	Mutual Telephone Company	61.50	351252	IA		A-CAM II	NECA	JSI	JSI
Northern Iowa Telephone Company	Mutual Telephone Company	61.50	351259	IA		A-CAM II	NECA	JSI	JSI
Webb-Dickens Telephone Corporation	Mutual Telephone Company	61.50	351327	IA		A-CAM II	NECA	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		A-CAM II	NECA	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		A-CAM II	NECA	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.		61.50	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 Packet-Based and Higher Capacity TDM BDS Detariffed Eff 07/01/2020	280467	MS		A-CAM	NECA	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
Twin Lakes Telephone Cooperative Corp.		61.39	290579	TN		Legacy	NECA Pool	JSI	JSI
Wilkes Telephone & Electric Company, Inc.		61.39	220394	GA		A-CAM II	JSI	JSI	JSI
Taylor Telephone Cooperative, Inc.		61.50	442151	TX		A-CAM	JSI	JSI	JSI
Teleguam Holdings LLC		61.39	663800	GU		Legacy	NECA Pool	JSI	JSI
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
Inter-Community Telephone Company, L.L.C.	BEK	61.50	381616	ND		A-CAM	JSI	NECA	JSI
Clarity Telecom, LLC-SPA Only; CL and SWA stays in NECA		61.50	391652	SD		A-CAM	NECA	NECA	JSI
Southwest Texas Telephone Company		61.39	442135	TX		Legacy	NECA Pool	JSI	JSI
TEC Companies-Alabama									
National Telephone of Alabama, Inc.	Telephone Electronics Corporation (TEC)	61.39	250286	AL		A-CAM	JSI	JSI	JSI
Roanoke Tel. Co., Inc.	Telephone Electronics Corporation (TEC)	61.39	250317	AL		A-CAM	JSI	JSI	JSI
TEC Companies-Mississippi									
Bay Springs Telephone Company, Inc.	Telephone Electronics Corporation (TEC)	61.39	280446	MS		A-CAM	JSI	JSI	JSI
TEC Companies-Tennessee									
Crockett Tel. Co. Inc.	Telephone Electronics Corporation (TEC)	61.39	290561	TN		A-CAM	JSI	JSI	JSI
Peoples Telephone Company (TN)	Telephone Electronics Corporation (TEC)	61.39	290576	TN		A-CAM	JSI	JSI	JSI
West Tennessee Tel. Co. Inc.	Telephone Electronics Corporation (TEC)	61.39	290583	TN		A-CAM	JSI	JSI	JSI
West Carolina Rural Telephone Cooperative, Inc. (SC)		61.50	240550	SC		A-CAM	JSI	JSI	JSI
Twin Valley Telephone, Inc.		61.50 Packet-Based and Higher Capacity TDM BDS Detariffed Eff 07/01/2020	411840	KS		A-CAM II	NECA	JSI	JSI
Seneca Telephone Company		61.39	421945	MO		Legacy	NECA Pool	JSI	JSI
Goodman Telephone Company		61.39	421886	MO		Legacy	NECA Pool	JSI	JSI
Ozark Telephone Company		61.39	421866	MO		Legacy	NECA Pool	JSI	JSI
TDS Telecom Group A									
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
TDS Telecom Group 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

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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
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
TDS Telecom Group C		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
TDS Telecom Group D		61.38							
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
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
TDS Telecom Group E									
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

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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
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
TDS Telecom Group F									
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
Wolverine Telephone Company	TDS	61.38	310738	MI		A-CAM	JSI	JSI	JSI
TDS Telecom Group G									
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

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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
CURRENTLY EFFECTIVE CARRIERS - COMMON LINE RATES ONLY									
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
Rye Telephone Company - COMMON LINE ONLY			462203	CO		A-CAM II	JSI	NECA	NECA
South Park Telephone Company - COMMON LINE ONLY			462195	CO		A-CAM II	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
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

NEW CARRIERS EFFECTIVE JULY 1, 2020	Holding Company	Previous Tariff	Filing Rules	SAC	State	Support Category	Common Line Rates	Switched Access Rates	Special Access Rates
American Broadband Louisiana									
Cameron Telephone Company-LA	American Broadband	NECA	61.39	270425	LA	A-CAM II	NECA	JSI	JSI
Elizabeth Telephone Company	American Broadband	NECA	61.39	270430	LA	A-CAM II	NECA	JSI	JSI
American Broadband Missouri									
KLM Telephone Company	American Broadband	NECA	61.39	421900	MO	A-CAM	NECA	JSI	JSI
Holway Telephone Company	American Broadband	NECA	61.39	421929	MO	A-CAM	NECA	JSI	JSI
ITS Telecommunications Systems, Inc.		NECA	61.39	210331	FL	Legacy	NECA Pool	JSI	JSI
Franklin Telephone Company	Telapex, Inc.	NECA	61.50	280454	MS	A-CAM	NECA	NECA	JSI
BEK Communications Cooperative		NECA	61.50	381604	ND	A-CAM II	JSI	NECA	JSI
Absaraka Coop Tel. Co.		NECA	61.50	381601	ND	A-CAM	JSI	NECA	JSI
Hiawatha Telephone Company	Hiawatha Communications, Inc.	NECA	61.50	310713	MI	A-CAM	NECA	NECA	JSI
Ontonagon County Telephone Company	Hiawatha Communications, Inc.	NECA	61.50	310717	MI	A-CAM	NECA	NECA	JSI
Midway Telephone Company	Hiawatha Communications, Inc.	NECA	61.50	310711	MI	A-CAM	NECA	NECA	JSI
Hospers Telephone Exchange, Inc.	Mutual Telephone Company	NECA	61.50	351202	IA	A-CAM II	NECA	JSI	JSI
Poka Lambro Rural Telephone Cooperative, Inc.		NECA	61.50 Packet-Based and Higher Capacity TDM BDS Detariffed Eff 07/01/2020	442131	TX	A-CAM	NECA	NECA	JSI
Le-Ru Telephone Company	STEL-CO	NECA	61.50	421908	MO	A-CAM	JSI	NECA	JSI

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Bluffton Telephone Company (SC)

Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 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 2020-2021.

Bluffton CAF-ICC data is represented in a single consolidated file, *Bluffton 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Bluffton 2020 ROR-ILEC-ICC Data
- Bluffton 2020 Tariff Rate Comp CAF
- Bluffton 2020 True Up RoR ILEC
- Bluffton 2020 Rate Ceiling CAF
- Bluffton 2020-21 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

¹ 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. 232 - 2020 Annual Access Filing
Bluffton Telephone Company (SC)

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(j), 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 limited to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “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. 232 - 2020 Annual Access Filing
Bluffton Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Bluffton Telephone Company (SC)

**Wireline
Broadband
Internet
Access Service** 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-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, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

**Part 36
Category** 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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Bluffton Telephone Company (SC)

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

The Company's proposed Special Access rates represent a 24.36% percent across the board increase from current rates. Bluffton's special access rates will results in an increase in Special Access revenues of about \$129,000 due to a decrease in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate increase, showing that Bluffton's Special Access rate of return was -7.38%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM COMMUNICATIONS HOLDING COMPANY 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 2020-2021.

Citizens CAF-ICC data is represented in a single consolidated holding company file, *Comporium Communications 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up RoR ILEC
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

¹ 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. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

- 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(j), 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 limited to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “PYCOS”):

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

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]. 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 a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

**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.

**Wireline
Broadband
Internet
Access Service**

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-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-*

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

State Joint Board, CC Docket No. 80-286, Report and Order, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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. 232 - 2020 Annual Access Filing
Citizens Telephone Company (NC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 5.94% percent across the board decrease from current rates. Citizens' special access rates are decreasing by 5.94% due to an increase in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate decrease, showing that Citizens' Special Access rate of return was 3.29%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Comporium, Inc. (SC)

years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM COMMUNICATIONS HOLDING COMPANY 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 2020-2021.

Comporium, Inc. CAF-ICC data is represented in a single consolidated holding company file, *Comporium Communications 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up RoR ILEC
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

¹ 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. 232 - 2020 Annual Access Filing
Comporium, Inc. (SC)

- 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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “PYCOS”):

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Comporium, Inc. (SC)

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]. 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 a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Comporium, Inc. (SC)

No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

**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.

**Wireline
Broadband
Internet
Access Service**

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-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-*

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Comporium, Inc. (SC)

State Joint Board, CC Docket No. 80-286, Report and Order, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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.
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6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 1.64% percent across the board decrease from current rates. Comporium's special access rates are decreasing by 1.64% due to a decrease in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate decrease, showing that Comporium's Special Access rate of return was 10.22%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled *In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing*, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. FARMERS TARIFF REVIEW PLANS

¹ 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. 232 - 2020 Annual Access Filing
Farmers Telephone Company (SC)

Farmers submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021.

Farmers CAF-ICC data is represented in a single consolidated file, *Farmers Telephone Cooperative, Inc. 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Farmers 2020 ROR-ILEC-ICC Data
- Farmers 2020 Tariff Rate Comp CAF
- Farmers 2020 True Up RoR ILEC
- Farmers 2020 Rate Ceiling CAF
- Farmers 2020-2021 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Farmers Telephone Company (SC)

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Farmers Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.
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.
Wireline Broadband Internet	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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Farmers Telephone Company (SC)

Access Service 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-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, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Farmers Telephone Company (SC)

period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 8.52% percent across the board decrease from current rates. Farmers' special access rates are decreasing by 8.52% due to an increase in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate decrease, showing that Farmers' Special Access rate of return was 43.95%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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 1, 2020 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM COMMUNICATIONS HOLDING COMPANY 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 2020 - 2021.

Fort Mill CAF-ICC data is represented in a single consolidated holding company file, *Comporium Communications 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up RoR ILEC
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Fort Mill 2020 Annual Filing TRP

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

¹ 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. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

- 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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “PYCOS”):

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

including End User Common Line rates.

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.

Wireline Broadband Internet Access Service 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-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, FCC

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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.
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Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Fort Mill Telephone Company (SC)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 5.11% percent across the board decrease from current rates. Fort Mill's special access rates are decreasing by 5.11% due to a decrease in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate decrease, showing that Fort Mill's Special Access rate of return was 34.52%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

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.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hargray Telephone Company (SC)

reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 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 2020-2021.

Hargray CAF-ICC data is represented in a single consolidated file, *Hargray 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hargray 2020 ROR-ILEC-ICC Data
- Hargray 2020 Tariff Rate Comp CAF
- Hargray 2020 True Up RoR ILEC
- Hargray 2020 Rate Ceiling CAF
- Hargray 2020-21 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

¹ 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. 232 - 2020 Annual Access Filing
Hargray Telephone Company (SC)

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(j), 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 limited to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hargray Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

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.

Wireline Broadband Internet 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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hargray Telephone Company (SC)

Access Service 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-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, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hargray Telephone Company (SC)

period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 3.45% percent across the board increase from current rates. Hargray's special access rates will result in an increase in total revenues of about \$43,000 due to a decrease in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate increase, showing that Hargray's Special Access rate of return was -3.23%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled *In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing*, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. HORRY TARIFF REVIEW PLANS

¹ 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. 232 - 2020 Annual Access Filing
Horry Telephone Company (SC)

Horry submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021.

