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DIVISION OF
COMPETITIVE SERVICES

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Beth Salak
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RECEIVED-FPSC
08 AUG -5 PM 1:58
COMMISSION
CLERK

July 25, 2008

Subject: Application of NewPhone for designation as an eligible telecommunications carrier (ETC) pursuant to 47 U.S.C. 214(e)

Dear Ms. Salak:

Please accept this application for designation of Image Access, Inc. d/b/a NewPhone ("NewPhone") as an eligible telecommunications carrier (ETC) pursuant to 47 U.S.C. 214(e).

Enclosed for filing with the Commission are the original and fifteen (15) copies of the application and supporting documentation. NewPhone has met the requirements for ETC designation. Grant of this request will serve the public interest by allowing NewPhone to serve current and additional low-income subscribers.

Please date and time stamp the extra copy as proof of filing and return it in the enclosed self addressed stamped envelope. Please refer any questions about this application to me at 5555 Hilton Avenue, Suite 415, Baton Rouge, LA, 70808 or telephone at 225-214-4414.

Sincerely,



Jim Dry
President

* Price list forwarded to RCP.
* Exhibit B removed from application. R.V.N.

Image Access, Inc. d/b/a NewPhone

- COM _____
- ECR _____
- GCL 2
- OPC 1
- RCP _____
- SSC _____
- SGA _____
- ADM _____
- CLK 1

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DOCUMENT NUMBER-DATE

06842 AUG-5 88

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**APPLICATION OF)
IMAGE ACCESS, INC. d/b/a)
NEWPHONE FOR CERTIFICATION)
AS AN ELIGIBLE TELECOMMUNICATIONS) DOCKET NO.:
CARRIER)**

**APPLICATION FOR CERTIFICATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

Image Access, Inc. d/b/a NewPhone, Inc. (“NewPhone” or the “Company”), 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 the rules, regulations and orders of the Florida Public Service Commission (the “Commission”), hereby applies to the Commission for certification as an Eligible Telecommunications Carrier (“ETC”) throughout the BellSouth Telecommunications, Inc. d/b/a AT&T Florida or AT&T Southeast (“AT&T Florida”) exchanges and service areas of the State (the “Designated Service Area”) for the purpose of receiving low-income federal universal service support only.³ The Company is seeking only low income support, and is not requesting support from the federal high cost fund. As demonstrated below, NewPhone satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of NewPhone as an ETC in the Designated Service Area will serve the public

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ See Exhibit E.

interest. Accordingly, NewPhone respectfully requests that the Commission grant this Application.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Jim R. Dry
President
Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

I. Background

1. NewPhone is a Louisiana corporation⁴ and is authorized to conduct business as a foreign corporation in the State of Florida. Copies of the Company's Articles of Organization and authority to transact business in the State of Florida are on file with the Florida Secretary of State's Office. The Company currently holds a Certificate of Public Convenience and Necessity (No.5783) and Interexchange Registration No. TJ902 with the Commission.⁵

2. The principal office of the Company is located at 5555 Hilton Avenue, Suite 415, Baton Rouge, LA 70808. The Company provides pre-paid local exchange service in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through commercial

⁴ Newphone was incorporated in the State of Louisiana on April 7, 1997.

⁵ See Order No. PSC-06-0332-FOF-TP, Docket No. 060218-TP, issued April 24, 2006. See also Order No. PSC-06-0333-FOF-TP, Docket No. 060218-TP, issued April 24, 2006.

agreements (“UNE’s”), consisting of the local loop, ports and transport, provided by AT&T Florida, that allows end-to-end switching and delivery of calls.

3. 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.”⁶ Upon designation as an ETC, the carrier shall be eligible to receive federal universal service support in accordance with Section 254 of the Act.⁷

4. The requirements for designation as an ETC set forth in Section 214 (e) (1) and 47 C.F.R. 54.201(d)(1) and (2), are that the carrier must be a common carrier and:

- (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.⁸

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

5. NewPhone is a common carrier as that term is defined in the Act.⁹ The Company provides competitive local telecommunications services in the Designated Service Area pursuant to FPSC amended Competitive Local Exchange Certificate of Public Convenience and Necessity No. 5783, issued April 24, 2006, referenced above.

