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**This material is being filed on 15 days' notice under Section 204(a)(3) of the Communications Act.**

September 8, 2005

Transmittal No. 109

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 F.C.C. Registration Number (FRN) for JSI is 0003-7481-42. The FRNs for the issuing carriers for JSI Tariff F.C.C. No. 1 are provided on Appendix A to this transmittal letter.

The filing, to become effective September 23, 2005, consists of tariff pages as indicated on the following checksheet:

Tariff F.C.C. No. 1

103rd Revised Page 0-1

This filing is made on behalf of Concord Telephone Company (CTC), an issuing carrier for JSI Tariff F.C.C. No. 1 operating in North Carolina. CTC bills end user charges under JSI Tariff F.C.C. No. 1 and bills all other interstate access charges under rates established in National Exchange Carrier Association (NECA) Tariff F.C.C. No. 5. Pursuant to the Commission's July 19, 2004 Order<sup>1</sup> and under authority of Special Permission No. 05-040 of the Federal Communications Commission, this filing reduces

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<sup>1</sup> See National Exchange Carrier Association Petition to Amend Section 69.104 of the Commission's Rules, WC Docket No. 04-259, RM-10603, *Order Granting Petition for Rulemaking, Notice of Proposed Rulemaking, and Order Granting Interim Partial Waiver*, FCC 04-174 (rel. July 19, 2004).

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the number of End User Common Line (EUCL) charges assessed on DS1 channel services provided by CTC from twenty-four to five where the customer provides the terminating channelization equipment. The ability to assess five EUCL charges on DS1 channel services expires at such time as the Commission resolves the issues raised in its notice of proposed rulemaking. In addition, this filing introduces an end-user DS1 Line Port charge to recover the line port costs of DS1 channel services.

Also under authority of Special Permission No. 05-040, this filing includes filing of ISDN Line Port charges mirroring National Exchange Carrier Association (NECA) Tariff F.C.C. No. 5.

As part of this filing JSI proposes revisions to these two sections to align them with NECA Tariff F.C.C. No. 5. These changes are necessary as these sections include the regulations pertaining to both CTC EUCL charges and DS1 Line Port and ISDN Line Port charges. The primary revision is the addition to Section 3 of regulations for DS1 Line Port charges mirroring NECA Tariff F.C.C. No. 5 regulations and addition to Section 4 of regulations pertaining to EUCL charges for Channelized DS1 service also mirroring NECA regulations.

Proposed revisions indirectly related to the establishment of CTC DS1 channel service include elimination of all regulations in Section 3 pertaining to Carrier Common Line charges no longer billed by Rate-of-Return carriers. Additionally, this filing moves regulations for ISDN Line Port charges from Section 4 to Section 3 to parallel the placement in NECA Tariff FCC No. 5. The proposed revised title for Section 3 is "Federal Universal Service Charge, ISDN Line Ports and DS1 Line Port" paralleling the title of NECA Tariff FCC No. 5 Section 3 and replacing the current, obsolete title "Carrier Common Line Access Service and Federal Universal Service Charge."

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.

Customers will be notified of the proposed changes in accordance with the Commission's requirements.

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Any questions regarding the filing may be directed to me at the address above, 301-459-7590 or [sduncan@jsitel.com](mailto:sduncan@jsitel.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Duncan". The signature is written in a cursive style with a large initial "S" and "D".

Scott Duncan  
Staff Director-Regulatory Affairs

Enclosures

cc: Issuing Carriers

JSI Interstate Access Tariff F.C.C. No. 1  
Transmittal No. 109– Appendix A  
F.C.C. Registration Numbers (FRNs)  
**June 16, 2005**

John Staurulakis, Inc. FRN 0003-7481-42

<b><u>JSI ISSUING CARRIER</u></b>	<b><u>FRN</u></b>
Atlantic Telephone Membership Corporation	0004-0615-86
Bluffton Telephone Company, Inc.	0005-0581-51
Concord Telephone Company	0003-7620-10
Farmers Telephone Cooperative, Inc.	0001-8870-25
Fort Mill Telephone Company - SC	0001-8896-17
Hargray Telephone Company, Inc.	0001-8867-04
Home Telephone Company	0001-8868-45
Horry Telephone Cooperative, Inc.	0001-8869-44
Interstate Telephone Company	0003-7335-81
Lancaster Telephone Company	0001-8892-45
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
Star Telephone Membership Corporation	0001-9609-62
Smart City Telecommunications LLC d/b/a Smart City Telecom	0005-0260-75
Warwick Valley Telephone Company	0005-5691-99