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

October 12, 2005

Transmittal No. 110

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, to become effective on October 27, 2005, consists of tariff pages as indicated on the following checksheet:

Tariff F.C.C. No. 1

104th Revised Page 0-1

Issuing carriers for JSI Tariff FCC No. 1 are listed on Attachment A to this transmittal letter along with the respective FRN number for each carrier and JSI.

Page by page proposed changes are indicated on Attachment B to this transmittal.

This filing proposes for Mt. Horeb Telephone Company (Mt. Horeb), an issuing carrier for JSI Tariff FCC No. 1 operating in Wisconsin, introduction of expanded High Speed Internet Access Service offerings under both existing regulations and revised regulations. Newly introduced services include Special Access Metallic Service 100Base-T DSL/High Speed Internet Access Service Connection, Special Access Synchronous Optical Channel Service OC12 Channel Termination and DSL/High Speed Internet Access Service Connection. Additionally, this filing proposes restructuring of the High Speed Internet (HSI) Access Service rate regulations to separate services between those currently offered by Mt. Horeb under a single rate. Under the proposed revisions, the existing current single rate offered by Mt. Horeb will be divided between Monthly Rates Without Discount and HSI Term Pricing Arrangement (HSITPA) rates. HSITPA

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
Fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve
Eagan, Minnesota 55121
Phone: 651-452-2660
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547 South Oakview Lane
Bountiful, UT 84010
Phone: 801-294-4576
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4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
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discounted rates for will require payment of a single HSITPA Monthly Charge in addition to charges for individual HSI lines ordered.

As part of the restructure, rates are bifurcated between HSI provided on the basis of voice/data lines (i.e., over lines also providing voice service access to the PSTN through the wire center switch) and data-only lines (i.e., where the HSI is provided over a line that does not also provide voice service, sometimes called "Naked-DSL").

With respect to existing Mt. Horeb rates, this filing proposes an increase in the Special Access Metallic Service Channel Termination rate, a reduction in the Special Access High Capacity Service DSL/HSI Access Service Connection rate and an increase in the non-discounted HSI voice/data rate.

In addition to Mt. Horeb, Hargray Telephone Company (Hargray) also provides High Speed Internet (HSI) Access Service under Section 16.6. No changes in rates are proposed for Hargray. However, this filing proposes modification of the terms and organization of Hargray's HSI Access Service rate pages to align with the revised regulations. These changes will have no effect either on the provision of HSI Access Service by Hargray or the rates charged customers. Rather, these changes will ensure that the Hargray HSI Access Service rate section headings and descriptions continue to match the regulations. No other issuing carriers for JSI Tariff FCC No. 1 provide HSI Access Service under Section 16.6.

In addition to tariff revisions for the issuing carriers mentioned above, this transmittal also proposes removal of regulations for Telecommunications Service Provider Service Access (TSPSA) currently contained in Section 16.4. JSI introduced Section 16.4, Telecommunications Service Provider Service Access (TSPSA) under Transmittal No. 54 effective April 6, 2001 on behalf of Fort Bend Telephone Company. Fort Bend Telephone Company cancelled as an issuing carrier effective February 7, 2004 under Transmittal No. 91 filed on January 23, 2005.

A description and justification for this filing is attached. Pursuant to Section 61.39 of the Commission's Rules, supporting cost information for Mt. Horeb will be furnished to interested parties upon reasonable request.

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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". The signature is written in a cursive style with a large initial "S" and "D".

Scott Duncan
Staff Director-Regulatory Affairs

Enclosures

cc: Mt. Horeb Telephone Company
Hargray Telephone Company

JSI Interstate Access Tariff FCC No. 1
JSI Transmittal No. 110
Attachment A

FCC Registration Numbers (FRNs)
October 12, 2005

John Staurulakis, Inc. FRN 0003-7481-42

<u>JSI ISSUING CARRIER</u>	<u>FRN</u>
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
Bluffton Telephone Company, Inc.	0005-0581-51

JSI TRANSMITTAL NO. 110
ATTACHMENT B
SUMMARY OF PROPOSED TARIFF REVISIONS

<i>PROPOSED REVISIONS TO REGULATIONS, INCLUDING INTRODUCTION OF NEW SERVICES AND TEXT CHANGES</i>				
Page	Section	Description	Carriers Affected by New Regulation in This Filing	
			Mt. Horeb	Hargray
2-64	2.64	Add definition of Data-Only DSL Access Service	X	X
2-64.1	2.6	Moved material from page 2-64.		
2-78	2.6	Moved material to page 2-79.		
2-79	2.6	Add definition of Voice-Data DSL Access Service. Moved material from page 2-78.	X	X
7-39	7.4.3	Text Change Only. Special Access Metallic Service: Rearrange Section Numbering to add additional Optional Features and Functions		
7.39.1	7.4.3(B)	Special Access Metallic Service: Add new Optional Feature for DSL Access Connection Added for future use by issuing carriers. Expected to be used in near future.		
7.39.2	7.4.3(C)	Special Access Metallic Service: Add new Optional Feature for High Speed Internet Access Connection	X	
7-60	7.11.3	Synchronous Optical Channel Service – Regulations I: Adds Mt. Horeb to issuing carriers providing SOCS under Regulations I.	X	
7-61.2	7.11.3(E)	Synchronous Optical Channel Service. Adds OC12 and 100 Mbps options to DSL Access Service Connection Added for future use by issuing carriers. Expected to be used in near future.		
7-61.2	7.11.3(F)	Synchronous Optical Channel Service. Adds OC12 and 100 Mbps options to High Speed Internet Access Service Connection	X	
16-27 through 16-40	16.4	Obsolete Regulation Deletion: Telecommunications Service Provider Service Access (TSPSA): Delete regulations for service only offered by Fort Bend Telephone Company, no longer an issuing carrier. TSPSA		

