

## **DESCRIPTION AND JUSTIFICATION**

### **John Staurulakis, Inc. Tariff F.C.C. No. 1**

#### **Transmittal No. 129 - June 15, 2007**

John Staurulakis, Inc. (“JSI”) hereby provides description and justification (D&J) for JSI Transmittal No. 129 on behalf of the issuing carriers for JSI Tariff F.C.C. No. 1.

## **INTRODUCTION**

In this transmittal, JSI proposes addition to JSI Tariff F.C.C. No. 1 of regulations for the following:

Asymmetric Digital Subscriber Line (“ADSL”) Access Service at new Section 8.1,

Digital Subscriber Line (“DSL”) Access Services Wholesale Rate Plan (“WRP”) at new Section 8.3, and

Public Packet Data Network Ethernet Transport Service (“ETS”) at new Section 16.4.

The issuing carrier offerings associated with the above regulations are being filed today under the JSI Tariff F.C.C. No. 1 annual filing, JSI Transmittal No. 130 for eight new issuing carriers migrating from issuing carrier status for National Exchange Carrier Association, Inc. (NECA) Tariff F.C.C. No. 5. The addition of these regulations allows continued offering by the new issuing carriers of the services offered under NECA Tariff F.C.C. No. 5. A list of the eight carriers exiting the NECA Traffic Sensitive Pool and for which NECA will cancel issuing carrier status for NECA Tariff F.C.C. No. 5 is attached hereto as D&J Exhibit 1.

Also in this transmittal, JSI proposes revisions to the following sections of the tariff:

Section 2, General Regulations

Section 5, Access Ordering

Section 7, Special Access,

Section 16.1, Public Packet Data Network Frame Relay Service (“FRAS”), and

Section 16.7, Public Packet Data Network Asynchronous Transfer Mode Cell Relay Access Service (“ATM-CRS”).

No introduction of new rates for issuing carriers are proposed in this filing. Proposed rate page revisions included in this filing are limited to two pages: one page each for Horry Telephone Cooperative, Inc. (“Horry”) and Hargray Telephone Company (“Hargray”).

These additions and revisions are necessary to allow seamless transition for the new issuing carriers concurrent with cancellation as issuing carriers for National Exchange Carrier Association, Inc. (“NECA”) Tariff F.C.C. No. 5 effective June 30, 2007.

This transmittal is a companion filing to JSI Transmittal No. 130, the required 2007 annual filing. In the annual filing, JSI is filing revised rates on behalf of existing issuing carriers who file rates pursuant to Section 61.39 on a mandatory basis in odd-numbered years. In addition to the eight issuing carriers exiting the NECA Traffic Sensitive Pool and becoming issuing carriers for JSI Tariff F.C.C. No. 1 effective June 30, 2007 a ninth carrier, South Central Rural Telephone Cooperative (“South Central”) is being added as an issuing carrier concurrent with cancellation of its individual tariff, South Central Rural Telephone Cooperative Tariff F.C.C. No. 1. under JSI Transmittal No. 130.

## **DESCRIPTIONS**

### **1. Revisions to Section 2, General Regulations**

Revisions proposed in this tariff to three pages in Section 2, General Regulations are limited to changing references to other tariff sections for the purpose of including all new service offerings added to JSI Tariff F.C.C. No. 1.

### **2. Revisions to Section 5, Access Ordering**

Revisions proposed in this tariff to three pages in Section 5, Access Ordering, are limited to adding all new service offerings added to JSI Tariff F.C.C. No. 1 together with changing references to other tariff sections.

### **3. Revisions to Section 7, Special Access**

Revisions to Section 7, Special Access are necessary to ensure seamless application of rate regulations for the new issuing carriers as they migrate from NECA Tariff F.C.C. No. 5 to JSI Tariff F.C.C. No. 1. These revisions do not currently and directly affect the Special Access offerings of existing issuing carriers for JSI Tariff F.C.C. No. 1. The principal reason for revisions is to fully integrate Synchronous Optical Channel Service into the Special Access regulations of JSI Tariff F.C.C. No. 1. Revisions to JSI Tariff F.C.C. No. 1 for Synchronous Optical Channel Service to date have not been as detailed as revisions by NECA, including descriptions of interfaces and technical standards.

