

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for designation as an eligible  
telecommunications carrier by Tele Circuit  
Network Corporation.

DOCKET NO. 080201-TX  
ORDER NO. PSC-11-0419-PAA-TX  
ISSUED: September 28, 2011

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
EDUARDO E. BALBIS  
JULIE I. BROWN

NOTICE OF PROPOSED AGENCY ACTION  
ORDER GRANTING ETC CERTIFICATION

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

**I. Case Background**

Tele Circuit Network Corporation (Tele Circuit or Company) filed an application with the Florida Public Service Commission (FSPC or Commission) on April 4, 2008, for designation as a landline Eligible Telecommunications Carrier (ETC) in Florida throughout the BellSouth Telecommunications, Inc. d/b/a AT&T Florida (AT&T), and Verizon Florida (Verizon) service areas. On February 19, 2009, a recommendation was filed to grant ETC status to Tele Circuit.

On March 3, 2009, our staff withdrew its recommendation when it became aware of an outstanding Notice of Apparent Liability (NAL) by the Federal Communications Commission (FCC) for violation of Customer Proprietary Network Information rules. In its application, Tele Circuit certified that the "Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service." (See Attachment B) The filing of this recommendation was delayed until after the FCC settled the NAL with Tele Circuit.

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FPSC-COMMISSION CLERK

### Company History

Tele Circuit is a privately-held corporation incorporated in the state of Georgia and is authorized to transact business as a foreign corporation in Florida. Tele Circuit is a FPSC certificated competitive local exchange carrier (CLEC), which provides prepaid local exchange service in Florida.<sup>1</sup> In addition to its request for designation as an ETC in Florida, Tele Circuit currently has a petition pending in Georgia. Tele Circuit is not certified as an ETC in any other state. Tele Circuit states it is certified as a local provider in Alabama, Florida, Georgia, North Carolina, South Carolina and Tennessee. Tele Circuit further states it has not been denied ETC status in any other state, or has not withdrawn any petitions for ETC designation. Tele Circuit states it has 1,565 Florida customers as of June 2011.

On February 15, 2008, a certified letter was sent to Tele Circuit requesting data to compile our annual report to the Legislature on the status of local competition in Florida (Local Competition Report). Tele Circuit received the certified letter, but failed to provide the requested data. On July 8, 2008, Docket No. 080451-TX was opened against Tele Circuit for its apparent violation of Section 364.183(1), Florida Statutes (F.S.), Access to Company Records. By Order PSC-08-0628-PAA-TX, issued September 24, 2008, the Commission imposed a penalty of \$10,000 for failure to provide information for the Local Competition Report. On October 13, 2008, Tele Circuit submitted a settlement proposal, which we accepted by PAA Order PSC-08-0804-PAA-TX, issued December 4, 2008. The docket was subsequently closed January 13, 2009, upon Tele Circuit's compliance with all terms of the Order and receipt of its \$3,500 settlement. On March 29, 2011, the FCC settled the NAL with Tele Circuit. On June 1, 2011, Tele Circuit sent an updated petition to the FPSC for designation as a landline ETC in the State of Florida.

Tele Circuit is requesting that it be granted landline ETC status for the purpose of receiving low-income federal universal service support. Tele Circuit states it does not own, operate, or provide service in Florida using its own facilities; however, Tele Circuit will meet the ETC facilities requirement by purchasing Unbundled Network Elements (UNEs) through an existing interconnection agreement with AT&T<sup>2</sup> or unbundled network equivalents through a commercial agreement. Tele Circuit has amended its original petition and it no longer seeks ETC designation in the Verizon service area.

We are vested with authority under Section 364.10(1)(a), Florida Statutes, to decide a petition by a CLEC seeking designation as an ETC pursuant to 47 C.F.R. § 54.201.

## **II. Analysis**

Under FCC rules, the state commissions have the primary responsibility to designate providers as ETCs.<sup>3</sup> Designation as an ETC is required in order for a provider to be eligible to receive monies from the federal Universal Service Fund. Section 254(e) of the Act provides that

<sup>1</sup> Order PSC-05-0481-CO-TX, Docket No. 050 126-TX, issued April 14, 2005.

