

State of Florida



# Public Service Commission


CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** August 12, 2025

**TO:** Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

**FROM:** Susan Sapoznikoff, Senior Attorney, Office of the General Counsel 

**RE:** Request for Rule Development Workshop – Docket 20250097

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Attached is an email with attached letter we received from Cecil Bradley with Florida Telecommunications Relay, Inc. requesting a rule development workshop to address proposed amendments to Rule 25-4.150 and 25.4.160, Florida Administrative Code. Please add this to the docket file.

## Susan Sapoznikoff

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**From:** Cecil Bradley <cbradley@ftri.org>  
**Sent:** Monday, August 11, 2025 2:41 PM  
**To:** Susan Sapoznikoff  
**Subject:** Request for a Rule Development Workshop/Docket 20250097  
**Attachments:** Letter to Sapoznikoff PSC on Rulemaking Docket 20250097.pdf  
  
**Importance:** High

**CAUTION:** This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

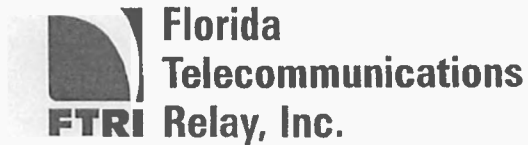
Ms. Sapoznikoff - on behalf of the Florida Telecommunications Relay, Inc. (FTRI), I am requesting a rule development workshop to address proposed amendments to Rules 25-4.150 and 25.4.160, Florida Administrative Code.

More details are provided in the attached letter.

A hard original letter is being mailed to you today.

Thank you.

Cecil Bradley, Executive Director  
Florida Telecommunications Relay, Inc.  
1820 East Park Avenue, Suite 101  
Tallahassee, Florida 32301  
cbradley@ftri.org  
850-270-2641 VP  
800-222-3448 Phone



1820 E. Park Avenue, Suite 101  
Tallahassee, FL 32301  
800-222-3448  
[www.ftri.org](http://www.ftri.org)

August 11, 2025

Susan Sapoznikoff  
Florida Public Service Commission  
Office of the General Counsel  
2530 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Notice of Development of Rulemaking;  
Proposed Amendment of Rule 25-4.150, F.A.C.  
And Rule 25-4, 160, F.A.C.;  
Docket 20250097 - TP

Dear Ms. Sapoznikoff:

On behalf of Florida Telecommunications Relay, Inc. ("FTRI"), as the Administrator of the telecommunications relay service system and pursuant to section 120.54(2)(c), Florida Statutes, please accept this letter as a request to hold a rule development workshop to address the proposed amendments to Rules 25-4.150 and 25.4.160, Florida Administrative Code. FTRI asserts that a rule development workshop is necessary for two reasons.

First, the proposed changes to subsection (5) of Rule 25-4.150 are in conflict with the eligibility requirements for customers receiving specialized communications technology as codified in section 427.704(1)(e), Florida Statutes, by Senate Bill 344 (2025), signed into law by Governor Ron DeSantis on June 19, 2025. The new eligibility "requirements must be set at no less than double but no more than triple the federal poverty level," yet the proposed change is technically lower than what is permissible. See § 427.704(1)(e), Fla. Stat. (2025).

Second, FTRI believes that presenting evidence and findings of similar programs in other states that have established eligibility requirements would be beneficial to the Public Service Commission as it continues the rulemaking process. Providing examples that FTRI has analyzed and vetted should aid the PSC in creating new rule proposals that incorporates tried and true programs that will better serve FTRI's customers. Additionally, constructing a rule that provides flexibility to FTRI allowing for alternate ways to determine eligibility instead of a limited number of ways, while also ensuring customers meet the income eligibility thresholds set by the PSC, should create a better experience for FTRI's customers when implementing the new program.

If the PSC determines it is not unnecessary to hold a rule development workshop, FTRI looks forward to receiving notice of the location, date, and time of the rule development workshop.

Thank you,

Sincerely,

A handwritten signature in black ink, appearing to read "Cecil Bradley". The signature is fluid and cursive, with a large loop at the end.

Cecil Bradley, Executive Director  
Florida Telecommunications Relay Inc.  
[cbradley@ftri.org](mailto:cbradley@ftri.org)  
850-270-2641 (VP)

cc: Sean Bankston, President of FTRI Board of Directors