JSI is including in the proposed revised tariff sheets for Special Access the tables included in D&J Exhibit 2. Unlike Switched Access, for which rate regulation application is more uniform among the issuing carriers, applicability of Special Access rate regulations varies. The tables will indicate which Special Access Services apply to both the continuing and the new issuing carriers for JSI Tariff F.C.C. No. 1.

#### **4. Removal of Obsolete DS3 Capacity Discounts**

JSI Tariff F.C.C. No. 1 includes as a Special Access High Capacity Optional Rate Plan, at Section 7.2.8(B), DS3 Capacity Discounts. As this is an obsolete offering, JSI proposes removal of the offering from the tariff. Only two continuing issuing carriers have DS3 Capacity Discounts listed in their rate sections, Horry and Hargray. Neither Horry nor Hargray has any customers subscribing to DS3 Capacity Discount offerings. For the new issuing carriers, none is currently offering a DS3 Capacity Discount. Moreover, NECA removed the offering as an obsolete offering from NECA Tariff F.C.C. No. 5 effective May 1, 2003 under NECA Transmittal No. 980 filed April 16, 2003. According to Transmittal No. 980, the DS3 Capacity Discount Plan expired February 1, 2002.

The former regulations for the DS3 Capacity Discount in NECA Tariff F.C.C. No. 5 indicated that it was grandfathered for carriers who had ordered it prior to February 1, 1997 (of which there were only three NECA issuing carriers in 2003). Horry and Hargray became issuing carriers for JSI Tariff F.C.C. No. 1 on August 1, 1994 – before the apparent grandfathering of the DS3 Capacity Discount in NECA Tariff F.C.C. No. 5. Thus it appears the DS3 Capacity Discount migrated from the NECA tariff to JSI Tariff F.C.C. No. 1 and JSI did not subsequently make filings parallel to NECA filings respecting first the grandfathering and, in turn, the removal of the offering.

The obsolete DS3 Capacity Discount pricing structure allows discounted rates for higher volumes of DS3 ordered by a single customer. However, it appears that at the time of the MAG Order in 2004, the Commission's understanding was that DS1 and DS3 services were not subject to volume discount provisions. Thus, it appears that it is consistent with Commission policy that the DS3 Capacity Discount pricing option be removed from JSI Tariff F.C.C. No. 1 at this time.<sup>1</sup> Together with the fact that no current customers are impacted, the apparent Commission policy supports removal of the regulations without any related Section 214 discontinuance filings.

#### **5. Addition of ADSL Access Service and Wholesale Rate Plan Regulations**

The addition of new ADSL Access Service and DSL Access Service Wholesale Rate Plan (“WPR”) regulations mirroring those of National Exchange Carrier Association, Inc. (“NECA”) Tariff F.C.C. No. 5 is necessary to allow continue offering of ADSL Access Service under existing terms and conditions by four carriers exiting the NECA Traffic Sensitive Pool and becoming issuing carriers for JSI Tariff F.C.C. No. 1. See Exhibit 1 for a list of carriers becoming issuing carriers for JSI Tariff F.C.C. No. 1. JSI's existing

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<sup>1</sup> See *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order and Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 4122, FCC 04-31 (Rel. Feb. 26, 2004) at par. 52.

ADSL regulations, which will continue with application limited to the four carriers currently offering ADSL services under those regulations, have not been updated to match precisely the NECA ADSL regulations. Moreover, JSI Tariff F.C.C. No. 1 does not have as an offering a DSL-Wholesale Rate Plan (“WRP”) consistent with the NECA offering, instead offering simpler discount structures. To avoid confusion, JSI proposes adding as new ADSL Access Service at new Section 8.1 regulations mirroring those of NECA with retention of the existing JSI ADSL Access Service regulations at Section 16.2 applicable to existing issuing carriers for JSI Tariff F.C.C. No. 1. The proposed tariff revisions include introduction of tables at the beginning of new Sections 8.1 and 8.3 together with existing Section 16.2 to indicate which issuing carriers offer services under the respective sections. None of the new issuing carriers offers SDSL, thus JSI is not proposing addition of SDSL regulations mirroring those of NECA Tariff F.C.C. No. 5 at this time (however, JSI is reserving Section 8.2 for possible future addition or migration of the JSI Section 16.3 SDSL regulations in future tariff maintenance filings).