Horry CAF-ICC data is represented in a single consolidated file, *Horry 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks

- Horry 2020 ROR-ILEC-ICC Data
- Horry 2020 Tariff Rate Comp CAF
- Horry 2020 True Up RoR ILEC
- Horry 2020 Rate Ceiling CAF
- Horry 2020-2021 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Horry Telephone Company (SC)

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Horry Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association ("NECA") Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.
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.
Wireline Broadband Internet	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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Horry Telephone Company (SC)

Access Service 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-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, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Horry Telephone Company (SC)

period ending December 31, 2000.

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 2.4% percent decrease from current rates for TDM based special services, including DS-1 and DS-3 services. Ethernet-based services (Stand-Alone Broadband Network Transport Service) are being reduced by approximately 8% on a composite basis. These rate reductions are being made in order to achieve the authorized ROR of 10% during the upcoming test period. Overall, the rate changes are projected to reduce Special Access revenues by \$306,457 for the upcoming test period as shown on Attachment 7.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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. 232 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered years. Additionally, the Company’s filing reflects reductions required by the Rate-of-

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Lancaster Telephone Company (SC)

Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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 1, 2020 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM COMMUNICATIONS HOLDING COMPANY 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 2020-2021.

Lancaster CAF-ICC data is represented in a single consolidated holding company file, *Comporium Communications 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up RoR ILEC
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

¹ 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).

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JSI Transmittal No. 232 - 2020 Annual Access Filing
Lancaster Telephone Company (SC)

- 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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “PYCOS”):

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JSI Transmittal No. 232 - 2020 Annual Access Filing
Lancaster Telephone Company (SC)

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]. 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 a member of the National Exchange Carrier Association (“NECA”) Common Line Pool. The Company’s rate pages in JSI Tariff FCC

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Lancaster Telephone Company (SC)

No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.

**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.

**Wireline
Broadband
Internet
Access Service**

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-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-*

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Lancaster Telephone Company (SC)

State Joint Board, CC Docket No. 80-286, Report and Order, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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.
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6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 3.40% percent across the board decrease from current rates. Lancaster's special access rates are decreasing by 3.40% due to a decrease in demand. The FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 supports the rate decrease, showing that Lancaster's Special Access rate of return was 22.98%.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, 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. 232 – 2020 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 individual rates proposed under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). PBT is an Issuing Carrier of the JSI Tariff. PBT 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. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502. In addition to the prescribed documents, additional cost support schedules are provided, including both Prior Year Cost of Service and Test Year Cost of Service documents as indicated in the table below.

This filing proposes revised Special Access and Public Packet Data Network rates consistent with the requirement under 61.38 for annual filings in even-numbered

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
PBT Telecom (South Carolina)

years. Additionally, the Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates reflect a rate-of-return of 10.0%, as well as the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. COMPORIUM COMMUNICATIONS HOLDING COMPANY TARIFF REVIEW PLANS

PBT submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020 - 2021.

PBT CAF-ICC data is represented in a single consolidated holding company file, *Comporium Communications 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up RoR ILEC
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

The TRP required of rate of return ILECs subject to section 61.38 of the Commission's rules is also provided:

- Annual Filing ROR CAF BLS

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

¹ 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. 232 - 2020 Annual Access Filing
PBT Telecom (South Carolina)

- 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(j), 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 limited in effect to Special Access. For End User Common Line, the Company participates in the NECA Common Line pool.

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, 2021 (also referred to herein as the July 1, 2020-June 30, 2021 Test Year Cost of Service or “TYCOS” or “2021 TYCOS”). The costs for the twelve (12) month period ending June 30, 2021 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, 2019, identified as follows (also referred to herein as the 2019 Prior Year Cost of Service or “PYCOS”):

Description and Justification
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PBT Telecom (South Carolina)

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]. 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 a member of the National Exchange Carrier Association (“NECA”)

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
PBT Telecom (South Carolina)

	Common Line Pool. The Company's rate pages in JSI Tariff FCC No. 1 reference NECA Tariff FCC No. 5 for Common Line Rates including End User Common Line rates.
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.
Wireline Broadband Internet Access Service	<p>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-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.</p> <p>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.</p>
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 <i>2001 Separations Freeze Order</i> . See <i>Jurisdictional Separations and Referral to the Federal-State Joint Board</i> , 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 <i>Separations Freeze Order</i> . The

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
PBT Telecom (South Carolina)

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, FCC 18-182 (rel. Dec. 17, 2018), extending the separations freeze until December 31, 2024.

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. 232 - 2020 Annual Access Filing
PBT Telecom (South Carolina)

6. SPECIAL ACCESS

The Company's proposed Special Access rates represent a 2.839% percent across the board decrease from current rates. PBT's special access rates are decreasing by 2.839% due to a decrease in cost coupled with higher demand. While the FCC Form 492 report filed in March 2020 for the calendar year ending 12/31/19 theoretically supports a rate increase, showing that PBT's Special Access rate of return was only -1.07%, due to the combination of declining overall costs with increasing demand this results in projected rate decrease. Additionally, it should be noted that the March 2020 filing was reflective of only a six month period (July-December) as PBT first began offering company specific tariff rates (exit NECA) on July 2, 2019.

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 2020 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 the rate of return of 10.0% effective July 1, 2020, development of its interstate cost of service and, in turn, rate calculations.

John Staurulakis, Inc. Transmittal No. 232 – June 16, 2020
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. 232 for JSI Tariff F.C.C. No. 1 (“JSI Tariff”) for the TDS Telecom study areas listed below.

TDS Telecom Companies Group A Study Area Company Name	Study Area State	Study Area Code
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

TDS Telecom Companies-Group B Individual Study Area Company Name	State	Study Area Code
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

TDS Telecom Companies

Description and Justification

TDS Telecom Companies-Group C Individual Study Area Company Name	State	Study Area Code
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	122047
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

TDS Telecom Companies-Group D Individual Study Area Company Name	State	Study Area Code
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

TDS Telecom Companies

Description and Justification

TDS Telecom Companies Group E Study Area Company Name	Study Area State	Study Area Code
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

TDS Telecom Companies Group F Study Area Company Name	Study Area State	Study Area Code
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

TDS Telecom Companies

Description and Justification

TDS Telecom Companies Group G Study Area Company Name	Study Area State	Study Area Code
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 2020 Access Filing Order and 2020 TRP Order

The filing is made in accordance with the 2020 Annual Access Filing Order adopted and released by the Commission’s Wireline Competition Bureau-Pricing Policy Division (WCB-PPD). *See* July 1, 2020 Annual Access Charge Tariff Filings, WC Docket No. 20-55, Order, DA 20-413 (Released April 15, 2020). 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 2020 Annual Access

Tariff Filings, WC Docket No. 20-55, Order, DA 20-502 (rel. May 12, 2020). In addition, Special Access rates reflect the rate of return for the Test Year of 10.00 percent as adopted in the Rate-of-Return Reform Order, FCC 16-33, WC Docket No. 10-90 et al., rel. March 30, 2016.

2020 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(j) prescribes a Terminating End Office Access rate of \$0.0000 in accordance with a bill and keep methodology 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
- CBOL True-up Summary
- CBOL True-up Detail
- ROR Rate Ceiling
- ROR Tariff Rate Comparison
- ROR CBOL Imputation Calculation
- Max ARC Rev & CAF Calculations
- Mt. Vernon ARC Calculation to ensure ARC does not exceed its Eligible Recovery Group A only

Summary Tabs of CAF-ICC Filing forms

- TDS Telecom Groups A-G ILEC Summary Report
- TDS Telecom Groups A-G CAF-ICC Summary Report (Summarizes the filing and is similar to the NECA report provided to USAC)
- ROR ER Summary Report

- ICC-CAF Certifications

TDS Groups A-G proposes ARC rate changes effective July 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

2020 Tariff Review Plans

The 2020 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 2020 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 1, 2020 through June 30, 2021 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. 232 on behalf of TDS Telecom in compliance with the requirements of WC Docket No. 20-55, Order, DA 20-413 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
ICC CAF Certification	#1-TDS

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom A Companies	#1-TDSA
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom A Companies	#2-TDSA
TRP – Combined TDS Telecom A Companies	#3-TDSA

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom B Companies	#1-TDSB
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom B Companies	#2-TDSB
TRP – Combined TDS Telecom B Companies	#3-TDSB

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom C Companies	#1-TDSC
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom C Companies	#2-TDSC
TRP – Combined TDS Telecom C Companies	#3-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

Description	Attachment
Demand, Rate Development and Revenue Impacts: Combined TDS Telecom E Companies	#1-TDSE
TYCOS and PYCOS Parts 36 and 69: Combined TDS Telecom E Companies	#2-TDSE
TRP – Combined TDS Telecom E Companies	#3-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
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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

2020 Special Access Rates

Development of Projected Special Access Demand

Special Access demand quantities for the projected test year were determined by review of historical end of year demand from 2017 to 2019. Based on this historical data, demand trends were developed to project end of year demand for 2020 and 2021. The TDS Companies averaged a 17 percent decrease in High Capacity DS1 demand from December 2018 through December 2019 while Ethernet services increased 17%.

These trends are 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 experience and observations indicates 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 2019. 2020 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 2019 demand and 2020 forecasted demand was averaged to determine demand as of July 1, 2020. Next, year-end 2020 and 2021 forecasted demand was averaged to determine July 1, 2021 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 propose increasing TDM Special Access rates by a composite amount of 6.5 percent and decreasing ETS Special Access rates by 10 to 20% as compared with the July 2, 2019 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. 232 – 2020 Annual Access Filing

AMERICAN BROADBAND

American Broadband, (alternatively “ABB” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”).

I. EXISTING CARRIER
American Broadband Nebraska

The four ABB study areas listed below comprise American Broadband Nebraska and 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 Nebraska 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

A. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by ABB Nebraska 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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
AMERICAN BROADBAND

ABB Nebraska, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

II. NEW CARRIERS
American Broadband Missouri
American Broadband Louisiana

Effective July 1, 2020, the below carriers will exit the National Exchange Carrier Association, Inc. ("NECA") Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel these carriers for NECA Tariff F.C.C. No. 5 and they will become issuing carriers for the JSI Tariff F.C.C. No. 1 effective July 1, 2020.

The two ABB Missouri study areas listed below are collectively American Broadband Missouri, 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>
KLM Telephone Company	200000392	MO	421900
Holway Telephone Company	200000392	MO	421929

The two ABB Louisiana study areas listed below are collectively American Broadband Louisiana, 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>
Cameron Telephone Company-LA	200000392	LA	270425
Elizabeth Telephone Company	200000392	LA	270430

As issuing carriers for JSI Tariff F.C.C. No. 1, ABB Missouri and ABB Louisiana will provide services and bill Switched Access, Special Access, Miscellaneous

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
AMERICAN BROADBAND

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 1, 2020, 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 ABB Missouri carriers accepted Alternative Connect America Model support and were removed from the NECA Common Line Pool effective February 1, 2017. The ABB Louisiana carriers accepted Alternative Connect American Model II support and were removed from the NECA Common Line Pool effective August 31, 2019. ABB Louisiana and ABB Missouri carriers elected to have Common Line and End User rates tariffed by NECA.

With respect to Wireline Broadband Internet Access Service, ABB Missouri provides DSL and Consumer Broadband-Only Loop transmission as part of the complete retail service offered to end user customers. ABB-Louisiana provides DSL transmission on a permissively detariffed basis.

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

A. 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 carriers have 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.

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

ABB-Missouri
KLM Telephone Company
Holway Telephone Company

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
AMERICAN BROADBAND

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 43.06 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2020-2021 demand produces revenue of \$224,507. Application of the rates for Switched Access proposed under this transmittal to 2020-2021 Test Year demand produces revenue of 127,828, a reduction of \$ 96,679 or -43.06 percent.

