

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION OF INTEGRATED PATH)
COMMUNICATIONS LLC AS AN) **DOCKET NUMBER _____**
ELIGIBLE TELECOMMUNICATIONS CARRIER)

Integrated Path Communications LLC (“Integrated Path” or the “Company”), pursuant to Sections 214(e)(2), 214(e)(6) and 254 of the Communications Act of 1934, as amended (the “Act”) and Sections 54.101-54.207 of the Rules of the Federal Communications Commission (“FCC”), and Florida Statute Section 364.10(2) and 364.025(5), hereby applies to the Florida Public Service Commission (“FPSC” or “Commission”) for approval and certification as an Eligible Telecommunications Carrier (“ETC”) in certain service areas throughout the entire State of Florida, including all tribal communities (“Designated Service Area”). Integrated Path seeks certification as an ETC for the purpose of receiving Federal Universal Service (“USF”) support in conjunction with providing Lifeline service to customers, including tribal communities in Florida and high cost support. A list of each rate center for which the Applicant is requesting ETC status in the State of Florida is attached hereto as Exhibit A. Integrated Path satisfies the statutory and regulatory requirements for FPSC designation as an ETC for its proposed Designated Service Area. Designation of Integrated Path as an ETC for its proposed Designated Service Area is consistent with and will serve the public interest by extending affordable telecommunications services to Florida consumers, including those located in Florida’s tribal communities. After the FPSC grants this petition, Integrated Path will offer Lifeline services to qualified low-income consumers as required by the FPSC’s rules and regulations. Accordingly, Integrated Path respectfully requests that the Commission approve this Application and grant ETC status to Integrated Path.

I. Background

Integrated Path is a New York Corporation, incorporated in 2006 with its corporate headquarters in Hillsdale NY and has authority from the Florida Secretary of State to transact business in the state of Florida. Integrated Path was issued a certificate 8865 in docket 14-0690-

PAA-TX on December 15, 2014 see exhibit A. Pursuant to its authorization, Integrated Path provides competitive local exchange and long distance service in its Designated Service Area using a combination of its own facilities and resale.

If FPSC designates Integrated Path as an ETC, Integrated Path will be eligible to receive universal service support consistent with 254 of the Act.¹ The requirements for designation as an ETC are found in Section 214(e)(1) of the Act.

II. Integrated Path Satisfies the Requirement for Designation as an ETC to Serve the Designated Service Area

Integrated Path is a common carrier, as defined in the Act.² Integrated Path provides competitive local telecommunications services in the State of Florida, as discussed above. Integrated Path offers all the supported services enumerated in Section 254(c) of the Act using its own facilities and resale. Integrated Path satisfies the requirements set forth in 2214(e)(1)(a).

The Federal Universal Service Fund supports a variety of services under Section 254(c) of the Act.³

Voice grade access to the public switched network. “Voice grade access” is defined as a functionality that enables a user of telecommunication 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 that there is an incoming call. For the purpose of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz. Integrated Path provides voice grade access using a combination of its own facilities and the resale of the incumbent provider.

Access to Emergency Services. “Access to emergency services” includes access to services, such as 911 and E911, provided by local governments or other public safety organizations. “911” is defined as a service that permits a telecommunications user, by dialing

¹ 47 U.S.C. 214(e)(2)

² See 47 U.S.C. 153(10)

³ See 47 U.S.C. 54.101(a)(1)-(9)

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 extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911.

Minutes of use for Local Service Provided at no Additional Charge to End Users.

Integrated Path will offer customers a basic service level that includes a monthly allowance of minutes that can be used for local service at no additional charge.

Toll Limitation Services to Qualifying Low-Income Customers. Integrated Path will allow customers to avoid unexpected toll charges as the Company provides long distance at an additional charge to the customer on a prepaid basis. Customers can choose a long distance plan that meets their needs without the risk of receiving a high long distance bill.

