

Ruth Nettles

180169

From: Janssen, Angela [ajanssen@telecomcounsel.com]
Sent: Friday, March 21, 2008 12:47 PM
To: Filings@psc.state.fl.us
Subject: Express Phone Service, Inc.
Attachments: FL ETC Filing.pdf

Attached please find for filing Express Phone Service, Inc.'s Application for Certification as an Eligible Telecommunications Carrier.

Thank You -

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3/21/2008

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March 21, 2008

VIA E-FILING

Bob Casey, Public Utility Supervisor
Division of Competitive Markets
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Express Phone Service, Inc. - ETC Designation

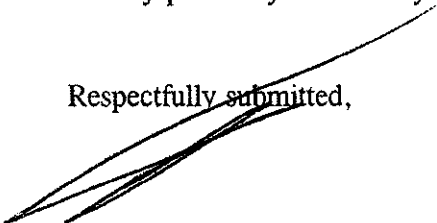
Dear Mr. Casey:

Enclosed please find for filing one original of Express Phone Service, Inc.' s Application for Certification as an Eligible Telecommunications Carrier.

I have also enclosed an extra copy of this letter to be date-stamped and returned to me in the enclosed preaddressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for Express Phone Service, Inc.

Enclosures

DOCUMENT NUMBER-DATE

02135 MAR 21 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION OF)
EXPRESS PHONE SERVICE, INC.)
FOR CERTIFICATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER)

DOCKET NO.

080169

APPLICATION FOR CERTIFICATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

Express Phone Service, Inc. ("Express Phone" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),² and §364.10(2), and §364.025(5), Florida Statutes, hereby applies to the Florida Public Service Commission ("Commission") for certification as an Eligible Telecommunications Carrier ("ETC") throughout the BellSouth/AT&T, Embarq and Verizon service territories ("Designated Service Area") for the purpose of receiving federal universal service support. A list of each rate center which the Applicant is requesting ETC status in the State of Florida is attached hereto as Exhibit 1. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, Express Phone satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of Express Phone in the Designated Service Area will serve the public interest. Accordingly, Express Phone respectfully requests that the Commission grant this Application.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

I. Background

1. Express Phone is a Florida Corporation³ and is authorized to conduct business as a domestic corporation in the State of Florida. Copies of the Applicant's Articles of Incorporation and authority to transact business in the State of Florida are on file with the Commission and incorporated herein by reference. The Applicant was granted Certification to Operate as an Alternate Local Exchange Services Company (ALEC) in Florida which became effective on May 4, 1998, in Docket Number 980219-TX, Order Number PSC-98-0628-FOF-TX. The principal office of the Applicant is located at 1803 W. Fairfield Drive, Pensacola, Florida 32501. The Applicant provides local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through commercial agreements ("UNEs") that allows end-to-end switching delivery of calls.
2. As set forth in Section 214(e)(2) of the Act, the Commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State commission."⁴ Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.⁵

³ Express Phone was organized in the State of Florida on May 17, 1999

⁴ 47 U.S.C. § 214(e)(2); *see* 47 C.F.R. § 54.201(b) (FCC Rules citing the Act's requirements).

⁵ 47 U.S.C. § 214(e)(1).

3. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- (A) offer the services that are supported by Federal universal support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using the media of general distribution.⁶

II. Express Phone Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area

4. Express Phone is a common carrier as that term is defined in the Act.⁷ The Applicant provides competitive local telecommunications services in the state of Florida pursuant to Order Number Order Number PSC-98-0628-FOF-TX referenced above.

5. Express Phone offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.⁸ Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

6. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated in the rules of the Federal Communications Commission ("FCC") at 47 C.F.R. § 54.101(a)(1)-(9). These services are:

⁶ *Id.*

⁷ See 47 U.S.C. § 153(10) ("the term 'common carrier' or 'carrier' means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy").

⁸ Section 54.201(f) of the FCC's Rules states, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." 47 C.F.R. § 54.201(f). The term "facilities" under Section 54.201 is defined as "any physical components of the telecommunications

- a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;
- c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;
- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;

network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part." 47 C.F.R. § 54.201(e). Express Phone's use of UNEs meets this definition of "facilities."

- e) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

- h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- i) Toll limitation for qualifying low-income consumers.

7. Upon certification as an ETC, Express Phone will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services, as required by FCC Rules.⁹

8. Express Phone will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.¹⁰

III. Area for Which ETC Certification Is Requested

9. Express Phone has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the state of Florida. Express Phone does not seek certification as an ETC in any areas served by rural telephone companies. Express Phone is not requesting to provide service in any tribal areas in the State of Florida.

IV. Granting Express Phone's Application Will Serve the Public Interest

10. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹¹ No specific public interest test is mentioned, as is the case for areas served by

⁹ See 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d)..

¹⁰ See 47 C.F.R. §§ 54.201(d)(2).

