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-

DATE: November 23, 2021

TO: Office of Commission Clerk (Teitzman)

FROM: Office of Industry Development and Market Analysis (Yglesias de Ayala,

Fogleman, Wendel)

Office of the General Counsel (Weisenfeld)

RE: Docket No. 20210163-TP – Request for relinquishment of eligible

telecommunications carrier (ETC) designation in Florida, by BellSouth

Telecommunications, LLC d/b/a AT&T Florida.

AGENDA: 12/07/21 – Regular Agenda – Proposed Agency Action – Interested Persons May

Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Passidomo

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

Case Background

On October 12, 2021, BellSouth Telecommunications, LLC d/b/a AT&T Florida (AT&T Florida or Company) filed a petition with the Florida Public Service Commission (Commission) for relinquishment of its Eligible Telecommunications Carrier (ETC) designation for its service areas in Florida, effective February 15, 2022. AT&T Florida is an incumbent local exchange carrier (ILEC) in Florida. On October 14, 1997, the Commission designated AT&T Florida as an ETC in its ILEC service territory pursuant to 47 U.S.C. 214 (e)(2) and Section 364.10(2), Florida Statutes (F.S.) (1997). An ETC designation is a requirement for telecommunications carriers to

¹ Order No. PSC-97-1262-FOF-TP issued October 14, 1997, in Docket No. 970644-TP, *In re: Establishment of eligible telecommunications carriers pursuant to Section 214(e) of the Telecommunications Act of 1996*, and Docket

receive funding support from the federal Universal Service Fund for the Lifeline and High-Cost programs. The Lifeline program enables low-income households to obtain and maintain basic telephone and broadband services by offering qualifying households a discount on monthly bills. The High-Cost program helps carriers provide voice and broadband service in remote and underserved communities.

In 2014, the Federal Communications Commission (FCC) restructured the High-Cost program and launched the Connect American Fund Phase II auction (CAF II), which provided funding by census blocks rather than larger areas such as wire centers.² The FCC implemented this change to ensure that high-cost support reaches its targeted areas and is not used to support broadband in areas where the subsidy is not needed. AT&T Florida accepted CAF II support and was required to retain ETC designation in the CAF II census blocks for the duration of the funding term and to offer Lifeline discounts to eligible customers who reside in those census blocks.

On July 24, 2017, the Commission granted AT&T Florida's petition for partial relinquishment of its ETC designation for the census blocks in its service area where it did not participate in the CAF II program.³ AT&T Florida will not receive CAF II support in its remaining Florida ETC service territory after December 31, 2021. In 2020, the FCC replaced the model-based CAF II support program with the Rural Digital Opportunity Fund (RDOF).⁴ AT&T Florida did not participate in the RDOF auction and, therefore, will no longer receive any federal High-Cost universal service support in Florida after December 31, 2021.

AT&T Florida states that the Commission's approval of its petition will not affect the availability of AT&T Florida's legacy voice services in Florida. The Company will continue to offer and provide legacy voice services, complying with federal and state law, and any applicable service obligations across its entire service territory, including the relinquishment area.

As of June 2021, AT&T Florida had 65 Lifeline customers in Florida. AT&T Florida will no longer receive federal High-Cost universal service support in Florida. In addition, AT&T Florida accepted forbearance from the FCC of its obligation to offer a Lifeline discount on broadband Internet access service after December 31, 2021. While this forbearance is not directly related to the current AT&T Florida relinquishment petition, it does further shrink the market it serves through the federal Lifeline program. To complete its withdrawal from the Lifeline market, AT&T Florida is requesting relinquishment of its ETC designation in Florida.

No. 970744-TP, In Re: Implementation of changes in the Federal Lifeline Assistance Plan currently provided by telecommunications carriers of last resort.

² FCC 14-190, WC Docket No. 10-90, Connect America Fund, Report and Order, released December 18, 2014, https://apps.fcc.gov/edocs-public/attachmatch/FCC-14-190A1 Red.pdf

³ Order No. PSC-2017-0290-PAA-TP issued July 24, 2017, in Docket No. 170082-TP, In re: Request for relinquishment of partial eligible telecommunications carrier status, by BellSouth Telecommunications, LLC d/b/a AT&T Florida.

⁴ FCC 20-5, WC Docket No. 10-90, Rural Digital Opportunity Fund, Report and Order, released February 7, 2020, https://docs.fcc.gov/public/attachments/FCC-20-5A1.pdf

⁵ AT&T Notice for Forbearance from Lifeline BIAS Requirements, In *the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, filed July 29, 2021 (filing effective January 1, 2022).

