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October 15, 2004 – *VIA ELECTRONIC MAIL*

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

Re: Docket No. 040604-TL
Adoption of the National School Lunch Program and an income-based criterion at
or below 135% of the Federal Poverty Guidelines as eligibility criteria for the
Lifeline and Link-up programs

Dear Ms. Bayó:

Enclosed is Verizon Florida Inc.'s Preliminary Issues List for filing in the above matter.
Service has been made as indicated on the Certificate of Service. If there are any
questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

/s Richard A. Chapkis

Richard A. Chapkis

RAC:tas
Enclosures

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Preliminary Issues List in Docket No. 040604-TL were sent via electronic mail on October 15, 2004 to the parties on the attached list.

/s Richard A. Chapkis

Richard A. Chapkis

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of the National School Lunch) Docket No. 040604-TL
Program and an income-based criterion at or) Filed: October 15, 2004
below 135% of the Federal Poverty Guidelines)
as eligibility criteria for the Lifeline and Link-Up)
programs)
_____)

VERIZON FLORIDA INC.'S PRELIMINARY LIST OF ISSUES

Verizon Florida Inc. (Verizon) hereby submits the following proposed list of issues to be discussed at the Issue Identification Conference scheduled for October 20, 2004, in the above-captioned proceeding:

National School Lunch Program

1. Does the Commission have the requisite statutory authority to expand the current Florida Lifeline program to include the National School Lunch (NSL) Program as an eligibility criterion?
2. What are the implementation issues associated with adopting the NSL eligibility criterion? Can these issues be resolved? If so, how?
3. What are the costs of implementing and administering the NSL eligibility criterion? If there are additional costs, how will they be recovered?
4. How much will telephone penetration rates increase as a result of implementing the NSL eligibility criterion? Does the estimated increase in telephone penetration rates justify the cost of implementing and administering this eligibility criterion?

Expanded criteria to 135% of the Federal Poverty Guidelines

5. Does the Commission have the requisite statutory authority to expand the current Florida Lifeline program by increasing the income-based eligibility criterion from 125% to 135% of the Federal Poverty Guidelines (FPG)?
6. What are the implementation issues associated with adopting the FPG eligibility criterion? Can these issues be resolved? If so, how?
7. What are the costs of implementing and administering the FPG eligibility criterion? If there are additional costs, how will they be recovered?

8. How much will telephone penetration rates increase as a result of implementing the FPG eligibility criterion? Does the estimated increase in telephone penetration rates justify the cost of implementing and administering this eligibility criterion?

Self-Certification Process

9. Does the Commission have the requisite statutory authority to create a self-certification process for Eligible Telecommunications Carriers (ETCs)?
10. What are the implementation issues associated with adopting a self-certification process? Can these issues be resolved? If so, how?
11. What are the costs of implementing and administering a self-certification process? If there are additional implementation and administration costs, how will they be recovered?
12. What are the costs of monitoring and auditing a self-certification process to ensure that the Lifeline program is not subject to excessive fraud and abuse? If there are additional monitoring and auditing costs, how will they be recovered?
13. How much will telephone penetration rates increase as a result of implementing a self-certification process? Does the estimated increase in telephone penetration rates justify the cost of implementing and administering this process?

General

14. Should changes to the Lifeline program be examined in a rulemaking proceeding?
15. Is there a need for a state Universal Service Fund (USF)?

Respectfully submitted this 15th day of October, 2004.

By: /s/ Richard A. Chapkis

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