

FLORIDA PUBLIC SERVICE COMMISSION
Capital Circle Office Center • 2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

M E M O R A N D U M

September 11, 1997

RECEIVED

SEP 11 1997
12:10
FPSC - Records/Reporting

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF COMMUNICATIONS (MARSH)^{ser}
DIVISION OF LEGAL SERVICES (COX) *MB for WPC*

RE: DOCKET NO. 970644-TP - ESTABLISHMENT OF ELIGIBLE
TELECOMMUNICATIONS CARRIERS PURSUANT TO SECTION 214(e) OF
THE TELECOMMUNICATIONS ACT OF 1996

DOCKET NO. 970744-TP - IMPLEMENTATION OF CHANGES IN THE
FEDERAL LIFELINE ASSISTANCE PROGRAM CURRENTLY PROVIDED BY
TELECOMMUNICATIONS CARRIERS OF LAST RESORT

AGENDA: 09/23/97 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: January 1, 1998

SPECIAL INSTRUCTIONS: S:\PSC\CMU\WP\970644TP.RCM

CASE BACKGROUND

The Telecommunications Act of 1996 (the Act) initiated sweeping changes in the telecommunications industry. Among those changes was the introduction of Eligible Telecommunications Carriers (ETCs). ETCs are defined in Section 214(e) of the United States Code (47 U.S.C. 214).

(1) A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal support . . . and shall, throughout the service area for which the designation is received--

(A) offer the services that are supported by Federal universal service 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

DOCUMENT NUMBER-DATE

09235-SEP 11 97

FPSC-RECORDS/REPORTING

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.

The Act provides that State commissions may designate ETCs either on their own motion or upon request.

The FCC determined in its Report and Order on Universal Service (CC Docket No. 96-45, FCC Order 97-157, Released May 8, 1997) (Order) that the supported services to be provided by all ETCs must include voice grade access to the public switched network, a certain amount of free local usage, dual tone multi-frequency signaling or its functional equivalent, single-party service, access to emergency services, access to operator services, access to interexchange service, and access to directory assistance. In addition, ETCs must provide Lifeline and Link Up to eligible subscribers. As part of their Lifeline plans, ETCs must offer voluntary toll limitation services in exchange for reduced or zero deposits.

The Order institutes several changes in the existing Lifeline program. Many of the changes were adopted to make the program consistent with the Act, particularly with regard to competitive neutrality. The current program is a function of jurisdictional separations and applies only to incumbent LECs; thus, it is not competitively neutral. Other changes were instituted in an attempt to increase subscribership levels among low-income consumers.

Beginning January 1, 1998, a baseline federal support amount of \$3.50 will be available in all states, the District of Columbia, and all territories and possessions, regardless of whether any intrastate support is provided. The baseline amount of federal support will increase from the current \$3.50 waiver of the Subscriber Line charge (SLC) to \$5.25, provided the state approves the additional support to be passed through in intrastate rates. The federal jurisdiction will also provide additional Lifeline support equal to one-half of any intrastate support, up to an additional \$1.75. A total of \$7.00 in federal universal support can be received for each Lifeline subscriber.

This recommendation addresses the initial designation of ETCs in Florida, and implementation of changes to Lifeline.

DISCUSSION OF ISSUES

ISSUE 1: Should the FPSC designate eligible telecommunications carriers (ETCs), pursuant to 47 C.F.R. § 54.201-.203?

RECOMMENDATION: Yes. Initially, the incumbent LECs should be designated as ETCs. LECs should continue to serve their current certificated service areas. All carriers who wish to receive ETC status in the service area of a non-rural LEC should apply to the FPSC for ETC status and should propose what they believe is an appropriate service area, subject to FPSC approval. Any carriers that wish to be designated as an ETC in the service area of a rural LEC must show why it is in the public interest to have more than one ETC in that service area. Additionally, if approved, such carriers must serve the entire service area of the rural LEC or make a showing as to why some other area would better serve the public interest. (MARSH)

STAFF ANALYSIS: Only ETCs designated by state commissions pursuant to the criteria in the Act will be eligible to receive high cost and low income support. At present, the LECs serve in a similar role as carriers of last resort. Florida LECs can receive federal universal service support, either through the current high cost fund, or through Lifeline and Link Up.