<sup>2</sup> Docket No. 070026-TP -Request for approval of interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. and Tele Circuit Network Corporation.

<sup>3</sup> 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201 (b).

“only an eligible telecommunications carrier designated under Section 214(e) ... shall be eligible to receive specific Federal universal service support.”<sup>4</sup> According to Section 214(e)(1), a common carrier designated as an ETC must offer and advertise the services supported by the federal Universal Service mechanisms throughout a designated service area.

#### ETC Certification Requirements

The Code of Federal Regulations addresses a state commission's responsibilities related to an ETC designation:<sup>5</sup>

Upon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the state commission, so long as each additional requesting carrier meets the requirements of paragraph (d) of this section. Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the state commission shall find that the designation is in the public interest.

To qualify as an ETC, telecommunications carriers must provide nine services identified in CFR Rule 54.201(d)(1).<sup>6</sup>

- (1) Voice grade access to the public switched network Voice grade access is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call.
- (2) Local Usage Local usage indicates the amount of minutes of use of exchange service, provided free of charge to end users.
- (3) Dual tone multi-frequency signaling or its functional equivalent Dual tone multi-frequency (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, thus shortening call set-up time.
- (4) Single-party service or its functional equivalent Single party service is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission.
- (5) Access to emergency services Access to emergency services includes access to services,

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<sup>4</sup> 47 U.S.C. § 254(e)(2).

<sup>5</sup> 47 C.F.R. § 54.201(c).

<sup>6</sup> Cross-referencing 47 C.F.R. § 54.101.

such as 911 and enhanced 911, provided by local governments or other public safety organizations.

- (6) Access to operator services Access to operator services is defined as access to any automatic or live assistance to a consumer to arrange for billing and/or completion, of a telephone call.
- (7) Access to interexchange service Access to interexchange service is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network.
- (8) Access to directory assistance Access to directory assistance is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.
- (9) Toll limitation for qualifying low-income consumers Toll limitation or blocking restricts all direct dial toll access.

In addition to providing the above services, ETCs must advertise the availability of such services and the associated charges using media of general distribution.

Tele Circuit has the ability and has committed to provide the nine-point list of services that are supported by federal universal support mechanisms using its own facilities or a combination of its own facilities and the resale of another carrier's services.

#### Additional ETC Certification Requirements

In addition to requiring the above services, the FCC, on March 17, 2005, issued a Report and Order that established additional criteria that all ETC applicants must satisfy in order to be granted ETC status by the FCC. In this Order, the FCC determined that an ETC applicant must also demonstrate:

- 1) a commitment and ability to provide the supported services throughout the designated area;
- 2) the ability to remain functional in emergency situations;
- 3) the ability to satisfy consumer protection and service quality standards;
- 4) provision of local usage comparable to that offered by the incumbent LEC; and
- 5) an acknowledgement that the applicant may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.

The FCC encouraged states to also adopt these criteria, and the FPSC has done so in Docket No. 010977-TL, In re: State certification of rural telecommunications carriers pursuant to 47 C.F.R. 54.314, by Order No. PSC-05-0824-FOF-TL, issued August 15, 2005. Tele Circuit signed an affidavit attesting that it will follow all Florida Statutes, Florida Administrative Rules,

Florida PSC Orders, FCC Rules and Orders. In addition, Tele Circuit has committed to follow all regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service (see Attachment B).

### Public Interest Determinations

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience, and necessity for rural areas. They also must consider whether an ETC designation serves the public interest. Congress did not establish specific criteria to be applied under the public interest tests in Section 214. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.<sup>7</sup> The FPSC has determined that before designating a carrier as an ETC, it should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.<sup>8</sup>

Beyond the principles detailed in the Act, the FCC and state commissions have used additional factors to analyze whether the designation of an ETC is in the public interest. A rigorous ETC designation process ensures that only fully qualified applicants receive designation as ETCs and that all ETC designees are prepared to serve all customers within the designated service area.

