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October 20, 2004

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COMMISSION CLERK

VIA HAND DELIVERY

Ms. Blanca Bayo
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Docket No. 040604-TL - In re: 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. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Northeast Florida Telephone Company d/b/a NEFCOM is the original and fifteen copies of their Petition to Intervene.

Please acknowledge receipt of this document by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

[Handwritten signature of Kenneth A. Hoffman]

Kenneth A. Hoffman

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11323 OCT 20 04

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 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.

Docket No. 040604-TL

Filed: October 20, 2004

NORTHEAST FLORIDA TELEPHONE COMPANY
d/b/a NEFCOM'S PETITION TO INTERVENE

Northeast Florida Telephone Company d/b/a NEFCOM, (hereinafter referred to as "Petitioner" or "NEFCOM") by and through undersigned counsel, and pursuant to Rule 25-22.309, Florida Administrative Code, hereby files this Petition to Intervene in the above-styled docket. In support of this Petition, Petitioner states as follows:

1. The name, address and telephone numbers of Petitioner are as follows:

Northeast Florida Telephone Company
d/b/a NEFCOM
Ms. Deborah Nobles
Vice President of Regulatory Affairs
TTSC
505 Plaza Circle, Suite 200
Orange Park, Florida 32073
(904) 688-0029 (telephone)
(904) 688-0025 (facsimile)

2. All notices, pleadings, staff recommendations, orders or other documents filed or served in this docket should be provided to the following representatives of NEFCOM:

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Martin P. McDonnell, Esquire
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FPSC-COMMISSION CLERK

Ms. Deborah Nobles
Vice President of Regulatory Affairs
TTSC
505 Plaza Circle, Suite 200
Orange Park, Florida 32073
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(904) 688-0025 (facsimile)

3. NEFCOM is a Florida corporation with its principal office located at 130 North Fourth Street, Macclenny, Florida. NEFCOM is a small local exchange company within the meaning of Section 364.052(1), Florida Statutes, providing basic local exchange service to approximately 10,200 access lines in the Macclenny and Sanderson exchanges. NEFCOM thus is engaged in the provision of general telecommunications services in the State of Florida subject to the jurisdiction of this Commission. NEFCOM also qualifies as a "rural telephone company" within the meaning of 47 U.S.C. § 153(47) and has been certified by the Commission as an Eligible Telecommunications Carrier ("ETC").

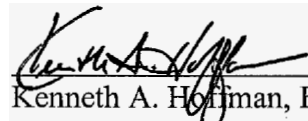
4. In the instant docket, the Commission will address whether to expand eligibility criteria for Lifeline and Link-Up assistance. Such determinations could increase the number of NEFCOM's customers who qualify for Lifeline and Link-Up assistance. The Commission also will address whether Florida incumbent local exchange companies ("ILECs"), including NEFCOM, should be required to offer Lifeline credits to customers based on the newly-expanded eligibility criteria and whether to adopt a new self-certification process to be implemented by NEFCOM and other Florida ILECs to determine eligibility for Lifeline and Link-Up assistance. Additionally, several telecommunications companies have asked the Commission to take action in this docket to establish a state universal service funding mechanism to support Lifeline and to determine how contributions to the fund should be collected, who should administer the fund, and how the monies

in the fund should be distributed. NEFCOM concurs in the request that a state universal service funding mechanism for Lifeline be considered and established in this docket.

5. The Commission's actions in this docket will have a direct and immediate effect on NEFCOM's substantial interests. As an ETC, NEFCOM will be required to implement the eligibility criteria and any self-certification process adopted by the Commission and to offer credits to newly-eligible customers. Further, NEFCOM would be either a net contributor to or net recipient from any state universal funding mechanism established by the Commission to support the Lifeline program.

WHEREFORE, NEFCOM requests the Commission enter an order granting NEFCOM's Petition to Intervene and authorizing NEFCOM to participate with full party rights in this proceeding, and to grant such further relief as may be deemed proper and just.

Respectfully submitted this 20th day of October, 2004.



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Attorneys for Petitioners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Electronic Mail and U.S. Mail this 20th day of October, 2004 to:

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