

DESCRIPTION AND JUSTIFICATION**John Staurulakis, Inc. Tariff F.C.C. No. 1****Transmittal No. 105****December 17, 2004****Addition of Inverse Multiplexing-ATM Optional Feature**

John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for introduction of Inverse Multiplexing – ATM (IMA) in JSI Tariff F.C.C. No. 1. IMA will be an offering for all issuing carriers of JSI Tariff FCC No. 1 providing Asynchronous Transfer Mode – Cell Relay Service (ATM-CRS)

Description of Filing

The accompanying revised tariff material is being filed by JSI to meet the demand by customers of Atlantic Telephone Membership Corporation (ATMC) for ATM-CRS speeds above 1.544 Mbps but below 44.736 Mbps. Inverse Multiplexing – ATM (IMA) is a specification defined by the ATM Forum that provides a way to combine an ATM cell stream over two or more circuits (i.e., DS1 lines), thus allowing an organization to lease just the bandwidth it needs. When more than DS1 capacity and less than DS3 capacity is required, IMA allows ordering bandwidth at higher than a DS1 1.544 Mbps level but lower than a DS3 44.736 Mbps level where Asynchronous Transfer Mode (ATM) service is available.

IMA effectively provides pricing for capacities up to the level where ordering of a DS3 channel and DS3 ATM Port is more economical. The pricing on this service is linked to the pricing for the individual DS1s comprising the IMA connection and the number of port charges necessary to recover the port costs associated with connection to the ATM switch. Following is the table included in the proposed regulations indicating the number of channel charges and port charges under existing Special Access High Capacity and ATM-CRS Port rates, respectively.

Capacity	Number of Channel Terminations (or Channel Mileage Terminations) Required	Number of ATM 1.544 Mbps Port Charges
3 Mbps	2	1
4.6 Mbps	3	1
6.1 Mbps	4	2
7.7 Mbps	5	2
9.2 Mbps	6	3
10.7 Mbps	7	3
12.3 Mbps	8	4

Because the existing ATM-CRS regulations require ordering of Special Access High Capacity DS1s and DS3s for connection to an ATM Port, the proposed tariff regulations for IMA also require ordering of DS1s under Special Access High Capacity regulations in the tariff in lieu of establishing a new charge within the ATM-CRS regulations.

Based on an analysis of the costs, application of channel charges as indicated in the table is reflective of the costs required to provision the respective capacities. The application of ATM Port charges is reflective of the costs of providing the appropriate port capacity for each indicated speed. As indicated by the table, the customer will benefit from economies gained by use of port cards for IMA.

Justification for Cost Support and Rate Development

Because of the relationship of capacity to cost discussed above, the IMA offering is based on existing rates for Special Access High Capacity offerings and ATM-CRS Port offerings as currently priced.