

Citizens Telecommunications Companies
TARIFF F.C.C. NO. 1
DESCRIPTION AND JUSTIFICATION
TRANSMITTAL NO. 139
July 17, 2003

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. 139, pursuant to sections 61.41 through 61.49 of the Commission's rules and relevant Commission orders. In this Transmittal, Citizens creates a limited time promotional offering for its ADSL service.

2. Promotional Offering

In this filing, Citizens creates a limited time promotional offering of ADSL Channel Class R2 service for some of the companies participating in Citizens Tariff F.C.C. No. 1. For orders placed from August 4, 2003 through October 15, 2003, customers will receive ADSL Channel Class R2 at no charge for the first month of service. Customers must commit to keeping the service for six months in order to receive this promotion. Customers canceling the service prior to the end of the six month commitment period will be charged a termination liability equal to what they would have paid for the first month of service at the tariffed rate. As a

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result of this promotion, Citizens expects to sell approximately 8.4 thousand additional monthly ADSL Channels and receive an additional \$165 thousand ADSL revenue for the first twelve months following the effective date of this filing. There are no complementary or cross-elastic revenue impacts expected as a result of this promotion.

3. Miscellaneous

In this filing, Citizens also makes administrative changes to reflect the reorganization of Rhinelander Telephone Company into a limited liability corporation named Rhinelander Telephone LLC. The surviving corporation retains the existing Tax ID Number and Federal Registration Number.