

JOHN STAURULAKIS, INC.
REVISIONS TO ACCESS TARIFF F.C.C. NO. 1
TRANSMITTAL NO. 110
October 12, 2005

DESCRIPTION AND JUSTIFICATION

John Staurulakis, Inc. (JSI) proposes to modify its Access Tariff F.C.C. No. 1 for the following issuing carriers.

Issuing Carrier	State	FRN #
Mt. Horeb Telephone Company (Mt. Horeb)	WI	0002-7190-45
Hargray Telephone Company, Inc. (Hargray)	SC	0001-8867-04

1. INTRODUCTION

Following are descriptions of the proposed modifications.

A. Removal of Regulations Telecommunications Service Provider Service Access (TSPSA) Formerly Provided by Fort Bend Telephone Company.

In addition to tariff revisions for the issuing carriers mentioned above, JSI 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, 2004.

No issuing carrier currently provides this service. The service is similar to services available by indicated carriers under Section 16.7, Asynchronous Transfer Mode-Cell

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Relay Service (ATM-CRS). JSI introduced the ATM-CRS regulations under Transmittal No. 89 filed on December 1, 2003 and effective December 16, 2003. JSI initially added the ATM-CRS regulations concurrent with adding Smart City Telecom as an issuing carrier for JSI and canceling Smart City Telecom Tariff FCC No. 1. The former Smart City Telecom ATM-CRS regulations paralleled those of National Exchange Carrier Association (NECA) Tariff FCC No. 5. All introductions of ATM-CRS by issuing carriers for JSI since have been under the Section 16.7, as JSI wishes to maintain parallel regulations and rate structure with NECA Tariff FCC No. 1 wherever possible.

B. Mt. Horeb Telephone Company Restructuring of High Speed Internet (HSI) Access Service Rates and Expansion of DSL/HSI Access Connections Options

This filing proposes for Mt. Horeb Telephone Company (Mt. Horeb) introduction of expanded High Speed Internet Access Service Offerings under both existing regulations and revised regulations. Newly introduced services include the following:

- Special Access Metallic Service 100Base-T DSL/High Speed Internet Access Service Connection
- Special Access Synchronous Optical Channel Service OC12 Channel Termination
- Special Access Synchronous Optical Channel Service OC12 DSL/High Speed Internet Access Service Connection.

Additionally, this filing proposes restructuring of the High Speed Internet (HSI) Access Service rate regulations as follows:

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Mt. Horeb Telephone Company HSI Rate Restructure			
Existing Structure (Single Rate, no Data-Only Service).		Proposed Structure	
<p>(A) <u>HSI Access Service Arrangement</u> (For all available up and down speeds as provided by the Telephone Company subject to the technical capabilities of the Telephone Company's facilities.)</p>	\$15.50	<p>(A) HSI Access Service Arrangement (1) <u>Monthly Rates Without Discount</u> -Per Voice/Data Arrangement (For all available up and down-speeds as provided by the Telephone Company subject to the technical capabilities of the Telephone Company's facilities.) -Per Data Only Arrangement (2) <u>HSI Term Pricing Arrangement (HSITPA) Rates</u> -HSITPA Monthly Charge -Per Voice/Data Arrangement -Per Data Only Arrangement</p>	<p>\$18.50</p> <p>\$27.00</p> <p>\$828.05</p> <p>\$7.00</p> <p>\$13.00</p>

The existing current single rate offered by Mt. Horeb Telephone Company will be divided between Monthly Rates Without Discount and HSI Term Pricing Arrangement (HSITPA) rates, and within each option rates divided between Voice-Data and Data-Only.

The new HSITPA requires a term commitment and payment of the single HSITPA Monthly Charge in order for the customer to qualify for payment of a discounted rate.

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In this filing, JSI also proposes bifurcating all HSI Access Service rates 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.

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.

C. Hargray Telephone Company High Speed Internet (HSI) Access Service Rate Page Text Changes

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.

The table on the following page compares the existing Hargray High Speed Internet (HSI) Access Service rate pages with the proposed revised tariff pages.

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Hargray Telephone Company HSI Rate Restructure	
Existing Structure (Single Rate, no Data-Only Service).	Proposed Structure
<p>17.4.8.1 <u>High Speed Internet (HSI) Access Service</u></p> <p>(A) <u>HSI Access Service Arrangement – Residence</u></p> <p>(1) Monthly Plan Charges [Existing Rates Carried forward under new heading]</p> <p>(2) Term and Volume Plan – 1 Year Carried forward without change under new numbering.</p> <p>(B) <u>HSI Access Service Arrangement – Business</u></p> <p>(1) Option 1 Charges [Existing Rates Carried forward under new heading]</p> <p>(2) Term and Volume Plan – 1 Year</p>	<p>17.4.8.1 <u>High Speed Internet (HSI) Access Service</u></p> <p>(A) <u>HSI Access Service Arrangement –Voice/Data</u></p> <p>(1) <u>Monthly Rates Without Discount</u> [Existing Rates Carried forward under new heading]</p> <p>(2) <u>Term and Volume Plan – 100 or More Arrangements -1 Year</u> Carried forward without change under new title and numbering.</p> <p>(B) <u>HSI Access Service Arrangement –Data-Only</u></p> <p>(1) <u>Monthly Rates Without Discount</u> [Existing Rates Carried forward under new heading]</p> <p>(2) <u>Term and Volume Plan – 100 or More Arrangements -1 Year</u> Carried forward without change under new title and numbering.</p>