JSI is including in the proposed revised or new tariff sheets the following tables respecting ADSL at proposed Original Sheet 8.1. for the purpose of identifying issuing carriers offering ADSL under the Section 8.1 ADSL regulations.

<u>Telephone Company</u>	<u>Study Area Code</u>	<u>Non-WRP</u>	<u>Wholesale Rate Plan (WRP)*</u>
Chesnee Telephone Company, Inc.	240515		X
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	260408		X
Skyline Telephone Membership Corp.	230501		X
South Central Rural Telephone Cooperative Corporation, Inc.	206418	X	
Yadkin Valley Telephone Membership Corporation	230511		X

JSI is including in the proposed revised or new tariff sheets the following tables respecting the DSL Wholesale Rate Plan at Original Sheet 8-22. for the purpose of identifying issuing carriers offering the DSL Wholesale Rate Plan (“WRP”) under the Section 8.3 regulations.

<u>Telephone Company</u>	<u>Study Area Code</u>	<u>ADSL</u>	<u>SDSL</u>
Chesnee Telephone Company, Inc.	240515	X	
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	260408	X	
Skyline Telephone Membership Corp.	230501	X	
Yadkin Valley Telephone Membership Corporation	230511	X	

## 6. Addition of Ethernet Transport Service

The addition of Ethernet Transport Service (“ETS”) regulations is necessary for seven carriers that will become issuing carriers in the upcoming annual filing on June 15, 2007 to be effective June 30, 2007. The seven new issuing carriers are currently issuing carriers for NECA Tariff F.C.C. No. 5 and each offers some or all of the services covered by the regulations described above. One of the eight carriers migrating from NECA Tariff F.C.C. No. 5 does not offer ETS (Skyline Telephone Membership Corporation).

### 16.4 Ethernet Transport Service

Telephone Companies providing Ethernet Transport Service (ETS) under this Section are indicated in the following table.

<u>Telephone Company</u>	<u>Study Area Code</u>	<u>Provides ETS</u>
TDS Telecom Companies <sup>(1)</sup>		X
Camden Tel. and Telegraph Company, Inc. d/b/a TDS Telecom <sup>(1)</sup>	220351	X
Mt. Vernon Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	330917	X
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom <sup>(1)</sup>	431984	X
Tennessee Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	290575	X
Chesnee Telephone Company, Inc.	240515	X
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	260408	X
Yadkin Valley Telephone Membership Corporation	230511	X

**7. Revisions to Section 16.1, Public Packet Data Network Frame Relay Service (“FRAS”)**

Proposed revisions to Section 16.1, Public Packet Data Network Frame Relay Service, are limited to addition of the following table.

**16.1 Frame Relay Access Service**

Telephone Companies providing Frame Relay Access Service under this Section are indicated in the following table.

<b>Carrier</b>	<b>SAC</b>	<b>Stand-ard Ports</b>	<b>Chan-nelized End User Port</b>	<b>FRIC * FRAC</b>	<b>PVCs</b>	<b>DLCI</b>	<b>DSL Access Con-nection</b>	<b>Term Dis-counts</b>
Atlantic Telephone Membership Corporation (NC)	230468	X	X	X	X		X	
Bluffton Telephone Company (SC)	240512	X		X	X			X
Fort Mill Telephone Co. d/b/a Comporium Communications (SC)	240521	X	X		X	X		
Hargray Telephone Co. (SC)	240523	X		X	X			X
Home Telephone Co. (SC)	240527	X	X		X	X		
Horry Telephone Coop. (SC)	240528	X	X	X	X			X
Lancaster Telephone Co. d/b/a Comporium Communications (SC)	240531	X	X		X	X		
Rock Hill Telephone Co. d/b/a Comporium Communications (SC)	240542	X	X		X	X		
TDS Telecom Companies (1)		X	X	X	X			
Camden Tel. and Telegraph Company, Inc. d/b/a TDS Telecom(1)	220351	X	X	X	X			
Mt. Vernon Telephone Company d/b/a TDS Telecom(1)	330917	X	X	X	X			
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom(1)	431984	X	X	X	X			
Tennessee Telephone Company d/b/a TDS Telecom(1)	290575	X	X	X	X			
Chesnee Telephone Company, Inc.	240515	X	X	X	X			X
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	260408	X	X	X	X			X
Skyline Telephone Membership Corp.	230501	X	X	X	X			X
Yadkin Valery Telephone Membership Corp.	230511	X	X	X	X			X

