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May 6, 2014

Mrs. Ann Cole
Director, Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: 2014 FCC Forms 555 for BellSouth Telecommunications, LLC d/b/a AT&T
Florida d/b/a AT& Southeast ("AT&T Florida") - Annual Lifeline Eligible Certification

Dear Ms. Cole:

Attached is a copy of the Annual Lifeline Eligible Telecommunications Carrier Certification ("FCC Form 555") for AT&T Florida that was filed with the Federal Communications Commission ("FCC") on May 2, 2014, along with the cover letter accompanying that filing. This Form originally was due to be filed with the FCC on January 31, 2014, but prior to that date, AT&T filed with the FCC a request for extension of time in which to make the filing.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5553.

Sincerely,

MaryRose Sirianni
External Affairs Manager
AT&T Florida

Enclosure



Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.,
Suite 1000
Washington, D.C. 20036

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May 2, 2014

Via Electronic Submission:

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Via Hand Delivery:

Ms. Karen Majcher
VP – High Cost and Low Income
Universal Service Administrative Company
2000 L Street, NW
Suite 200
Washington, D.C. 20036

**Re: *In the Matter of Lifeline and Link Up Reform and Modernization, WC
Docket No. 11-42; FCC Forms 555 for BellSouth Telecommunications,
LLC.***

Dear Ms. Dortch and Ms. Majcher:

Attached to the accompanying cover letter, please find the 2014 FCC Forms 555 for BellSouth Telecommunications, LLC.

Please contact me if you have any questions.

Sincerely,

/s/ Anisa Latif

Anisa Latif

Attachments

Cc: Suzanne Tetreault
Radhika Karmarkar



Mel Coker
Chief Marketing Officer – Home Solutions
208 South Akard Street, Suite 3516
Dallas, Texas 75202
214-757-5860 Office

May 2, 2014

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

**Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42;
Copies of FCC Forms 555 for BellSouth Telecommunications, LLC**

Dear Ms. Dortch:

Please find enclosed the 2014 FCC Forms 555 for each of the nine states where BellSouth Telecommunications, LLC (“BellSouth”) is an eligible telecommunications carrier (“ETC”).¹

As representatives of BellSouth have explained to senior USAC and FCC Wireline Competition Bureau staff in separate discussions, BellSouth commenced an internal review of its Lifeline subscriber base at the beginning of the year. During the course of that review, BellSouth reviewed Lifeline subscriber documentation for each of the nine states where it is an ETC. BellSouth has identified a small fraction of subscribers for which it currently is not able to confirm that it has complete or current certifications of eligibility. Specifically, BellSouth identified an error rate of 0.8% out of a statistically valid sample, with a 95% confidence level that the error rate in the total population would be between 0.4% and 1.2%. As a result of this review, BellSouth has reduced retroactively the number of retail subscribers for whom it is seeking Lifeline reimbursement by the high end of this range, 1.2%.

It was BellSouth’s preference to provide the explanation in the preceding paragraph on the Form 555 itself. However, I understand that USAC will not accept FCC- and OMB-approved forms that have been modified in any way by third parties without written approval from the FCC and, instead, USAC indicated that BellSouth could provide this information in a cover letter. I further understand that BellSouth’s representatives were not successful in their efforts to have the FCC provide USAC such written approval so that BellSouth could provide the information about its *de minimis* error rate and its decision to seek less reimbursement on the Form 555 itself but that

¹ BellSouth does business in each of the nine states under a different name, as follows: AT&T Alabama (SAC 255181), AT&T Florida (SAC 215191), AT&T Georgia (SAC 225192), AT&T Kentucky (SAC 265182), AT&T Louisiana (SAC 275183), AT&T Mississippi (SAC 285184), AT&T North Carolina (235193), AT&T South Carolina (245194), and AT&T Tennessee (SAC 295185).

Marlene Dortch

May 2, 2014

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FCC staff had no objection to BellSouth providing the information in a cover letter. Consequently, BellSouth is providing this information in a cover letter.

Please do not hesitate to contact me immediately if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,



Mel Coker

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections
Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

Florida

State

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each state in which it provides Lifeline service).

215191

BellSouth Telecommunications, Inc.

