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Timolyn Henry

**From:** Michelle Blanton [MBlanton@Mac-Law.Com]  
**Sent:** Friday, December 17, 2004 4:06 PM  
**To:** PSC  
**Cc:** Adam Teitzman; Benjamin Dickens; Betty Willis; Charles Beck; Charles Rehwinkel; Coralette Hannon; David Christian; Deborah Nobles; Harold McLean; Mark Ellmer; Michael Gross; Mike Twomey; Nancy Sims; Richard Chapkis; Ken Hoffman; Susan Masterton; Tom Mccabe  
**Subject:** Docket No. 040604

The Florida Competitive Carriers Association and the Competitive Carriers of the South provide the following information pursuant to the Florida Public Service Commission's guidelines on electronic f

1. The attorney responsible for this filing is:

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2. The filing is to be made in Docket No.: 040604-TP. 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 Criterial for the Lifeline and Link-up Programs.

3. This filing is made on behalf of Florida Competitive Carriers Association and Competitive Carriers of the South

4. The total number of pages is 5.

5. The document is Florida Competitive Carriers Association and Competitive Carriers of the South Peition to Intervene.

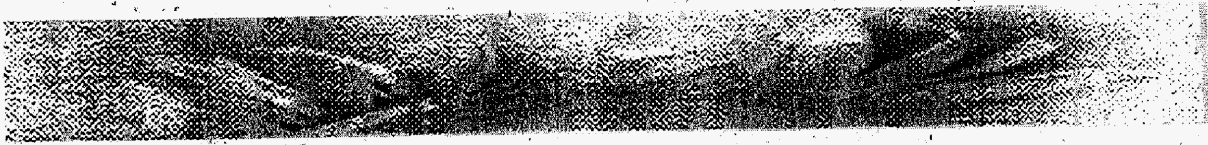
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FPSC-COMMISSION CLERK



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 <u>For the Lifeline and Link-up Programs</u>	)	)	Docket No.040604-TP
	)	)	Filed: December 17, 2004

**FLORIDA COMPETITIVE CARRIERS ASSOCIATION AND THE  
COMPETITIVE CARRIERS OF THE SOUTH, INC.  
PETITION TO INTERVENE**

COMES NOW the Florida Competitive Carriers Association and the Competitive Carrier of the South, Inc.<sup>1</sup> (hereinafter "FCCA/CompSouth"), pursuant to Rules 25-22.039 and 28-106-205, Florida Administrative Code, and files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. Petitioner respectfully requests that the Commission grant this petition, designating FCCA/CompSouth as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, Petitioners respectfully show the following:

1. Petitioner's principal place of business is:

FCCA/CompSouth  
C/o Vicki Gordon Kaufman  
117 South Gadsden Street  
Tallahassee, Florida 32301

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<sup>1</sup> The members of FCCA include AT&T, MCI, Access Integrated Networks, Inc., ICG Communications, Inc., IDS Telcom LLC, ITC DeltaCom, Inc., KMC Telecom, Network Telephone Corporation, NewSouth Communications, Inc., Supra Telecommunications and Information Systems, Inc., and Z-Tel Communications, Inc. With the exceptions of Supra and ICG, each of these members, is also a member of the Competitive Carriers of the South, Inc. (CompSouth). The members of CompSouth participating in this proceeding include: Access Integrated Networks, Inc., Access Point Inc., MCI, Birch Telecom, Covad Communications Company, AT&T, Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Telecom, Inc., Network Telephone Corp., KMC Telecom, LecStar Telecom, Inc., Z-Tel Communications, Inc., InLine and IDS Telcom LLC. As of January 1, 2005, FCCA will merge and become a part of CompSouth. At that time, Supra will also become a member of CompSouth.

2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Vicki Gordon Kaufman  
McWhirter Reeves Davidson Kaufman & Arnold, PA  
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3. FCCA/CompSouth is an association of telecommunications companies that have been duly certificated by the Commission as competitive local exchange telecommunications companies ("CLECs") or interexchange companies ("IXCs") in Florida. As such, FCCA/CompSouth's members are subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact FCCA/CompSouth's members' ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.

4. In this docket, the Commission is set to address whether to expand eligibility criteria for Lifeline and Link-Up assistance. The Commission is also expected to address whether Florida Incumbent Local Exchange Companies (ILECs) 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 the ILECs to determine eligibility for Lifeline and Link-Up assistance.

5. Some of the parties to this proceeding have stated a need for a state universal service fund or alternative cost recovery mechanism to recover the cost of the \$3.50 state discount for Lifeline customers.

6. Because this proceeding will address, *inter alia*, proposed universal service funding mechanisms, the Commission's decision in this docket may or will directly affect the substantial interests of FCCA/CompSouth members and their business operations in the state of Florida.

**WHEREFORE**, FCCA/CompSouth, on behalf of its member companies, respectfully requests that the Commission grant them the leave to intervene for all legal purposes in this docket.

S/Vicki Gordon Kaufman

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FCCA/CompSouth Petition to Intervene has been furnished by electronic mail and US Mail to the following parties of record this 17<sup>th</sup> day of December 2004:

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