**8. Revisions to Section 16.7, Public Packet Data Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS)**

Revisions to Section 16.7 Public Packet Data Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS) include addition of the following table to indicate issuing carriers offering ATM-CRS under the tariff and also revisions to the regulations. Revisions to the regulations are for the purpose of updating descriptions of interconnections with other services offered under the tariff.

**16.7 Asynchronous Transfer Mode Cell Relay Access Service (ATM-CRS)**

Telephone Companies providing Asynchronous Transfer Mode Cell Relay Access Service under this Section are indicated in the following table.

<b>Carrier</b>	<b>SAC</b>	<b>Ports</b>	<b>DSL Access Service Connection</b>	<b>VPs</b>	<b>VCC</b>	<b>Inverse Multiplexing</b>
Atlantic Telephone Membership Corporation (NC)	230468	X	X	X	X	X
Home Telephone Co. (SC)	240527					
Horry Telephone Coop. (SC)	240528	X		X		
Mt. Horeb Telephone Co. (WI)	330916					
Pineland Tel. Coop. (GA)	220377	X				
TDS Telecom Companies <sup>(1)</sup>		X	X	X	X	
Camden Tel. and Telegraph Company, Inc. d/b/a TDS Telecom <sup>(1)</sup>	220351	X	X	X	X	
Mt. Vernon Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	330917	X	X	X	X	
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom <sup>(1)</sup>	431984	X	X	X	X	
Tennessee Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	290575	X	X	X	X	
Chesnee Telephone Company, Inc.	240515	X	X	X	X	
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company	260408	X	X	X	X	
Skyline Telephone Membership Corp.	230501	X	X	X	X	
Yadkin Valley Telephone Membership Corporation	230511	X	X	X	X	

## **CONCLUSION**

This transmittal is essential for the purpose of adding regulations to allow new issuing carriers to continue to provide services they have until now provided as issuing carriers for NECA Tariff F.C.C. No. 5. Additionally, this filing includes additions of tables to clearly indicate which carriers offer which Special Access, DSL and Public Packet Data services (similar tables are not necessary for Switched Access at this time because of the greater universality of provision of those services).

Allowing the revisions proposed in JSI Transmittal No. 129 to become effective without suspension will facilitate the seamless migration of carriers from status as issuing carriers for NECA Tariff F.C.C. No. 5 to status as issuing carriers for JSI Tariff F.C.C. No. 1 effective June 30, 2007.

**JSI TARIFF F.C.C. NO.1 - TRANSMITTAL No. 129 – JUNE 15, 2007**

**D&J EXHIBIT 1**

**NEW ISSUING CARRIERS FOR JSI TARIFF F.C.C. No. 1 WITH JSI TRANSMITTAL No. 130 TO  
BE FILED JUNE 15, 2007**

<i>Company Name</i>	<i>Study Area Code</i>	<i>Previous Tariff</i>	<i>Filing Rules</i>
Camden Telephone and Telegraph Company, Inc. d/b/a TDS Telecom (GA)	220351	NECA	61.38
Mt. Vernon Telephone Company d/b/a TDS Telecom (WI)	330917	NECA	61.38
Oklahoma Communication Systems, Inc. d/b/a TDS Telecom (OK)	431984	NECA	61.38
Tennessee Telephone Company d/b/a TDS Telecom (TN)	290575	NECA	61.38
Chesnee Telephone Company, Inc. (SC)	240515	NECA	61.39
Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company (KY)	260408	NECA	61.39
Skyline Telephone Membership Corp. (NC)	230501	NECA	61.39
South Central Rural Telephone Cooperative Corporation, Inc.	260418	SCRTC	61.39
Yadkin Valley Telephone Membership Corporation (NC)	230511	NECA	61.39