The supported services, with the exception of certain toll limitation services, are already provided by LECs. Additionally, the provision of Lifeline has already been imposed upon them by the Florida statutes. Since the LECs are largely meeting the requirements of the new federal rules, staff believes it is appropriate to allow them to continue to receive federal universal service support.

State commissions must also establish service areas for ETCs. A service area has been defined by the FCC as "a geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms." (47 C.F.R. 54.207) LECs already have a certificated service area. That area should serve for purposes of federal universal service funding. However, ALECs are certificated state-wide, although they may actually serve much smaller areas. We believe it would be appropriate to determine what area should be an ALEC's service area for purposes of federal universal service support at such time as it applies for ETC status.

In the case of a rural LEC, the Act defines the service area as the study area that is used for jurisdictional separations. An ETC in the service area of a rural LEC must serve the entire study

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

area, unless a different area is approved by both the state Commission and the FCC. Additionally, the Act requires that

[b]efore designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest. (47 U.S.C. 214(2))

It should be noted that under Florida law, ALECs may not offer basic local telecommunications services within the territory served by a small LEC before January 1, 2001 unless it has elected price regulation. However, mobile carriers may serve those areas, and may apply for ETC status.

Staff recommends that the requirements of the 1996 Act can be met initially by designating the incumbent LECs as ETCs. LECs should continue to serve their current certificated service areas. All carriers who wish to receive ETC status in the service area of a non-rural LEC should petition the FPSC for ETC status and should propose what they believe is an appropriate service area, subject to FPSC approval. Any carriers that wish to be designated as an ETC in the service area of a rural LEC must show why it is in the public interest to have more than one ETC in that service area. Further, if approved, such carriers must serve the entire service area of the rural LEC to be considered an ETC or make a showing as to why some other area would better serve the public interest.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

ISSUE 2: By what means should the availability of services be advertised?

RECOMMENDATION: On an interim basis, ETCs should provide Lifeline and Link Up information in their telephone directories. This information should include information on voluntary toll limitation services and the availability of reduced deposits. If the directory contains an index, Lifeline and Linkup should be listed in the index. ETCs should provide a bill stuffer advertising the availability of these services on an annual basis. Further, ETCs should be required to work with local welfare agencies, to the extent it is possible, to reach eligible subscribers. At such time as non-LECs apply to become ETCs, additional advertising requirements for all supported services should be established that will apply to both LECs and non-LECs. (MARSH)

STAFF ANALYSIS: One of the requirements for receipt of federal universal service funding is the advertisement of supported services in a media of general distribution.

Presently, LECs work with various local welfare agencies who include Lifeline information in their client packages. Although this appears to be the most effective means of reaching eligible subscribers, the FPSC has no authority to mandate the participation of the local welfare agencies. However, we can require the ETCs to work with those agencies to the extent it is possible to do so. Although LECs provided a bill stuffer regarding Lifeline when it was first offered, no ongoing advertising is required. We note that at least one company, Sprint, includes Lifeline information in its telephone directory.

Staff analyzed the growth in Lifeline customers to evaluate the effectiveness of the current advertising methods. Florida's Lifeline statute became effective on July 1, 1995, for all companies other than BellSouth. By June 30, 1996, there were 120,499 Lifeline subscribers. Five companies reported no participants. By June 30, 1997, there were 155,302 Lifeline subscribers, with only one company (Vista-United) reporting no participants. Of a total 34,803 increase in Lifeline subscribers over a period of one year, 29,076 were added in the first six months of 1997. Based on this data, it appears that the growth in Lifeline subscribership is accelerating.

While Lifeline subscribership is increasing in Florida, Florida's participation level is still substantially below the national average of approximately five percent. Notably, small Florida LECs in rural areas have some of the lowest participation

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

levels in the state. It is clear that more work needs to be done to increase Lifeline subscribership in Florida.

The advertising requirement imposed upon ETCs by the 1996 Act extends to all supported services, not just Lifeline. However, staff believes that until there is meaningful competition, requiring the LECs to advertise more than Lifeline and Link Up will serve no purpose. Customers already know that they can obtain service from the "phone company," as demonstrated by the high rate of growth in access lines in this state. What they do not know is what other companies can also provide comparable service. Accordingly, staff believes it would be appropriate to establish additional advertising requirements for supported services at such time as non-LEC companies apply to become ETCs.

