

DESCRIPTION AND JUSTIFICATION
John Staurulakis, Inc. Tariff F.C.C. No. 1
Transmittal No. 106
December 28, 2004
Addition of Inverse Multiplexing-ATM Optional Feature

John Staurulakis, Inc. (JSI) hereby provides a Description and Justification for revision of JSI Tariff F.C.C. No. 1 regulations for Inverse Multiplexing – ATM (IMA) introduced in JSI Transmittal No. 105. In this Description and Justification, JSI reviews Transmittal No. 105 in which IMA was introduced and describes the revisions of the IMA rate regulations proposed in this filing.

Description of Filing

In Transmittal 105, JSI filed revisions to meet the demand by customers of Atlantic Telephone Membership Corporation (Atlantic) for ATM-CRS speeds above 1.544 Mbps but below 44.736 Mbps by introducing Inverse Multiplexing – ATM (IMA).

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.

1. The proposed revisions in this filing include a correction to remove 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 where circumstances warrant. 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.

The proposed revisions in this filing 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, allow “ratcheting” of the price for an IMA port from the single ATM DS1 Port rate needed for 1.544 Mbps up through the seven IMA speeds of 3 Mbps through 12.3 Mbps.

The regulations for the pricing of the related DS1 circuits needed for provisioning IMA are not changed by this filing. Thus, the table introduced under Transmittal 105 will be retained for purposes of matching the capacity with the required number of High Capacity DS1 circuits. Only the column for the number of ATM Port Charges will be removed, replaced by IMA Port Charge rates filed in Section 17 of the tariff.

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

Justification for Cost Support and Rate Development

The direct relationship between High Capacity DS1 circuits and IMA Channel Terminations of Channel Mileage, as the case may be, indicated in the description and justification for Transmittal No. 105 is unchanged by this filing. The relationship between ATM Port charges and IMA Port Charges is modified only insomuch as issuing carriers have the option of tariffing rates for IMA Port Charges rather than those for ATM Port Charges.

With respect to Atlantic, who files pursuant to Section 61.39, the initial rates for IMA proposed in this filing mirror Atlantic's existing ATM Port Charge rates for DS1s multiplied by the number of DS1s required for each capacity in the above table. The difference from Transmittal No. 105 that this method represents is that the former method shown in the table above indicated fewer ATM Port Charges than DS1 channel charges applied. Subsequent to the filing of Transmittal 105, review by Atlantic's engineer modified the assumptions underlying the above methodology for determination of port charges.