ABB-Louisiana
Cameron Telephone Company-LA
Elizabeth Telephone Company

Exiting of the NECA Traffic Sensitive Pool by the Company will result in a 87.31 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2020-2021 demand produces revenue of \$502,260. Application of the rates for Switched Access proposed under this transmittal to 2020-2021 Test Year demand produces revenue of \$940,779, an increase of \$ 438,519 or 87.31percent.

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

1	<p>51.909(a)(4)(ii)(A)</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>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</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>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</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</p>	<p><i>See Exhibit A, Lines 203 through 221</i></p>

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
AMERICAN BROADBAND

	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;	
4	51.909(j) Each Rate-of-Return Carrier shall transition Terminating End Office Access rates in accordance with a bill-and-keep methodology.	<i>See Exhibit A, Lines 401 through 405</i>
5	51.909(a)(5)(ii) [Step 4 Portion of the Rule] 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 232 effective July 1, 2020</i>
6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] 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

ABB-Missouri is comprised of one Cost carrier, Holway Telephone Company, and one Average Schedule carrier, KLM Telephone Company. ABB-Louisiana is comprised of two Cost carriers – Cameron Telephone Company-LA and Elizabeth Telephone Company. Proposed Special Access (including Public Packet Data Network) rates to be effective July 1, 2020 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ ABB is filing blended Special Access rates for the two Louisiana study areas that comprise ABB Louisiana and for the two Missouri study areas that comprise ABB Missouri. The Company submits the required 61.39 ILEC Special Access Reallocation TRPs in support of proposed Special Access rates.

III. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

¹ 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. 232 - 2020 Annual Access Filing
AMERICAN BROADBAND

The ABB-Nebraska, ABB-Missouri and ABB-Louisiana carriers elected in their 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 tariffs ARC rates 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

IV. TARIFF REVIEW PLANS

ABB-Nebraska, ABB-Missouri and ABB-Louisiana submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in single holding company consolidated file, *ABB Holding Company 2020 RoR ILEC ICC CAF TRP*, which is comprised of the following TRP workbooks:

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020-21 Rate of Return ILEC Summary

V. 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

² 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).

Cameron Tel Co., - LA
270425

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$502,260
102	Projected 2011-12 Pool Settlements without LSS	NECA	940,779
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (438,519)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-87.31%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	87.31%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.091242
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.100398

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$154.90
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$247.88
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$755.19
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$6,895.49
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$11.01
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$11.01
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$51.75
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$450.72
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$110.89
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$110.89
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$268.45
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,723.84
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,572.80
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$607.26
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000380
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001989
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.005018
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.010864
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.011988

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

Band 8 / Band 10 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.000700
301 b	Local Switching Premium Rates Originating		\$0.048712
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$82.70
304	Voice Grade 4-Wire Entrance Facility		\$132.34
305	DS-1 Entrance Facility		\$403.18
306	DS-3 Entrance Facility		\$3,681.34
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.63
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$240.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.20
313	DS-1 Direct Trunk Termination		\$143.32
314	DS-3 Direct Trunk Termination		\$920.32
315	Multiplexing DS3-DS1		\$839.68
316	Multiplexing DS1-Voice		\$324.20
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000203
318	Tandem Switched Termination		\$0.001062
319	Tandem Switching		\$0.002679
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

Cameron Tel Co., - LA
270425

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000700
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	-\$0.000700
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.000350
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405	Rate Effective Date July 2020	Line 401 + (Line 404)+(Line 404)	\$0.000000
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Elizabeth Tel CO., Inc.
270430

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$502,260
102	Projected 2011-12 Pool Settlements without LSS	NECA	940,779
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (438,519)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-87.31%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	87.31%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.091242
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.100398

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$154.90
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$247.88
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$755.19
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$6,895.49
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$11.01
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$11.01
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$51.75
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$450.72
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$110.89
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$110.89
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$268.45
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,723.84
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,572.80
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$607.26
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000380
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001989
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.005018
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.010864
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.011988

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

Band 8 / Band 10 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.000700
301 b	Local Switching Premium Rates Originating		\$0.048712
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$82.70
304	Voice Grade 4-Wire Entrance Facility		\$132.34
305	DS-1 Entrance Facility		\$403.18
306	DS-3 Entrance Facility		\$3,681.34
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.63
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$240.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.20
313	DS-1 Direct Trunk Termination		\$143.32
314	DS-3 Direct Trunk Termination		\$920.32
315	Multiplexing DS3-DS1		\$839.68
316	Multiplexing DS1-Voice		\$324.20
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000203
318	Tandem Switched Termination		\$0.001062
319	Tandem Switching		\$0.002679
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

Elizabeth Tel CO., Inc.
270430

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000700
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	-\$0.000700
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.000350
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405	Rate Effective Date July 2020	Line 401 + (Line 404)+(Line 404)	\$0.000000
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Holway Tel. Co.
421929

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$224,507
102	Projected 2011-12 Pool Settlements without LSS	NECA	127,828
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 96,679
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	43.06%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-43.06%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.024962
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.030518

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$17.37
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$27.80
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$84.69
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$773.31
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$1.23
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$1.23
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$5.79
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$50.54
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$12.44
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$12.44
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$30.11
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$193.34
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$176.39
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$68.10
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000116
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.000605
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.001525
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.003302
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.003644

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

Band 7 / Band 5 / Band 1

End Office

301 a	Local Switching Premium Rates Terminating		\$0.000700
301 b	Local Switching Premium Rates Originating		\$0.043841
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$30.51
304	Voice Grade 4-Wire Entrance Facility		\$48.83
305	DS-1 Entrance Facility		\$148.75
306	DS-3 Entrance Facility		\$1,358.18
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.16
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$2.16
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$10.17
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$88.76
311	Voice Grade 2-Wire Direct Trunk Termination		\$21.84
312	Voice Grade 4-Wire Direct Trunk Termination		\$21.84
313	DS-1 Direct Trunk Termination		\$52.88
314	DS-3 Direct Trunk Termination		\$339.56
315	Multiplexing DS3-DS1		\$309.80
316	Multiplexing DS1-Voice		\$119.61
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000203
318	Tandem Switched Termination		\$0.001062
319	Tandem Switching		\$0.002679
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

Holway Tel. Co.
421929

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000700
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	-\$0.000700
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.000350
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405	Rate Effective Date July 2020	Line 401 + (Line 402)+(Line 404)	\$0.000000
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KLM Tel Co.
421900

CALCULATION OF DEPOOLING ADJUSTMENT FACTOR

	SOURCE	
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA \$224,507
102	Projected 2011-12 Pool Settlements without LSS	NECA 127,828
103	Net Pool Contributions	Ln 101 - Ln 102 \$ 96,679
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101 43.06%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1 -43.06%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405 \$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105) \$0.019414
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105) \$0.030518

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105) \$47.09
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105) \$75.35
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105) \$229.56
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105) \$2,096.05
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105) \$3.35
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105) \$3.35
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105) \$15.73
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105) \$137.01
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105) \$33.71
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105) \$33.71
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105) \$81.60
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105) \$524.00
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105) \$478.09
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105) \$184.59
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105) \$0.000249
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105) \$0.001291
219	Tandem Switching	Line 319 + (Line 319 * Line 105) \$0.003256
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105) \$0.003302
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105) \$0.003644

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

End Office

Band 5 / Band 10 / Band 2

301 a	Local Switching Premium Rates Terminating	\$0.000700
301 b	Local Switching Premium Rates Originating	\$0.034098
302	Information Surcharge Premium Per 100 Originating Access Minutes	\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility	\$82.70
304	Voice Grade 4-Wire Entrance Facility	\$132.34
305	DS-1 Entrance Facility	\$403.18
306	DS-3 Entrance Facility	\$3,681.34
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	\$5.88
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	\$5.88
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	\$27.63
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	\$240.63
311	Voice Grade 2-Wire Direct Trunk Termination	\$59.20
312	Voice Grade 4-Wire Direct Trunk Termination	\$59.20
313	DS-1 Direct Trunk Termination	\$143.32
314	DS-3 Direct Trunk Termination	\$920.32
315	Multiplexing DS3-DS1	\$839.68
316	Multiplexing DS1-Voice	\$324.20
317	Tandem Switched Facility (Per MOU per Mile)	\$0.000437
318	Tandem Switched Termination	\$0.002267
319	Tandem Switching	\$0.005718
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

KLM Tel Co.
421900

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000700
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	-\$0.000700
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.000350
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405	Rate Effective Date July 2020	Line 401 + (Line 402)+(Line 404)	\$0.000000
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Arkwest, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Arkwest 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Arkwest 2020 ROR-ILEC-ICC Data
- Arkwest 2020 Tariff Rate Comp CAF
- Arkwest 2020 True Up
- Arkwest 2020 Rate Ceiling CAF
- Arkwest 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Atlantic TMC, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Atlantic 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is submitted in the following TRP workbooks:

- 2020 ROR-ILEC-ICC Data - ATMC
- 2020 Tariff Rate Comp CAF - ATMC
- 2020 True Up - ATMC
- 2020 Rate Ceiling CAF - ATMC
- 2020-2021 Rate of Return ILEC Summary - ATMC

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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Bixby, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Bixby 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Bixby 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Bixby 2020 ROR-ILEC-ICC Data
- Bixby 2020 Tariff Rate Comp CAF
- Bixby 2020 True Up
- Bixby 2020 Rate Ceiling CAF
- Bixby 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Chazy & Westport, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Chazy & Westport Telephone Corporation (NY)

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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in a single consolidated file, *Chazy & Westport 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chazy & Westport 2020 ROR-ILEC-ICC Data
- Chazy & Westport 2020 Tariff Rate Comp CAF
- Chazy & Westport 2020 True Up
- Chazy & Westport 2020 Rate Ceiling CAF
- Chazy & Westport 2020 - 2021 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

¹ 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. 232 – 2020 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

1. DESCRIPTION OF FILING

Chesnee, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

Chesnee provided the Commission with notice of its intent to discontinue common-carriage tariffed Wireline Broadband Internet Access Service and provision on a permissive detariffed common-carriage basis effective July 1, 2020 (see April 10, 2020 filing in CC Docket No. 02-33). Therefore, proposed revisions include deletion from the tariff of the Chesnee DSL Access Services Wholesale Rate Plan.

