

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of Alltel Communications, Inc.)
for designation as an eligible telecommunications) Docket No. 060582-TP
carrier (ETC) in certain rural telephone company)
study areas located entirely in Alltel's licensed area.) Filed: October 19, 2007
_____)

GTC, INC. D/B/A FAIRPOINT COMMUNICATIONS'
PROPOSED ISSUES LIST

GTC, Inc. d/b/a FairPoint Communications ("FairPoint"), by and through its undersigned counsel, hereby submits its Proposed List of Issues for the Issues Identification Conference scheduled for October 22, 2007:

FAIRPOINT'S PROPOSED LIST OF ISSUES

1. Whether the Commission should defer consideration and a ruling on Alltel's application pending comprehensive action by the federal-state Joint Board on Universal Service and/or the FCC concerning the impacts of designation of multiple ETCs and the development of prospective rules and regulations addressing the high cost universal service fund, the designation of multiple ETCs, and an appropriate funding mechanism for ETCs.
2. What are the appropriate criteria to be applied by the Commission in determining whether an additional ETC should be designated in a high cost, rural study area?
3. What are the appropriate criteria to determine whether Alltel's application for CETC designation should be approved?
4. What are the appropriate criteria to be utilized by the Commission in determining whether designation of Alltel as a CETC is in the public interest?
5. What are the policy considerations that the Commission should consider in determining whether to approve Alltel's application?

6. Whether the Commission should impose competitively neutral consistent requirements on all ETCs, including CETCs, and, if so, what those requirements should be.

7. Whether Alltel offers all supported services set forth in 47 C.F.R. §54.101(a).

8. What criteria should be used to determine if Alltel is meeting Lifeline and Link-Up advertising requirements?

9. What are the rates, descriptions, terms and conditions of all required, supported services that would be provided by Alltel in the requested study areas if designated as an ETC by this Commission and if not designated as an ETC by this Commission?

10. Whether Alltel provides voice grade access to the public switched network as required and defined by 47 C.F.R. §54.101(a).

11. Whether Alltel provides local usage as required and defined by 47 C.F.R. §54.101(a).

12. Whether Alltel provides dual tone multi-frequency signaling or its functional equivalent as required and defined by 47 C.F.R. §54.101(a).

13. Whether Alltel provides single-party service or its functional equivalent as required and defined by 47 C.F.R. §54.101(a).

14. Whether Alltel provides access to emergency services as required and defined by 47 C.F.R. §54.101(a).

15. Whether Alltel provides access to operator services as required and defined by 47 C.F.R. §54.101(a).

16. Whether Alltel provides access to interexchange service as required and defined by 47 C.F.R. §54.101(a).

17. Whether Alltel provides access to directory assistance as required and defined by 47 C.F.R. §54.101(a).

18. Whether Alltel provides toll limitation for qualifying low-income consumers as required and defined by 47 C.F.R. §54.101(a).

19. Whether Alltel will provide a binding commitment and has the ability to provide the required, supported services throughout the requested designated area.

20. Whether Alltel has the ability to remain functional in emergency situations.

21. Whether Alltel will satisfy applicable consumer protection and service quality standards.

22. Whether Alltel offers local usage comparable to that offered by the incumbent LEC.

23. Whether Alltel meets the requirements of Section 214(e)(4).

24. Whether Alltel meets the requirements of Section 214(e)(5).

25. Whether Alltel meets the requirements in 47 C.F.R. §54.202 and PSC Order No. PSC-05-0824-TL.

26. Whether Alltel complies with the CTIA Code of Conduct.

27. Whether the Commission should impose additional service requirements on Alltel.

28. Whether Alltel meets the requirements in FPSC Order No. PSC-05-0824-FOF-TL.

29. Whether the Commission should develop and implement oversight, filing and reporting requirements if Alltel is designated as an ETC for the requested study areas to ensure

that USF monies are spent for the purposes required by federal law and the FCC, and, if so, the specific oversight, filing and reporting requirements.

30. Whether approval of Alltel's application is in the public interest.

Respectfully submitted,

s/ Benjamin H. Dickens, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition for Leave to Intervene was furnished by Telecopier(*) and/or U. S. Mail to the following this 19th day of October, 2007:

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