PROPOSED REVISIONS TO REGULATIONS, INCLUDING INTRODUCTION OF NEW SERVICES AND TEXT CHANGES				
Page	Section	Description	Carriers Affected by New Regulation in This Filing	
			Mt. Horeb	Hargray
		was Fort Bend's version of ATM-CRS. Current JSI issuing carriers offering ATM-CRS service do so under Section 16.7.		
16-51	16.6	High Speed Internet Access: Previous material moved to new original page 16-51.1. New table created on page 16.51 to indicate High Speed Internet Access Services offered by, respectively, Hargray and Mt. Horeb.	X	X
16-51.1, 16-51.2	16.6.1	High Speed Internet Access: Material moved from page 16.51. Changes made to add Metallic and Synchronous Optical Channel Service High Speed Internet Access Connection Options.	X	X
16-52	6.1.1(B)	High Speed Internet Access: Changes made in general description of service provisioning to add table to match carriers providing High Speed Internet Access with the types of Special Access or Frame Relay HSI Access Connections offered by the carrier.	X	X
16-52.1	16.6.1(B)	Move Only. Material moved from page 16-52 to make room for new table on page 16-52.		
16-55	16.6.2(A)	Revised monthly rate descriptions to describe division of services between Monthly Rates Without Discount, HSI Term and Volume Discount (HSITVD) rates and HSI Term Pricing Arrangement (HSITPA) rates. Effect on Hargray rate section is text change only.	X	
16-55.1	16.6.2(A)	Add Service Classes for Voice-Data and Data-Only to distinguish rates required for service provisioned over facility also carrying voice from facility not carrying voice. Effect on Hargray rate section is text change only.	X	
16-55.2	16.6.2(A)(2)	Adds nonrecurring charge waiver for customers committing to 12-month minimum. The nonrecurring charge waiver previously appeared in the respective rate sections for Mt. Horeb and Hargray.	X	X
16-55.3	16.6.2(A)(3)	Moved from page 16.55. Text change		
16-57-60.	16.6.2(E)	Revises description of TVP as HSI Term and Volume Plan (HSITVP).		X

<i>PROPOSED REVISIONS TO REGULATIONS, INCLUDING INTRODUCTION OF NEW SERVICES AND TEXT CHANGES</i>				
Page	Section	Description	Carriers Affected by New Regulation in This Filing	
			Mt. Horeb	Hargray
16-60.1 - 60.3.	16.6.2(F)	Adds regulations for new HSI Term Pricing Arrangement (HSITPA)	X	

<i>PROPOSED REVISIONS TO RATE PAGES INCLUDING INTRODUCTION OF NEW SERVICES</i>				
Page	Section	Description	Mt. Horeb	Hargray
17- 216.1 and 17- 216.2	17.4.8.1(A) and 17.4.8.1(B)	Hargray: Make text changes to align High Speed Internet Access Service rate structure with revised rate regulations splitting service between Option 1 and Option 2. Changes only affect descriptions and do not change service or rates.		X
17- 216.3	17.4.8.1(D)	Hargray: Removal of Nonrecurring charges for 1-year and 3-year Term and Volume Plan to make consistent with Section 16.6.2(A)(2) nonrecurring charge waiver for 12-month commitments.		X
17-295	17.3.2(A)	Mt. Horeb Metallic Service Channel Termination rate increase	X	
17-295	17.3.2(C)(2)	Mr. Horeb: Introduces new Special Access Metallic Service Optional Feature and Function DSL/High Speed Internet Access Service Connection – 100Base-T under proposed new regulation 7.4.3(C) described above.	X	
17- 308.1	17.3.8(F)	Mt. Horeb: Reduces rate for High Capacity Service DSL/High Speed Internet Access Service Connection 44.736 Mbps offering.	X	
17- 309.1	17.3.10	Mt. Horeb: Introduces Special Access Synchronous Optical Channel Service OC12 Channel Termination and OC12 DSL/High Speed Internet Access Service Connection. The Channel Termination would be under existing regulations. The proposed new OC12 DSL/High Speed Internet Access Service Connection would be under proposed new regulations in Section 17.3.11 above.	X	
17- 321.1	17.4.8.1(A)	Mt. Horeb: Corresponding to new revised regulations for High Speed Internet Access Service discussed above for Section 16.6, HSI Access Service rate structure is split between Voice/Data and Data-Only options, and also rates for new HSI Term Pricing Arrangement (HSITPA)	X	

<i>PROPOSED REVISIONS TO RATE PAGES INCLUDING INTRODUCTION OF NEW SERVICES</i>				
Page	Section	Description	Mt. Horeb	Hargray
		The current rate for an HSI Access voice/data connection is increasing under Option 1. All current customers will migrate to HSITPA. New customers can either pay the non-discounted monthly rates or commit for the discounted rate under the HSITPA.		
17-321.2	17.4.8.1(C)	Mt. Horeb: Expired HSI Access Service Promotional Offering deleted. The promotional offering availability expired August 31, 2002 and the enforceability of the regulation became obsolete August 31, 2003.	X	
17-321.2	17.4.8.1(C)	Mt. Horeb: Removal of Nonrecurring charges waiver provision in rate section to make consistent with Section 16.6.2(A)(2) nonrecurring charge waiver for 12-month commitments.	X	