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

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Chesnee 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chesnee 2020 ROR-ILEC-ICC Data
- Chesnee 2020 Tariff Rate Comp CAF
- Chesnee 2020 True Up
- Chesnee 2020 Rate Ceiling CAF
- Chesnee 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Arkwest, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Eastex Telephone Cooperative, Inc. (TX)

with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Eastex 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Eastex 2020 ROR-ILEC-ICC Data
- Eastex 2020 Tariff Rate Comp CAF
- Eastex 2020 True Up
- Eastex 2020 Rate Ceiling CAF
- Eastex 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Ellijay, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Ellijay Telephone Company (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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Ellijay Telephone Company 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ellijay 2020 ROR-ILEC-ICC Data
- Ellijay 2020 Tariff Rate Comp CAF
- Ellijay 2020 True Up
- Ellijay 2020 Rate Ceiling CAF
- Ellijay 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Etex, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Etex Telephone Cooperative, Inc. (TX)

with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Etex 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Etex 2020 ROR-ILEC-ICC Data
- Etex 2020 Tariff Rate Comp CAF
- Etex 2020 True Up
- Etex 2020 Rate Ceiling CAF
- Etex 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Gearheart, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Gearheart dba Coalfields 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Gearheart 2020 ROR-ILEC-ICC Data
- Gearheart 2020 Tariff Rate Comp CAF
- Gearheart 2020 True Up
- Gearheart 2020 Rate Ceiling CAF
- Gearheart 2020-21 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

¹ 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Goodman is an Issuing Carrier of the JSI Tariff. Goodman 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

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

Goodman, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. GOODMAN TARIFF REVIEW PLANS

Goodman submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Goodman 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Goodman 2020 ROR-ILEC-ICC Data
- Goodman 2020 Tariff Rate Comp CAF
- Goodman 2020 True Up
- Goodman 2020 Rate Ceiling CAF
- Goodman 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Grand River, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in single consolidated files, *Grand River Mutual Telephone Company IA 351888 2020 RoR ILEC ICC CAF TRP* and *Grand River Mutual Telephone Company MO 421888 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Grand River IA 2020 ROR-ILEC-ICC Data
- Grand River IA 2020 Tariff Rate Comp CAF
- Grand River IA 2020 True Up
- Grand River IA 2020 Rate Ceiling CAF
- Grand River IA 2020-21 Rate of Return ILEC Summary

- Grand River MO 2020 ROR-ILEC-ICC Data
- Grand River MO 2020 Tariff Rate Comp CAF
- Grand River MO 2020 True Up
- Grand River MO 2020 Rate Ceiling CAF
- Grand River MO 2020-21 Rate of Return ILEC Summary

¹ 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. 232 - 2020 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Hancock, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Hancock Rural Telephone Corporation d/b/a NineStar Connect (IN)

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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Hancock RTC dba NineStar Connect 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Hancock 2020 ROR-ILEC-ICC Data
- Hancock 2020 Tariff Rate Comp CAF
- Hancock 2020 True Up
- Hancock 2020 Rate Ceiling CAF
- Hancock 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Highland, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Highland Telephone Cooperative (VA)

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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in a single consolidated file, *Highland 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Highland 2020 ROR-ILEC-ICC Data
- Highland 2020 Tariff Rate Comp CAF
- Highland 2020 True Up
- Highland 2020 Rate Ceiling CAF
- Highland 2020 - 2021 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Industry, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Industry 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Industry 2020 ROR-ILEC-ICC Data
- Industry 2020 Tariff Rate Comp CAF
- Industry 2020 True Up
- Industry 2020 Rate Ceiling CAF
- Industry 2020-21 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

¹ 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. 232 – 2020 Annual Access Filing

ITS Telecommunications Systems, Inc.
SAC 210331 (Florida)

ITS Telecommunications Systems, Inc., (alternatively “ITS” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, ITS will exit National Exchange Carrier Association, Inc. (“NECA”) Tariff F.C.C. No. 5. Concurrent with exiting the NECA Tariff, NECA will cancel ITS as an issuing carrier for NECA Tariff F.C.C. No. 5 and ITS will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2020.

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 1, 2020, 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 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 ITS parallel those of NECA Tariff FCC No. 5 in all material respects.

With respect to Wireline Broadband Internet Access Service, the Company will provide DSL transmission on a permissively detariffed basis effective July 1, 2020, pursuant to notice filed with the Commission May 15, 2020, CC Docket No. 02-33. The Company’s CBOL rate remains tariffed in NECA Tariff F.C.C. No. 5.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
ITS Telecommunications Systems, Inc. (Florida)

The Company's filing reflects reductions required by the Rate-of-Return Reform Order beginning July 1, 2020. Accordingly, Special Access rates filed for ITS reflect a rate-of-return of 10.00%. In addition, Switched Access terminating End Office rates reflect the stepdown pursuant to § 51.909(i).

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.

ITA 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 28.42 percent reduction in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2020-2021 demand produces revenue of \$251,838. Application of the rates for Switched Access proposed under this transmittal to 2020-2021 Test Year demand produces revenue of \$180,257, a reduction of \$71,581 or -28.42 percent.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
ITS Telecommunications Systems, Inc. (Florida)

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

1	<p>51.909(a)(4)(ii)(A)</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>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</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>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</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>
4	<p>51.909(j)</p> <p>Each Rate-of-Return Carrier shall transition Terminating End Office Access rates in accordance with a bill-and-keep methodology.</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>
5	<p>51.909(a)(5)(ii) [Step 4 Portion of the Rule]</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 justify the revised interstate switched access rate caps, [...].</p>	<p><i>Rates determined under Steps 3 and 4 filed in JSI Tariff FCC No. 1 under JSI Transmittal 232 effective July 1, 2020</i></p>

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
ITS Telecommunications Systems, Inc. (Florida)

6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] 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>
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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 1, 2020 have been determined based on Section 61.39(b)(1)(i) of the Commission's rules. See 47 CFR § 61.39(b)(1)(i).¹ 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 1, 2020 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.² The Test Year (TY) 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

ITS submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021 in a single consolidated file, *ITS 2020 RoR ILEC ICC CAF TRP*, comprised of the following workbooks:

- ITS 2020 ROR-ILEC-ICC Data
- ITS 2020 Tariff Rate Comp CAF

¹ 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.

² 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. 232 - 2020 Annual Access Filing
ITS Telecommunications Systems, Inc. (Florida)

- ITS 2020 True Up
- ITS 2020 Rate Ceiling CAF
- ITS 2020 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

ITS Telecommunications Systems, Inc.
210331

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$251,838
102	Projected 2011-12 Pool Settlements without LSS	NECA	180,257
103	Net Pool Contributions	Ln 101 - Ln 102	\$ 71,581
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	28.42%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	-28.42%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.024406
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.038365

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$59.19
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$94.72
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$288.58
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$2,634.98
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$4.21
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$4.21
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$19.78
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$172.23
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$42.37
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$42.37
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$102.58
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$658.73
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$601.01
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$232.05
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000313
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.001623
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.004093
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.004151
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.004581

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

Band 5 / Band 10 / Band 2

End Office

301 a	Local Switching Premium Rates Terminating		\$0.000700
301 b	Local Switching Premium Rates Originating		\$0.034098
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$82.70
304	Voice Grade 4-Wire Entrance Facility		\$132.34
305	DS-1 Entrance Facility		\$403.18
306	DS-3 Entrance Facility		\$3,681.34
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.63
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$240.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.20
313	DS-1 Direct Trunk Termination		\$143.32
314	DS-3 Direct Trunk Termination		\$920.32
315	Multiplexing DS3-DS1		\$839.68
316	Multiplexing DS1-Voice		\$324.20
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000437
318	Tandem Switched Termination		\$0.002267
319	Tandem Switching		\$0.005718
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

ITS Telecommunications Systems, Inc.

210331

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000700
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	-\$0.000700
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	-\$0.000350
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405	Rate Effective Date July 2020	Line 401 + (Line 404)+(Line 404)	\$0.000000
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Livingston, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Livingston 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Livingston 2020 ROR-ILEC-ICC Data
- Livingston 2020 Tariff Rate Comp CAF
- Livingston 2020 True Up
- Livingston 2020 Rate Ceiling CAF
- Livingston 2020-21 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

¹ 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Mark Twain is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Mark Twain, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Mark Twain Rural Telephone Company (MO)

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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single combined file, *Mark Twain 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mark Twain 2020 ROR-ILEC-ICC Data
- Mark Twain 2020 Tariff Rate Comp CAF
- Mark Twain 2020 True Up
- Mark Twain 2020 Rate Ceiling CAF
- Mark Twain 2020-20 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Mid-Plains, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Mid-Plains 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Mid-Plains 2020 ROR-ILEC-ICC Data
- Mid-Plains 2020 Tariff Rate Comp CAF
- Mid-Plains 2020 True Up
- Mid-Plains 2020 Rate Ceiling CAF
- Mid-Plains 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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. 232 - 2020 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.

Millington, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Millington Telephone Company, Inc. 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Millington 2020 ROR-ILEC-ICC Data
- Millington 2020 Tariff Rate Comp CAF
- Millington 2020 True Up
- Millington 2020 Rate Ceiling CAF
- Millington 2020-21 Rate of Return ILEC Summary

¹ 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. 232 - 2020 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Ozark is an Issuing Carrier of the JSI Tariff. Ozark 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

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

Ozark, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Ozark 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. OZARK TARIFF REVIEW PLANS

Ozark submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Ozark 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ozark 2020 ROR-ILEC-ICC Data
- Ozark 2020 Tariff Rate Comp CAF
- Ozark 2020 True Up
- Ozark 2020 Rate Ceiling CAF
- Ozark 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Piedmont, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in a single consolidated file, *Piedmont Rural Telephone Cooperative, Inc. 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Piedmont 2020 ROR-ILEC-ICC Data
- Piedmont 2020 Tariff Rate Comp CAF
- Piedmont 2020 True Up
- Piedmont 2020 Rate Ceiling CAF
- Piedmont 2020 - 2021 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Pine, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021.

- Pine 2020 ROR-ILEC-ICC Data
- Pine 2020 Tariff Rate Comp CAF
- Pine 2020 True Up
- Pine 2020 Rate Ceiling CAF
- Pine 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Pineland, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Pineland Telephone Cooperative, Inc. (GA)

The Company proposes ARC rate changes effective July 1, 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Pineland Telephone Cooperative, Inc. 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Pineland 2020 ROR-ILEC-ICC Data
- Pineland 2020 Tariff Rate Comp CAF
- Pineland 2020 True Up
- Pineland 2020 Rate Ceiling CAF
- Pineland 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Pioneer, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications (KS)

The Company proposes ARC rate changes effective July 1, 2020 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.¹ The TY 2020 - 2021 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 2020-2021.

- Pioneer 2020 ROR-ILEC-ICC Data
- Pioneer 2020 Tariff Rate Comp CAF
- Pioneer 2020 True Up
- Pioneer 2020 Rate Ceiling CAF
- Pioneer 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Ringgold, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Ringgold Telephone Company (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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in a single consolidated file, *Ringgold Telephone Company 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Ringgold 2020 ROR-ILEC-ICC Data
- Ringgold 2020 Tariff Rate Comp CAF
- Ringgold 2020 True Up
- Ringgold 2020 Rate Ceiling CAF
- Ringgold 2020 - 2021 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

¹ 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Seneca is an Issuing Carrier of the JSI Tariff. Seneca 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

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

Seneca, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Seneca 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SENECA TARIFF REVIEW PLANS

Seneca submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Seneca 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Seneca 2020 ROR-ILEC-ICC Data
- Seneca 2020 Tariff Rate Comp CAF
- Seneca 2020 True Up
- Seneca 2020 Rate Ceiling CAF
- Seneca 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

Skyline TMC 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. 232.

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.