⁶ 47 U.S.C. § 214(e)(2); see 47 C.F.R. §54.201(d) (FCC Rules citing the Act’s requirements).

⁷ 47 U.S.C. §214 (e)(1).

⁸ Id.

6. NewPhone offers all of the supported services enumerated under Section 254 (c) via the resale of AT&T Florida's services in combination with using facilities obtained as UNE's, or the equivalents thereof, through commercial agreements with AT&T Florida. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services.¹⁰ Accordingly, the Company satisfies the requirements set forth in Section 214(e)(1)(A).

7. The services that are supported by the 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:

- (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;

NewPhone meets this requirement by providing voice-grade access to the public switched telephone network (PSTN). Through its interconnection agreement with AT&T Florida, all customers of

⁹ 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 . . .).

¹⁰ 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 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 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). NewPhone's use of UNEs, or equivalents thereof, meets this definition of "facilities."

the Company are able to make and receive calls on the PSTN within the specified bandwidth.

- (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;

Although the FCC requires an ETC applicant to demonstrate that it offers a local usage plan comparable to the one offered by AT&T Florida in the service areas for which the applicant seeks designation, the FCC has not adopted a specific local usage threshold.¹¹ NewPhone offers unlimited local service in the AT&T Florida service areas permitting the customer to make an unlimited amount of local calls within his/her local calling area.

- (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;

NewPhone currently uses out-of-band digital signaling and in-band multi-frequency signaling that is functionally equivalent to DTMF in Florida.

- (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;

NewPhone meets the requirement of single-party service by providing its customers with exclusive use of a wireline subscriber loop for each call placed, through its interconnection agreement with AT&T Florida.

- (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

¹¹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45 (March 17, 2005) at paras. 32 – 34 ("FCC March 17, 2005 Order").

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;

NewPhone currently provides all of its customers with access to emergency services by dialing 911 through its interconnection agreement with AT&T Florida in satisfaction of this requirement.

- (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;

NewPhone meets this requirement by providing all of its customers with access to operator services provided by AT&T Florida through its interconnection agreement with AT&T Florida.

- (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 functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier’s network;

NewPhone meets this requirement by providing all of its customers with the ability to connect with an interexchange carrier.

- (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

NewPhone meets this requirement by providing its customers with access to directory assistance.

- (I) Toll limitation for qualifying low-income consumers. Toll limitation service is defined as either “toll control” or “toll blocking” services pursuant to 47 C.F.R. 54-400(d).

NewPhone provides toll blocking services to requesting Lifeline eligible customers in Florida free-of-charge via its interconnection agreement with AT&T Florida.

8. NewPhone currently advertises the availability of the above-listed services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.¹²

9. Upon certification as an ETC, NewPhone will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income customers 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.¹³ Attached hereto as Exhibit A and incorporated herein by reference are copies of NewPhone's proposed Lifeline and Linkup tariff to be filed with the Authority upon approval. The Company's advertising plan is designed to provide notification of the existence of low-income programs to the widest possible audience in the Designated Service Area in Florida.

III. Area for Which ETC Certification is Requested.

10. NewPhone has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural incumbent telephone company (BellSouth/AT&T Florida) in the State of Florida. NewPhone does not seek certification as an ETC in any areas served by any Rural Telephone Company in the State of Florida. The Company does not provide local exchange service in any area served by any Rural Telephone Company in the State of Florida. The exchanges in the AT&T Florida service

¹² See 47 C.F.R. §§ 54.201(d)(2).

¹³ See 47 C.F.R. §§ 54.401-54.417; 54.405(b)&54.411(d).

area that NewPhone serves and for which it seeks ETC designation are attached as Exhibit E.

11. NewPhone will provide Lifeline and Link-Up services in the Designated Service Area where AT&T Florida is the incumbent local exchange carrier.