Staff recommends that, on an interim basis, ETCs should provide Lifeline and Link Up information in their telephone directories. This information should include information on voluntary toll limitation services and the availability of reduced deposits. If the directory contains an index, Lifeline and Linkup should be listed in the index. ETCs should provide a bill stuffer advertising the availability of these services on an annual basis. Further, ETCs should be required to work with local welfare agencies, to the extent it is possible, to reach eligible subscribers. At such time as non-LECs apply to become ETCs, additional advertising requirements for all supported services should be established that will apply to both LECs and non-LECs.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

ISSUE 3: Should ETCs be permitted to disconnect the service of Lifeline customers for non-payment of toll charges?

RECOMMENDATION: No. Local service for Lifeline customers may not be disconnected for non-payment of toll charges; however, toll service may be disconnected for non-payment. Toll limitation services should be made available to customers on a voluntary basis and at no charge, in exchange for reduced or zero deposits. ETCs unable to provide toll limitation services at this time should file implementation plans and a request for waiver with the FPSC within 30 days of the vote on this recommendation. (MARSH)

STAFF ANALYSIS: One of the new requirements for Lifeline is that Lifeline consumers be able to receive, without charge, toll limitation services. This is due to the belief that one of the primary reasons subscribers lose access to telecommunications services is disconnection for failure to pay toll bills.

With voluntary toll blocking, customers may have all toll calls blocked. With toll control services, customers may limit in advance the toll usage per billing cycle. However, the prohibition against disconnection is not conditioned upon the acceptance of toll limitation services. Rather, a customer's deposit can be eliminated in exchange for participation in toll blocking. ETCs may not collect service deposits from customers who select toll blocking. The service deposit should be reduced appropriately for those customers who selected toll control.

The FCC limited the disconnect prohibition to Lifeline subscribers because it believes only low-income consumers experience dramatically lower subscribership levels that can be attributed to toll charges. However, the FCC also stated that if it subsequently finds that subscribership levels among non-Lifeline subscribers begin to decrease, it will consider whether this rule should apply to all consumers. At present, the matter of disconnection of non-Lifeline customers is being left to the states' discretion.

It is important to note that this is an exception to the FPSC's long-standing policy on discontinuance of local service for non-payment of toll charges. If a LEC provides billing service for an IXC, it has disconnect authority for nonpayment of the IXC bill. (Docket No. 820537-TP, Order No. 12765, p. 26) The FPSC recently reaffirmed that policy. However, staff has recommended that this provision be included for Lifeline customers because it is a mandatory part of the new Lifeline program. Companies cannot qualify as ETCs if they do not meet this requirement.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

Even though the no-disconnect provision is required, ETCs may apply to their state commissions for a waiver of the no-disconnect requirement. The ETC must make a three-prong showing that: 1) The ETC would incur substantial costs in complying with such a requirement; 2) the ETC offers toll-limitation services to its Lifeline subscribers; and 3) telephone subscribership among low-income consumers in its service area in the state from which it seeks the waiver is at least as high as the national subscribership level for low-income consumers. All of these requirements must be met for an ETC to receive a waiver. Since no LEC currently has a Lifeline subscribership level equal to the national average of approximately five percent, the waiver requirements for LECs cannot be met in Florida at this time.

However, waivers may be granted by the states to carriers that are technically incapable of providing toll limitation services while they upgrade their switches to enable them to provide such services. The FCC made it clear that it expects waivers to be granted very infrequently, due to the heavy burden of proof it has placed on the carriers. If granted, waivers may be effective for no more than two years, but may be renewed.

Presently, toll limitation services can be provided only in certain areas of the state. Most carriers can provide toll blocking, but not toll control. Staff believes that carriers desirous of receiving federal support should provide the services upon which that support is contingent. Carriers who cannot provide full toll limitation services should provide a plan and time line to the FPSC for their provision. The FCC has agreed that carriers providing voluntary toll limitation should be compensated from universal service support mechanisms for the incremental cost of providing toll-limiting services. (Order, ¶386) No intrastate funding is available in Florida.