Integrated Path will comply with the obligation to submit terms and conditions of all voice telephony plans offered to subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each of those plans.

Upon certification as an ETC, Integrated Path will participate in and offer Lifeline to qualifying low-income consumers and publicize the availability of Lifeline in a manner reasonably designed to reach those likely to qualify for those services, and as otherwise required by FCC rules.⁴

Integrated Path will advertise the availability of the above-listed services and the charges for those services in the Designated Service Area, via media of general distribution, as required by FCC rules.⁵

⁴ See 47 U.S.C. 54.501-54.417; 54.405(b); 54.411(d)

⁵ See 47 U.S.C. 54.201(d)(2)

III. Area for Which ETC Certification is Required

Integrated Path seeks ETC certification in designated exchanges throughout the entire State of Florida, including tribal territories located within the State of Florida. Integrated Path seeks ETC certification in the Designated Service Areas listed in Exhibit A.

IV. Grant of Integrated Path's Application Will Serve the Public Interest

Integrated Path offering will be similar to those offered by other landline telecommunications providers in quality and functionality and will be similar in price to its competitors. Currently Integrated Path is offering Lifeline services in New York and Texas to low income consumers. Integrated Path's Lifeline service does not require customer to make a deposit for service and its prepaid long distance services allows for customers to pick a long distance plan that meets their needs without the risk of an unexpected bill.

Florida law says that the Legislature finds that competitive provision of telecommunications services, including local exchange telecommunications service, is in the public interest and will serve consumers with freedom of choice, encourage the introduction of new telecommunications service, encourage technological innovation, and encourage investment in telecommunications infrastructure."⁶ Granting ETC certification will enable Integrated Path to obtain Federal Universal Service Fund support, extending the availability and benefits of competitive telecommunications services to more customers, including those in Florida tribal communities and to continue to build out its network to be able to bring competitive local telecommunications services to more rural areas in the state of Florida. Granting Integrated Path's ETC application will enhance the overall value of the PSTN to all users in Florida, while also fostering innovative telecommunications services at competitive prices to consumers, especially those in need throughout the State of Florida.

Integrated Path is financially and technically capable of providing a Lifeline service in Florida. The FPSC recently reviewed Integrated Path's financial standing and determined that it

⁶ Fla. Stat. 364.01(3)

has sufficient financial resources to provide services in Florida. See order No. PSC 14-0690-PAA-TX issued December 15, 2014.

Integrated Path acknowledges that it may serve as a provider of last resort in areas that thereby provide universal service telephone service as an ETC in its Designated Service Area. Integrated Path agrees to provide equal access if all other ETC's in the Company's Designated Service Area relinquish their ETC designations as permitted under the Act. While the FCC does not currently impose a general equal access requirement upon ETC applicants⁷, it has suggested that applicants acknowledge that an ETC applicant may in the future 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 area. Integrated Path recognizes and acknowledges this potential and will abide by the requirement under such circumstances.

Integrated Path is aware of claims of fraud, waste and abuse of the Lifeline program. Integrated Path will work to avoid fraud, limit waste, and mitigate abuse of the Lifeline program, and is committed to ensuring that each Lifeline subscriber is limited to one Lifeline program per household. Integrated Path will utilize the National Lifeline Accountability Database to validate customers prior to provisioning service.

The FCC requires an ETC applicant to submit a five-year plan that describes with specificity the proposed improvements or upgrades to the applicant's network on a wire center by wire center basis throughout the proposed Designated Service Area. Integrated Path will submit a five-year plan on a wire center by wire center basis for its Designated Service Area, and will continually amend this plan to include additional wire centers where the Company plans to upgrade and build out its network.