Study Area Code(s) (SAC)

ETC Name(s)

AT&T, Inc.

AT&T Florida

Holding Company Name(s)

DBA, Marketing or Other Branding Name(s)

Affiliated ETCs (include names and SACs, attach additional sheets if necessary)	See page 5.
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Provide a list of all ETCs that are affiliated with the reporting ETC. Affiliation shall be determined in accordance with section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification

Section 1: All ETCs MUST COMPLETE SECTION 1- Initial Certification

I certify that the company listed above has certification procedures in place either to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial mc

Section 2: All ETCs MUST COMPLETE SECTION 2- Annual Recertification
Do not leave empty columns. If an ETC has nothing to report in a column, enter a zero.

A	B	C
Number of Subscribers Claimed on February FCC Form(s) 497 of current Form 555 calendar year	Number of Lines Claimed on February FCC Form(s) 497 of current Form 555 calendar year provided to Wireline Resellers	Number of Subscribers claimed on the February FCC Form(s) 497 that were initially enrolled in current Form 555 calendar year
37,313	1,466	2,312

Initial the certifications below that apply to your ETC and complete the tables corresponding to the certification below. Depending on the state, BOTH CERTIFICATION A AND B MAY APPLY.

A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

Initial AS

D	E	F = D-E	G	H = (F+G)	I
Number of Subscribers ETC Contacted Directly to Recertify Eligibility Through Attestation	Number of Subscribers Responding to ETC Contact	Number of Non-Responding Subscribers	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt
30,880	18,184	12,696	0	12,696	0

AND/OR

In the space below, please list the program eligibility data sources, such as ETC access to a state database and/or notice of eligibility from the state Lifeline administrator or the Universal Service Administrative Company (USAC), and indicate for which qualifying programs (e.g., SNAP, SSI) these sources are used to verify subscriber eligibility. If any of subscribers are subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in columns D through I as appropriate and not in columns J through L.

B) I certify that the company listed above has procedures in place to re-certify consumer eligibility by relying on _____ . Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial _____

J	K	L
Number of Subscribers Whose Eligibility was Reviewed By State Administrator ETC Access to Eligibility Data or by USAC	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Finding of Ineligibility by State Administrator, ETC Access to Eligibility Data or USAC	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt

OR

C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial _____

Section 3: ALL ETCS MUST COMPLETE SECTION 3 – De-enroll percentage
What is the percentage of subscribers de-enrolled for this ETC?

M	N	O	P = N + O	Q = ((P + M) * 100)
Number of Subscribers Claimed on February FCC Form(s) 497 <i>(From Column A)</i>	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility <i>(From Column H)</i>	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of a Finding of Ineligibility <i>(From Column K)</i>	Total Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled	Percentage of Subscribers De-Enrolled or Scheduled to be De-Enrolled that were Claimed on the February FCC Form(s) 497
37,313	12,696	0	12,696	34.0%

Section 4: ALL ETCS MUST COMPLETE APPROPRIATE CHECK BOX; PRE-PAID ETCS MUST COMPLETE ALL OF SECTION 4

Is the ETC Pre-Paid?

Yes No *(A Pre-Paid ETC does not assess or collect a monthly fee from its Lifeline subscribers)*

If yes, record the number of subscribers de-enrolled for non-usage by month in column S below.

Non-Usage Results Applicable to Pre-Paid ETCs:

R	S
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	

Signature Block: ALL ETCS MUST COMPLETE SIGNATURE FIELDS

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

Signed,

Mel Coker
Signature of Officer
Chief Marketing Officer, Home Solutions
Title of Officer
Dewey Alexander III
Person Completing this Certification Form

Mel Coker
Printed Name of Officer
5-2-14
Date
210-246-8291
Contact Phone Number

ETC Identification

SAC	ETC Name
215191	BellSouth Telecommunications, Inc.

Holding Company Name(s)

SAC	Holding Company Name
215191	AT&T, Inc.

