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November 17, 2006

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COMMISSION
CLERK

BY HAND DELIVERY

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

Re: Petition to Implement Automatic Enrollment for Lifeline Telephone Service
Docket No. 060677-TL

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of Florida Telecommunication Industry Association, Inc.'s Motion to Intervene and for Abeyance in the above-referenced docket.

Please acknowledge receipt and filing of the above by stamping the duplicate of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,
[Handwritten Signature]
J. Jeffry Wahlen

- CMP
COM
CTR
ECR Enclosures
GCL cc: All Parties of Record
OPC
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DOCUMENT NUMBER-DATE
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition to Implement Automatic )  
Enrollment for Lifeline Telephone Service )

Docket No. 060677-TL  
Filed: November 17, 2006

**MOTION TO INTERVENE AND FOR ABEYANCE**

Pursuant to Rules 28-106.204 and 28-106.205, Florida Administrative Code, the Florida Telecommunications Industry Association, Inc. ("FTIA"), on behalf of its member companies, hereby petitions to intervene in this docket and requests that the Florida Public Service Commission ("Commission") hold the above-captioned matter in abeyance, for a minimum of six months, pending the results of the Commission's newly initiated On-Line Automated Lifeline and Link-Up Application Process and the upcoming industry workshops scheduled for February 2007. In support thereof, FTIA states as follows:

1. FTIA is a not-for-profit trade organization organized to represent and which represents the interests of Florida's telecommunications companies before the legislature and state agencies on matters that affect members of the telecommunications industry. Member companies include incumbent and competitive local exchange services providers, long distance providers and wireless providers. The Board of Directors of the FTIA voted to approve the filing of this motion on November 17, 2006.

2. All pleadings, motions, notices, orders and other papers filed or served in this docket should be served on:

J. Jeffrey Wahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
850.425.5471  
850.222.7560 (fax)

DOCUMENT NUMBER-DATE

10568 NOV 17 06

FPSC-COMMISSION CLERK

3. On or about October 11, 2006, the Citizens of Florida, through Harold McLean, Public Counsel (“OPC”), and AARP, (jointly referred to as “Joint Petitioners”) filed their Petition requesting that the Commission order local exchange telecommunications companies in Florida to implement practices and procedures with the Department of Children and Families (“DCF”) to automatically enroll eligible customers in the Lifeline telephone program.

4. On or about October 13, 2006, the Commission launched an automated process on its website for customers of BellSouth to submit on-line Lifeline and Link-Up applications.<sup>1</sup> The Florida Lifeline and Link-Up programs assist low-income consumers in obtaining and maintaining basic telecommunications services.<sup>2</sup>

5. Link-Up Florida and Lifeline Assistance are available to customers enrolled in the National School Free Lunch Program, Temporary Assistance to Needy Families, Food Stamps, Medicaid, Low-Income Home Energy Assistance Program, Supplemental Security Income, or Federal Public Housing Assistance.<sup>3</sup> In addition, if a consumer lives on federally recognized tribal land, the consumer may qualify for expanded Lifeline assistance.<sup>4</sup> Furthermore, a consumer whose household income is no greater than 135% of the federal poverty level may contact the OPC via a toll-free number to inquire as to whether they also qualify for Link-Up Florida and Lifeline Assistance.<sup>5</sup>

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<sup>1</sup> See Commission News Release entitled “PSC Launches Online Application for Link-Up Florida and Lifeline” dated October 13, 2006 attached hereto as Exhibit “A”.

<sup>2</sup> See *id.*

<sup>3</sup> See *id.*

<sup>4</sup> See *id.*

<sup>5</sup> See *id.*

6. The goal of the Commission's online application process is to make it easier for eligible Floridians to participate in Lifeline and Link-Up.<sup>6</sup>

7. To access the secure online application, a consumer simply needs to go to [www.floridapsc.com](http://www.floridapsc.com) and click on "Lifeline and Link-Up" on the right hand side of the web page.<sup>7</sup> On-line applications are available in English, Spanish and Creole. Consumers click "Apply On-line" and follow the instructions on how to submit an application electronically.<sup>8</sup> The consumer then provides exclusive information for identification purposes, their local carrier, and their qualifying public assistance program. Once the consumer submits the application, an automatic e-mail is sent to the appropriate eligible telecommunications carrier ("ETC") notifying it that a consumer has completed a Link-Up and Lifeline application.<sup>9</sup> The ETC then retrieves the application from a secure application site via a PSC-issued password.<sup>10</sup> The ETC may then process the application and contact the customer for additional information as may be required.

8. While the online application program was initially limited to BellSouth customers, there are currently nineteen (19) ETCs participating in or evaluating the Commission's online automated application program.<sup>11</sup>

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<sup>6</sup> See *id.*

<sup>7</sup> See *id.*

<sup>8</sup> See *id.*

<sup>9</sup> See October 13, 2006 correspondence from Chairman Lisa Polak Edgar to BellSouth attached hereto as Exhibit "B".

