

Citizens Telecommunications Companies
TARIFF F.C.C. NO. 1
DESCRIPTION AND JUSTIFICATION
TRANSMITTAL NO. 159
January 14, 2005

Citizens Telecommunications Companies ("Citizens") submits herewith its Description and Justification ("D&J") in support of changes to its Tariff F.C.C. No. 1 filed under Transmittal No. 159, pursuant to sections 61.41 through 61.49 of the Commission's rules and relevant Commission orders. In this Transmittal, Citizens adds additional exchanges where Local Number Portability (LNP) is now available so that Citizens may recover the LNP investment and expenses. The recovery of these costs was provided for in the FCC's Third Report and Order in Docket CC No. 95-116, "In the Matter of Telephone Number Portability," released May 12, 1998.

Citizens has received bona fide requests for Local Number Portability in numerous additional switches. In this filing, Citizens implements the LNP Surcharge to the exchanges served by these switches and their associated host-remote complexes. Demand and costs for all of Citizens' exchanges, including the ones subject to the current request, were included in the cost study filed under Transmittal No. 149. These costs have not changed since that filing and still remain applicable. The five year cost recovery period is set to start on January 29, 2005. Citizens will have the ability to provide permanent LNP to competitors in the requested exchanges effective with that date.