IV. Granting Newphone's Application Will Serve the Public Interest.

12. The FCC has determined that Lifeline providers utilize federal universal service support for the purpose it was intended when the carrier reduces the price of access to telecommunications services for eligible customers by the amount of that support.¹⁴ NewPhone will pass through all applicable state and federal service discounts and mandated service support to its Lifeline and Link-Up customers, thus reducing the price of access to telecommunications services for the Lifeline and Link-Up eligible customers in Florida.

13. NewPhone complies with all applicable consumer protection and service quality standards in Florida.

14. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹⁵ No specific public interest test is mentioned, as is the case for areas served by Rural Telephone Companies.¹⁶ Thus, the Act provides that the Commission "shall" designate NewPhone as an ETC upon finding that the Company meets the nine-point list of services and that it agrees to advertise the supported services

¹⁴ *In the Matter of Federal-State Joint Board on Universal Service, Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. Sect. 214(e)(1)(A) and 47 C.F.R. 54.201(i)*, para. 26 (CC Docket No. 96-45, rel. Sept. 8, 2005).

¹⁵ See 47 U.S.C. 214(e)(2).

¹⁶ See *Id.*

throughout the Designated Service Area. Notwithstanding the foregoing, the designation of NewPhone as an ETC will serve the public interest.

15. 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.”¹⁷ Designation of NewPhone as an ETC would further these goals. Granting ETC status to NewPhone would allow the Company to obtain federal low-income universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

16. NewPhone 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 NewPhone’s service.

17. NewPhone will provide universal service as an ETC in all of its Designated Service Area. Designation of NewPhone as an ETC will increase the low-income consumer’s choice of carriers. For those consumers who have been disconnected

¹⁷ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56,56 (1996).

from AT&T Florida or other competitive carriers for non-payment of bills, NewPhone provides an alternative service to these consumers.

18. NewPhone's customers generally have poor credit and have had service disconnected by AT&T Florida or another competitive carrier because of unpaid bills. These consumers may be without telephone service because of an inability to bring their accounts current and comply with other requirements for being reconnected to the telephone network, such as the payment of a deposit and/or reconnection fee. NewPhone removes significant barriers to telephone subscribership by providing service to all Lifeline and Link-Up eligible consumers within its Designated Service Area of Florida without credit checks or the posting of a deposit, and despite the customer having been disconnected by another carrier.

19. NewPhone provides toll restriction services throughout its Designated Service Area in Florida, free of charge, as required by the FCC rules. As an alternative to subscription to toll interexchange services, NewPhone provides prepaid long distance. As a result, the majority of NewPhone's customers choose toll restriction services and/or prepaid long distance, which leads to affordable telephone service for the low-income consumer.

20. Under FCC guidelines, where applicable, 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 its requirement is where an applicant's requested ETC serving territory would qualify it to

receive no “high cost” federal universal service support, but only “low income” federal universal service support. Because NewPhone seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers in Florida, submission of a Five-Year Network Improvement Plan is not required at this time.

21. Under FCC guidelines, where applicable, an ETC Applicant must demonstrate its ability to remain functional in emergency situations: (47 C.F.R. § 54.202(a)(2); FCC March 17, 2005 Order, at para. 25). Because NewPhone is providing service to its customers through the resale of AT&T Florida’s service and/or through the use of facilities leased from AT&T Florida, this arrangement allows NewPhone to provide to its customers the same ability to remain functional in emergency situations as currently provided by AT&T Florida to its 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.

22. Under FCC guidelines, where applicable, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making reasonable requests for service. (FCC March 17, 2005 Order, at para. 22; 47 C.F.R. § 54.202(a)(1)(i)). NewPhone commits to provide service throughout its proposed ETC-Designated Service Area to all customers making reasonable requests for service.

V. Exhibits

23. Attached as Exhibit A and incorporated herein by reference are copies of NewPhone's proposed Lifeline and Linkup tariff to be filed with the Commission upon approval.

