

1. Introduction

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. ____, 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 makes revisions addressing concerns expressed by the Commission's staff in regards to Transmittal No. 127. This filing is being made on less than statutory notice with changes to material that has not yet gone into effect under authority of Special Permission No. _____.

2. Downstream Speed for ADSL Class R2

In Transmittal No. 127, Citizens sought to change the downstream

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speed of its ADSL Channel Class R2 service from 384 Kbps to a range from 384Kbps to 1.0 Mbps. This change reflects Citizens' plan to upgrade the speed of this service across the company, along with the reality that this change cannot be accomplished in a brief period of time.

The Commission's Staff has expressed concern that the tariff language as filed did not indicate where the higher speed is available. To address Staff's concerns, Citizens proposes to list the areas where ADSL Class R2 service is available at 1.0 Mbps, by the date the service is expected to become available in those areas.

3. ADSL Channel Rate Reduction

Citizens also reduces the rates for ADSL Channel, Class R1 and ADSL Channel, Class R2 at several companies. Cost support information submitted with Transmittal No. 116 applies to this rate reduction and is incorporated in this filing by reference. The rate

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reduction portion of this filing is being made on 15 day's notice
under section 204(a)(3) of the Communications Act of 1934, as
amended, and does not rely upon the above-cited Special
Permission.