**JSI TARIFF F.C.C. NO.1 - TRANSMITTAL NO. 129– JUNE 15, 2007  
D&J EXHIBIT 2**

**Proposed Tables for Section 7, Special Access to Indicate Issuing Carrier Special Access Offerings**

Section 7.1.1.B. Issuing Carrier Special Access Offerings

Special Access Channel Types and Optional Features and Functions Offered by individual issuing carrier Telephone Companies under regulations herein are indicated by a “X” in the column for the respective service. Telephone Company rates for Special Access Services are established at individual Telephone Company Section rate pages at 17.3 of the respective Telephone Company rate pages.

Issuing Carrier	State	Study Area Code	Metallic §7.4	Metallic DSL Access Connection §7.4(B)
Atlantic Telephone Membership Corporation.	NC	230468	X	
Bluffton Telephone Company	SC	240512		
Farmers Telephone Cooperative, Inc.	SC	240520	X	
Fort Mill Telephone Company d/b/a Comporium Communications	SC	240521	X	
Hargray Telephone Company	SC	240523	X	
Home Telephone Company	SC	240527	X	
Horry Telephone Cooperative, Inc.	SC	240528	X	
Interstate Telephone Company	GA	220371		
Lancaster Telephone Company d/b/a Comporium Communications	SC	240531	X	
Millington Telephone Company	TN	290571	X	
Mt. Horeb Telephone Company	WI	330916	X	X
Rock Hill Telephone Company d/b/a Comporium Communications	SC	240542	X	
Pineland Telephone Cooperative	GA	220377	X	
Smart City Telecommunications d/b/a Smart City Telecom	FL	210330	X	
Star Telephone Membership Corporation	NC	230502	X	
#TDS Telecom Companies <sup>(1)</sup>			X	X
#Camden Tel. and Telegraph Company, Inc. d/b/a TDS Telecom <sup>(1)</sup>	GA	220351	(1)	(1)
#Mt. Vernon Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	WI	330917	(1)	(1)
#Oklahoma Communication Systems, Inc. d/b/a TDS Telecom <sup>(1)</sup>	OK	431984	(1)	(1)
#Tennessee Telephone Company d/b/a TDS Telecom <sup>(1)</sup>	TN	290575	(1)	(1)
#Chesnee Telephone Company, Inc.	SC	240515	X	X
#Gearhart Communications Company, Inc. d/b/a Coalfields Telephone Company	KY	260408	X	X
#Skyline Telephone Membership Corp.	NC	230501	X	X
#South Central Rural Telephone Cooperative Corporation, Inc. d/b/a South Central Rural Telephone Cooperative	KY	206418	X	
#Yadkin Valley Telephone Membership Corporation	NC	230511	X	X

(1) TDS Telecom Companies file pooled rates under “TDS Telecom Companies” rate pages in JSI Tariff F.C.C. No. 1.

# Will become issuing carrier under JSI Transmittal No. 130 to be filed today, June 15, 2007 and to become effective June 30, 2007.

**JSI Transmittal No. 129**  
**D&J Exhibit 2**

Section 7.1.1.B. Issuing Carrier Special Access Offerings (Cont'd)