24. Attached as Exhibit B and incorporated herein by reference are NewPhone's updated financial statements demonstrating that the Company has the financial qualifications to provide the services specified herein. *The financial statements of NewPhone contain proprietary and confidential information not generally available to the public and thus have been marked confidential and are being submitted under seal to be maintained by the Commission and Commission staff on a confidential basis pursuant to the Commission's current rules.*

25. Attached as Exhibit C and incorporated herein by reference is a current list of officers of NewPhone.

26. Attached as Exhibit D to this Application and incorporated herein by reference is an Affidavit of Jim R. Dry, President of NewPhone certifying that the Company satisfies all of the requirements for designation as an ETC to serve the Designated Area.

VI. Relief Requested

For the foregoing reasons, Image Access, Inc. d/b/a NewPhone, Inc. respectfully requests that the Commission grant its Application for designation as an Eligible Telecommunications Carrier for the purposes of receiving low-income, Lifeline and Link-Up, federal universal service support in the Designated Service Area in Florida.

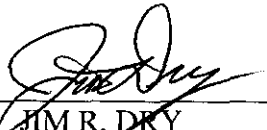
Respectfully submitted,



JIM R. DRY, PRESIDENT
IMAGE ACCESS, INC. D/B/A NEWPHONE
5555 HILTON AVENUE, SUITE 415
BATON ROUGE, LOUISIANA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

VERIFICATION

I, Jim R. Dry, President of Image Access, Inc. d/b/a NewPhone, do verify, on behalf of applicant, that Image Access, Inc. d/b/a NewPhone will comply with and abide by the Commission guidelines and requirements presently in effect or otherwise adopted in the future.



JIM R. DRY
PRESIDENT

Exhibit A

Proposed Lifeline and Linkup Tariff

Price list forwarded to RCP.

Exhibit C

Current List of Officers

NewPhone Corporate Principal Officers

Jim R. Dry

President

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Gene R. Dry

Vice President, Legal Affairs

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Richard R. Jaubert

Vice President & Chief Financial Officer (CFO)

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Exhibit D

Certification/Affidavit in Support of the Application

AFFIDAVIT OF JIM R. DRY
IN SUPPORT OF
PETITION OF
IMAGE ACCESS, INC. D/B/A NEWPHONE AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN FLORIDA

Jim R. Dry, being first duly sworn upon oath, deposes and states as follows:

1. I am President of Image Access, Inc. d/b/a NewPhone ("Newphone"). My office is currently located at 5555 Hilton Avenue, Suite 415, Baton Rouge, LA 70808.

2. I have read the foregoing Application and all information therein is true and correct to the best of my knowledge, information and belief.

3. NewPhone currently holds a Certificate of Authority to Operate as a local exchange and long distance reseller in BellSouth Telecommunications, Inc.'s ("BellSouth") service areas of Florida, Certificate No. TSP00187-B, June 7, 2004. NewPhone is currently providing telecommunications services in Florida to residential consumers throughout the AT&T Florida local exchange service areas of the State.

4. NewPhone respectfully requests federal ETC designation in the AT&T Florida service areas throughout the state as set forth in the Application. NewPhone requests ETC designation only for the purpose of obtaining reimbursement from the federal low-income portion (Lifeline and Linkup) of the federal universal service mechanisms from the federal Universal Service Administrative Company. NewPhone is not requesting ETC status for the purpose of receiving support from the high cost portion of the federal universal service support mechanisms.