The Commission is vested with jurisdiction in this matter, pursuant to Section 364.10, F.S., 47 U.S.C. §214(e)(4), and 47 C.F.R. §54.205.

Discussion of Issues

Issue 1: Should the Commission approve AT&T Florida's request for relinquishment of its ETC designation?

Recommendation: Yes. The Commission should approve AT&T Florida's request to relinquish its ETC designation. (Yglesias de Ayala, Fogleman, Wendel, Weisenfeld)

Staff Analysis: An ETC may relinquish its ETC designation pursuant to 47 C.F.R. §54.205(a), which provides that:

A state commission shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the state commission of such relinquishment.

In approving a relinquishment, state commissions must require the remaining ETCs to ensure that existing customers will continue to be served. 47 C.F.R. §54.205(b), provides that:

Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the state commission shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The state commission shall establish a time, not to exceed one year after the state commission approves such relinquishment under this section, within which such purchase or construction shall be completed.

AT&T Florida identified in its petition all of the designated ETCs currently serving its service territory by wire center. Staff sent a data request to each ETC in AT&T Florida's service area to verify the ETC designation of the company and to confirm it is providing service in the wire centers identified by AT&T Florida. Staff compared the responses to ensure that customers in the relinquished area would continue to have Lifeline service available. While staff's review concluded some discrepancies in the number of ETCs offering service in each wire center, customers in the area AT&T Florida seeks to relinquish ETC designation will continue to have Lifeline service available from one or more ETCs (Attachment A).⁶

In its petition, AT&T Florida has asserted that its Lifeline customers will receive ample notice of the need to select another ETC to continue receiving a Lifeline discount. The customers will

⁶ Staff disagrees with the number of ETCs identified by AT&T Florida offering service in many wire centers. Specifically, staff understands that the following ETCs will continue to offer Lifeline in AT&T Florida's territory in whole or in part: Assurance Wireless (T-Mobile), WOW! (Knology of Florida, LLC), SafeLink Wireless (TracFone Wireless, Inc.), Phone Club, and T-Mobile.

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receive this notice, at least 60 days prior to the relinquishment date, explaining that AT&T Florida will no longer offer a Lifeline discount, and if the customer does not choose another Lifeline provider they will be charged standard prices (including applicable surcharges, fees, and taxes) for their existing AT&T Florida services.

AT&T Florida will also send a second notice and a bill message at least 15 days prior to the relinquishment date. All notices will provide each customer instructions about communicating with the remaining ETCs in the area to discuss Lifeline benefits offered by those ETCs. The notices will also provide information on how to contact the Universal Service Administrative Company for a list of other ETCs in the state. In addition, AT&T Florida will stop enrolling customers in the Lifeline program on December 1, 2021, or within five (5) days after the Commission's Order is final, whichever is later.

After reviewing AT&T Florida's petition and the responses to the ETC data requests, staff has verified there will be one or more ETCs remaining in AT&T Florida's service area. Therefore, Lifeline service will continue to be available to customers residing within the relinquishment area if AT&T Florida's petition is granted. Staff believes AT&T Florida has met the 47 C.F.R. §54.205 requirements to relinquish its ETC designation in its service area. Therefore, staff recommends that the Commission approve AT&T Florida's petition for relinquishment of its ETC designation.

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Issue 2: Should this docket be closed?

Recommendation: Yes. If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, this docket should be closed upon the issuance of a consummating order. (Weisenfeld)

Staff Analysis: At the conclusion of the protest period, if no protest is filed this docket should be closed upon the issuance of a consummating order.

| ID Code | CETC Name |
|---------|---|
| 1 | Access Wireless (i-wireless, LLC) |
| 2 | Assurance Wireless (T-Mobile) |
| 3 | WOW! (Knology of Florida, LLC) |
| 4 | Phone Club Corporation |
| 5 | SafeLink Wireless (TracFone Wireless, Inc.) |
| 6 | T-Mobile |

| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|-----------------|-----------------------------------|--|
| ARCHFLMA | ARCHER | 1,2,4,5,6 | 2,4,5,6 |
| BCRTFLBT | BOCA RATON | 1,2,4,5,6 | 2,5,6 |
| BCRTFLMA | BOCA RATON | 1,2,4,5,6 | 2,4,5,6 |
| BCRTFLSA | BOCA RATON | 1,2,4,5,6 | 2,4,5,6 |
| BGPIFLMA | KEYS | 1,2,4,5,6 | 2,5,6 |
| BKVLFLJF | BROOKSVILLE | 1,2,4,5,6 | 2,4,5,6 |
| BLDWFLMA | BALDWIN | 1,2,4,5,6 | 2,4,5,6 |
| BLGLFLMA | BELLE GLADE | 1,2,4,5,6 | 2,4,5,6 |
| BNNLFLMA | BUNNELL | 1,2,4,5,6 | 2,4,5,6 |
| BRSNFLMA | BRONSON | 1,2,4,5,6 | 2,4,5,6 |
| BYBHFLMA | BOYNTON BEACH | 1,2,4,5,6 | 2,5,6 |
| CCBHFLMA | COCOA BEACH | 1,2,4,5,6 | 2,5,6 |
| CDKYFLMA | CEDAR KEY | 1,2,4,5,6 | 2,4,5,6 |
| CFLDFLMA | CHIEFLAND | 1,2,4,5,6 | 2,4,5,6 |
| CHPLFLJA | CHIPLEY | 1,2,4,5,6 | 2,4,5,6 |
| CNTMFLLE | CANTONMENT | 1,2,4,5,6 | 2,4,5,6 |
| COCOFLMA | COCOA | 1,2,4,5,6 | 2,4,5,6 |
| COCOFLME | COCOA | 1,2,4,5,6 | 2,4,5,6 |
| CSCYFLBA | CROSS CITY | 1,2,4,5,6 | 2,4,5,6 |
| DBRYFLMA | DEBARY | 1,2,4,5,6 | 2,4,5,6 |
| DELDFLMA | DELAND | 1,2,4,5,6 | 2,5,6 |
| DLBHFLKP | DELRAY BEACH | 1,2,4,5,6 | 2,5,6 |
| DLSPFLMA | DE LEON SPRINGS | 1,2,4,5,6 | 2,4,5,6 |
| DNLNFLWM | DUNNELLON | 1,2,4,5,6 | 2,4,5,6 |

^{*} The numbers in this column correspond to the ETCs identified on the first page of this attachment.

| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|--------------------|-----------------------------------|--|
| DRBHFLMA | DEERFIELD BEACH | 1,2,4,5,6 | 2,5,6 |
| DYBHFLMA | DAYTONA BEACH | 1,2,4,5,6 | 2,5,6 |
| DYBHFLOB | DAYTONA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| DYBHFLOS | DAYTONA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| DYBHFLPO | DAYTONA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| EGLLFLIH | EAU GALLIE | 1,2,4,5,6 | 2,4,5,6 |
| EORNFLMA | EAST ORANGE | 1,2,4,5,6 | 2,4,5,6 |
| FMTNALMT | CENTURY | 1,2,4,5,6 | 2,4,5,6 |
| FRBHFLFP | FERNANDINA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| FTGRFLMA | JACKSONVILLE | 1,2,4,5,6 | 2,5,6 |
| FTLDFLCY | FORT LAUDERDALE | 1,2,4,5,6 | 2,5,6 |
| FTLDFLJA | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLMR | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLOA | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLPL | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLSG | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLSU | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTLDFLWN | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| FTPRFLMA | FORT PIERCE | 1,2,4,5,6 | 2,5,6 |
| GCSPFLCN | GREEN COVE SPRINGS | 1,2,4,5,6 | 2,4,5,6 |
| GCVLFLMA | GRACEVILLE | 1,2,4,5,6 | 2,4,5,6 |
| GENVFLMA | GENEVA | 1,2,4,5,6 | 2,4,5,6 |
| GLBRFLMC | GULF BREEZE | 1,2,4,5,6 | 2,4,5,6 |
| GSVLFLMA | GAINESVILLE | 1,2,4,5,6 | 2,5,6 |
| HAVNFLMA | HAVANA | 1,2,4,5,6 | 2,4,5,6 |
| HBSDFLMA | HOBE SOUND | 1,2,4,5,6 | 2,4,5,6 |
| HLNVFLMA | HOLLEY-NAVARRE | 1,2,4,5,6 | 2,4,5,6 |
| HLWDFLMA | HOLLYWOOD | 1,2,4,5,6 | 2,4,5,6 |
| HLWDFLPE | FORT LAUDERDALE | 1,2,4,5,6 | 2,4,5,6 |
| HLWDFLWH | HOLLYWOOD | 1,2,4,5,6 | 2,4,5,6 |
| HMSTFLEA | HOMESTEAD | 1,2,4,5,6 | 2,5,6 |
| HMSTFLHM | HOMESTEAD | 1,2,4,5,6 | 2,4,5,6 |
| HMSTFLNA | HOMESTEAD | 1,2,4,5,6 | 2,4,5,6 |
| HMSTFLNA | JENSEN BEACH | 1,2,4,5,6 | 2,4,5,6 |