Issuing Carrier	Telegraph §7.5	Voice Grade §7.6	Program Audio §7.7	Video Service §7.8	Digital Data §7.9
Atlantic Telephone Membership Corp.	X	X	X		
Bluffton Telephone Company		X			X
Farmers Telephone Cooperative, Inc.	X	X	X		
Fort Mill Tel. Co. d/b/a Comporium Com.					
Hargray Telephone Company	X	X	X	X	X
Home Telephone Company	X	X	X	X	X
Horry Telephone Cooperative, Inc.	X	X	X	X	X
Interstate Telephone Company		X			X
Lancaster Tel. Co. d/b/a Comporium Com.	X	X	X	X	X
Millington Telephone Company	X	X	X	X	X
Mt. Horeb Telephone Company	X	X	X	X	X
Rock Hill Tel. Co. d/b/a Comporium Com.	X	X	X	X	X
Pineland Telephone Cooperative	X	X	X	X	X
Smart City Telecom	X	X	X	ICB	X
Star Telephone Membership Corp.	X	X	X	X	X
TDS Telecom Companies <sup>(1)</sup>	X	X	X	X	X
Camden Tel. and Telegraph Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Mt. Vernon Telephone Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Oklahoma Com. Sys. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Tennessee Telephone Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Chesnee Telephone Company, Inc.	X	X	X	X	X
Coalfields Telephone Company	X	X	X	X	X
Skyline Telephone Membership Corp.	X	X	X	X	X
South Central Rural Tel. Cooperative	ICB	X	ICB	ICB	X
Yadkin Valley Tel. Membership Corp	X	X	X	X	X

**JSI Transmittal No. 129**  
**D&J Exhibit 2**

Section 7.1.1.B. Issuing Carrier Special Access Offerings (Cont'd)

Issuing Carrier	High Capacity DS1 §7.10	High Capacity DS3 §7.10	High Capacity DS1 DSL Access Connection §7.10.3(E),(F)	High Capacity DS3 DSL Access Connection §7.10.3(E),(F)	High Capacity Term Discounts §7.2.8
Atlantic Telephone Membership Corp.	X	X	X	X	
Bluffton Telephone Company	X	X			X
Farmers Telephone Cooperative, Inc.	X	X			
Fort Mill Tel. Co. d/b/a Comporium Com.	X	X	X	X	X
Hargray Telephone Company	X	X			X
Home Telephone Company	X	X			
Horry Telephone Cooperative, Inc.	X	X			X
Interstate Telephone Company	X	X			X
Lancaster Tel. Co. d/b/a Comporium Com.	X	X	X	X	X
Millington Telephone Company	X	X			
Mt. Horeb Telephone Company	X	X	X	X	
Rock Hill Tel. Co. d/b/a Comporium Com.	X	X	X	X	X
Pineland Telephone Cooperative	X	X			
Smart City Telecom	X	X			DS3
Star Telephone Membership Corp.	X	ICB	X		
TDS Telecom Companies <sup>(1)</sup>	X	X	X	X	X
Camden Tel. and Telegraph Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Mt. Vernon Telephone Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Oklahoma Com. Sys. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Tennessee Telephone Co. <sup>(1)</sup>	(1)	(1)	(1)	(1)	(1)
Chesnee Telephone Company, Inc.	X	X	X	X	X
Coalfields Telephone Company	X	X	X	X	
Skyline Telephone Membership Corp.	X	X	X	X	
South Central Rural Tel. Cooperative	X	X	X	X	
Yadkin Valley Tel. Membership Corp	X	X	X	X	

**JSI Transmittal No. 129**  
**D&J Exhibit 2**

Section 7.1.1.B. Issuing Carrier Special Access Offerings (Cont'd)

Issuing Carrier	SOCS Rate Regs. I - CT With out Mileage Charges §7.11.3	SOCS Rate Regs. II - CT With Mileage Charges §7.11.4. -	SOCS STS1 §7.11	SOCS OC3 §7.11	SOCS OC12 §7.11
Atlantic Telephone Membership Corp.					
Bluffton Telephone Company					
Farmers Telephone Cooperative, Inc.					
Fort Mill Tel. Co. d/b/a Comporium Com.	X		X	X	
Hargray Telephone Company					
Home Telephone Company					
Horry Telephone Cooperative, Inc.					
Interstate Telephone Company					
Lancaster Tel. Co. d/b/a Comporium Com.	X		X	X	
Millington Telephone Company					
Mt. Horeb Telephone Company	X				X
Rock Hill Tel. Co. d/b/a Comporium Com.	X		X	X	
Pineland Telephone Cooperative					
Smart City Telecom		X		X	X
Star Telephone Membership Corp.					
TDS Telecom Companies <sup>(1)</sup>	X			X	X
Camden Tel. and Telegraph Co. <sup>(1)</sup>	(1)			(1)	(1)
Mt. Vernon Telephone Co. <sup>(1)</sup>	(1)			(1)	(1)
Oklahoma Com. Sys. <sup>(1)</sup>	(1)			(1)	(1)
Tennessee Telephone Co. <sup>(1)</sup>	(1)			(1)	(1)
Chesnee Telephone Company, Inc.	X			X	X
Coalfields Telephone Company	X			X	X
Skyline Telephone Membership Corp.	X			X	X
South Central Rural Tel. Cooperative					
Yadkin Valley Tel. Membership Corp.	X			X	X