5. As set forth in the Application, NewPhone fulfills the FCC's requirements for ETC designation because:

- a. NewPhone is a common carrier;
- b. NewPhone provides the services supported by the federal universal service support mechanisms;
- c. NewPhone has made a reasonable demonstration of its capability and commitment to provide the supported services, as enumerated and described in the Application, to low-income consumers in Florida;
- d. NewPhone provides the support services in Florida to Lifeline and Link-Up eligible consumers via a combination of its own facilities and resale of AT&T Florida's retail services;
- e. NewPhone advertises the availability of Lifeline and Link-Up services in Florida via television advertisement, newspaper advertisement and customer brochures;
- f. NewPhone will comply with all applicable requirements of the FCC and the Commission, as addressed in the Application and as required by the Commission;
- g. NewPhone will pass through to its Lifeline and Link-Up eligible customers all discounts and waivers required by the FCC's rules; and
- h. NewPhone's designation as an ETC in the AT&T Florida service areas is in the public interest because such designation will: 1) lead to increased consumer choice of carriers, and provide an alternative to higher priced pre-paid local exchange carriers; 2) lead to increased subscribership due to advertising, which increases consumer awareness, and the provision of service without the imposition of deposits or credit checks; 3) lead to reduced toll charges for customers due to NewPhone's policy of

educating consumers about toll limitation services and prepaid long distance telephone service; 4) make premium services available to low-income consumers; and 5) contribute to low-income consumers' continued presence on the public telephone network through the Company's provision of affordable service.

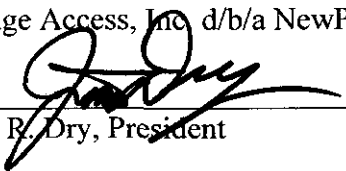
7. NewPhone's designation will have no measurable impact on the federal universal service fund. The Company requests reimbursement for low-income support only and will receive reimbursements previously received by other carriers, except in the case where a customer subscribes to telephone service for the first time.

8. No party to this petition is subject of a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Sec. 862, and Sections 1.2001-1.2003 of the FCC's rules, 47 C.F.R. Sects. 1.2001-1.2003.

9. This concludes my Affidavit.

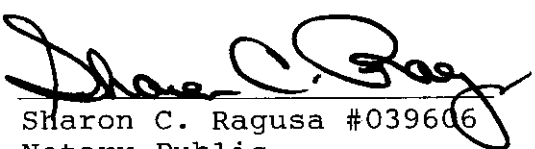
Respectfully submitted this 31st day of July, 2008.

Image Access, Inc. d/b/a NewPhone



Jim R. Dry, President

Subscribed and sworn to before me, Sharon C. Ragusa, a Notary Public in and for the State of Louisiana, on this 31st day of July, 2008.



Sharon C. Ragusa #039606
Notary Public

My Commission expires: At Death

Exhibit E

**Exchanges in the AT&T Florida Service Areas that NewPhone serves
and for which it seeks ETC designation.**

Source: Section A 3.3 of AT&T Florida's General Subscriber Service Tariff

BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	ALACHUA
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	BALDWIN
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	BRANFORD
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	CALLAHAN
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	CRESCENT CITY
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	DOWLING PARK
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	FERNANDINA BEACH
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	FLORAHOME
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	FLA. SHERIFF'S BOYS RANCH
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	FORT WHITE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	GREEN COVE SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	HASTINGS
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	HIGH SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	HILLIARD
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	INTERLACHEN
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	JACKSONVILLE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	JACKSONVILLE BEACH
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	JASPER
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	JENNINGS
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	KINGSLEY LAKE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	LAKE BUTLER
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	LAKE CITY
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	LAWTEY
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	LIVE OAK
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	LURAVILLE
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BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	ORANGE PARK
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	PALATKA
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BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	ST. JOHN
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	STARKE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	WELAKA
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	WELLBORN
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	WHITE SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	YULEE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	APOPKA
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	CELEBRATION
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	COCOA
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	COCOA BEACH
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	DE BARY
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	EAST ORANGE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	EAU GALLIE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	GENEVA
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	KENANSVILLE
BELLSOUTH TLECOMM INC DBA AT&T FLORIDA OR AT&T SOUTHEAST	KISSIMMEE
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STATE OF FLORIDA

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



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Public Service Commission

ACKNOWLEDGEMENT

DATE: August 5, 2008

TO: Jim Dry, Newphone

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 080523 or, if filed in an undocketed matter, concerning Exhibit B, Financial Statements, and filed on behalf of Newphone. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER-DATE
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