¹¹ See 47 U.S.C. 214(e)(2).

rural telephone companies.¹² Thus, the Act provides that the Commission “shall” designate Express Phone as an ETC upon finding that the company meets the nine-point list of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding, the designation of Express Phone as an ETC will serve the public interest.

11. A central purpose of the Telecommunications Act of 1996 was to “promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ... and encourage the rapid deployment of new telecommunications technologies.”¹³ Designation of Express Phone as an ETC would further these goals. Granting ETC status to Express Phone would allow the Applicant to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

12. Express Phone will announce and advertise telecommunications services as an ETC where it provides service in its Designated Service Area in Florida and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Florida residents will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those opportunities by subscribing to Express Phone’s service.

13. Express Phone will provide universal service as an ETC in all of its Designated Service Area.

¹² See *Id.*

¹³ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

14. Express Phone acknowledges it shall provide equal access if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996. The FCC's ETC Order does not impose a general equal access requirement on ETC applicants at this time, but instead suggests the applicants acknowledge that an ETC applicant may be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area. Applicant acknowledges this potential and will abide by the requirement should it occur in the future. Applicant is willing to sign an affidavit attesting to its critical responsibilities regarding carrier of last resort obligations.

15. Under FCC guidelines, an ETC Applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed Designated Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because Express Phone seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for *eligible consumers, and is distributed on a per-customer basis and is directly reflected in the price that the eligible customer pays*, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

16. Applicant offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

17. Under FCC guidelines, an ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 CFR §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's ETC Order. Applicant in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

18. Under FCC guidelines, an ETC Applicant must demonstrate its ability to remain functional in emergency situations. 47 CFR §54.202(a)(2); FCC ETC Order at Para 25.

Since Applicant is providing service to its customers through the use of ILEC leased facilities, this arrangement allows Applicant to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

19. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service.

20. To the best of the Applicant's knowledge, its account is current with the FCC in regards to regulatory fees; and its account is current with the Universal Service Administrative Company in regards to universal service contributions. The Applicant is aware that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions. To the best of the Applicant's knowledge, it has no outstanding complaints at the FCC.

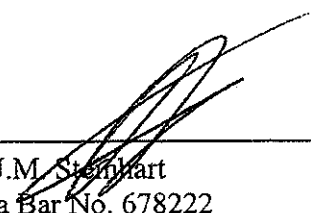
V. Legal Authority

This Application is filed pursuant to 47 U.S. C. §§151 *et seq.* and § 364.10(2), and §364.025(5), Florida Statutes.

VI. Relief Requested

For the foregoing reasons, Express Phone respectfully requests that the Commission grant its application and designate the Applicant as an ETC for the Designated Service Area.

Respectfully submitted,



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E-Mail: lsteinhart@telecomcounsel.com

Attorney for Express Phone Service, Inc.

Exhibit 1
Rate Centers

Exhibit 1

Company	RateCenter	Switch
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ARCHER	ARCHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOCA RATON	BCRTFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BROOKSVL	BKVLFLJFDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BALDWIN	BLDWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLEGLADE	BLGLFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BUNNELL	BNNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BRONSON	BRSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOYNTONBCH	BYBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOABEACH	CCBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CEDAR KEYS	CDKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIEFLAND	CFLDFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIPLEY	CHPLFLJADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CANTONMENT	CNTMFLEDS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOA	COCOFLMEDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CROSS CITY	CSCYFLBARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEBARY	DBRYFLMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELAND	DELDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELRAY BCH	DLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELEON SPG	DLSPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DUNNELLON	DNLNFLWMRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEERFLDBCH	DRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DAYTONABCH	DYBHFLPODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EAU GALLIE	EGLLFLIHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EASTORANGE	EORNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLAGLERBCH	FLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FERNADNBCH	FRBHFLFPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FORTPIERCE	FTPRFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GREENCVSPG	GCSPFLCND0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRACEVILLE	GCVLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GENEVA	GENVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GULFBREEZE	GLBRFLMCDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GAINESVL	GSVLFLNW33E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HAVANA	HAVNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOBE SOUND	HBSDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOLLEYNVRR	HLNVFLMADS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FTLAUDERDL	HLWDFLPEDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOLLYWOOD	HLWDFLWHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOMESTEAD	HMSTFLNARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HAWTHORNE	HWTHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JAY	JAY FLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSOLBCH	JCBHFLMA24E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JUPITER	JPTRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYSTN HTS	KYHGFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LAKE CITY	LKCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LYNN HAVEN	LYHNFLOHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MICANOPY	MCNPFMLARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIDDLEBURG	MDBGFLPMDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIAMI	MIAMFLWMDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MELBOURNE	MLBRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MILTON	MLTNFLRADS0