\* SOCS = Synchronous Optical Channel Service

**JSI Transmittal No. 129**  
**D&J Exhibit 2**

Section 7.1.1.B. Issuing Carrier Special Access Offerings (Cont'd)

Issuing Carrier	SOCS Optional Rate Plan A 7.2.9.A	SOCS Optional Rate Plan B §7.2.9.B	SOCS* OC3 DSL Access Connection §7.11.3(E),(F)	SOCS OC12 DSL Access Connection §7.11.3(E),(F)
Atlantic Telephone Membership Corp.				
Bluffton Telephone Company				
Farmers Telephone Cooperative, Inc.				
Fort Mill Tel. Co. d/b/a Comporium Com.	X		X	
Hargray Telephone Company				
Home Telephone Company				
Horry Telephone Cooperative, Inc.				
Lancaster Tel. Co. d/b/a Comporium Com.	X		X	
Millington Telephone Company				
Mt. Horeb Telephone Company				X
Rock Hill Tel. Co. d/b/a Comporium Com.	X		X	
Pineland Telephone Cooperative				
Smart City Telecom		X		
Star Telephone Membership Corp.				
TDS Telecom Companies <sup>(1)</sup>	X		X	
Camden Tel. and Telegraph Co. <sup>(1)</sup>	(1)		(1)	
Mt. Vernon Telephone Co. <sup>(1)</sup>	(1)		(1)	
Oklahoma Com. Sys. <sup>(1)</sup>	(1)		(1)	
Tennessee Telephone Co. <sup>(1)</sup>	(1)		(1)	
Chesnee Telephone Company, Inc.			X	X
Coalfields Telephone Company			X	
Skyline Telephone Membership Corp.			X	
South Central Rural Tel. Cooperative				
Yadkin Valley Tel. Membership Corp.			X	

\* SOCS = Synchronous Optical Channel Service

**JSI Transmittal No. 129**  
**D&J Exhibit 2**

Section 7.1.1.B. Issuing Carrier Special Access Offerings (Cont'd)

Issuing Carrier	Digital Access Cross Connect Service (DACCS) §7.12
Atlantic Telephone Membership Corp.	
Bluffton Telephone Company	
Farmers Telephone Cooperative, Inc.	
Fort Mill Tel. Co. d/b/a Comporium Com.	X
Hargray Telephone Company	
Home Telephone Company	
Horry Telephone Cooperative, Inc.	
Lancaster Tel. Co. d/b/a Comporium Com.	X
Millington Telephone Company	
Mt. Horeb Telephone Company	
Rock Hill Tel. Co. d/b/a Comporium Com.	X
Pineland Telephone Cooperative	
Smart City Telecom	
Star Telephone Membership Corp.	
TDS Telecom Companies <sup>(1)</sup>	
Camden Tel. and Telegraph Co. <sup>(1)</sup>	
Mt. Vernon Telephone Co. <sup>(1)</sup>	
Oklahoma Com. Sys. <sup>(1)</sup>	
Tennessee Telephone Co. <sup>(1)</sup>	
Chesnee Telephone Company, Inc.	
Coalfields Telephone Company	
Skyline Telephone Membership Corp.	
South Central Rural Tel. Cooperative	
Yadkin Valley Tel. Membership Corp.	