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June 29, 2004

Application No. 18

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

Application is hereby made by John Staurulakis, Inc. (JSI) for Special Permission for a limited waiver of Sections 61.58 and 61.59 of the Commission's rules. A grant of this application will allow JSI to file on behalf of Hargray Telephone Company (Hargray) to make changes in Switched Access-Direct Transport and Special Access rates that would have become effective on July 1, 2004 under Transmittal No. 96. Hargray files access rates pursuant to Section 61.38 of the Commission's rules.

On June 23, 2004 AT&T Corp. (AT&T) filed a petition in which it requested, inter alia, suspension of Hargray's tariff due to the alleged recovery of DSL costs through overstated Special Access rates.¹ Hargray, through JSI, has been in contact with AT&T and the parties have agreed to revision by Hargray of its July 1 rates for Special Access and the Switched Access Direct Trunk rates affected, in turn by the Special Access rate reductions. The reduction in Special Access rates serve to address the concerns raised by AT&T in its Petition.

A limited waiver of Section 61.59 of the Commission's rules will allow filing revisions to rates prior to having been in effect for 30 days in order to revise rates to reflect the reduction in the Special Access revenue requirement mentioned above. A waiver of Section 61.58 of the Commission's rules will allow the revised rates to become effective on less than 15 or, as the case may be, 7 days' notice.

¹ See Petition of AT&T Corp. Addressing July 1, 2004 Annual Access Charge Tariff Filings, WCB 04-18, (June 23, 2004) (*AT&T Petition*) at Section I.H, page 14.

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If Special Permission is granted, the waivers will allow Hargray's revised Special Access and Switched Access-Local Transport rates for July 1, 2004 to reflect reduction of the projected annual Special Access billed revenues by \$300,000 (ten percent) from that originally proposed under JSI Transmittal No. 96. Switched Access-Local Transport rates are affected to the extent a particular Local Transport service may be based on the same facilities and technology of a corresponding Special Access service.

Illustrative tariff pages are attached, indicating an issue date of June 30, 2004 and an effective date of July 1, 2004.

The proposed changes do not affect Hargray's revised Switched Access Local Switching rates as filed on June 16, 2004 in Transmittal No. 96.

JSI and Hargray recognize that the filing made under a transmittal filed under the authority of the Special Permission requested herein will be effective on less than 15 or, as the case may be, 7 days' notice and therefore will not be deemed lawful.

Pursuant to Section 61.17 of the Commission's Rules, the original of this letter, Form 159, and a check for \$695.00 have been sent via overnight delivery to the Mellon Bank, Pittsburgh, Pennsylvania, as of this date. Questions may be addressed to the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott Duncan".

Scott Duncan
Staff Director-Regulatory Affairs

cc: Hargray Telephone Company

JSI Interstate Access Tariff FCC No. 1
FCC Registration Numbers (FRNs)
June 29, 2004

JSI Application for Special Permission No. 18
John Staurulakis, Inc. FRN 0003-7481-42

JSI ISSUING CARRIER

FRN

Warwick Valley Telephone Company – NY/NJ	0005-5691-99
Concord Telephone Company - NC	0003-7620-10
Atlantic Telephone Membership Corporation - NC	0004-0615-86
Coastal Utilities, Inc. - GA	0004-3336-88
Farmers Telephone Cooperative, Inc. - SC	0001-8870-25
Hargray Telephone Company, Inc. - SC	0001-8867-04
Horry Telephone Cooperative, Inc. - SC	0001-8869-44
Millington Telephone Company, Inc. - TN	0004-3095-48
Mt. Horeb Telephone Company - WI	0002-7190-45
Pineland Telephone Cooperative, Inc. - GA	0001-8566-73
Rock Hill Telephone Company - SC	0001-8887-18
Lancaster Telephone Company - SC	0001-8892-45
Fort Mill Telephone Company - SC	0001-8896-17
Home Telephone Company - SC	0001-8868-45
Star Telephone Membership Corporation - NC	0001-9609-62
Interstate Telephone Company - GA	0003-7335-81
Smart City Telecommunications LLC d/b/a Smart City Telecom - FL	0005-0260-75