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**This material is being filed on 15 days'
notice under Section 204(a)(3) of the
Communications Act.**

December 17, 2004

Transmittal No. 105

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

Attention: Wireline Competition Bureau

The accompanying tariff material issued by John Staurulakis, Inc. ("JSI"), and bearing Tariff F.C.C. No. 1, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended.

The filing, to become effective January 1, 2005, consists of tariff pages as indicated on the following checksheet:

Tariff F.C.C. No. 1

99th Revised Page 0-1

This filing includes proposed revisions in charges for the Federal Universal Service Contribution (FUSC) reflective of the increase in the Universal Service Contribution Factor from 8.9% to 10.7% for the first quarter of 2005. Proposed First Quarter 2005 Universal Service Contribution Factor, CC Docket No. 96-45, Public Notice, DA 04-3902 (released December 13, 2004). Two issuing carriers for JSI Tariff F.C.C. No. 1 bill FUSC charges pursuant to JSI Tariff FCC No. 1: Warwick Valley Telephone Company operating in New York and New Jersey (Warwick) and Interstate Telephone Company operating in Georgia (Interstate). Warwick files pursuant to Section 61.38. Interstate files pursuant to Section 61.39. These two carriers are not members of the National Exchange Carrier Association (NECA) Common Line Pool and therefore bill common line charges and the related FUSC charges pursuant to JSI Tariff FCC No. 1. All remaining issuing carriers for JSI Tariff FCC No. 1 participate in the NECA Common Line Pool and reference NECA Tariff FCC No. 5 with respect to FUSC rates.

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This filing also proposes introduction of an optional feature for Asynchronous Transfer Mode (ATM) Cell Relay Service (CRS), "Inverse Multiplexing-ATM" (IMA). Attachment 2 comprises the Description and Justification for Inverse Multiplexing-ATM. Atlantic Telephone Membership Corporation (ATMC) has requested this option to meet the needs of an ATM customer. It will be available from any issuing carrier for JSI-Tariff F.C.C. No. 1 who provides ATM-CRS service.

Pursuant to Section 61.38 of the Commission's Rules, cost support information is being furnished for the Warwick's FUSC filing in Attachment 1. Interstate does not adjust the Multiline Business End User Common Line FUSC for Centrex, therefore its FUSC filing reflects only revision to the 10.7% factor and does not reflect any cost development work.

Pursuant to Section 61.32(b) of the Commission's Rules, the original of this letter, Form 159, and a check for \$720.00 have been sent via overnight delivery to the Mellon Bank, Pittsburgh, Pennsylvania, as of this date.

Any questions regarding the filing may be directed to me at the address and telephone number listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Duncan", written in a cursive style.

Scott Duncan
Staff Director-Regulatory Affairs

Enclosures

cc: Warwick Valley Telephone Company
Interstate Telephone Company
Atlantic Telephone Membership Corporation

JSI Interstate Access Tariff FCC No. 1
FCC Registration Numbers (FRNs)
December 17, 2004

JSI Transmittal No. 105

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
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	0005-0260-75