

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 258 - June 17, 2024

John Staurulakis, Inc. ("JSI") hereby provides description and justification ("D&J") for JSI Transmittal No. 258 on behalf of the issuing carriers for JSI Tariff F.C.C. No. 1.

INTRODUCTION

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

Title Pages, Table of Contents

Addition of issuing carriers effective July 2, 2024, listed at D&J Exhibit 1 ("New Issuing Carriers")

Cancellation of three carriers who are exiting the JSI Tariff F.C.C. No. 1 effective July 2, 2024. Revisions reflect removal of these carriers from the Title pages, Table of Contents, and Carrier Tables within the regulations. These companies include Etex Telephone Cooperative, Inc. (TX) SAC 442070, Poka Lambro Rural Telephone Cooperative, Inc. (TX) SAC 442131 and Wilkes Telephone Membership Corporation (NC) SAC 230510

DESCRIPTION

The New Issuing Carriers' offerings are being filed today under the JSI Tariff F.C.C. No. 1 2025 annual access filing, JSI Transmittal No. 258, for the twenty-five (25) carriers listed at Exhibit 1. All New Issuing Carriers are migrating from NECA Tariff F.C.C. No. 5.

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

No introduction of new rates for issuing carriers are proposed in this filing. No deletions of rates for the three carriers exiting the JSI Tariff F.C.C. No. 1 are proposed in this filing.

These revisions are necessary to allow seamless transition for New Issuing Carriers concurrent with cancellation as issuing carriers for NECA Tariff F.C.C. No. 5 effective July 2, 2024.

This transmittal is a companion filing to JSI Transmittal No. 259, the required 2024 annual access filing.

CONCLUSION

This transmittal provides for the addition of New Issuing Carriers to JSI Tariff F.C.C. No. 1. Allowing the revisions proposed in JSI Transmittal No. 258 to become effective will facilitate the seamless migration of New Issuing Carriers' services and rates from NECA Tariff F.C.C. No. 5 to JSI Tariff F.C.C. No. 1 effective July 2, 2024. In addition, this transmittal provides the cancellation of three carriers which will exit from the JSI Tariff F.C.C. No. 1 as of July 2, 2024.

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DESCRIPTION AND JUSTIFICATION EXHIBIT 1

NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. No. 1

EFFECTIVE JULY 2, 2024 - JSI TRANSMITTAL NO. 258 TO BE FILED JUNE 17, 2024

					<i>Effective July 2, 2024</i>		
<i>Company Name</i>	<i>Previous Tariff</i>	<i>Filing Rules</i>	<i>SAC</i>	<i>State</i>	<i>Common Line Rates</i>	<i>Switched Access Rates</i>	<i>Special Access Rates</i>
Ben Lomand Rural Telephone Cooperative, Inc.	NECA	61.50	290553	TN	JSI	JSI	JSI
Dekalb Telephone Cooperative, Inc.	NECA	61.50	290562	TN	JSI	JSI	JSI
Fastwyre Broadband:							
Interior Telephone Company, Inc. d/b/a Fastyree Broadband	NECA	61.50	613011	AK	JSI	JSI	JSI
Mukluk Telephone Company, Inc. d/b/a Fastwyre Broadband	NECA	61.50	613016	AK	JSI	JSI	JSI
Moundville Telephone Company d/b/a Fastwyre Broadband	NECA	61.50	250307	AL	JSI	JSI	JSI
Cameron Telephone Company d/b/a Fastwyre Broadband	NECA	61.50	440425	TX	JSI	JSI	JSI
EMPOWER Telecom, Inc	NECA	61.50	190219	VA	JSI	JSI	JSI
Flat Rock Telephone Company, Inc.	NECA	61.50	341012	IL	NECA	NECA	JSI
Fidelity Telephone LLC	NECA	61.50	421882	MO	NECA	JSI	JSI
Dalton Telephone Company	NECA	61.50	371537	NE	JSI	NECA	JSI
Elsie Communications, Inc.	NECA	61.50	371518	NE	JSI	NECA	JSI
South Park Telephone Company	NECA	61.50	462195	CO	JSI	NECA	JSI

