

Citizens Telecommunications Companies  
Tariff F.C.C. No. 1  
Description and Justification  
Transmittal No. 128  
October 25, 2002

Citizens Telecommunications Companies ("Citizens") submits herewith its Description and Justification ("D&J") in support of changes to its Tariff F.C.C. No. 1 filed under Transmittal No. 128, pursuant to sections 61.41 through 61.49 of the Commission's rules and relevant Commission orders. This filing is made on behalf of the exchange carriers issuing Citizens Tariff F.C.C. No. 1. In this tariff, five separate rate schedules are maintained. These rate schedules are referred to as Rate Group 1 through Rate Group 5, and correspond to the COSA codes CTC1 through CTC5. In this filing, Citizens is changing its rate schedules to add additional exchanges where Local Number Portability (LNP) is now available so that Citizens may recover the LNP investment and expenses. The recovery of these costs was provided for in the FCC's Third Report and Order in Docket CC No. 95-116, "In the Matter of Telephone Number Portability," released May 12, 1998.

Citizens recovers the allowable costs of implementing Local Number Portability through its LNP Surcharge rate element. This

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rate element was developed in accordance with the Commission's Rules and Orders, using cost data for the total company. However, Citizens was only allowed to recover of these costs in exchanges that had received bona fide requests for LNP from competitors and where Citizens had implemented LNP in response to these requests.

Citizens has received a bona fide request for Local Number Portability in the Jerseyville, Illinois switch; the Middletown, New York switch; and the Spencerport, Ny switch. In this filing, Citizens extends the existing LNP Surcharge rates to the exchanges served by these switches and their remotes. The rates for LNP Surcharge are set at the level originally developed for recovery, and the five year cost recovery period is set to start on November 12, 2002 or December 4, 2002, according to the date that a bona fide request was received for each switch. Citizens expects to be providing LNP to competitors from these switch on these dates.

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In addition, Citizens is removing several exchanges in Rate Group 5 from the list of exchanges that are billed the LNP surcharge.

These exchanges have been sold to other companies, and will no longer be covered by the Citizens tariff. Accordingly, Citizens is removing the reference to these exchanges from its tariff.