Integrated Path offers a local usage plan comparable to the one offered by ILECs in the Designated Service Area. Integrated Path will satisfy all consumer protection and service quality

⁷ See Federal-State Joint Board on Universal Service, Report and Order 20 FCC Rcd. 6371 (2005) "FCC ETC Order"

standards.⁸ Integrated Path also agrees to abide by the service quality and consumer protection rules of the FPSC. Integrated Path will also report information on the number of consumer complaints per 1,000 lines on an annual basis, consistent with the FCC's ETC Order.⁹

Integrated Path will abide by the FCC's regulations regarding its ability to remain functional in emergency situations.¹⁰ Integrated Path will ensure its Lifeline customers have access to emergency services, including 911. Integrated Path will provide its customers the same ability to remain functional in emergency situations as currently provided by the ILEC to its own subscribers. Integrated Path uses on combination of its own facilities and purchases of Unbundled Network Elements (UNE) to provide service to its customers. Integrated Path's facilities are monitored 24 hours per day 7 days per week and are housed in carrier grade telecommunications co-location centers with ample emergency power through back-up generators that can handle prolonged outages in the event of a power outage. Integrated Path networks is build to allow for traffic spikes or damaged facilities as calls will be routed around the facilities that are impaired.

V. Conclusion

Based on the foregoing, Integrated Path respectfully request that the Commission grant its Application and designate the Company as an ETC for the Designated Service Area in the State of Florida, including tribal areas.

Brian Shepard

Brian Shepard

Integrated Path Communications LLC

⁸ See 47 C.F.R. 202(a)(3); ETC Order ¶ 28

⁹ See FCC ETC Order ¶ 14

¹⁰ See 47 C.F.R. 202(a)(2); FCC ETC Order ¶ 25

EXHIBIT A
WIRE CENTERS

CLLI	Rate Center	ILEC
MIAMFLHLDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLCADSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
HMSTFLNARSD0	HOMESTEAD	BELLSOUTH TELECOMM INC DBA SOU
HMSTFLEARS0	HOMESTEAD	BELLSOUTH TELECOMM INC DBA SOU
PRRNFLMADSD0	PERRINE	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLGRDS1	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
HMSTFLHMDS0	HOMESTEAD	BELLSOUTH TELECOMM INC DBA SOU
NDADFLGGSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLBARP0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLWMDS0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLSODSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLRRSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MRTHFLVERSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
KYWSFLMADSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLMERP0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
NDADFLACSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLKEDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
NKLRFLMARSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLWDDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLPLSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
NDADFLGGSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
NDADFLBRSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
KYLRFLMARSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLBCSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLAEDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
KYLRFLLSRS0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
NDADFLOLDSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLAPSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
BGPIFLMARSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
ISLMFLMARSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLAERS0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLGRSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLBRSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLFLSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLPLBBD0	N/A	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLMERS0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLPLRS0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLALSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLDBRS1	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLOLDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLNSDSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
SGKYFLMARSD0	KEYS	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLSHSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLPBSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLHLDSD0	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOU
MIAMFLICSD0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU

