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Dorothy Menasco

From: Kelly, Tamela D [LTD] [Tamela.Kelly@embarq.com]
Sent: Wednesday, October 11, 2006 4:30 PM
To: Filings@psc.state.fl.us
Cc: Masterton, Susan S [LTD]
Subject: Docket No. 060582-TL, Embarq's Petition to Intervene
Attachments: 060582-TL,Embarq's Petition to Intervene, 10-11-06.pdf

Filed on Behalf of: Susan S. Masterton

Counsel
Embarq Florida, Inc.
1313 Blair Stone Road
Tallahassee, FL 32301
Telephone: 850/599-1560
Email: susan.masterton@embarq.com

Docket No. 060582-TL

Title of filing: Embarq's Petition to Intervene

Filed on behalf of: Embarq Florida, Inc.

No of pages: 5 pgs.

Description: Embarq's Petition to Intervene in Docket No. 060581-TL

<<060582-TL,Embarq's Petition to Intervene, 10-11-06.pdf>>

Tamela Kelly
Legal Specialist
Law & External Affairs-State External Affairs
EMBARQ Corporation
Voice: 850-599-1029 | Fax: 850-878-0777 | Email: tamela.kelly@EMBARQ.com
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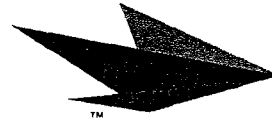
10/11/2006

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EMBARQ™

Embarq Corporation
Mailstop: FLTLH00102
1313 Blair Stone Rd.
Tallahassee, FL 32301
EMBARQ.com

October 11, 2006

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

RE: Docket No. 060582-TL, Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located entirely in Alltel's licensed area.

Dear Ms. Bayó:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's Petition to Intervene in Docket No. 060582-TL.

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

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

Sincerely,

Susan S. Masterton

Enclosure

Susan S. Masterton
COUNSEL
LAW AND EXTERNAL AFFAIRS - REGULATORY
Voice: (850) 599-1560
Fax: (850) 878-0777

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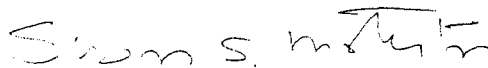
**CERTIFICATE OF SERVICE
DOCKET NO. 060582-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 11th day of October, 2006 to the following.

Alltel Communications, Inc.
Stephen B. Rowell
One Allied Drive
Little Rock, AR 72202

Florida Public Service Commission
Adam Teitzman, Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida Public Service Commission
Robert Casey, Division of Competitive Markets & Enforcement
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located entirely in Alltel's licensed area.	Docket No. 060582-TL Filed: October 11, 2006
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PETITION TO INTERVENE

Pursuant to Commission Rule 25-22.039, Embarq Florida, Inc. ("Embarq") respectfully request the Commission to allow Embarq to intervene in this proceeding. In support thereof Embarq states as follows:

1. Petitioners' name and address are:

Embarq Florida, Inc.
555 Lake Border Drive
Apopka, Florida

2. All notices, pleadings, orders and documents in this proceeding should be provided to:

Susan S. Masterton
Embarq Florida, Inc.
1313 Blair Stone Road
Tallahassee, FL 32301
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@embarq.com

3. Embarq Florida, Inc. is an incumbent local exchange telecommunications company (ILEC) authorized by the Commission to provide local exchange service in the State of Florida.

4. The instant proceeding involves a request by Alltel Communications, Inc. (Alltel) for eligible telecommunications carrier (ETC) status to serve certain areas of the state where Embarq operates as a rural ILEC under FCC rules. As set forth in the following paragraphs, Embarq will be substantially affected by the actions the Commission may take on Alltel's Petition.

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5. The federal universal service fund (“USF”) dollars that Alltel wireless would be eligible to receive if its ETC petition were granted for Embarq's serving territory in Florida are dollars that would come from the portion of the federal USF called "Interstate Access Support (IAS)". This is sometimes referred to as "CALLS" support because it was implemented as a result of an FCC Order that is commonly referred to as the CALLS Order (Sixth Report and Order in CC Docket 96-262 and 94-1; Report and Order in CC Docket 99-249; released May 31, 2000). IAS (or CALLS) support is the overwhelming majority of the federal USF support that Embarq receives in Florida.¹ The federal USF dollars in the IAS portion of the fund are unique in that they are **capped**; the overall size of the IAS fund is capped at approximately \$650 million annually. This means that whenever a competitor is granted ETC status, if that competitive ETC draws from the IAS fund the amount of IAS support that other carriers receive decreases.² If Alltel Wireless receives \$1 of CALLS support there is one less dollar to be distributed to the remaining carriers receiving support from that fund. Quite literally, if Alltel Wireless is granted ETC status in Florida it will be taking some support away from other carriers—including Embarq—with every dollar of federal USF it receives. Accordingly, it is reasonable that Embarq would have a substantial interest in this proceeding, particularly the “public interest” aspects as referenced on page 14 of Alltel’s application.

6. Universal service support is intended to help offset the cost of providing service in the highest cost, most remote and rural areas of the country. Embarq fully understands that the Commission’s role is to weigh the costs and benefits of granting

¹ Embarq receives some funds from the federal low income programs (Lifeline/Link-Up) and E-rate program (schools and libraries).

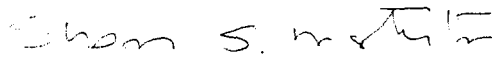
² The reduction is spread across all carriers that receive dollars from the IAS fund.

Alltel's application, and respectfully requests to be allowed to participate in the discussion as an intervener in this proceeding.

7. No other party will adequately represent Sprint's rights and interests in this matter.

WHEREFORE, Embarq respectfully requests that the Commission grant this Petition and allow Embarq to become a full party of record in this docket.

Respectfully submitted this 11th day of October 2006.



Susan S. Masterton
Embarq Florida, Inc.
1313 Blair Stone Road
Tallahassee, FL 32301
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@embarq.com