If there is a future change of company ownership, the new owners shall be required to file a petition with the FPSC, and make a showing of public interest to maintain the company's ETC designation. This will ensure that only carriers that are financially viable, likely to remain in the market, willing and able to provide supported services throughout the designated service area, and able to provide an evolving level of universal service are designated as ETCs.

### Transitional Lifeline

Transitional Lifeline requires that ETCs offer discounted residential basic local telecommunications service at 70 percent of the residential local telecommunications service rate for any Lifeline subscriber who no longer qualifies for Lifeline. A Lifeline subscriber who requests such services receives the discounted price for a period of one year after the date the subscriber ceases to be qualified for Lifeline. Tele Circuit understands that Florida's Lifeline program provides that if a Lifeline customer is no longer eligible for Lifeline, that the ETC must provide a 30 percent monthly discount off its local rate to that customer for a period of 12 months at the ETC's expense.

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<sup>7</sup> In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order FCC 0546 (¶40), Adopted: February 25, 2005 Released: March 17, 2005.

<sup>8</sup> See Docket No. 100124-TX, In RE: Petition for designation as eligible telecommunications carrier by Sun-Tel USA, Inc., Order No. PSC-10-0634-PAA-TX, issued October 25, 2010.

### Lifeline Advertising

Tele Circuit states that it will announce and advertise telecommunications services as a landline ETC where it provides service in its designated area in Florida and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Tele Circuit will be running advertising in newspaper, magazine, flyers, and radio commercials as required by Section 214( e)(1 )(B) of the Act.

### Facilities Requirement

In accordance with 47 C.F.R. 54.201(d)(l), a company must offer the services that are supported by the federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. Tele Circuit states that it intends to offer all of the supported services enumerated under Section 254( c) of the Act using facilities obtained as UNEs. Section 54.201, C.F.R., provides that the term "own facilities" includes facilities obtained as UNEs.

Rule 25-4.0665(20), Florida Administrative Code, requires ETCs offering Link-Up and Lifeline service to submit quarterly reports to the Commission, no later than 30 days following the ending of each quarter. The quarterly reports must include the following data:

- (1) The number of Lifeline subscribers, excluding resold Lifeline subscribers, for each month during the quarter.
- (2) The number of subscribers who received Link-Up for each month during the quarter.
- (3) The number of Lifeline subscribers added each month during the quarter.
- (4) The number of transitional Lifeline subscribers who received discounted service for each month during the quarter.
- (5) The number of residential access lines with Lifeline service that were resold to other carriers each month during the quarter.

Tele Circuit shall submit the number of UNEs or UNE equivalents purchased from AT&T for each month during the quarter when it files its quarterly reports. This will allow our staff to confirm that Tele Circuit is following FCC rules which require that an ETC must offer the services that are supported by the federal universal support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services.

### Tele Circuit's Petition

Tele Circuit is requesting designation as an ETC in the non-rural AT&T service area for the purpose of providing Lifeline and Link-Up service to Florida consumers and receiving federal universal service support. Tele Circuit is not seeking ETC status in any rural exchange, nor is it attempting to obtain high-cost funding from the Universal Service Administrative

Company (USAC).

Tele Circuit has indicated that its accounts with the FCC and the USAC are current, and it is not aware of any outstanding complaints or violations with either entity. As part of the petition process, Tele Circuit has agreed to abide by the Commission's rules, such as the procedures for approving, denying, and terminating recipients, time lines for submitting reports, and expectations pertaining to the Lifeline and Link-Up programs. Tele Circuit commits to use federal universal support only for the provision of services for which the support is intended.

Tele Circuit has acknowledged the requirements of the Florida Lifeline program, and it has agreed to adhere to the program which provides qualified customers a total of \$13.50 in Lifeline assistance credits consisting of: \$6.50 in federal subscriber line charges, \$1.75 in federal support for states that have approved the credit, and \$1.75 which is a 50 percent match of federal support for having a state lifeline program requiring a \$3.50 credit under the Florida eligibility criteria. Tele Circuit indicates that it will provide the \$13.50 credit to qualified clients, advertise the availability of Lifeline, and begin offering these services within 60 days of receiving ETC status. Tele Circuit plans to advertise the services supported by the Federal Universal Service mechanisms throughout the area where designated, as required in 47 C.F.R. §214(e)(1).