Staff recommends that local service for Lifeline customers should not be disconnected for non-payment of toll charges; however, toll service may be disconnected for non-payment. Toll limitation services should be made available to customers on a voluntary basis and at no charge, in exchange for reduced or zero deposits. ETCs unable to provide toll limitation services at this time should file implementation plans and a request for waiver with the FPSC within 30 days of the vote on this recommendation.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

ISSUE 4: Should the FPSC approve a reduction of \$1.75 in the amount paid by consumers participating in the Lifeline Assistance Plan (Lifeline)?

RECOMMENDATION: Yes. The FPSC should approve a reduction of \$1.75 in the amount paid by consumers participating in Lifeline. No matching state support is required. Telecommunications carriers should discount rates to Lifeline subscribers accordingly. Tariffs reflecting changes to Lifeline should be filed within 30 days of the vote on this issue, to be effective January 1, 1998. (MARSH)

STAFF ANALYSIS: Under the current Lifeline program, end-user charges are reduced for local service to low-income consumers. As implemented in Florida and in most other participating states, a subscriber's monthly bill is reduced by up to twice the \$3.50 Subscriber Line Charge (SLC). The federal jurisdiction allows for a waiver of the \$3.50 SLC, while the states contribute a matching amount of \$3.50. The state portion may be provided for through the ratemaking process, which is the case in Florida.

The new plan adopted by the FCC provides for federal baseline support of up to \$5.25 in all states, with no matching state support required. As stated in the FCC's Order:

Lifeline consumers will continue to receive the \$3.50 in federal support that is currently available. . . . For Lifeline consumers in a given state to receive the additional \$1.75 in federal support, that state need only approve the reduction in the portion of the intrastate rate paid by the end user; no state matching is required. (Order, ¶ 351)

The Florida legislature has expressed its intent that Florida LECs should participate in the federal Lifeline Assistance Plan as evidenced by Section 364.10, Florida Statutes. An additional benefit may be received by Florida consumers with no further action on the part of the State, beyond the adoption of the new discounted rate. Staff believes it is in the best interests of Florida's Lifeline subscribers to obtain this benefit for them.

Accordingly, staff recommends that the FPSC approve a reduction of \$1.75 in the amount paid by consumers participating in Lifeline. As discussed above, no matching state support is required.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

ISSUE 5: Should Florida apply for an additional \$1.75 in federal funding for the Lifeline Assistance Plan which requires matching state support of \$3.50?

RECOMMENDATION: Not at this time. Pursuant to Section 364.10(2), Florida Statutes, telecommunications carriers of last resort must provide a Lifeline Assistance Plan to their customers. However, it is not clear that Florida's program meets the FCC's requirement that state universal service support for Lifeline must be provided in an equitable and non-discriminatory manner. Until further guidance is received from the FCC or from the Florida Legislature, no action should be taken on this issue. (MARSH)

STAFF ANALYSIS: In addition to the \$1.75 baseline support discussed in Issue 1, the federal universal service fund will provide an additional amount equal to one half of any support generated from the intrastate jurisdiction, up to an additional \$1.75. Approval of this portion of the plan would bring total federal Lifeline support to \$7.00. In other words, if the state supports \$3.50 per lifeline consumer, the federal jurisdiction will provide another \$1.75 above the \$5.25 (\$3.50 + \$1.75) baseline amount. This is further demonstrated in Table 1.

TABLE 1

Levels of Lifeline Support

\$ 3.50	Baseline federal Lifeline support.
+ 1.75	Additional baseline federal Lifeline support if state approves reduction in the portion of the intrastate rate paid by the end user.
\$ 5.25	Total support available without any state contributions (state must approve rates).
+ 1.75	Additional federal Lifeline support is available equal to half of any support from the intrastate jurisdiction, up to a maximum of \$7.00 of total federal support. I.e., state support of \$3.50 generates additional federal support of \$1.75. This generates the maximum federal support available.
\$ 7.00	Maximum federal support available.
+ 3.50	State support needed to maximize federal support.
\$10.50	Total Lifeline support possible.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