CLLI	Rate Center	ILEC
MIAMFLNMDS0	MIAMI	BELLSOUTH TELECOMM INC DBA SOU
TTVLFLMADS0	TITUSVILLE	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLAPDS0	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
EGLLFLBGDS0	EAU GALLIE	BELLSOUTH TELECOMM INC DBA SOU
LKMRFLHEDS0	SANFORD	BELLSOUTH TELECOMM INC DBA SOU
CCBHFLMADS0	COCOABEACH	BELLSOUTH TELECOMM INC DBA SOU
CCBHFLAFRS0	COCOABEACH	BELLSOUTH TELECOMM INC DBA SOU
MLBRFLMADS0	MELBOURNE	BELLSOUTH TELECOMM INC DBA SOU
COCOFLMADS0	COCOA	BELLSOUTH TELECOMM INC DBA SOU
COCOFLMEDS0	COCOA	BELLSOUTH TELECOMM INC DBA SOU
EGLLFLIHDS0	EAU GALLIE	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLMADS1	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLSADS0	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
WWSPFLSHDS0	WEEKICHSPG	BELLSOUTH TELECOMM INC DBA SOU
GSVLFLMADS1	GAINESVL	BELLSOUTH TELECOMM INC DBA SOU
GSVLFLMADS0	GAINESVL	BELLSOUTH TELECOMM INC DBA SOU
GSVLFLNW33E	GAINESVL	BELLSOUTH TELECOMM INC DBA SOU
YNTWFLMARS0	YANKEETOWN	BELLSOUTH TELECOMM INC DBA SOU
TRENFLMARS0	TRENTON	BELLSOUTH TELECOMM INC DBA SOU
DNLNFLWMRS0	DUNNELLON	BELLSOUTH TELECOMM INC DBA SOU
MCNPFLMARS0	MICANOPY	BELLSOUTH TELECOMM INC DBA SOU
NWBYFLMARS0	NEWBERRY	BELLSOUTH TELECOMM INC DBA SOU
KYHGFLMARS0	KEYSTN HTS	BELLSOUTH TELECOMM INC DBA SOU
HWTHFLMARS0	HAWTHORNE	BELLSOUTH TELECOMM INC DBA SOU
BRSNFLMARS0	BRONSON	BELLSOUTH TELECOMM INC DBA SOU
CFLDFLMARS0	CHIEFLAND	BELLSOUTH TELECOMM INC DBA SOU
ARCHFLMARS0	ARCHER	BELLSOUTH TELECOMM INC DBA SOU
CSCYFLBARS0	CROSS CITY	BELLSOUTH TELECOMM INC DBA SOU
BKVLFLJFDS0	BROOKSVL	BELLSOUTH TELECOMM INC DBA SOU
OLTWFLLNRS0	OLD TOWN	BELLSOUTH TELECOMM INC DBA SOU
CDKYFLMARS0	CEDAR KEYS	BELLSOUTH TELECOMM INC DBA SOU
WWSPFLHIDS0	WEEKICHSPG	BELLSOUTH TELECOMM INC DBA SOU
BNNLFLMARS0	BUNNELL	BELLSOUTH TELECOMM INC DBA SOU
DYBHFLMADS0	DAYTONABCH	BELLSOUTH TELECOMM INC DBA SOU
DYBHFLOBDS0	DAYTONABCH	BELLSOUTH TELECOMM INC DBA SOU
PLCSFLMADS0	PALM COAST	BELLSOUTH TELECOMM INC DBA SOU
DYBHFLFNRS0	DAYTONABCH	BELLSOUTH TELECOMM INC DBA SOU
LKCYFLMADS0	LAKE CITY	BELLSOUTH TELECOMM INC DBA SOU
DYBHFLPODS0	DAYTONABCH	BELLSOUTH TELECOMM INC DBA SOU
PLTKFLMADS0	PALATKA	BELLSOUTH TELECOMM INC DBA SOU
OKHLFLMARS0	OAK HILL	BELLSOUTH TELECOMM INC DBA SOU
NSBHFLMADS0	NWSMYRNBCH	BELLSOUTH TELECOMM INC DBA SOU
FLBHFLMARS0	FLAGLERBCH	BELLSOUTH TELECOMM INC DBA SOU
DYBHFLOSRS0	DAYTONABCH	BELLSOUTH TELECOMM INC DBA SOU
WELKFLMARS0	WELAKA	BELLSOUTH TELECOMM INC DBA SOU
DBRYFLDLDS0	DEBARY	BELLSOUTH TELECOMM INC DBA SOU

