

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. 142, in compliance with the requirements of paragraph 581 of the *Commission's Report and Order on Remand and Further Notice of Proposed Rulemaking*, CC Docket No. 01-338, released August 21, 2003, FCC 03-336 ("*Triennial Review Order*").

In the *Triennial Review Order*, the Commission concluded that the Communications Act of 1934 ("the Act"), as amended to date, does not prohibit the commingling of Unbundled Network Elements (UNEs) and wholesale services and that section 251(c)(3) of the Act grants authority for the Commission to adopt rules to permit the commingling of UNEs and combinations of UNEs with wholesale services, including interstate access services.

In accordance with the above conclusion, Citizens is modifying its

Citizens Telecommunications Companies  
Tariff F.C.C. No. 1  
Description and Justification  
Transmittal No. 142  
October 2, 2003

Tariff F.C.C. No. 1 to expressly permit the commingling of UNEs with wholesale services, including interstate access services. This filing is being made on a streamline basis on 15 days' notice under Section 204(a)(3) of the Communications Act of 1934, as amended.