Intrastate matching may be provided from any source. The Federal-State Joint Board noted in its Recommended Decision that many states currently generate matching amounts through the state rate-regulation process. Although the Joint Board suggested that states should explicitly fund such reductions, rather than recovering the amounts through rates paid by other customers, the FCC declined to implement a specific requirement, stating:

We see no reason at this time to intrude . . . on states' decisions about how to generate intrastate support for Lifeline. We do not currently prescribe the methods states must use to generate intrastate Lifeline support, nor does this Order contain any such prescriptions. Many methods exist, including competitively neutral surcharges on all carriers or the use of general revenues, that would not place the burden on any single group of carriers. We note, however, that states must meet the requirements of section 254(e) in providing equitable and non-discriminatory support for state universal service support mechanisms. [emphasis added] (Order, ¶ 361)

It could be argued that the Florida program is not equitable and non-discriminatory. In Florida, Lifeline has been implemented under Section 364.10(2), Florida Statutes. The statute states that ". . . a telecommunications company serving as carrier of last resort shall provide a Lifeline Assistance Plan to qualified residential subscribers, as defined in a commission-approved tariff. . . ." However, there is no state funding for the program. Instead, the LECs provide a rate reduction of \$3.50 per month to Lifeline consumers. ALECs are not required to provide a Lifeline program, nor do other carriers contribute to the funding of the intrastate portion. While the FCC has not mandated the creation of a state fund for carriers to obtain the \$1.75 federal contribution above the baseline, it appears that a rather broad hint has been given. Certain action may be needed in Florida if it is desirous of obtaining full federal support.

The FPSC previously addressed the Lifeline issue in its report on "Universal Service in Florida" which was provided to the Governor and the Legislature in December 1996. The report stated:

At present, no universal service funding at the state level is provided for Lifeline . . . assistance. While this lack of funding may have been appropriate under

rate of return regulation, under which a LEC could apply for rate increases if needed, we believe it is less appropriate in a competitive climate. Those companies with qualifying customers could provide a disproportionate share of the funding for those customers, while companies with no customers would not contribute anything. This would be a disadvantage to the company serving the most low-income customers. Therefore, we believe provisions should be made to allow future funding of these programs through the state universal service fund, to the extent not funded through federal programs. (Page 47)

If needed, a Lifeline fund could be established as part of a permanent state Universal Service mechanism. Lifeline could also be funded by other means, such as a surcharge like that used to fund the Telecommunications Relay System.

We have attempted to quantify the impact of the various possibilities on Florida. At present, the Lifeline participation level in Florida is approximately two percent of residential access lines. This is below the national average of about five percent. However, some Florida LECs only began to provide Lifeline in 1995, and thus have low participation levels. If we assume five percent participation, the federal funding level of \$5.25 per subscriber could provide funding of about \$22 million for Florida. With additional Lifeline support of \$3.50 per subscriber provided by the state, the federal portion would increase to \$7.00 per access line, for a total of \$10.50 in Lifeline support for each subscriber. The total amount under this scenario would be \$45 million. Of this amount, \$15 million would come from the state, and \$30 million would come from federal funding.

Staff recommends that, due to the uncertainty regarding whether Florida's Lifeline Assistance Plan will meet federal requirements for state matching, Florida should not pursue the additional \$1.75 in federal funding at this time. Pursuant to Section 364.10(2), Florida Statutes, telecommunications carriers of last resort must provide a Lifeline Assistance Plan to their customers. However, it is not clear the statutory requirement meets the FCC's criteria that state Lifeline programs must be provided in an equitable and non-discriminatory manner. Until further guidance is received from the FCC or from the Florida Legislature, no action should be taken on this issue.

DOCKET NOS. 970644-TP, 970744-TP
DATE: September 11, 1997

ISSUE 6: Should these dockets be closed?

RECOMMENDATION: Yes, if no person whose substantial interests are affected by the FPSC's Proposed Agency Action files a protest within 21 days of the issuance date of the order. If a protest is filed that is applicable to one ETC, the order should remain in effect with respect to all other ETCs. (COX)

STAFF ANALYSIS: These dockets should be closed if no person whose substantial interests are affected by the FPSC's Proposed Agency Action files a protest within 21 days of the issuance date of the order.