CLLI	Rate Center	ILEC
DELDFLMADS0	DELAND	BELLSOUTH TELECOMM INC DBA SOU
PMPKFLMARS0	POMONAPARK	BELLSOUTH TELECOMM INC DBA SOU
DBRYFLMARS1	DEBARY	BELLSOUTH TELECOMM INC DBA SOU
PRSNFLFDRS0	PIERSON	BELLSOUTH TELECOMM INC DBA SOU
DLSPFLMARS0	DELEON SPG	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLCLDS0	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLPCDS0	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
ORLDFLPHDS0	ORLANDO	BELLSOUTH TELECOMM INC DBA SOU
SNFRFLMADS0	SANFORD	BELLSOUTH TELECOMM INC DBA SOU
SNFRFLMADS0	OVIEDO	BELLSOUTH TELECOMM INC DBA SOU
GENVFLMARS0	GENEVA	BELLSOUTH TELECOMM INC DBA SOU
OVIDFLCADS0	OVIEDO	BELLSOUTH TELECOMM INC DBA SOU
EORNFLMARS0	EASTORANGE	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLLEDS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLRPDS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLGRDS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
BCRTFLSADS0	BOCA RATON	BELLSOUTH TELECOMM INC DBA SOU
BCRTFLBTDS0	BOCA RATON	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLHHDS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
DLBHFLMADS0	DELRAY BCH	BELLSOUTH TELECOMM INC DBA SOU
JPTRFLMADS0	JUPITER	BELLSOUTH TELECOMM INC DBA SOU
BYBHFLMADS0	BOYNTONBCH	BELLSOUTH TELECOMM INC DBA SOU
BCRTFLMADS1	BOCA RATON	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLGADS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLANDS0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
DLBHFLKPRS0	DELRAY BCH	BELLSOUTH TELECOMM INC DBA SOU
DLBHFLMARS0	DELRAY BCH	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLRBRP0	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
DLBHFLKPDS0	DELRAY BCH	BELLSOUTH TELECOMM INC DBA SOU
BLGLFLMADS0	BELLEGLADE	BELLSOUTH TELECOMM INC DBA SOU
WPBHFLRB84E	WPALMBEACH	BELLSOUTH TELECOMM INC DBA SOU
PAHKFLMARS0	PAHOKEE	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLMRDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLOADS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLWHDS0	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOU
PTSLFLMADS0	PTST LUCIE	BELLSOUTH TELECOMM INC DBA SOU
STRFLMADS0	STUART	BELLSOUTH TELECOMM INC DBA SOU
HTISFLMADS0	JENSEN BCH	BELLSOUTH TELECOMM INC DBA SOU
VRBHFLMADS0	VERO BEACH	BELLSOUTH TELECOMM INC DBA SOU
SBSTFLMADS0	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOU
HTISFLMADS0	PTST LUCIE	BELLSOUTH TELECOMM INC DBA SOU
VRBHFLBERS0	VERO BEACH	BELLSOUTH TELECOMM INC DBA SOU
STRFLMADS0	JENSEN BCH	BELLSOUTH TELECOMM INC DBA SOU
FTPRFLMADS0	FORTPIERCE	BELLSOUTH TELECOMM INC DBA SOU
PTSLFLSOCG0	PTST LUCIE	BELLSOUTH TELECOMM INC DBA SOU
HBSDFLMADS0	HOBE SOUND	BELLSOUTH TELECOMM INC DBA SOU