DBA, Marketing or Other Branding Name(s)

SAC	Name
215191	AT&T Florida

Affiliated ETCs

SAC	Name
549004	AT&T CORP
639005	AT&T MOBILITY PURTO RICO, INC.
199009	AT&T MOBILITY, LLC
259908	AT&T MOBILITY, LLC
399015	AT&T MOBILITY, LLC
529910	AT&T MOBILITY, LLC
539010	AT&T MOBILITY, LLC
215191	BELLSOUTH TELECOMMUNICATIONS, LLC
225192	BELLSOUTH TELECOMMUNICATIONS, LLC
235193	BELLSOUTH TELECOMMUNICATIONS, LLC
245194	BELLSOUTH TELECOMMUNICATIONS, LLC
255181	BELLSOUTH TELECOMMUNICATIONS, LLC
265182	BELLSOUTH TELECOMMUNICATIONS, LLC
275183	BELLSOUTH TELECOMMUNICATIONS, LLC
285184	BELLSOUTH TELECOMMUNICATIONS, LLC
295185	BELLSOUTH TELECOMMUNICATIONS, LLC
409034	CRICKET COMMUNICATIONS, INC.
459009	CRICKET COMMUNICATIONS, INC.
549009	CRICKET COMMUNICATIONS, INC.
469012	CRICKET COMMUNICATIONS, INC.
579006	CRICKET COMMUNICATIONS, INC.
229023	CRICKET COMMUNICATIONS, INC.
479014	CRICKET COMMUNICATIONS, INC.
349028	CRICKET COMMUNICATIONS, INC.
329017	CRICKET COMMUNICATIONS, INC.
419025	CRICKET COMMUNICATIONS, INC.
269035	CRICKET COMMUNICATIONS, INC.
189008	CRICKET COMMUNICATIONS, INC.
429012	CRICKET COMMUNICATIONS, INC.
239027	CRICKET COMMUNICATIONS, INC.
379024	CRICKET COMMUNICATIONS, INC.
499014	CRICKET COMMUNICATIONS, INC.
559014	CRICKET COMMUNICATIONS, INC.
159025	CRICKET COMMUNICATIONS, INC.
309011	CRICKET COMMUNICATIONS, INC.
439053	CRICKET COMMUNICATIONS, INC.
539009	CRICKET COMMUNICATIONS, INC.
179017	CRICKET COMMUNICATIONS, INC.
249001	CRICKET COMMUNICATIONS, INC.
299024	CRICKET COMMUNICATIONS, INC.
449065	CRICKET COMMUNICATIONS, INC.
509008	CRICKET COMMUNICATIONS, INC.
199017	CRICKET COMMUNICATIONS, INC.
529017	CRICKET COMMUNICATIONS, INC.

Affiliated ETCs

SAC	Name
339035	CRICKET COMMUNICATIONS, INC.
229014	GEORGIA RSA#8 PARTNERSHIP
345070	ILLINOIS BELL TELEPHONE COMPANY
325080	INDIANA BELL TELEPHONE COMPANY, INC.
315090	MICHIGAN BELL TELEPHONE COMPANY
555173	NEVADA BELL TELEPHONE COMPANY
209012	NEW CINGULAR WIRELESS PCS, LLC
269905	NEW CINGULAR WIRELESS PCS, LLC
279010	NEW CINGULAR WIRELESS PCS, LLC
289912	NEW CINGULAR WIRELESS PCS, LLC
319026	NEW CINGULAR WIRELESS PCS, LLC
339920	NEW CINGULAR WIRELESS PCS, LLC
389015	NEW CINGULAR WIRELESS PCS, LLC
409004	NEW CINGULAR WIRELESS PCS, LLC
449022	NEW CINGULAR WIRELESS PCS, LLC
479006	NEW CINGULAR WIRELESS PCS, LLC
619004	NEW CINGULAR WIRELESS PCS, LLC
545170	PACIFIC BELL TELEPHONE COMPANY
405211	SOUTHWESTERN BELL TELEPHONE COMPANY
415214	SOUTHWESTERN BELL TELEPHONE COMPANY
425213	SOUTHWESTERN BELL TELEPHONE COMPANY
435215	SOUTHWESTERN BELL TELEPHONE COMPANY
445216	SOUTHWESTERN BELL TELEPHONE COMPANY
305150	THE OHIO BELL TELEPHONE COMPANY
135200	THE SOUTHERN NEW ENGLAND TELEPHONE CO.
335220	WISCONSIN BELL, INC.