

**DESCRIPTION AND JUSTIFICATION**  
**John Staurulakis, Inc. Tariff F.C.C. No. 1**  
**Transmittal No. 90**  
**December 16, 2003 (effective January 1, 2004)**  
**Concord Telephone Company (NC)**  
**FRN #0003-7620-10**

Concord Telephone Company (“CTC”) hereby provides a Description and Justification for introduction of a non-chargeable 44.736-STS-1 Interface. The non-chargeable Optional Feature and Function applies to an interface between a Telephone Company provided 44.736 Mbps Special Access High Capacity Channel Termination (“44.736 Mbps”) and a customer Synchronous Transport System-1 (“STS-1”).

**Description of Filing**

The accompanying revised tariff material is being filed by John Staurulakis, Inc. (“JSI”) on behalf of CTC, operating in the state of North Carolina. The JSI Tariff F.C.C. No. 1 governs the provision by CTC of Switched Access, Special Access, Miscellaneous Services, and End User Common Line Service. This filing introduces a non-chargeable Optional Feature and Function to allow ordering by customers of connection of a customer STS-1 to a Telephone Company 44.736 Mbps Special Access High Capacity Service Channel Termination.

CTC does not currently offer Synchronous Optical Channel Service (“SOCS”). When a customer has SOCS facilities, the customer can use an STS-1 for connection to a 44.736 Mbps. The STS-1 is the electrical equivalent of an Optical Channel OC-3 and facilitates connection between optical systems and electrical systems. For CTC, the same equipment that facilitates connection of 44.736 Mbps facility to another 44.736 Mbps facility also accommodates connection of a CTC 44.736 Mbps facility to a customer STS-1 facility.

**Justification for Cost Support and Rate Development**

Because no additional costs are required for connection between a Telephone Company 44.736 Mbps facility and customer provided STS-1 facility, the existing 44.736 Mbps Special Access High Capacity Channel Termination rate covers all of the costs that such a connection would require.