Skyline TMC, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020-2021 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 2020-2021:

- Skyline TMC 2020 ROR-ILEC-ICC Data
- Skyline TMC 2020 Tariff Rate Comp CAF
- Skyline TMC 2020 True Up
- Skyline TMC 2020 Rate Ceiling CAF
- Skyline TMC 2020-2021 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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

Smart City, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Smart City Telecommunications LLC d/b/a Smart City Telecom (FL)

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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Smart City Telecom, LLC 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Smart City 2020 ROR-ILEC-ICC Data
- Smart City 2020 Tariff Rate Comp CAF
- Smart City 2020 True Up
- Smart City 2020 Rate Ceiling CAF
- Smart City 2020-21 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

¹ 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Southwest is an Issuing Carrier of the JSI Tariff. The Company 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

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

Southwest, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Southwest Texas Telephone Company (Texas)

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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. SOUTHWEST TARIFF REVIEW PLANS

Southwest submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Southwest Texas Telephone Company 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Southwest 2020 ROR-ILEC-ICC Data
- Southwest 2020 Tariff Rate Comp CAF
- Southwest 2020 True Up
- Southwest 2020 Rate Ceiling CAF
- Southwest 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Star, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Star Telephone Membership Corp. (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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Star 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks

- Star TMC 2020 ROR-ILEC-ICC Data
- Star TMC 2020 Tariff Rate Comp CAF
- Star TMC 2020 True Up
- Star TMC 2020 Rate Ceiling CAF
- Star TMC 2020-21 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

¹ 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. 232 – 2020 Annual Access Filing

TELEPHONE ELECTRONICS CORPORATION

TEC Companies-Alabama
TEC Companies-Mississippi
TEC Companies-Tennessee

Telephone Electronics Corporation (“TEC”) Companies, (alternatively “TEC-Alabama, TEC-Mississippi and TEC-Tennessee” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The Companies are Issuing Carriers of the JSI Tariff and file 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

The TEC Companies file blended special access rates as shown below.

TEC Companies-Alabama

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
TEC Companies

TEC Companies-Mississippi

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

TEC Companies-Tennessee

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

1. DESCRIPTION OF FILING

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

The TEC Companies are 61.39 historic filers and make biennial annual filings in odd-numbered years. The Companies propose revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
TEC Companies

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

The Companies 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TARIFF REVIEW PLANS (TRPs)

The Companies submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020 - 2021. All CAF-ICC data is represented in a single consolidated file for each carrier, *2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

TeleGuam, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *TeleGuam Holdings LLC 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- TeleGuam 2020 ROR-ILEC-ICC Data
- TeleGuam 2020 Tariff Rate Comp CAF
- TeleGuam 2020 True Up
- TeleGuam 2020 Rate Ceiling CAF
- TeleGuam 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Totah, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Total Communications, Inc. (OK) (KS)

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

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 1, 2020 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.¹ The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TOTALH TARIFF REVIEW PLANS

Totalh submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Totalh 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Totalh 2020 ROR-ILEC-ICC Data
- Totalh 2020 Tariff Rate Comp CAF
- Totalh 2020 True Up
- Totalh 2020 Rate Ceiling CAF
- Totalh 2020-21 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

¹ 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. 232 - 2020 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Tri County, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Tri County WY 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Tri County 2020 ROR-ILEC-ICC Data
- Tri County 2020 Tariff Rate Comp CAF
- Tri County 2020 True Up
- Tri County 2020 Rate Ceiling CAF
- Tri County 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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 February 1, 2017. The Company elected to have Common Line and End User rates

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Tri-County Telephone Company, Inc. (AR)

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.

Tri-County, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in a single consolidated file, *Tri-County Telephone Company, Inc. AR 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Tri-County 2020 ROR-ILEC-ICC Data
- Tri-County 2020 Tariff Rate Comp CAF
- Tri-County 2020 True Up

¹ 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. 232 - 2020 Annual Access Filing
Tri-County Telephone Company, Inc. (AR)

- Tri-County 2020 Rate Ceiling CAF
- Tri-County 2020-21 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232 - 2020 Annual Access Filing
TruVista Communications Companies (SC)

TruVista, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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.¹ The TY 2020 - 2021 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 2020 - 2021. All CAF-ICC data is represented in single consolidated files for each TruVista carrier: *Chester 2020 RoR ILEC ICC CAF TRP, Lockhart 2020 RoR ILEC ICC CAF TRP, and Ridgeway 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Chester 2020 ROR-ILEC-ICC Data
- Chester 2020 Tariff Rate Comp CAF
- Chester 2020 True Up
- Chester 2020 Rate Ceiling CAF
- Chester 2020 - 2021 Rate of Return ILEC Summary
- Lockhart 2020 ROR-ILEC-ICC Data

¹ 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. 232 - 2020 Annual Access Filing
TruVista Communications Companies (SC)

- Lockhart 2020 Tariff Rate Comp CAF
- Lockhart 2020 True Up
- Lockhart 2020 Rate Ceiling CAF
- Lockhart 2020 - 2021 Rate of Return ILEC Summary

- Ridgeway 2020 ROR-ILEC-ICC Data
- Ridgeway 2020 Tariff Rate Comp CAF
- Ridgeway 2020 True Up
- Ridgeway 2020 Rate Ceiling CAF
- Ridgeway 2020 - 2021 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Twin Lakes, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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. 232 - 2020 Annual Access Filing
Twin Lakes Cooperative Corp. (TN)

with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Twin Lakes - 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Twin Lakes 2020 ROR-ILEC-ICC Data
- Twin Lakes 2020 Tariff Rate Comp CAF
- Twin Lakes 2020 True Up
- Twin Lakes 2020 Rate Ceiling CAF
- Twin Lakes 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Valley, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Valley Telephone Cooperative, Inc. (TX)

with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Valley TX 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Valley 2020 ROR-ILEC-ICC Data
- Valley 2020 Tariff Rate Comp CAF
- Valley 2020 True Up
- Valley 2020 Rate Ceiling CAF
- Valley 2020-21 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

¹ 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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, Wilkes accepted Alternative Connect America Model support, was removed from the NECA Common Line Pool effective August 31, 2019, and tariffs Common Line and End User rates in the JSI Tariff.

Wilkes, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 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

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

with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Wilkes Telephone & Electric Company 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Wilkes 2020 ROR-ILEC-ICC Data
- Wilkes 2020 Tariff Rate Comp CAF
- Wilkes 2020 True Up
- Wilkes 2020 Rate Ceiling CAF
- Wilkes 2020-21 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

¹ 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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.

Knology, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Knology of the Valley, Inc. (GA)

pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Knology of the Valley 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology 2020 ROR-ILEC-ICC Data
- Knology 2020 Tariff Rate Comp CAF
- Knology 2020 True Up
- Knology 2020 Rate Ceiling CAF
- Knology 2020-2021 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

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

¹ 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. 232 - 2020 Annual Access Filing
Knology of the Valley, Inc. (GA)

- 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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.

Knology Total, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Knology Total Communications, Inc. (AL)

Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Knology Total 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Knology Total 2020 ROR-ILEC-ICC Data
- Knology Total 2020 Tariff Rate Comp CAF
- Knology Total 2020 True Up
- Knology Total 2020 Rate Ceiling CAF
- Knology Total 2020-21 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

¹ 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. 232 - 2020 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. 232 – 2020 Annual Access Filing

Valley Telephone Co., LLC
SAC 220324 (Georgia)

Valley Telephone Co., LLC, (alternatively “Valley” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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. Valley 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.

Valley, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Valley Telephone Co., LLC (GA)

pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 with § 51.917 rules.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Valley Telephone 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Valley 2020 ROR-ILEC-ICC Data
- Valley 2020 Tariff Rate Comp CAF
- Valley 2020 True Up
- Valley 2020 Rate Ceiling CAF
- Valley 2020-21 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

¹ 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. 232 - 2020 Annual Access Filing
Valley Telephone Co., LLC (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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Yadkin, a 61.39 historic filer, makes biennial annual filings in odd-numbered years. The Company proposes revisions in what is otherwise a non-mandatory filing year to include revisions for the step down of Switched Access terminating End Office rates pursuant to § 51.909(j) and Special Access rates that reflect the rate of return reduction from 10.25% to 10.0%.

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

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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

Description and Justification
JSI Transmittal No. 232 - 2020 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.¹ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Yadkin 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks

- Yadkin 2020 ROR-ILEC-ICC Data
- Yadkin 2020 Tariff Rate Comp CAF
- Yadkin 2020 True Up
- Yadkin 2020 Rate Ceiling CAF
- Yadkin 2020-21 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

¹ 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. 232 – 2020 Annual Access Filing

Absaraka Coop Tel. Co.
SAC 381601 (North Dakota)

Absaraka Coop Tel. Co., (alternatively “Absaraka” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, Absaraka 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 Absaraka 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 1, 2020. The Common Line and Special Access regulations and rate structures applicable to Absaraka parallel those of NECA Tariff FCC No. 5 in all material respects.

Absaraka is wholly-owned by Inter-Community Telephone Company, L.L.C. (“ICTC”), and ICTC is wholly-owned by parent company BEK Communications Cooperative.

The Company accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective February 1, 2017. Effective July 1, 2020, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Absaraka remains in the NECA Traffic Sensitive Pool for Switched Access services. With respect to Wireline Broadband Internet Access Service, the Company will provide Consumer Broadband-Only Loop transmission on a permissively detariffed basis effective July 1, 2020, pursuant to notice filed with the Commission April 1, 2020, CC Docket No. 02-33.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.²

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

¹ See Letter from Derrick Bulawa, Chief Executive Officer, Absaraka, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 4, 2020.

² Note that the Absaraka study area will be merged into Inter-Community Telephone Company, L.L.C. study area 381616 effective August 1, 2020, to be implemented in a subsequent JSI Tariff filing. See letter from Derrick Bulawa, Chief Executive Officer of BEK Communications Cooperative and Affiliates, to Ryan Palmer, Chief, Telecommunications Access Policy Division, CC Docket No. 96-45, filed March 19, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Absaraka Coop Tel. Co. (North Dakota)

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 1, 2020.

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 1, 2020, 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.

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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 will be offered on a contractual basis.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Absaraka Coop Tel. Co. (North Dakota)

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. 232 – 2020 Annual Access Filing

BEK Communications Cooperative
SAC 381604 (North Dakota)

BEK Communications Cooperative, (alternatively “BEK” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, BEK 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 BEK 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 1, 2020. The Common Line and Special Access regulations and rate structures applicable to BEK 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 August 31, 2019. Effective July 1, 2020, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

BEK remains in the NECA Traffic Sensitive Pool for Switched Access services. With respect to Wireline Broadband Internet Access Service, the Company will provide DSL and Consumer Broadband-Only Loop transmission on a permissively detariffed basis effective July 1, 2020, pursuant to notice filed with the Commission April 1, 2020, CC Docket No. 02-33.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

DESCRIPTION OF FILING

¹ See Letter from Derrick Bulawa, Chief Executive Officer, BEK, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 4, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
BEK Communications Cooperative (North Dakota)

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 1, 2020.

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 1, 2020, 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.

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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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. 232 – 2020 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 provide a Description and Justification for filings under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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”).

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.

A. A-CAM BDS – 61.50 Filing Rules

Description and Justification

JSI Transmittal No. 232 - 2020 Annual Access Filing

Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (MT and ID)

Blackfoot and Fremont elected to convert to incentive regulation for BDS effective July 2, 2019.¹ The Companies propose revisions to lower capacity time division multiplexed (“TDM”) transport and end user channel termination services 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(j).

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) TDM transport and end user channel termination services reflect adjustments for the X-factor, inflation factor, and exogenous cost changes.

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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 1, 2020 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 with § 51.917 rules.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file for each carrier

¹ 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.

² 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. 232 - 2020 Annual Access Filing
Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (MT and ID)

by name, *2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020-21 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

Clarity elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

Switched Access Rates remain tariffed in NECA Tariff F.C.C. No. 5.

2. SPECIAL ACCESS RATES

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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

¹ 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. 232 - 2020 Annual Access Filing
Clarity Telecom, LLC (South Dakota)

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period pursuant to the Commission's Report and Order, FCC 18-146 released October 24, 2018.

