

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
July 1, 2004)	WCB/Pricing 04-18
Annual Access Charge Filings)	
)	
John Staurulakis, Inc.,)	
Tariff FCC No. 1)	Transmittal No. 96
)	
Coastal Utilities, Inc.)	
)	
Concord Telephone Company)	
)	
Farmers Telephone Cooperative, Inc.)	
)	
Hargray Telephone Company)	
)	
Horry Telephone Cooperative, Inc.)	
)	
Warwick Valley Telephone Company,)	
Inc.)	

MOTION TO ACCEPT LATE-FILED REPLY

Pursuant to Section 1.46¹ of the Commission's rules, John Staurulakis, Inc. (JSI) hereby requests that the Commission accept JSI's late-filed reply to the petition of AT&T Corp. (AT&T) in the above captioned proceeding.² The reply to AT&T's petition was

¹ 47 CFR § 1.46.

² In the context of this motion, the AT&T petition is that filed by AT&T on June 23 respecting the Annual Access Charge Filings made filed on June 16, 2004 on 15-days notice.

due by the close of business on Tuesday, June 28, 2004 pursuant to Section 1.773(b)³ of the Commission's rules and the 2004 Access Charge Filing Order.⁴ For purposes of the Commission's electronic Tariff Filing System (ETFSE), the close of business is 7:00 p.m. JSI completed filing through the ETFSE at 7:02 p.m. on Tuesday, June 29, 2004, two minutes past the deadline. In accordance with Rule 1.46(c), JSI has notified both the Commission and AT&T of its late filing. In addition to the ETFSE filing, JSI faxed a copy of the reply to AT&T Tuesday evening. Additionally, JSI sent copies to the respective AT&T locations by overnight delivery.

In significant part, the delay of initiation of the ETFSE filing session until 6:49 p.m. was due to the need to earlier file a critical Application for Special Permission associated with resolution of an issue raised by AT&T in its petition. The Application for Special Permission requests waiver of Part 61 rules respecting filing timeframes in order to revise downward Special Access rates for one of the issuing carriers named in AT&T's petition, Hargray Telephone Company (Hargray). JSI did not complete final discussions with AT&T regarding the Hargray revisions until late in the day.

JSI believes that its request will not impair AT&T in any way, as the pleading cycle is complete in this matter. With respect to the Commission, JSI provided the Wireline Competition Bureau-Pricing Policy Division with a copy of a draft of the reply on Tuesday morning.

³ 47 CFR § 1.773(b).

⁴ July 1, 2004 Annual Access Charge Tariff Filings, WCB/Pricing 04-18, DA 04-1049 (Rel. Apr. 19, 2004).

Based on the preceding, JSI respectfully requests that the Commission grant this motion and accept JSI's late filed reply.

Respectfully submitted,

John Staurulakis, Inc.

On behalf of:

Coastal Utilities, Inc.

Concord Telephone Company

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company

Horry Telephone Cooperative, Inc.

Warwick Valley Telephone Company, Inc.

June 29, 2003

By



Scott Duncan
Staff Director-Regulatory Affairs

6315 Seabrook Road
Seabrook, Maryland 20706
(301) 459-7590
FAX 301-577-5575