<sup>10</sup> See *id.*

<sup>11</sup> The ETCs currently participating in or evaluating the program are the following: Alltel Wireless, American Dial Tone, BellSouth, Budget Phone, Embarq, Frontier Communications, GT Com, ITS Telecommunications Systems, Knology, Midwestern Communications, NEFCOM, Nexus Communications, Smart City Telecom, Sprint Nextel Corporation, TDS Telecom, Verizon, Villaire Communications and Windstream. See Commission News Release entitled "PSC Expands Online Application for Link-Up Florida and Lifeline" dated November 6, 2006 attached hereto as Exhibit "B". Contrary to statements made in the November 6, 2006 Commission News Release, it is the FTIA's understanding that certain ETCs are still evaluating the Commission's online automated application program.

9. The Commission considers the online application process to be a significant step forward that will allow other state agencies to more easily enroll consumers and is part of the Commission's ongoing initiative to make it easier for eligible Floridians to participate in Lifeline and Link-Up.<sup>12</sup>

10. The Legislature has spelled out specific Lifeline program requirements and provided specific instruction where the Commission is to establish procedures (364.10). While the Legislature has required state agencies that provide benefits to Lifeline-eligible persons to develop procedures to promote Lifeline participation in cooperation with the Commission, the Office of Public Counsel and the Department of Children and Family Services, it has not given the Commission itself jurisdiction to establish auto-enrollment procedures or requirements (364.10(3)(g)). Further, it should be noted that the Commission's jurisdiction over eligible telecommunications carriers is limited to telecommunications companies designated as ETCs by the commission pursuant to 47 CFR s. 54.201 and explicitly excludes wireless carriers (364.10(2)(a) and 364.02(14)(c)). Thus, to the extent the Commission wishes to include all ETCs, a voluntary approach to the online application process is preferable.

11. FTIA believes that, before expending the resources and time litigating the Petition, the Commission should review the results of its newly initiated On-Line Automated Lifeline and Link-Up Application Process and allow interested parties to better understand the new process by participating in the upcoming industry workshops scheduled for February 2007.

12. FTIA believes that no party will be prejudiced by the Commission granting the instant Motion.

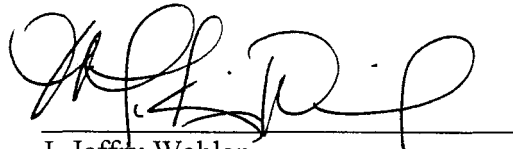
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<sup>12</sup> See October 13, 2006 Commission News Release.

13. FTIA contacted the parties in this docket regarding the instant Motion and OPC and Windstream do not object. The AARP indicated they were not prepared to agree to any delay. The AG has been contacted and had not provided a response at the time of filing.

WHEREFORE, based upon the foregoing, FTIA requests that the FTIA be allowed to intervene in this docket and that this docket be held in abeyance, for a minimum of six months, so that the Commission has an opportunity to review the results of its On-Line Automated Lifeline and Link-Up Application Process and allow interested parties to better understand the new process by participating in the upcoming industry workshops scheduled for February 2007.

DATED this 17<sup>th</sup> day of November, 2006.

A handwritten signature in black ink, appearing to read 'J. Jeffrey Wahlen', written over a horizontal line.

J. Jeffrey Wahlen  
Ausley & McMullen, P.A.  
227 South Calhoun Street  
Tallahassee, Florida 32302  
Tel No. (850) 425-5471  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

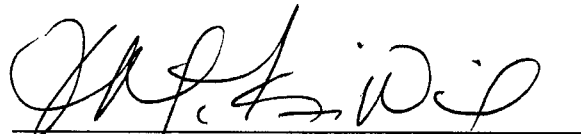
Attorneys for Florida Telecommunications  
Industry Association, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail (or Hand Delivery\*) this 17<sup>th</sup> day of November, 2006 to the following:

Michael Cooke* Adam Teitzman* Kira Scott* General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850	Patrick Wiggins* Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850
Beth Salak* Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850	Charles J. Beck/Harold McLean Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400
Michael B. Twomey Attorney for AARP Post Office Box 5256 Tallahassee, FL 32314-5256	Nancy H. Sims BellSouth Telecommunications, Inc. 150 S. Monroe St., Suite 400 Tallahassee, FL 32301
Mr. David Christian Verizon Florida, Inc. 106 East College Avenue Tallahassee, FL 32301-7721	Kenneth A. Hoffman, Esquire Rutledge, Ecenia, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302
J. Hendrix, J. Meza./E. Edenfield/ M. Gurdian BellSouth Telecommunications, Inc. 150 S. Monroe St., Suite 400 Tallahassee, FL 32301	Charles J. Rehwinkel State Vice President – Florida Embarq Corporation FLTHZO501 315 S. Calhoun St., Ste. 500 Tallahassee, FL 32301
C. Crist/J. Shreve/C. Bradley Office of the Attorney General The Capitol – PL01 Tallahassee, FL 32399-1050	Michael A. Gross Florida Cable Telecommunications Association 246 E. 6 <sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