Staff does not believe that an ETC designated by the FPSC should be prohibited from participation in the federal universal service program if a protest is not filed specifically with regard to that company. Accordingly, any protest shall be applicable only to the particular ETC that has been protested and shall not prevent the Order as it pertains to the non-protested ETCs from becoming final.

LANDERS & PARSONS, P.A.
ATTORNEYS AT LAW

CINDY L. BARTIN
DAVID S. DEE
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
FRED A. McCORMACK
PHILIP S. PARSONS
ROBERT SCHEFFEL WRIGHT

HOWELL L. FERGUSON
OF COUNSEL

VICTORIA J. TSCHINKEL
SENIOR CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

310 WEST COLLEGE AVENUE
POST OFFICE BOX 271
TALLAHASSEE, FLORIDA 32302
TELEPHONE (904) 681-0311
TELECOPY (904) 224-5595

RECEIVED
JUN 19 1997
FPSC - Records/Reporting

June 18, 1997

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**RE: FPSC Docket No. 970644-TP, Establishment
of Eligible Telecommunications Carriers
Pursuant to Section 214(e) of the
Telecommunications Act of 1996**

Dear Ms. Bayo:

Please add the following to the list of interested persons
for the above-captioned docket.

Jill Butler
Director, Regulatory Affairs
Cox Communications, Inc.
4585 Village Avenue
Norfolk, Virginia 23502
Telephone: (757) 552-6524
Telecopier: (757) 857-6716

Robert Scheffel Wright
Landers & Parsons, P.A.
310 West College Avenue (ZIP 32301)
Post Office Box 271
Tallahassee, Florida 32302
Telephone: (904) 681-0311
Telecopier: (904) 224-5595

On behalf of Cox Communications, Inc.

Thank you very much for your assistance. If you have any
questions, please give me a call.

Cordially yours,


Robert Scheffel Wright



June 6, 1997

RECEIVED

JUN 06 1997

-----VIA FACSIMILE-----

FPSC - Records/Reporting

Blanca S. Bayó, Director
 Division of Records and Reporting
 Florida Public Service Commission
 2540 Shumard Oak Blvd.
 Tallahassee, Florida 32399-0850

Re: Docket No. 970637-TL

Docket No. 970644-TP

Dear Ms. Bayó:

The Florida Public Telecommunications Association, Inc. requests that it be included on the mailing list as an interested entity in each of the above-referenced dockets. Please address all correspondence as follows:

Angela B. Green, General Counsel
 Florida Public Telecommunications Association, Inc.
 125 South Gadsden Street, Suite 200
 Tallahassee, Florida 32301

Thank you for your assistance with this matter.

Sincerely,

Angela B. Green
 General Counsel

970637mailinglist.doc

added
 6/5/97
 CBM

ERVIN, VARN, JACOBS & ERVIN

ATTORNEYS AT LAW

305 SOUTH GADSDEN STREET

P. O. DRAWER 11701323021

TALLAHASSEE, FLORIDA 32301

TELEPHONE (904) 224-9135

TELECOPIER (904) 222-9164

THOMAS M. ERVIN, JR.
C. EVERETT BOYD, JR.
MELISSA FLETCHER ALLAMAN
ROBERT M. ERVIN, JR.
J. STANLEY CHAPMAN
DAVID R. WESTCOTT

RECEIVED

JUN 09 1997

FPSC - Records/Reporting

COUNSEL CONSULTANT
ROBERT M. ERVIN
OF COUNSEL
WILFRED C. VARN
JOSEPH C. JACOBS
RICHARD W. ERVIN
MARILYN R. MORRIS
ERROY COLLINS
(1908-1991)

June 6, 1997

Honorable Blanca S. Bayo
Director - Records and Reporting
Florida Public Service Commission
Room 110
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 970644-TP
Establishment of Eligible Telecommunications
Carriers Pursuant to Section 214(e) of the
Telecommunications Act of 1996

Dear Ms. Bayo:

Please place my name on the mailing list for the referenced docket to receive all notices, orders and other communication from the Commission. Thank you for your assistance.

Sincerely,



C. Everett Boyd, Jr.

CEBJr/bc

6/11/97
entered in DK