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December 27, 2004

Application No. 19

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 Atlantic Telephone Membership Corporation (Atlantic) changes in regulations and rates respecting Inverse Multiplexing-ATM filed in JSI Transmittal No. 105 on December 17, 2004 that would have become effective January 1, 2005.

A limited waiver of Section 61.59 of the Commission's rules will allow filing revisions to rates and regulations prior to having been in effect for 30 days in order to correct errors in the original filing. A waiver of Section 61.58 of the Commission's rules will allow the revised rates and regulations to become effective on less than 15 days' notice. Specifically, the waivers will allow the corrections or changes described as follows.

1. The proposed revisions include corrections to the regulations for the new optional feature, Inverse Multiplexing-ATM (IMA) introduced in Transmittal 105. The correction removes the indication in the regulations of a discrete number of regular ATM Port charges for each of the indicated IMA speeds. In place of the indicated number of ATM Port charges, the revised regulations indicate that an "IMA Port Charge" will apply as indicated for each speed in the rate section of the tariff. This change allows issuing carriers for JSI Tariff No. 1 to develop IMA Port charges independent of ATM Port charges. Based on feedback from issuing carriers for JSI Tariff FCC No. 1, this revised methodology better addresses rate development characteristics and better serves customer choice.

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2. The proposed revisions would also introduce the initial IMA Port rates for Atlantic. IMA serves to allow customers to more economically order ATM connections when more than a DS1 Port is needed but an entire DS3 Port is not needed. The initial rates for Atlantic, pending grant of special permission, will allow "ratcheting" of the price for an IMA port from the ATM DS1 Port rate needed for 1.544 Mbps up to the seven IMA speeds of 3 Mbps through 12.3 Mbps.

The proposed changes do not affect existing customers. Atlantic is in the process of meeting the request received recently from a customer for IMA.

JSI is providing illustrative tariff pages for the proposed changes to be made under special permission.

JSI and Atlantic recognize that the filings made under a transmittal filed under the authority of the Special Permission requested herein will be effective on less than 15 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 \$720.00 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 black ink, appearing to read "Scott Duncan". The signature is written in a cursive, flowing style.

Scott Duncan  
Staff Director-Regulatory Affairs

**JSI Interstate Access Tariff FCC No. 1**  
**FCC Registration Numbers (FRNs)**  
**December 27, 2004**

John Staurulakis, Inc. FRN 0003-7481-42

**JSI ISSUING CARRIER**

**FRN**

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