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Sent: Tuesday, January 11, 2005 4:47 PM

To: Filings@psc.state.fl.us Subject: 040604-TL Sprint

Filed on behalf of:

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Docket No. 040604-TL

Title of filing: Letter from Sprint. Sprint similarly proposes to implement a simplified Lifeline certification process. Sprint's response generally conforms to BellSouth's proposal as set forth in its January 7, 2005 letter

Filed on behalf of: Sprint

No. of pages: 4

| CMP . | Description: | Letter from Sprint Sprint's response generally conforms to BellSouth's proposal as set forth in its January 7, 2005 |
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Susan S. Masterton Attorney

January 11, 2005

Via Electronic Mail and First Class U.S. Mail

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And Administrative Services
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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:

On January 4, 2005, BellSouth and the Staff of the Florida Public Service Commission met to discuss BellSouth's proposal for implementation of a simplified certification process in connection with the above captioned docket. During the course of the discussion, the Staff requested that BellSouth file a copy of its proposal in the docket by January 7th and that the other parties to the docket file a response to BellSouth's proposal by January 11, 2005.

In response to BellSouth's proposal, Sprint similarly proposes to implement a simplified Lifeline certification process. Sprint's response generally conforms to BellSouth's proposal as set forth in its January 7, 2005 letter, as follows:

- 1. Sprint would file a tariff to implement a simplified Lifeline certification process for a period of one year. Sprint's simplified certification process would enable all customers eligible under one of the existing qualifying programs to receive the full Lifeline and Link-Up (if applicable) credit. The Lifeline/Link-Up credit would apply after Sprint receives the customer's signature on a document certifying "under penalty of perjury" that the customer participates in one of the Florida Lifeline eligible programs and identifies the qualifying program.
- 2. During the course of the year, Docket No. 040604-TL would be held in abeyance in its entirety, as to all parties.
- 3. A review of the simplified certification process would be held six months into the year. Sprint would provide its findings of the first six months to Staff and the parties to the docket.

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- 4. If circumstances arise that warrant a review earlier than six months (e.g. indications of significant fraud), such a review would be held with the Staff and parties to the docket.
- 5. At the review or when the Florida Supreme Court rules on consolidated Case Nos. SC04-9, SC04-10 and SC04-946 (the rate rebalancing case), whichever is earlier, Sprint and the Staff would revisit the issue of adding the National School Lunch Program and an income-based criterion of 135% of the federal poverty level as additional eligibility criteria.
- 6. Sprint would commit to working with the Staff and the Office of Public Counsel to include a formal school outreach effort in the Lifeline education program.
- 7. If this proposal is accepted by the Commission in its entirety, Sprint would file its tariff to implement the proposal within ninety (90) days of an Order formally approving the abeyance.

In the Direct Testimony of witness Rod DeYonkers, BellSouth proposes a verification process that involves posting a list of all Lifeline customers to a secure website, which will then be reviewed by personnel at the applicable state agencies. BellSouth would then follow up with customers who are not identified by the agencies as participating in Lifeline eligible programs. Sprint is currently assessing its ability, from an administrative and cost perspective, to participate in such a process. However, to ensure that sufficient verification procedures are in place to prevent fraud and abuse of the self-certification enrollment process, Sprint commits as part of this proposal to conduct annual verification through a random sampling of Lifeline customers.

Sincerely,

Susan S. Masterton

Cc: All Parties of Record

Shows mity

Adam Teitzman Kira Scott

CERTIFICATE OF SERVICE DOCKET NO. 040604-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. and electronic mail on this $11^{\rm th}$ day of January, 2005 to the following:

Florida Cable Telecommunications Association, Inc. Michael A. Gross 246 E. 6th Avenue Suite 100 Tallahassee, FL 32303

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