<p>Greenberg, Traurig Law Firm Mitchell F. Brecher 800 Connecticut Avenue, NW Suite 500 Washington, DC 20006</p>	<p>Richard B. Salzman TracFone Wireless, Inc. 8390 NW 25<sup>th</sup> Street Miami, FL 33122</p>
<p>Cesar Caballero/Bettye J. Willis Windstream Florida, Inc. 4001 Rodney Parham Road Mailstop: 1170-B1F03-53A Little Rock, AR 72212</p>	

  
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Attorney





State of Florida  
**Public Service  
Commission**  
**NEWS RELEASE**

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10/13/2006

Contact: 850-413-6482

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### **PSC Launches Online Application For Link-Up Florida and Lifeline**

**TALLAHASSEE** — Customers are now able to apply for BellSouth's Link-Up Florida and Lifeline Assistance programs electronically on the Florida Public Service Commission's (PSC) Web site. The Florida Lifeline and Link-Up programs assist low-income consumers in obtaining and maintaining basic telecommunications services.

"One-step, electronic enrollment is part of our ongoing initiative to make it easier for eligible Floridians to participate in Lifeline and Link-Up. This is a significant step forward that will also allow other state agencies to more easily enroll clients," said PSC Chairman Lisa Polak Edgar.

The online form makes applying for assistance from BellSouth a one-step process and eliminates the need for an applicant to print out, fill out, and mail or fax a request for the benefit. To access the application, consumers should go to [www.floridapsc.com](http://www.floridapsc.com) and click on "Lifeline and Link-Up" on the right hand side of the page. Consumers then should click on "Apply On-line" and follow the instructions on how to submit an application electronically. Applications are available in both English and Spanish. BellSouth customers are being offered the Internet application initially and additional companies will be added to the system in the next few weeks. The PSC has implemented a secure Web site with data encryption for these records.

Link-Up Florida and Lifeline Assistance are available to customers enrolled in the National School Lunch Free Lunch Program, Temporary Assistance to Needy Families, Food Stamps, Medicaid, Low-Income Home Energy Assistance Program, Supplemental Security Income, or Federal Public Housing Assistance. If someone lives on federally recognized tribal land, he/she may qualify for expanded Lifeline assistance. In addition to the online application, the PSC continues to work with the Department of Children and Families (DCF) on a way to automatically enroll eligible Floridians who may be receiving services through DCF.

By contacting the Office of Public Counsel at 1-800-540-7039, a customer may also qualify for the programs if his or her household income is no greater than 135% of the federal poverty level.

LISA POLAK EDGAR  
CHAIRMAN

STATE OF FLORIDA



CAPITAL CIRCLE OFFICE CENTER  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
(850) 413-6044

Public Service Commission

October 13, 2006

Mr. Jerry Hendrix, Vice President – Regulatory  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Ste. 400  
Tallahassee, FL 32301-1556

**Re: New On-Line Automated Lifeline and Link-Up Application Process on the Florida Public Service Commission Website**

Dear Mr. Hendrix:

The Florida Public Service Commission (PSC) has created an automated process on our website for on-line Link-Up and Lifeline applications. This is an important step in our ongoing initiative to make it easier for eligible consumers to participate in these programs. The website for this new service is live as of today, Friday, October 13, 2006. BellSouth agreed to be the first eligible telecommunications carrier (ETC) to accept on-line applications. The PSC will now be adding the other carriers which have received ETC status in Florida.

I am asking for your assistance so that your company can take advantage of this new automated procedure. The automated process begins once a consumer completes the application form and hits the submit button. An automatic e-mail is sent to the appropriate ETC notifying it that a consumer has completed a Link-Up and Lifeline application. The ETC will then be able to retrieve the application from a secure application site via a PSC-issued password. Please send us the name and e-mail address of a contact at your company who will receive notifications from the PSC that a Link-Up and Lifeline application is at the secure website ready to be retrieved. We are also asking for the names, e-mail addresses, and phone numbers of one primary and one secondary company representative who will be responsible for retrieving these applications and managing the user accounts for your company.

**RECEIVED**

OCT 16 2006

U.S. MAIL-REG. RELATIONS  
TALLAHASSEE, FL

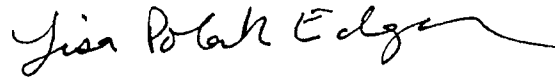
Page 2

October 13, 2006

We are truly excited about this new one-step electronic enrollment for the Link-Up and Lifeline application process and look forward to working with you to bring benefits to your customers. Please submit the necessary contact information for your ETC to Bob Casey at [bcasey@psc.state.fl.us](mailto:bcasey@psc.state.fl.us) by Friday, October 20, 2006. If you have any questions, you may contact Mr. Casey at (850) 413-6974.

Thank you for your participation to help make this new service a complete success.

Sincerely,

A handwritten signature in black ink that reads "Lisa Polak Edgar". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lisa Polak Edgar  
Chairman

cc: Commissioner J. Terry Deason  
Commissioner Isilio R. Arriaga  
Commissioner Matthew M. Carter II  
Commissioner Katrina J. Tew