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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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. 232.

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 elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ Therefore, the Company proposes revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules. In addition, proposed

¹ 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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
ComSouth Telecommunications, Inc. (GA)

revisions include the step down of Switched Access terminating End Office rates pursuant to § 51.909(j).

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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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 1, 2020 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *ComSouth 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- ComSouth 2020 ROR-ILEC-ICC Data
- ComSouth 2020 Tariff Rate Comp CAF

² 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. 232 - 2020 Annual Access Filing
ComSouth Telecommunications, Inc. (GA)

- ComSouth 2020 True Up
- ComSouth 2020 Rate Ceiling CAF
- ComSouth 2020-21 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ 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(j).

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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

¹ 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. 232 - 2020 Annual Access Filing
Cross Tel. Co. (OK)

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Cross 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Cross 2020 ROR-ILEC-ICC Data
- Cross 2020 Tariff Rate Comp CAF
- Cross 2020 True Up
- Cross 2020 Rate Ceiling CAF
- Cross 2020-21 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

² 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. 232 - 2020 Annual Access Filing
Cross Tel. Co. (OK)

- 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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”).

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule
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 of the Fail, Inc. affiliated rate-of-return carriers elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ Therefore,

¹ 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. 232 - 2020 Annual Access Filing
Fail, Inc. (Holding Company)

the Companies propose 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(j).

A. A-CAM BDS – 61.50 Filing Rules

The Companies submit 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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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).

The Companies propose ARC rate changes effective July 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file for each carrier by name, *2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

² 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. 232 - 2020 Annual Access Filing
Fail, Inc. (Holding Company)

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020-21 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. 232 – 2020 Annual Access Filing

Franklin Telephone Company
SAC 280454 (Mississippi)

Franklin Telephone Company, (alternatively “Franklin” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, Franklin 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 Franklin 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 1, 2020. The Special Access regulations and rate structures applicable to Franklin parallel those of NECA Tariff FCC No. 5 in all material respects.

Franklin 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 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

¹ See Letter from H. Wesley Goings, III, President, Telapex, Inc. and Franklin Telephone Company, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 4, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Franklin Telephone Company (Mississippi)

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 1, 2020.

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 1, 2020, 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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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. 232 – 2020 Annual Access Filing

Hiawatha Communications, Inc. Carriers

Hiawatha Communications, Inc., (alternatively “Hiawatha Communications Carriers” or “Companies”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, the below-listed Hiawatha Communications Carriers will exit the National Exchange Carrier Association, Inc. (“NECA”) Special Access Traffic Sensitive tariff. Concurrent with exiting the NECA Tariff for Special Access services, NECA will cancel the Companies as carriers 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 1, 2020. The Special Access regulations and rate structures applicable to the Companies parallel those of NECA Tariff FCC No. 5 in all material respects.

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule Effective 07/01/2020
Hiawatha Telephone Company	200000713	310713	MI	A-CAM	61.50
Ontonagon County Telephone Company	200000713	310717	MI	A-CAM	61.50
Midway Telephone Company	200000713	310711	MI	A-CAM	61.50

Hiawatha Communications Carriers remain in the NECA Tariff F.C.C. No. 5 for Common Line and End User rates and remain in the NECA Traffic Sensitive Pool for Switched Access services. The Companies accepted Alternative Connect America Model support, were 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 Companies provide DSL transmission as part of the complete retail service offered to end user customers.

The Hiawatha Communications Carriers have elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, the Companies propose BDS rates pursuant to Section 61.50 of the Commission’s rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

¹ See Letter from Camie Nebel Conklin, V.P., Chief Financial Officer, Hiawatha Communications, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 10, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hiawatha Communications, Inc. Carriers (Michigan)

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 Companies have elected to convert to incentive regulation for BDS effective July 1, 2020.

A. A-CAM BDS – 61.50 Filing Rules

The Companies submit the required Incentive-Based BDS Tariff Review Plan ("TRP") in support of proposed rates.

Study Areas Not Deemed Competitive

The Companies' study areas were not deemed competitive by the Commission.

As carriers exiting the NECA traffic-sensitive tariff pool, appropriate adjustments were made to account for exiting the NECA Special Access Traffic Sensitive Pool effective July 1, 2020, 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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 will be offered on a contractual basis.

3. ACCESS RECOVERY CHARGE AND TRPs FOR CAF-ICC

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hiawatha Communications, Inc. Carriers (Michigan)

The Hiawatha Communications Carriers' 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Home is an Issuing Carrier of the JSI Tariff.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

In the past, Home has participated as a 61.38 prospective filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, Home 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Home submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Home 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

¹ See Letter from H. Keith Oliver, Home Telephone ILEC, LLC dba Home Telecom, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 30, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Home Telephone Company (SC)

January 1, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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 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 with § 51.917 rules.² The TY 2020 - 2021 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 2020-2021.

Home CAF-ICC data is represented in a single consolidated file, *Home SC 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Home 2020 ROR-ILEC-ICC Data
- Home 2020 Tariff Rate Comp CAF
- Home 2020 True Up RoR ILEC
- Home 2020 Rate Ceiling CAF
- Home 2020-21 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

² 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. 232 - 2020 Annual Access Filing
Home Telephone Company (SC)

- 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

The Company accepted Alternative Connect America Model (“A-CAM”) 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.

ICTC is a wholly-owned subsidiary of BEK Communications Cooperative, an A-CAM II-support issuing carrier which will exit NECA Tariff F.C.C. No. 5 and become an issuing carrier for the JSI Tariff effective July 1, 2020. Furthermore, ICTC wholly-owns Absaraka Coop. Tel. Co., also an A-CAM II support carrier which will exit NECA Tariff F.C.C. No. 5 and become an issuing carrier for the JSI Tariff effective July 1, 2020.

ICTC elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

Switched Access Rates remain tariffed in NECA Tariff F.C.C. No. 5.

2. SPECIAL ACCESS RATES

A. A-CAM BDS – 61.50 Filing Rules

¹ 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. 232 - 2020 Annual Access Filing
Inter-Community Telephone Company, L.L.C. (North Dakota)

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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period pursuant to the Commission’s Report and Order, FCC 18-146 released October 24, 2018.

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. 232 – 2020 Annual Access Filing

Le-Ru Telephone Company
SAC 421908 (Missouri)

Le-Ru Telephone Company, (alternatively “Le-Ru” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, Le-Ru 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 Le-Ru 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 1, 2020. The Common Line and Special Access regulations and rate structures applicable to Le-Ru 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 1, 2020, the Company’s Common Line rates will be tariffed at JSI Section 17 Common Line Rates and Charges – Alternative Connect America Model Carriers.

Le-Ru 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.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

DESCRIPTION OF FILING

1. SWITCHED ACCESS RATES

¹ See Letter from W. Jay Mitchell, Le-Ru, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 20, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Le-Ru Telephone Company (Missouri)

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 1, 2020.

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 1, 2020, 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.

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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Lumos is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

In the past, Lumos has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, Lumos 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Lumos submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Areas Not Deemed Competitive

¹ See Letter from Mary McDermott, General Counsel, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 17, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Lumos Telephone of Botetourt, Inc. (VA)

The Lumos 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Lumos (R&B) 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Lumos 2020 ROR-ILEC-ICC Data
- Lumos 2020 Tariff Rate Comp CAF
- Lumos 2020 True Up
- Lumos 2020 Rate Ceiling CAF

² 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. 232 - 2020 Annual Access Filing
Lumos Telephone of Botetourt, Inc. (VA)

- Lumos 2020-21 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). MTA is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

In the past, MTA has participated as a 61.38 prospective filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, MTA 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(j).

A. A-CAM BDS – 61.50 Filing Rules

MTA submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The MTA 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, 2020, adjusted for the X-factor, inflation factor, and exogenous cost

¹ See Letter from Michael C. Burke, Matanuska Telephone Association, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 11, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Matanuska Telephone Association (AK)

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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. CAF-ICC data is comprised of the following TRP workbooks:

- MTA 2020 ROR-ILEC-ICC Data
- MTA 2020 Tariff Rate Comp CAF
- MTA 2020 True Up
- MTA 2020 Rate Ceiling CAF
- MTA 2020-21 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

² 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. 232 - 2020 Annual Access Filing
Matanuska Telephone Association (AK)

- 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Moundridge is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

In the past, Moundridge has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ The Company proposes revisions to reflect detariffing of higher capacity and packet data rates effective July 1, 2020, and revisions to lower capacity time division multiplexed (“TDM”) transport and end user channel termination services 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(j).

A. A-CAM BDS – 61.50 Filing Rules

¹ See Letter from Jane Sommer Smith, Vice President, CFO, Moundridge Telephone Company, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 23, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Moundridge Telephone Company (KS)

Moundridge submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Moundridge study area was not deemed competitive by the Commission. Proposed rates for lower capacity (at or below DS3) TDM transport and end user channel termination services reflect tariffed rates in effect on January 1, 2020, adjusted for the X-factor, inflation factor, and exogenous cost changes.

Moundridge proposes to transition higher capacity (above DS3) TDM and packet-based BDS to detariffed offerings on a contractual basis effective July 1, 2020.

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.² The TY 2020 - 2021 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 2020-2021.

- Moundridge 2020 ROR-ILEC-ICC Data
- Moundridge 2020 Tariff Rate Comp CAF
- Moundridge 2020 True Up
- Moundridge 2020 Rate Ceiling CAF
- Moundridge 2020-21 Rate of Return ILEC Summary

4. CERTIFICATIONS ACCOMPANYING TRANSMITTAL

² 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. 232 - 2020 Annual Access Filing
Moundridge Telephone Company (KS)

- 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ 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(j).

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

¹ 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. 232 - 2020 Annual Access Filing
Mt. Horeb Telephone Company (WI)

(“TDM”) transport and end user channel termination services reflect adjustments for the X-factor, inflation factor, and exogenous cost changes.

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Mt. Horeb 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Mt. Horeb 2020 ROR-ILEC-ICC Data
- Mt. Horeb 2020 Tariff Rate Comp CAF
- Mt. Horeb 2020 True Up
- Mt. Horeb 2020 Rate Ceiling CAF
- Mt. Horeb 2020-21 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

² 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. 232 - 2020 Annual Access Filing
Mt. Horeb Telephone Company (WI)

- 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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”).

ILEC	Holding Company Code	Study Area Code	State	Support Category	Filing Rule
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	A-CAM II	61.50
War Telephone LLC	200005312	200258	WV	A-CAM	61.50

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.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Otelco, Inc. (Holding Company)

Common Line rates for Otelco, Inc. Carriers are tariffed 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(j).

A. A-CAM BDS – 61.50 Filing Rules

The Otelco, Inc. affiliated rate-of-return carriers are authorized to receive A-CAM support. All but Shoreham elected to convert to incentive regulation for BDS effective July 2, 2019.¹ Shoreham elected to convert to incentive regulation for BDS effective July 1, 2020.² Therefore, the below carriers propose revisions to BDS rates pursuant to Section 61.50 of the Commission’s rules.

Carrier	SAC	State	
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
Shoreham Telephone LLC	140064	VT	
War Telephone LLC	200258	WV	

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

¹ 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.

² See Letter from Trina M. Bragdon, General Counsel and Vice President, Otelco, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 13, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 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 adjustments for the X-factor, inflation factor, and exogenous cost changes. Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to the end of the 36-month transition period 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 adjustments for the X-factor, inflation factor, and exogenous cost changes. Lower capacity TDM end user channel termination services and higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to the end of the 36-month transition period.

2. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

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 1, 2020 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.³ The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file for each carrier by name, *2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

³ 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. 232 - 2020 Annual Access Filing
Otelco, Inc. (Holding Company)

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020-21 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. 232 – 2020 Annual Access Filing

Poka Lambro Rural Telephone Cooperative, Inc.
SAC 442131 (Texas)

Poka Lambro Rural Telephone Cooperative, Inc., (alternatively “Poka Lambro” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, Poka Lambro 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 Poka Lambro 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 1, 2020. The Special Access regulations and rate structures applicable to Poka Lambro parallel those of NECA Tariff FCC No. 5 in all material respects.

Poka Lambro 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. The Company provides Wireline Broadband Internet Access Service on a permissively detariffed basis.

The Company has elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission’s rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

¹ See Letter from Patrick Sherrill, CEO and General Manager, Poka Lambro Rural Telephone Cooperative, Inc., Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 11, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Poka Lambro Rural Telephone Cooperative, Inc. (Texas)

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 1, 2020.

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 1, 2020, 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.

Higher capacity (above DS3) TDM and packet-based BDS will be offered on a contractual basis effective July 1, 2020.

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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Heartland is an Issuing Carrier of the JSI Tariff.

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
Hospers Telephone Exchange, Inc.	200001252	351202	IA	JSI Effective 07/01/2020	Yes

Each of the five issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.50 and is filing its own, separate Description and Justification under Transmittal No. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Heartland Telecommunications Company of Iowa d/b/a Premier
Communications (IA)

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. 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.

In the past, Heartland has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Heartland submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Heartland 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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

¹ See Letter from Ryan A. Boone, COO, Mutual Telephone Company of Sioux Center Iowa d/b/a Premier Communications, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 6, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Heartland Telecommunications Company of Iowa d/b/a Premier
Communications (IA)

51.917(f). The Company proposes ARC rate changes effective July 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Heartland 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Heartland 2020 ROR-ILEC-ICC Data
- Heartland 2020 Tariff Rate Comp CAF
- Heartland 2020 True Up
- Heartland 2020 Rate Ceiling CAF
- Heartland 2020-21 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

² 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. 232 – 2020 Annual Access Filing

Hospers Telephone Exchange, Inc.
SAC 351202 (Iowa)

Hospers Telephone Exchange, Inc., (alternatively “Hospers” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provides a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Effective July 1, 2020, Hospers will exit the National Exchange Carrier Association, Inc. (“NECA”) Traffic Sensitive Pool. Concurrent with exiting the NECA Traffic Sensitive Pool, NECA will cancel Hospers as an issuing carrier for NECA Tariff F.C.C. No. 5 and Hospers will become an issuing carrier for the JSI Tariff F.C.C. No. 1 effective July 1, 2020. The regulations and rate structures applicable to Hospers parallel those of NECA Tariff FCC No. 5 in all material respects.

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
Hospers Telephone Exchange, Inc.	200001252	351202	IA	JSI Effective 07/01/2020	Yes

Each of the five issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.50 and is filing its own, separate Description and Justification under Transmittal No. 232.

As an issuing carrier for JSI Tariff F.C.C. No. 1, Hospers 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

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hospers Telephone Exchange, Inc. (Iowa)

F.C.C. No. 1. Beginning July 1, 2020, 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 II support and was removed from the NECA Common Line Pool effective August 31, 2019. Hospers elected to have Common Line and End User rates tariffed by NECA.

Currently, the Company provides Wireline Broadband Internet Access Service ("WBIAS") under NECA Tariff FCC No. 5 rates and regulations for DSL. Effective July 1, 2020, 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 1, 2020.¹ Therefore, the Company proposes BDS rates pursuant to Section 61.50 of the Commission's rules.

Filing Made in Accordance with 2020 Access Filing Order and 2020 TRP Order

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

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

¹ See Letter from Ryan A. Boone, COO, Hospers Telephone Exchange, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 6, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hospers Telephone Exchange, Inc. (Iowa)

Exiting of the NECA Traffic Sensitive Pool by the Company will result in an 83.96 percent increase in Switched Access charges to carriers. Application of the current NECA Switched Access rates applicable to the Company to Test Year 2020-2021 demand produces revenue of \$47,569. Application of the rates for Switched Access proposed under this transmittal to 2020-2021 Test Year demand produces revenue of 87,506, an increase of \$39,937 or 83.96 percent.

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

1	<p>51.909(a)(4)(ii)(A)</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>
2	<p>51.909(a)(5)(i) – [Step 2 portion of rule]</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>
3	<p>51.909(a)(5)(i) – [Step 3 portion of rule]</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>
4	<p>51.909(j)</p> <p>Each Rate-of-Return Carrier shall transition Terminating End Office Access rates in accordance with a bill-and-keep methodology.</p>	<p><i>See Exhibit A, Lines 401 through 405</i></p>

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hospers Telephone Exchange, Inc. (Iowa)

5	51.909(a)(5)(ii) [Step 4 Portion of the Rule] 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 232 effective July 1, 2020</i>
6	51.909(a)(5)(ii) [Step 5 Portion of the Rule] [...] 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 1, 2020.

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 1, 2020, 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.

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 1, 2020 effective date of this transmittal. Services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 will be offered on a contractual basis.

3. ACCESS RECOVERY CHARGE AND CONNECT AMERICA FUND

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Hospers Telephone Exchange, Inc. (Iowa)

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 1, 2020 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.² The Test Year (TY) 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction.

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

Hospers Telephone Exchange, Inc. submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Hospers 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Hospers 2020 ROR-ILEC-ICC Data
- Hospers 2020 Tariff Rate Comp CAF
- Hospers 2020 True Up
- Hospers 2020 Rate Ceiling CAF
- Hospers 2020-21 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

² 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).

Hospers Tel. Exchange
351202

		SOURCE	
CALCULATION OF DEPOOLING ADJUSTMENT FACTOR			
101	Projected 2011-12 Interstate Billed Access Revenues (Includes Transport)	NECA	\$47,569
102	Projected 2011-12 Pool Settlements without LSS	NECA	87,506
103	Net Pool Contributions	Ln 101 - Ln 102	\$ (39,937)
104	Contribution Factor (Net Contribution (Receiver) Percentage)	Ln 103 / Ln 101	-83.96%
105	51.909 (a)(5)(i) Rule - Rate Adjustment Factor	Ln 104 * -1	83.96%

July 1, 2020 Recurring Switched Access Service

End Office

201 a	Local Switching Premium Rates Terminating	Line 405	\$0.000000
201 b	Local Switching Premium Rates Originating	Line 301 + (Line 301 * Line 105)	\$0.089609
202	Information Surcharge Premium Per 100 Originating Access Minutes	Line 302 + (Line 302 * Line 105)	\$0.098600

Local Transport

203	Voice Grade 2-Wire Entrance Facility	Line 303 + (Line 303 * Line 105)	\$152.13
204	Voice Grade 4-Wire Entrance Facility	Line 304 + (Line 304 * Line 105)	\$243.45
205	DS-1 Entrance Facility	Line 305 + (Line 305 * Line 105)	\$741.67
206	DS-3 Entrance Facility	Line 306 + (Line 306 * Line 105)	\$6,772.04
207	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 307 + (Line 307 * Line 105)	\$10.82
208	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)	Line 308 + (Line 308 * Line 105)	\$10.82
209	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)	Line 309 + (Line 309 * Line 105)	\$50.83
210	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)	Line 310 + (Line 310 * Line 105)	\$442.65
211	Voice Grade 2-Wire Direct Trunk Termination	Line 311 + (Line 311 * Line 105)	\$108.90
212	Voice Grade 4-Wire Direct Trunk Termination	Line 312 + (Line 312 * Line 105)	\$108.90
213	DS-1 Direct Trunk Termination	Line 313 + (Line 313 * Line 105)	\$263.65
214	DS-3 Direct Trunk Termination	Line 314 + (Line 314 * Line 105)	\$1,692.98
215	Multiplexing DS3-DS1	Line 315 + (Line 315 * Line 105)	\$1,544.64
216	Multiplexing DS1-Voice	Line 316 + (Line 316 * Line 105)	\$596.39
217	Tandem Switched Facility (Per MOU per Mile)	Line 317 + (Line 317 * Line 105)	\$0.000804
218	Tandem Switched Termination	Line 318 + (Line 318 * Line 105)	\$0.004170
219	Tandem Switching	Line 319 + (Line 319 * Line 105)	\$0.010519
220	800 Data Base Access Service Queries, Per Query - Basic	Line 320 + (Line 320 * Line 105)	\$0.010669
221	800 Data Base Access Service Queries, Per Query - Vertical Feature	Line 321 + (Line 321 * Line 105)	\$0.011773

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

End Office

Band 8 / Band 10 / Band 2

301 a	Local Switching Premium Rates Terminating		\$0.000000
301 b	Local Switching Premium Rates Originating		\$0.048712
302	Information Surcharge Premium Per 100 Originating Access Minutes		\$0.053600

Local Transport

303	Voice Grade 2-Wire Entrance Facility		\$82.70
304	Voice Grade 4-Wire Entrance Facility		\$132.34
305	DS-1 Entrance Facility		\$403.18
306	DS-3 Entrance Facility		\$3,681.34
307	Voice Grade 2-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
308	Voice Grade 4-Wire Direct Trunk Facility Per (Per MOU Per Mile)		\$5.88
309	DS-1 Direct Trunk Facility Per (Per MOU Per Mile)		\$27.63
310	DS-3 Direct Trunk Facility Per (Per MOU Per Mile)		\$240.63
311	Voice Grade 2-Wire Direct Trunk Termination		\$59.20
312	Voice Grade 4-Wire Direct Trunk Termination		\$59.20
313	DS-1 Direct Trunk Termination		\$143.32
314	DS-3 Direct Trunk Termination		\$920.32
315	Multiplexing DS3-DS1		\$839.68
316	Multiplexing DS1-Voice		\$324.20
317	Tandem Switched Facility (Per MOU per Mile)		\$0.000437
318	Tandem Switched Termination		\$0.002267
319	Tandem Switching		\$0.005718
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

Hospers Tel. Exchange
351202

SOURCE

Composite Rates Interstate Rates for July 1, 2020 - Before Step Down Calculation for Terminating Local Switching

401	Local Switching Premium Rates Terminating Prior to Step Down	Line 301a	\$0.000000
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Step-Down Calculation

402	Effective Rate July 1st 2020 - FCC Order	FCC Order	\$0.000000
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403	Difference In Unified Rate and July 1st 2020 Rate	Line 402 - Line 401	\$0.000000
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404	Transition to Rate on Line 401 in equal 1/2 Steps	Line 403 / 3 (if Line 403 is negative), otherwise \$0.00	\$0.000000
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405	Rate Effective Date July 2020	Line 401 + (Line 404)+(Line 404)	\$0.000000
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DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”).

Mutual is the holding company of four wholly-owned incumbent local exchange carrier company (“ILEC”) subsidiaries listed along with Mutual in the following Table. Together, all five 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
Hospers Telephone Exchange, Inc.	200001252	351202	IA	JSI Effective 07/01/2020	Yes

Each of the five issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.50 and is filing its own, separate Description and Justification under Transmittal No. 232.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Mutual Telephone Company (IA)

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 accepted Alternative Connect America Model support, was removed from the NECA Common Line Pool effective August 31, 2019 and elected to have Common Line and End User rates in NECA Tariff F.C.C. No. 5.

