

June 29, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Replies to Petition of AT&T Corporation
to Suspend and Investigate 2001 Annual
Access Tariff Filings
DA 01-1105, April 30, 2001

Dear Ms. Salas:

On June 18, 2001 John Staurulakis, Inc. filed revised interstate access charge rates for Interstate Telephone Company (Interstate), an issuing carrier of the JSI Tariff F.C.C No. 1. The revised rates are to go into effect on July 3, 2001. On June 25, 2001, AT&T Corporation (AT&T) filed a petition with the Commission seeking to suspend and investigate the filing made on behalf of Interstate. The complaint put forth by AT&T against Interstate is that the universal service contribution continues to be reflected in the carrier common line (CCL) rate. AT&T states that recovery of this contribution through access rates constitutes an impermissible implicit subsidy in violation of court rulings, and that the Commission granted a waiver expressly permitting carrier's to recover their universal service contribution from end-users for this filing.

In response to the petition filed, JSI plans to make the necessary changes to the access rates of Interstate Telephone Company to reflect recovery of the universal service contribution through an explicit charge to end-user customers. Due to the short time frame between the Commission's decision to waive its rules and the June 18, 2001 filing deadline, Interstate was unable to reflect a new end-user charge and reduced CCL access charge rate. JSI will be making a filing in July to reduce the CCL rate and to establish an end-user rate for the recovery of the universal service contribution effective August 1, 2001. When the filing is made, it is anticipated that the revised CCL rate for Interstate will be \$0.002152, reduced from \$0.002755. Until the effective date of the revised filing, Interstate will not bill AT&T or any other interexchange carriers the filed June 18, 2001 CCL rate for the July 3, 2001 through July 31, 2001 time period. In addition, JSI will make similar adjustments to the tariff rates for the Warwick Valley Telephone Company (Warwick). The revised per minute CCL rate for Warwick is anticipated to be \$0.001700,

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reduced from \$0.002500. Like Interstate, Warwick will not bill the interexchange carriers the higher CCL rate for the July 3, 2001 to July 31, 2001 time period.

Therefore, JSI respectfully requests that the Commission not grant AT&T's request for a suspension and investigation of the filing made on June 18, 2001 since revisions to the filing will be made in July and no interexchange carrier will be billed the higher CCL rate.

Sincerely,

Emmanuel Staurulakis
President

cc: Chief, Competitive Pricing Division – FCC
Raj Kannan, Competitive Pricing Division - FCC
ITS
AT&T Corporation