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Rye Telephone Company, Inc.	NECA	61.50	462203	CO	JSI	NECA	JSI
S & A Telephone Company, Inc.	NECA	61.50	411829	KS	JSI	NECA	JSI
Ontario Telephone Company, Inc.	NECA	61.50	150112	NY	JSI	JSI	JSI
Trumansburg Telephone Company, Inc.	NECA	61.50	150131	NY	JSI	JSI	JSI
Planters Rural Telephone Cooperative, Inc.	NECA	61.39	220378	GA	NECA	JSI	JSI
Royal Telephone Company	NECA	61.50	351283	IA	NECA	JSI	JSI
Manawa Telephone Company, Inc.	NECA	61.50	330905	WI	JSI	JSI	JSI
Wood County Telephone Company	NECA	61.50	330974	WI	JSI	JSI	JSI
Miller Telephone Company	NECA	61.50	421920	MO	JSI	JSI	JSI
West Side Telephone Company	NECA	61.50	170277	PA	JSI	JSI	JSI
West Side Telephone Company	NECA	61.50	200277	WV	JSI	JSI	JSI
Zenda Telephone Company, Inc.	NECA	61.50	411852	KS	JSI	JSI	JSI
Vermont Telephone Company, Inc..	NECA	61.39	230510	VT	NECA	JSI	JSI
Venture Communications Cooperative	NECA	61.50	391680	SD	JSI	JSI	JSI

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DESCRIPTION AND JUSTIFICATION EXHIBIT 2

TARIFF COMPARISON – NECA to JSI

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

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

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

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
13. Additional Engineering	13. Additional Engineering	JSI Tariff FCC No. 1 Section 13 is reflective of NECA Tariff FCC No. 5 Section 13.
14. Exceptions to Access Service Offerings	14. Reserved for Future Use	There are no exceptions applicable to current or new issuing carriers for JSI Tariff FCC No. 1.
15. Access Service Interfaces and Transmission Specifications	15. Access Service Interfaces and Transmission Specifications	JSI Tariff FCC No. 1 Section 15 is reflective of NECA Tariff FCC No. 5 Section 15.
16. Public Packet Data Network	16. Public Packet Data Network	See Below:
16.1 Frame Relay Access Service	16.1 Frame Relay Access Service	JSI Tariff FCC No. 1 Section 16.1 is reflective of NECA Tariff FCC No. 5 Section 16.1.
	16.2 Asymmetrical Digital Subscriber Line (ADSL) Service	JSI Tariff FCC No. 1 includes ADSL regulations at Section 16.2 based on earlier versions of NECA Tariff FCC No. 5 Section 8.2. None of the new issuing carriers offer ADSL service under tariff (see note under Section 8 preceding).
	16.3 Symmetrical Digital Subscriber Line (SDSL) Access Service	JSI Tariff FCC No. 1 contains SDSL regulations at Section 16.3 similar to earlier versions of NECA SDSL regulations. None of the new issuing carriers offer SDSL service under tariff (see note under Section 8 preceding).
16.2 Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS)	16.7 Asynchronous Transfer Mode Cell Relay Access Service	JSI Tariff FCC No. 1 Section 16.7 is reflective of NECA Tariff FCC No. 5 Section 16.2 with the addition of one optional feature and function not available in NECA Tariff FCC No. 5. That feature is Inverse Multiplexing Over ATM (IMA) tariffed at Section 16.7.4(A)(4)(c) of JSI Tariff

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<i>NECA Tariff FCC No. 5</i>	<i>JSI Tariff FCC No. 1</i>	<i>Note</i>
		FCC No. 1. New issuing carriers do not offer this optional feature.
16.3 Ethernet Transport Service	16.4 Ethernet Transport Service	JSI Tariff FCC No. 1 Section 16.4 is reflective of NECA Tariff FCC No. 5 Section 16.3 with the following exceptions: (1) DSL Access Service Connection Optional Feature <u>Two-Way</u> ETS MM-VCC; (2) ETS E-Rate Option.
	16.4.4(A)(5)(b) VLAN Service (ETS Virtual Local Area Network)	NECA Tariff FCC No. 5 does not include ETS VLAN Service at this time. New issuing carriers do not offer ETS VLAN service.
	16.4.4(A)(6) ETS Meet Point Interface (ETS-MPI)	NECA Tariff FCC No. 5 does not include ETS Meet Point Interface at this time. New issuing carriers do not offer ETS MPI.
	16.4.5(F) ETS Alternative Volume Discount Plan 16.4.6(E) ETS Port Term Discount Plan Alternative Volume Discount Plan	NECA Tariff FCC No. 5 does not include the ETS Alternative Volume Discount Plan or the ETS Port Term Discount Plan Alternative Volume Discount Plan at this time. New issuing carriers do not offer these alternative discount plans.
16.4 Internet Protocol Gateway (IPG) Access Service	16.9 Internet Protocol Gateway Access Service	JSI Tariff FCC No. 1 is reflective of NECA Tariff FCC No. 5 Section 16.4.
	16.5 Metro Ethernet Service (Metro Ethernet)	Metro Ethernet is the Ethernet Transport Service for the Comporium Companies (issuing carriers for JSI Tariff FCC No. 1, who tariffed Ethernet prior to NECA Tariff FCC No. 5). This service is not offered by new issuing carriers.

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