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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSONVL	MNDRFLLODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLLWRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MUNSON	MNSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MAXVILLE	MXVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NORTH DADE	NDADFLOLDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWSMYRNBCH	NSBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NEWBERRY	NWBVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OAK HILL	OKHLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OLD TOWN	OLTWFLLNRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORLANDO	ORLDFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORANGEPARK	ORPKFLRWDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PACE	PACEFLPVR0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PAHOKEE	PAHKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNAMACYBCH	PCBHFLNTDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALM COAST	PLCSFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALATKA	PLTKFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CORAL SPG	PMBHFLCSDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMPANOBCH	PMBHFLTADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMONAPARK	PMPKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PANAMACITY	PNCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PENSACOLA	PNSCFLWADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNTVDRABCH	PNVDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PERRINE	PRRNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLFDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOGG0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SEBASTIAN	SBSTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYS	SGKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OVIEDO	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SANFORD	SNFRFLMADS0
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SUNNYHILLS	SYHSFLCCRS0
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERO BEACH	VRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WELAKA	WELKFLMARS0
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WEEKICHSPG	WWSPFLSHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YONGSTFNTN	YNFNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YANKEETOWN	YNTWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YULEE	YULEFLMARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	ALFORD	ALFRFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	BAKER	BAKRFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	BONIFAY	BNFYFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	CRAWFORDVL	CFVLFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SOPCHOPPY	CFVLFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	CHERRYLAKE	CHLKFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	CRESTVIEW	CRVWFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	COTTONDALE	CTDLFLXARS0

SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	DESTIN	DESTFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	DFUNIAKSPG	DFSPFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	FREEPORT	FRPTFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	FTWALTNBCH	FTWBFLXCRS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	GRANDRIDGE	GDRGFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	GLENDALE	GLDLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	GREENVILLE	GNVLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	GREENWOOD	GNWDFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	KINGSLEYLK	KGLKFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	LEE	LEE FLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	MALONE	MALNFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	MADISON	MDSNFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	MONTICELLO	MNTIFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	MARIANNA	MRNNFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	PANACEA	PANCFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	PONCE LEON	PNLNFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	REYNOLDSHL	RYHLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SEAGRV BCH	SGBHFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SHALIMAR	SHLMFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SNEADS	SNDSFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SANROSABCH	SNRSFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	ST MARKS	STMKFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	STARKE	STRKFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	TALLAHASSE	TLHSFLXHDS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	VALPARAISO	VLPRFLXBRS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	WESTVILLE	WSTVFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	APOPKA	APPKFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ARCADIA	ARCDFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ASTOR	ASTRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	AVON PARK	AVPKFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BOCAGRANDE	BCGRFLXARS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BELLEVIEW	BLVWFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BONITA SPG	BNSPFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BUSHNELL	BSHNFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BEVERLYHLS	BVHLFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BOWLNGGREN	BWLGFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CLERMONT	CLMTFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CLEWISTON	CLTNFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CAPE CORAL	CPCRFLEXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	NCAPECORAL	CPCRFLEXBDS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CAPE HAZE	CPHZFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CRYSTALRIV	CRRVFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	DADE CITY	DDCYFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	EUSTIS	ESTSFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	EVERGLADES	EVRGFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FTMYERSBCH	FTMBFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FORT MEADE	FTMDFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	GROVELAND	GVLDLFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	HOMOSSSSPG	HMSPFLEXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	HOWEYINHLS	HOWYFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	IMMOKALEE	IMKLFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	INVERNESS	INVRFLXADS1

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MYAKKA	MYCYFLXA32H
NORTH PORT	NRPTFLXA42H
TAMPAWST	OLDSFLXA85H
POLK CITY	PKCYFLXARSA
BRADENTON	PLSLFLXA79H
HAINESCITY	POINFLXARSA
PALMETTO	PRSHFLXARSA
PLANT CITY	PTCYFLXA75H
STPETERSBG	SPBGFLXS86H
TAMPA	TAMPFLXA1JB
CLEARWATER	TAMPFLXAW44
NWPTRICHEY	TAMPFLXAW44
SARASOTA	TAMPFLXAW44
TAMPACEN	TAMPFLXEDS0
TARPON SPG	TRSPFLXA93H
VENICE	VENCFLXSDS0
WINTER HVN	WNHNFLXC29H
ZEPHYRHILS	ZPHYFLXA78H

State of Florida

County of Escambia

Certification:

I Thomas M. Armstrong certify that I am the company officer/employee responsible for this request and that I have examined/formulated the foregoing request. To the best of my knowledge, information and belief, all statements of fact contained in said request are correct statements of the business and affairs of the requesting carrier with respect to each and every matter set forth.

Dated 3/7/08

Telephone Number 850-455-1234

Signature Thomas M. Armstrong

Subscribed and sworn to before me, a Notary Public in and for the State of Florida above named, this 7th day of March, 2008.

Darlene Pugh
(Notary Public)

DARLENE PUGH
Notary Public, State of Florida
My Comm. Expires Nov. 15, 2008
Comm. No. DD 692529

(Seal)

My Commission Expires: 11.15.08

FL ETC

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