In the past, Mutual has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services ("BDS") effective July 1, 2020.¹ 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Mutual submits the required Incentive-Based BDS Tariff Review Plans ("TRPs") in support of proposed rates.

Study Area Not Deemed Competitive

The Mutual 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 will be offered on a contractual basis. This notation provides for the transition from these permissively tariffed services to provision on a

¹ See Letter from Ryan A. Boone, COO, Mutual Telephone Company of Sioux Center Iowa d/b/a Premier Communications, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 6, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Mutual Telephone Company (IA)

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 1, 2020 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

Mutual 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. 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Mutual 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Mutual 2020 ROR-ILEC-ICC Data
- Mutual 2020 Tariff Rate Comp CAF
- Mutual 2020 True Up
- Mutual 2020 Rate Ceiling CAF
- Mutual 2020-21 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

² 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. 232 - 2020 Annual Access Filing
Mutual Telephone Company (IA)

- 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Northern Iowa is an Issuing Carrier of the JSI Tariff.

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
Hospers Telephone Exchange, Inc.	200001252	351202	IA	JSI Effective 07/01/2020	Yes

Each of the five issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.50 and is filing its own, separate Description and Justification under Transmittal No. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Northern Iowa Telephone Company (IA)

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 accepted Alternative Connect America Model support, was removed from the NECA Common Line Pool effective August 31, 2019 and elected to have Common Line and End User rates in NECA Tariff F.C.C. No. 5.

In the past, Northern Iowa has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Northern Iowa submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Northern Iowa 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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

¹ See Letter from Ryan A. Boone, COO, Mutual Telephone Company of Sioux Center Iowa d/b/a Premier Communications, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 6, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Northern Iowa Telephone Company (IA)

51.917(f). The Company proposes ARC rate changes effective July 1, 2020 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

Northern Iowa 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. 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Northern Iowa 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Northern Iowa 2020 ROR-ILEC-ICC Data
- Northern Iowa 2020 Tariff Rate Comp CAF
- Northern Iowa 2020 True Up
- Northern Iowa 2020 Rate Ceiling CAF
- Northern Iowa 2020-21 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

² 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Webb-Dickens is an Issuing Carrier of the JSI Tariff.

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
Hospers Telephone Exchange, Inc.	200001252	351202	IA	JSI Effective 07/01/2020	Yes

Each of the five issuing carriers for JSI Tariff FCC No. 1 listed in the above table will file its own individual company rates pursuant to Section 61.50 and is filing its own, separate Description and Justification under Transmittal No. 232.

1. DESCRIPTION OF FILING

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Webb-Dickens Telephone Corporation (IA)

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 services. With respect to Common Line, Webb-Dickens accepted Alternative Connect America Model support, was removed from the NECA Common Line Pool effective August 31, 2019 and elected to have Common Line and End User rates in NECA Tariff F.C.C. No. 5.

In the past, Webb-Dickens has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Webb-Dickens submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Webb-Dickens 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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 1, 2020 under Section 51.917(e) as shown in the supporting documentation.

¹ See Letter from Ryan A. Boone, COO, Mutual Telephone Company of Sioux Center Iowa d/b/a Premier Communications, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed March 6, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Webb-Dickens Telephone Corporation (IA)

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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

Webb-Dickens 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. 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Webb-Dickens 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- Webb-Dickens 2020 ROR-ILEC-ICC Data
- Webb-Dickens 2020 Tariff Rate Comp CAF
- Webb-Dickens 2020 True Up
- Webb-Dickens 2020 Rate Ceiling CAF
- Webb-Dickens 2020-21 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

² 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. 232 – 2020 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. 232 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 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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 elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ The Company proposes revisions to reflect detariffing of higher capacity and packet data rates effective July 1, 2020, and revisions to lower capacity time division multiplexed (“TDM”) transport and end user channel termination services 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(j).

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) TDM transport and end user

¹ 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. 232 - 2020 Annual Access Filing
Smithville Telephone Company, Inc. (MS)

channel termination services reflect adjustments for the X-factor, inflation factor, and exogenous cost changes.

Smithville proposes to transition higher capacity (above DS3) TDM and packet-based BDS to detariffed offerings on a contractual basis effective July 1, 2020.

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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Smithville Telephone Company 2020 RoR ILEC ICC CAF TRP* comprised of the following TRP workbooks

- Smithville 2020 ROR-ILEC-ICC Data
- Smithville 2020 Tariff Rate Comp CAF
- Smithville 2020 True Up
- Smithville 2020 Rate Ceiling CAF
- Smithville 2020-21 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

² 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. 232 - 2020 Annual Access Filing
Smithville Telephone Company, Inc. (MS)

- 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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Taylor is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

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.

In the past, Taylor has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ 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(j).

A. A-CAM BDS – 61.50 Filing Rules

Taylor submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Taylor 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

¹ See Letter from Steve Singletary, General Manager and CEO, Taylor Telephone Cooperative, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 8, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Taylor Telephone Cooperative, Inc. (TX)

January 1, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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 1, 2020 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.² The TY 2020 - 2021 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 2020-2021. All CAF-ICC data is represented in a single consolidated file, *Taylor 2020 RoR ILEC ICC CAF TRP*, comprised of the following TRP workbooks:

- Taylor 2020 ROR-ILEC-ICC Data
- Taylor 2020 Tariff Rate Comp CAF
- Taylor 2020 True Up
- Taylor 2020 Rate Ceiling CAF
- Taylor 2020-21 Rate of Return ILEC Summary

² 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. 232 - 2020 Annual Access Filing
Taylor Telephone Cooperative, Inc. (TX)

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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Twin Valley is an Issuing Carrier of the JSI Tariff. The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Twin Valley of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Twin Valley accepted Alternative Connect America Model support and was removed from the NECA Common Line Pool effective August 31, 2019. 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.

In the past, Twin Valley has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ The Company proposes revisions to reflect detariffing of higher capacity and packet data rates effective July 1, 2020, and revisions to lower capacity time division multiplexed (“TDM”) transport and end user channel termination services 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(j).

A. A-CAM BDS – 61.50 Filing Rules

¹ See Letter from Scott Leitzel, Chief Operating Officer, Twin Valley Telephone, Inc., to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed April 28, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Twin Valley Telephone, Inc. (Kansas)

Twin Valley submits the required Incentive-Based BDS Tariff Review Plans (“TRPs”) in support of proposed rates.

Study Area Not Deemed Competitive

The Twin Valley 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, 2020, adjusted for the X-factor, inflation factor, and exogenous cost changes.

Moundridge proposes to transition higher capacity (above DS3) TDM and packet-based BDS to detariffed offerings on a contractual basis effective July 1, 2020.

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 1, 2020 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TWIN VALLEY TARIFF REVIEW PLANS

Twin Valley submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021.

- Twin Valley 2020 ROR-ILEC-ICC Data
- Twin Valley 2020 Tariff Rate Comp CAF
- Twin Valley 2020 True Up
- Twin Valley 2020 Rate Ceiling CAF
- Twin Valley 2020-21 Rate of Return ILEC Summary

² 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. 232 - 2020 Annual Access Filing
Twin Valley Telephone, Inc. (Kansas)

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. 232 – 2020 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. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by West Carolina 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.

The Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 2, 2019.¹ Therefore, the Company proposes 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(j).

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 adjustments for the X-factor, inflation factor, and exogenous cost changes.

¹ 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. 232 - 2020 Annual Access Filing
West Carolina Rural Telephone Cooperative, Inc. (South Carolina)

Higher capacity (above DS3) TDM or packet-based BDS remain permissively tariffed and will be transitioned to a detariffed offering on a contractual basis prior to July 1, 2022, the end of the 36-month transition period 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.² The TY 2020 - 2021 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. WEST CAROLINA TARIFF REVIEW PLANS

West Carolina submits the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in a single consolidated file, *West Carolina 2020 RoR ILEC ICC CAF TRP Combined*, comprised of the following TRP workbooks:

- West Carolina 2020 ROR-ILEC-ICC Data
- West Carolina 2020 Tariff Rate Comp CAF
- West Carolina 2020 True Up
- West Carolina 2020 Rate Ceiling CAF
- West Carolina 2020-21 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

² 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. 232 - 2020 Annual Access Filing
West Carolina Rural Telephone Cooperative, Inc. (South Carolina)

- 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. 232 – 2020 Annual Access Filing

Winnebago Cooperative Telecom Association
SAC 351337-Iowa
SAC 361337-Minnesota

Winnebago Cooperative Telecom Association-LB
SAC 351338 (Iowa)

Winnebago Cooperative Telecom Association and Winnebago Cooperative Telecom Association-LB (alternatively “Winnebago” and “Winnebago-LB” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) hereby provide a Description and Justification for its filing under Transmittal No. 232 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”). Winnebago and Winnebago-LB are Issuing Carriers of the JSI Tariff.

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.

The filing is made 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, and the May 12, 2020 release entitled In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filing, WC Docket No. 20-55, Order, DA 20-502.

1. DESCRIPTION OF FILING

JSI Tariff F.C.C. No. 1 governs the provision by Winnebago and Winnebago-LB of interstate Switched Access, Special Access and Miscellaneous and Public Packet Data Network services. With respect to Common Line, Winnebago accepted Alternative Connect America Model support, was removed from the NECA Common Line Pool effective August 31, 2019, and tariffs Common Line and End User rates in the JSI Tariff. Winnebago-LB is a recipient of CAF Phase II support and bills End User Common Line (“EUCL”) charges pursuant to JSI Tariff FCC No. 1.

In the past, Winnebago has participated as a 61.38 prospective filer and Winnebago-LB has participated as a 61.39 historic filer. However, the Company elected to convert to incentive regulation for Business Data Services (“BDS”) effective July 1, 2020.¹ Therefore, Winnebago and Winnebago-LB propose revisions to BDS rates

¹ See Letter from Mark Thoma, Winnebago Cooperative Telecom Association, to Kris Monteith, Chief, Wireline Competition Bureau, FCC, WC Docket No. 17-144 et al., filed Feb. 21, 2020.

Description and Justification
JSI Transmittal No. 232 - 2020 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)
Winnebago Cooperative Telecom Association-LB (IA)

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(j).

A. A-CAM BDS – 61.50 Filing Rules

Winnebago and Winnebago-LB submit the required Incentive-Based BDS Tariff Review Plans ("TRPs") in support of proposed rates.

Study Areas Not Deemed Competitive

The Winnebago and Winnebago-LB study areas were 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, 2020, 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 1, 2020 effective date of this transmittal, and that services for new customers and for existing customers who request moves, additions or changes after July 1, 2020 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.² The TY 2020-21 eligible recovery reflects the required TY Baseline Adjustment Factor reduction and true-up adjustments.

3. TARIFF REVIEW PLANS

² 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. 232 - 2020 Annual Access Filing
Winnebago Cooperative Telecom Association (IA and MN)
Winnebago Cooperative Telecom Association-LB (IA)

Winnebago and Winnebago-LB submit the required ROR-ILEC-ICC data workbook and the ARC spreadsheets in support of Eligible Recovery claimed for tariff year 2020-2021. All CAF-ICC data is represented in single consolidated files, *Winnebago* and *Winnebago-LB 2020 RoR ILEC ICC CAF TRP* comprised of the following TRP workbooks

- 2020 ROR-ILEC-ICC Data
- 2020 Tariff Rate Comp CAF
- 2020 True Up
- 2020 Rate Ceiling CAF
- 2020-21 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