CLLI	Rate Center	ILEC
SBSTFLFERSO	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOU
MICCFLBRSO	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOU
PCBHFLNTDSO	PNAMACYBCH	BELLSOUTH TELECOMM INC DBA SOU
FMTNALMTRSO	CENTURY	BELLSOUTH TELECOMM INC DBA SOU
GCVLFLMARSO	GRACEVILLE	BELLSOUTH TELECOMM INC DBA SOU
LYHNFLHDSO	LYNN HAVEN	BELLSOUTH TELECOMM INC DBA SOU
PNSCFBLDSO	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOU
CHPLFLJADSO	CHIPLEY	BELLSOUTH TELECOMM INC DBA SOU
PNSCFLPDSO	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOU
PNSCFLWADSO	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOU
PNSCFLPBDSO	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOU
HLNVFLMADS1	HOLLEYNVRR	BELLSOUTH TELECOMM INC DBA SOU
PNCYFLMADSO	PANAMACITY	BELLSOUTH TELECOMM INC DBA SOU
VERNFLMARSO	VERNON	BELLSOUTH TELECOMM INC DBA SOU
HAVNFLMADSO	HAVANA	BELLSOUTH TELECOMM INC DBA SOU
MLTNFLRADSO	MILTON	BELLSOUTH TELECOMM INC DBA SOU
JAY FLMARSO	JAY	BELLSOUTH TELECOMM INC DBA SOU
YNFNFLMARSO	YONGSTFNTN	BELLSOUTH TELECOMM INC DBA SOU
SYHSFLCCRSO	SUNNYHILLS	BELLSOUTH TELECOMM INC DBA SOU
PNCYFLCARSO	PANAMACITY	BELLSOUTH TELECOMM INC DBA SOU
GLBRFLMCDSO	GULFBREEZE	BELLSOUTH TELECOMM INC DBA SOU
CNTMFLLED1	CANTONMENT	BELLSOUTH TELECOMM INC DBA SOU
PNSCFLHCRSO	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOU
MNSNFLMARSO	MUNSON	BELLSOUTH TELECOMM INC DBA SOU
PACEFLPVRSO	PACE	BELLSOUTH TELECOMM INC DBA SOU
STAGFLWGRSO	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLSMDSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLCLBBO	N/A	BELLSOUTH TELECOMM INC DBA SOU
FRBHFLFPDSO	FERNADNBCH	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLBWDSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
ORPKFLRWDSO	ORANGEPARK	BELLSOUTH TELECOMM INC DBA SOU
MDBGFLPMDSO	MIDDLEBURG	BELLSOUTH TELECOMM INC DBA SOU
ORPKFLMADSO	ORANGEPARK	BELLSOUTH TELECOMM INC DBA SOU
JCBHFLABRSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCBHFLSPRSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
YULEFLMARSO	YULEE	BELLSOUTH TELECOMM INC DBA SOU
MNDRFLLWRSO	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLCLDSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCBHFLMA24E	JACKSOLBCH	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLJTRSA	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
MNDRFLLODSO	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLSJ73E	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
BLDWFLMARSO	BALDWIN	BELLSOUTH TELECOMM INC DBA SOU
PNVDFLMADSO	PNTVDRABCH	BELLSOUTH TELECOMM INC DBA SOU
GCSPFLCNDSO	GREENCVSPG	BELLSOUTH TELECOMM INC DBA SOU
MXVFLMARSO	MAXVILLE	BELLSOUTH TELECOMM INC DBA SOU

CLLI	Rate Center	ILEC
JCVLFLWCDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
MNDRFLAVDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLNODS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLRV38E	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
STAGFLBSRS0	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLJTRS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
STAGFLMADS0	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLOWDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLLFDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLARDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLIARS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
JCVLFLFCDS0	JACKSONVL	BELLSOUTH TELECOMM INC DBA SOU
STAGFLSHRS0	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLJADS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLCYDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLWNS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
PMBHFLCSDS0	CORAL SPG	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLPEDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLPEDS0	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLSULRP	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLPLDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLMADS0	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLMADS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
DRBHFLMADS0	DEERFLDBCH	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLCRDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLPLBB0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
HLWDFLHARPO	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLSGDS0	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
PMBHFLFEDS0	POMPANOBCH	BELLSOUTH TELECOMM INC DBA SOU
FTLDFLSURPO	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
PMBHFLMADS0	POMPANOBCH	BELLSOUTH TELECOMM INC DBA SOU
PMBHFLTADS0	POMPANOBCH	BELLSOUTH TELECOMM INC DBA SOU
MIANFLYIDS6	FTLAUDERDL	BELLSOUTH TELECOMM INC DBA SOU
PMBHFLNPRS0	POMPANOBCH	BELLSOUTH TELECOMM INC DBA SOU