Tele Circuit states that it will pass through all applicable state and federal service discounts and mandated service support to its Lifeline and Link-Up customers, thus reducing the price of access to telecommunications services for the Lifeline and Link-Up eligible customers in Florida. Tele Circuit commits to apply the Lifeline discount to bundled packages, as well as non-bundled services.

Granting Tele Circuit ETC status in Florida, would provide Lifeline eligible customers in Florida another option for landline telephone service. For customers who have been disconnected from other carriers due to non-payment, Tele Circuit provides local service, prepaid long-distance services, and toll restriction services to customers. Per Florida Statutes, carriers cannot charge for toll blocking, and Tele Circuit complies with this law. Tele Circuit intends to educate customers about the option of toll blocking and prepaid long-distance, in hopes of reducing toll charges for customers.

### **III. Decision**

Tele Circuit shall promote the availability of universal service to the underserved, economically disadvantaged telephone customers in Florida. If Tele Circuit should decide to seek any high-cost universal service funds, or seek ETC status in any rural service areas in the future, it shall be required to file a petition and make a showing that it would be in the public interest to grant such a request.

Upon review, along with Tele Circuit's commitment to abide by both state and federal rules and procedures, we find that Tele Circuit's petition for landline ETC designation is in the public interest and should be approved. We find that public interest benefits of a particular ETC designation should be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the

availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas. Our staff will continue the necessary oversight to ensure that Tele Circuit, along with all other ETCs in Florida, are upholding these principles and attaining the goals and objectives of both the state and federal universal service programs. Therefore, we find it appropriate that Tele Circuit's application for landline ETC designation in the Florida AT&T wire centers listed in Attachment A be granted. If there is a future change of company ownership, the new owners shall file a petition with us, and make a showing of public interest to maintain the company's ETC designation. We also find that Tele Circuit shall submit the number of UNEs or UNE equivalents purchased from AT&T for each month during the quarter when it files its quarterly reports.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that Tele Circuit Network Corporation's application for Florida ETC designation in the AT&T wire centers listed in Attachment A is hereby be granted. It is further

ORDERED that if a future change of company ownership, the new owners shall file a petition, and make a showing of public interest to maintain the company's ETC designation. It is further

ORDERED that Tele Circuit Network Corporation shall submit the number of UNEs or UNE equivalents purchased from AT&T for each month during the quarter when it files its quarterly reports. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 28th day of September, 2011.



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ANN COLE  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
(850) 413-6770  
www.floridapsc.com

TLT

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on October 19, 2011.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Exhibit 1

Company	RateCenter	Switch
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ARCHER	ARCHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOCA RATON	BCRTFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BROOKSVL	8KVLFLJFDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BALDWIN	BLDWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLEGLADE	BLGLFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BUNNELL	8NNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BRONSON	BRSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOYNTONBCH	BYBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOABEACH	CCBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CEDAR KEYS	CDKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIEFLAND	CFLDFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIPLEY	CHPLFLJADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CANTONMENT	CNTMFLLED1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOA	COCOFLMEDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CROSS CITY	CSCYFLBARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEBARY	DBRYFLMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELAND	DELDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELAY BCH	DLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELEON SPG	DLSPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DUNNELLON	DNLNFLWMRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEERFLDBCH	DRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DAYTONABCH	DYBHFLPODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EAU GALLIE	EGLLFLIHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EASTORANGE	EORNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLAGLERBCH	FLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FERNADNBCH	FRBHFLFPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FORTPIERCE	FTPRFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GREENCVSPG	GCSFFLCNDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRACEVILLE	GCYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GENEVA	GENVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GULFBREEZE	GLBRFLMCD0
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOLLYWOOD	HLWDFLWHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOMESTEAD	HMSTFLNARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HAWTHORNE	HWTHFLMARS0
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSOLBCH	JCBHFLMA24E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JUPITER	JPTRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYSTN HTS	KYHGFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LAKE CITY	LKCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LYNN HAVEN	LYHNFLQHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MICANOPY	MCNPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIDDLEBURG	MDBQFLPMOS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIAMI	MIAMFLWMDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MELBOURNE	MLBRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MILTON	MLTNFLRADS0

