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February 5, 2007

Mrs. 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.: 060677-TL  
Petition to Implement Automatic Enrollment for Lifeline  
Telephone Service**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Answer to the Office of Public Counsel and AARP's Petition, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: All Parties of Record  
Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

**CERTIFICATE OF SERVICE**  
**Docket No. 060677-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 5th day of February, 2007 to the following:

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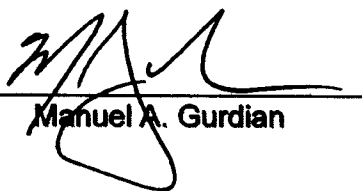
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Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition to Implement Automatic Enrollment ) Docket No. 060677-TL  
For Lifeline Telephone Service )  
\_\_\_\_\_ ) Filed: February 5, 2007

**BELLSOUTH'S ANSWER TO THE OFFICE OF PUBLIC COUNSEL  
AND AARP'S PETITION**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through undersigned counsel, and pursuant to Rule 28-106.203, Florida Administrative Code, hereby answers the Petition filed by The Citizens of Florida, through Harold McLean, Public Counsel, ("OPC") and AARP, and states as follows:

**ANSWER**

Responding to the specific allegations in the Petition, BellSouth alleges and says that:

1. BellSouth admits that OPC is authorized to represent the people of the State of Florida before the Florida Public Service Commission ("Commission") in certain matters. BellSouth admits that the statute cited in paragraph 1 speaks for itself and does not require a response from BellSouth
2. BellSouth is without knowledge as to the allegations contained in paragraph 2 and therefore denies same.
3. BellSouth denies the allegations of paragraph 3 except to admit that the report cited in paragraph 3 speaks for itself and does not require a response from BellSouth and that standards for Lifeline eligibility have been expanded over the past ten years so that more households are eligible.
4. BellSouth denies the allegations of paragraph 4 except to admit that it has participated in numerous efforts with OPC, AARP and Florida

telecommunications companies to increase Lifeline awareness and participation during the past ten years and that OPC and AARP actively participated in the recent Connect Florida campaign events.

5. BellSouth admits the allegations contained in paragraph 5.

6. BellSouth admits that the Commission has been extremely supportive of Lifeline awareness programs and has taken numerous steps toward that end. BellSouth further admits that the Commission's actions in support of Lifeline awareness programs and its report on Lifeline cited in paragraph 6 speak for themselves and do not require a response from BellSouth.

7. BellSouth denies the allegations contained in paragraph 7.

8. BellSouth admits that the Recommended Decision and Order cited in paragraph 8 speak for themselves and do not require a response from BellSouth. BellSouth is without knowledge as to the remainder of the allegations in paragraph 8 and therefore denies same.

9. BellSouth is without knowledge as to the allegations contained in paragraph 9 and therefore denies same.

10. BellSouth admits that the reports and documents cited in paragraph 10 speak for themselves and do not require a response from BellSouth. BellSouth is without knowledge as to the remainder of the allegations in paragraph 10 and therefore denies same.

11. The statutes cited by OPC and AARP speak for themselves and do not require a response from BellSouth. BellSouth admits that the Commission has no authority over the Department of Children and Families, that the

Commission has authority over local exchange telecommunications companies and that Lifeline is an important part of providing telephone service to all consumers at reasonable and affordable prices. BellSouth denies the remainder of the allegations contained in paragraph 11.

12. The allegations contained in paragraph 12 are denied.

13. BellSouth denies each and every allegation in the Petition not specifically admitted herein, and demands strict proof thereof.

#### **AFFIRMATIVE DEFENSE**

14. The Commission cannot grant the relief requested in the Petition because it does not have authority or jurisdiction over the Department of Children and Families.

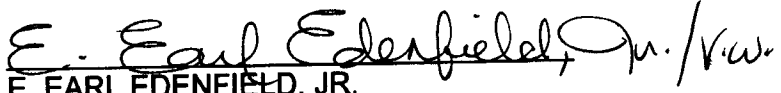
WHEREFORE, BellSouth respectfully requests the Commission to enter an Order in BellSouth's favor, deny OPC and AARP the relief sought, and grant BellSouth such other relief as the Commission deems just and proper.

Respectfully submitted this 5th day of February, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC.



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AUTHORIZED HOUSE COUNSEL NO. 426260<sup>1</sup>  
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<sup>1</sup> The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, has been granted qualified representative status by the Commission for 2006 in Order No. PSC-06-0165A-FOF-OT, and has filed an Application for Qualified Representative Status for 2007 in Docket No. 070008-OT per Commission Order No. 07-0008-PCO-OT.