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| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|--------------------|--------------------------------------|--|
| HTISFLMA | PORT ST LUCIE | 1,2,4,5,6 | 2,5,6 |
| HWTHFLMA | HAWTHORNE | 1,2,4,5,6 | 2,4,5,6 |
| ISLMFLMA | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| JAYFLMA | JAY | 1,2,4,5,6 | 4,5 |
| JCBHFLMA | JACKSONVILLE BEACH | 1,2,4,5,6 | 2,4,5,6 |
| JCBHFLSP | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLAR | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLBW | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLCL | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLFC | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLIA | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLJT | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLLF | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLNO | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLOW | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLRV | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLSJ | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLSM | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JCVLFLWC | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| JPTRFLMA | JUPITER | 1,2,4,5,6 | 2,4,5,6 |
| KYHGFLMA | KEYSTONE HEIGHTS | 1,2,4,5,6 | 2,4,5,6 |
| KYLRFLLS | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| KYLRFLMA | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| KYWSFLMA | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| LKCYFLMA | LAKE CITY | 1,2,4,5,6 | 2,4,5,6 |
| LYHNFLOH | LYNN HAVEN | 1,2,3,4,5,6 | 2,3,4,5,6 |
| MCNPFLMA | MICANOPY | 1,2,4,5,6 | 2,4,5,6 |
| MDBGFLPM | MIDDLEBURG | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLAE | MIAMI | 1,2,4,5,6 | 2,5,6 |
| MIAMFLAL | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLAP | MIAMI | 1,2,4,5,6 | 4,5,6 |
| MIAMFLBA | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLBR | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLCA | MIAMI | 1,2,4,5,6 | 2,5,6 |

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| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|------------------|--------------------------------------|--|
| MIAMFLFL | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLGR | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLHL | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLIC | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLKE | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLME | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLNM | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLNS | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLOL | MIAMI | 1,2,4,5,6 | 4,5,6 |
| MIAMFLPB | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLPL | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLRR | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLSH | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLSO | MIAMI | 1,2,4,5,6 | 2,5,6 |
| MIAMFLWD | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MIAMFLWM | MIAMI | 1,2,4,5,6 | 2,4,5,6 |
| MICCFLBB | SEBASTIAN | 1,2,4,5,6 | 2,4,5,6 |
| MLBRFLMA | MELBOURNE | 1,2,4,5,6 | 2,4,5,6 |
| MLTNFLRA | MILTON | 1,2,4,5,6 | 2,4,5,6 |
| MNDRFLAV | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| MNDRFLLO | JACKSONVILLE | 1,2,4,5,6 | 2,4,5,6 |
| MNDRFLLW | ST. JOHNS | 1,2,4,5,6 | 2,4,5,6 |
| MNSNFLMA | MUNSON | 1,2,4,5,6 | 4,5 |
| MRTHFLVE | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| MXVLFLMA | MAXVILLE | 1,2,4,5,6 | 2,4,5,6 |
| NDADFLAC | NORTH DADE | 1,2,4,5,6 | 2,5,6 |
| NDADFLBR | NORTH DADE | 1,2,4,5,6 | 2,4,5,6 |
| NDADFLGG | NORTH DADE | 1,2,4,5,6 | 2,4,5,6 |
| NDADFLOL | NORTH DADE | 1,2,4,5,6 | 2,4,5,6 |
| NKLRFLMA | KEYS | 1,2,4,5,6 | 2,4,5,6 |
| NSBHFLMA | NEW SMYRNA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| NWBYFLMA | NEWBERRY | 1,2,4,5,6 | 2,4,5,6 |
| OKHLFLMA | OAKHILL | 1,2,4,5,6 | 2,4,5,6 |
| OLTWFLLN | OLDTOWN | 1,2,4,5,6 | 2,4,5,6 |

^{*} The numbers in this column correspond to the ETCs identified on the first page of this attachment.

| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|-------------------|--------------------------------------|--|
| ORLDFLAP | ORLANDO | 1,2,4,5,6 | 2,4,5,6 |
| ORLDFLPC | ORLANDO | 1,2,4,5,6 | 2,5,6 |
| ORPKFLMA | ORANGE PARK | 1,2,4,5,6 | 2,4,5,6 |
| ORPKFLRW | ORANGE PARK | 1,2,4,5,6 | 2,4,5,6 |
| OVIDFLCA | OVIEDO | 1,2,4,5,6 | 2,4,5,6 |
| PACEFLPV | PACE | 1,2,4,5,6 | 2,4,5,6 |
| PAHKFLMA | PAHOKEE | 1,2,4,5,6 | 2,4,5,6 |
| PCBHFLNT | PANAMA CITY BEACH | 1,2,3,4,5,6 | 2,3,4,5,6 |
| PLCSFLMA | PALM COAST | 1,2,4,5,6 | 2,5,6 |
| PLTKFLMA | PALATKA | 1,2,4,5,6 | 2,4,5,6 |
| PMBHFLCS | CORAL SPRINGS | 1,2,4,5,6 | 2,4,5,6 |
| PMBHFLFE | POMPANO BEACH | 1,2,4,5,6 | 2,4,5,6 |
| PMBHFLMA | POMPANO BEACH | 1,2,4,5,6 | 2,4,5,6 |
| PMBHFLTA | POMPANO BEACH | 1,2,4,5,6 | 2,4,5,6 |
| PMPKFLMA | POMONA PARK | 1,2,4,5,6 | 2,4,5,6 |
| PNCYFLCA | PANAMA CITY | 1,2,3,4,5,6 | 2,3,4,5,6 |
| PNCYFLMA | PANAMA CITY | 1,2,3,4,5,6 | 2,3,4,5,6 |
| PNSCFLBL | PENSACOLA | 1,2,4,5,6 | 2,4,5,6 |
| PNSCFLFP | PENSACOLA | 1,2,4,5,6 | 2,4,5,6 |
| PNSCFLPB | PENSACOLA | 1,2,4,5,6 | 2,4,5,6 |
| PNSCFLWA | PENSACOLA | 1,2,4,5,6 | 2,4,5,6 |
| PNVDFLMA | PONTE VEDRA BEACH | 1,2,4,5,6 | 2,4,5,6 |
| PRRNFLMA | PERRINE | 1,2,4,5,6 | 2,4,5,6 |
| PRSNFLFD | PIERSON | 1,2,4,5,6 | 2,4,5,6 |
| PTSLFLMA | PORT ST. LUCIE | 1,2,4,5,6 | 2,4,5,6 |
| PTSLFLSO | PORT ST. LUCIE | 1,2,4,5,6 | 2,4,5,6 |
| SBSTFLFE | SEBASTIAN | 1,2,4,5,6 | 2,4,5,6 |
| SBSTFLMA | SEBASTIAN | 1,2,4,5,6 | 2,4,5,6 |
| SGKYFLMA | KEYS | 1,2,4,5,6 | 4,5 |
| SNFRFLMA | SANFORD | 1,2,4,5,6 | 2,4,5,6 |
| STAGFLBS | ST.JOHNS | 1,2,4,5,6 | 2,4,5,6 |
| STAGFLMA | ST.JOHNS | 1,2,4,5,6 | 2,4,5,6 |
| STAGFLSH | ST.JOHNS | 1,2,4,5,6 | 2,4,5,6 |
| STAGFLWG | ST.JOHNS | 1,2,4,5,6 | 2,4,5,6 |

^{*} The numbers in this column correspond to the ETCs identified on the first page of this attachment.

Date: November 23, 2021

| Wire Center | Exchange | ETCs identified by AT&T Florida * | ETCs verified by Commission's staff * |
|-------------|---------------------|--------------------------------------|--|
| STRTFLMA | STUART | 1,2,4,5,6 | 2,4,5,6 |
| SYHSFLCC | SUNNY HILLS | 1,2,4,5,6 | 4,5 |
| TRENFLMA | TRENTON | 1,2,4,5,6 | 2,4,5,6 |
| TTVLFLMA | TITUSVILLE | 1,2,4,5,6 | 2,4,5,6 |
| VERNFLMA | VERNON | 1,2,4,5,6 | 4,5 |
| VRBHFLBE | VERO BEACH | 1,2,4,5,6 | 2,5,6 |
| VRBHFLMA | VERO BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WELKFLMA | WELAKA | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLAN | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLGA | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLGR | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLHH | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLLE | WEST PALM BEACH | 1,2,4,5,6 | 2,5,6 |
| WPBHFLRB | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WPBHFLRP | WEST PALM BEACH | 1,2,4,5,6 | 2,4,5,6 |
| WWSPFLHI | WEEKIWACHEE SPRINGS | 1,2,4,5,6 | 2,4,5,6 |
| YNFNFLMA | YOUNGSTOWN-FOUNTAIN | 1,2,4,5,6 | 4,5 |
| YNTWFLMA | YANKEETOWN | 1,2,4,5,6 | 2,4,5,6 |
| YULEFLMA | YULEE | 1,2,4,5,6 | 4,5 |

^{*} The numbers in this column correspond to the ETCs identified on the first page of this attachment.