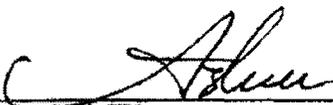
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLWRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MUNSON	MNSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MAXVILLE	MXVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NORTH DADE	NDADFLDLS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWSMYRNBCH	NSBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NEWBERRY	NWBYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OAK HILL	OKHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OLD TOWN	OLTWFLNRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORLANDO	ORLDFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORANGEPARK	ORPKFLRWDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PAGE	PACEFLPVR0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PAHOKEE	PAHKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNAMACYBCH	PCBHFLNTDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALM COAST	PLCSFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALATKA	PLTKFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CORAL SPG	PMBHFLCSDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMPANOBCH	PMBHFLTADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMONAPARK	PMPKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PANAMACITY	PNCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PENSACOLA	PNSCFLWADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNTVDRABCH	PNVDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PERRINE	PRRNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLFDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOGG0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SEBASTIAN	SBSTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYS	SGKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OVIEDO	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SANFORD	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STAUGUSTIN	STAGFLSHRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ST JOHNS	STAGFLWGRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JENSEN BCH	STRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STUART	STRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SUNNYHILLS	SYHSFLCCRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TRENTON	TRENFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TITUSVILLE	TTVFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERNON	VERNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERO BEACH	VRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WELAKA	WELKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WPALMBEACH	WPBHFLRPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WEEKICHSPG	WWSPFLSHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YONGSTFNTN	YNFNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YANKEETOWN	YNTWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YULEE	YULEFLMARS0

State of Georgia )  
 )  
County of Gwinnett )

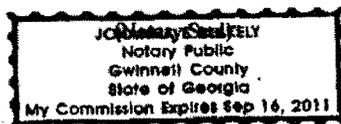
Certification

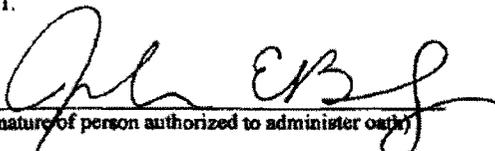
I, Ashar Syed, certify that I am the company officer/employee responsible for this request and that I have examined/formulated the foregoing request. To the best of my knowledge, information and belief, all statements of fact contained in said request are correct statements of the business and affairs of the requesting carrier with respect to each and every matter set forth.

Dated: 05/25/2011

  
\_\_\_\_\_  
Ashar Syed, CEO

Subscribed and sworn to before me, a Notary Public in the State and County above named, this 26<sup>th</sup> day of May 2011.



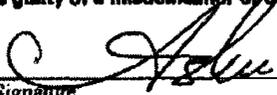
  
\_\_\_\_\_  
(Signature of person authorized to administer oaths)

My Commission Expires: Sept. 16, 2011

PL BTC

7. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline/Link-Up programs for as long as the consumer receives Lifeline service plus three years.
8. Company understands that low income support reimbursed by USAC for toll limitation service is available only for the incremental costs that are associated exclusively with toll limitation service.
9. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
10. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
11. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC, along with supporting signed customer Lifeline certifications to:  
  
Florida Public Service Commission  
Division of Regulatory Analysis, Market Practices Section  
2540 Shumard Oak Drive  
Tallahassee, Florida 32399-0850
12. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bills, \$3.50 of which is provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.

  
\_\_\_\_\_  
Signature  
Ashar Syed  
Printed Name

05/25/2011  
\_\_\_\_\_  
Date

Business Address:  
1815 Satellite Blvd., Suite 504  
Duluth, Georgia 30097