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December 28, 2004

Transmittal No. 106

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 is made under authority of Special Permission No. 04-084 granted by the Federal Communications Commission on December 28, 2004.

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

Tariff F.C.C. No. 1

100<sup>th</sup> Revised Page 0-1

In Transmittal No. 105, JSI, *inter alia*, introduced a new optional feature for Asynchronous Transfer Mode (ATM) called Inverse Multiplexing-ATM (IMA). Pursuant to Special Permission No. 04-084, this filing proposes revisions, prior to having been in effect for 30 days, to the regulations filed by JSI in Transmittal No. 105 pertaining to IMA. Pursuant to Special Permission No. 04-084, the proposed effective date for the revisions filed under this transmittal is January 1, 2004 on less than fifteen days' notice. As mentioned in the Application, the revisions serve to introduce a new rate element called an "IMA Port Charge" in lieu of charging regular ATM Port Charges for the IMA port as indicated in the original regulations filed in Transmittal No. 105.

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4625 Alexander Drive, Suite 135  
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Attendant to the proposed introduction of the new IMA Port Charge rate element in this filing, JSI introduces, on behalf of Atlantic Telephone Membership Corporation (Atlantic), an issuing carrier for JSI Tariff F.C.C. No. 1 operating in North Carolina, IMA Port Charges to be effective January 1, 2004 on less than fifteen days' notice pursuant to Special Permission No. 04-084.

JSI and Atlantic recognize that the regulations and rates filed in this transmittal on less than 15 days' notice will not be deemed lawful.

Pursuant to Section 61.38 of the Commission's Rules, Attachment 1 comprises the Description and Justification for the IMA Port Charge.

Pursuant to Section 61.39 of the Commission's Rules, supporting cost information for Atlantic will be furnished to interested parties upon reasonable request.

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: Atlantic Telephone Membership Corporation

JSI Interstate Access Tariff FCC No. 1  
FCC Registration Numbers (FRNs)  
**December 28, 2004**

JSI Transmittal No. 106

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