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Matilda Sanders

From: Whitt, Chrystal [CC] [Chrystal.Whitt@mail.sprint.com]  
Sent: Friday, October 15, 2004 4:14 PM  
To: Filings@psc.state.fl.us  
Subject: 040604-TL

Filed on behalf of:

Susan S. Masterton

Attorney

Law/External Affairs  
Sprint  
1313 Blirstone Rd.  
Tallahassee, FL 32301  
M/S FLTLHO0103  
Voice (850)-599-1560  
Fax (850)-878-0777  
susan.masterton@mail.sprint.com

Docket No. 040604-TL

Title of filing: Sprint's Preliminary List of Issues

Filed on behalf of: Sprint

No. of pages: 4

Description: Preliminary List of Issues

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Susan S. Masterton  
Attorney

Law/External Affairs  
FTLH00103  
1313 Blair Stone Rd.  
Tallahassee, FL 32301  
Voice 850 599 1560  
Fax 850 878 0777  
susan.masterton@mail.sprint.com

October 15, 2004

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
& Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 040604-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated is Sprint's Preliminary List of Issues.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

A handwritten signature in black ink that reads "Susan S. Masterton".

Susan S. Masterton

Enclosure

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11142 OCT 15 04

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**CERTIFICATE OF SERVICE  
DOCKET NO. 040604-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail on this 15<sup>th</sup> day of October, 2004 to the following:

Florida Cable Telecommunications  
Association, Inc.  
Michael A. Gross  
246 E. 6th Avenue  
Suite 100  
Tallahassee, FL 32303

Verizon Florida Inc.  
Mr. Richard Chapkis  
P.O. Box 110  
Tampa, FL 33601

Florida Public Service Commission  
Adam Teitzman  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc.  
Nancy B. White/R. Douglas Lackey  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Office of Public Counsel  
Charles J. Beck/Harold Mclean  
111 West Madison Street, #812  
Tallahassee, FL 32399-1400

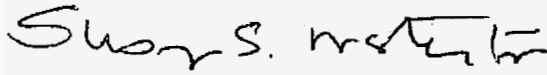
Verizon Florida Inc.  
Mr. David Christian  
106 East College Avenue  
Tallahassee, FL 32301-7748

TDS Telecom/Quincy Telephone  
Mr. Thomas M. McCabe  
P. O. Box 189  
Quincy, FL 32353-0189

Rutledge Law Firm  
Ken Hoffman/M. McDonnell/J.S.  
Menton  
P.O. Box 551  
Tallahassee, FL 32302-0551

GT Com  
Mr. Mark Ellmer  
P. O. Box 220  
Port St. Joe, FL 32457-0220

ALLTEL Communications Services,  
Inc.  
Ms. Betty Willis  
One Allied Drive, B4F4ND  
Little Rock, AR 72203-2177



Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Adoption of the National School Lunch Program and an income-based Criterion at or below 135% of the Federal Poverty Guideline as eligibility Criteria for the Lifeline and Link-up Programs.	)	Docket No. 040604-TL
	)	
	)	Filed: October 15, 2004
	)	
	)	
	)	

**SPRINT-FLORIDA INCORPORATED'S PRELIMINARY LIST OF ISSUES**

Sprint-Florida, Incorporated ("Sprint") generally agrees with BellSouth's preliminary list of issues, but would suggest the following modifications and additions.

BellSouth's Issue 4 should be modified as follows:

4. What are the implementation issues related to the actions taken by the Commission in Order No. PSC-04-0781-PAA-TL? Can these issues be resolved? If so, how?

- (a) What is the impact on carriers' processes and costs of the addition of the National School Lunch Program as an eligibility criterion?
- (b) What is the impact on carriers' processes and costs of implementing self-certification as proposed in the Commission's Order, including initial qualification procedures and annual verification procedures?
- (c) What is the impact on carriers' processes and costs of implementing the customer contact protocols related to self-certification?
- (d) What other implementation issues are raised by the additional qualification criteria and mechanisms in the Commission's Order?

BellSouth's Issue 6 should be modified as follows:

DOCUMENT NUMBER-DATE

11142 OCT 15 04

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6. Is the Commission required to implement modifications to the Lifeline qualification criteria and mechanisms through rulemaking pursuant to s. 120.54, F.S.?

In addition, Sprint suggests the following additional issues:

7. Are the additional qualification criteria and mechanisms proposed in the Commission's Order the most cost effective and efficient means for increasing Lifeline participation rates in Florida?
  - (a) Does an increase in Lifeline participation rates, if any, outweigh any additional administrative burdens imposed by the additional qualification criteria and mechanisms?
  - (b) Is the current certification process a barrier to participation in the Lifeline program?
8. Is the methodology employed in the Commission's Order for determining the effectiveness of the Lifeline program in Florida valid (i.e., a comparison of the number of wireline Lifeline subscribers to the potential number of individuals meeting one or more of the eligibility criteria)?