

080201-TX

**Diamond Williams**

**From:** Angela Janssen [ajanssen@telecomcounsel.com]  
**Sent:** Wednesday, June 01, 2011 8:55 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Lance Steinhart; Jim Polk; Bob Casey  
**Subject:** Tele Circuit Network Corporation  
**Attachments:** FL ETC Filing.pdf

Attached please find Tele Circuit Network Corporation's ETC Designation Application for filing. Thank you.

Angela M. Janssen  
 Lance J.M. Steinhart, P.C.  
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6/1/2011

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June 1, 2011

**VIA E-FILING ONLY**

080201-TX

Bob Casey, Public Utility Supervisor  
Division of Competitive Markets  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: Tele Circuit Network Corporation - ETC Designation

Dear Mr. Casey:

Enclosed please find for filing one original of Tele Circuit Network Corporation's Application for Certification as an Eligible Telecommunications Carrier.

Please acknowledge receipt via return e-mail.

If you have any questions or additional information is necessary, please do not hesitate to contact Angela Janssen via phone or e-mail at (678) 775-2253 or [ajanssen@telecomcounsel.com](mailto:ajanssen@telecomcounsel.com).

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for Tele Circuit Network Corporation

Enclosures  
cc: Ashar Syed

DOCUMENT NUMBER-DATE  
03783 JUN-1 =  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION OF )  
TELE CIRCUIT NETWORK CORPORATION )  
FOR CERTIFICATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER )

DOCKET NO. 080201-TX

APPLICATION FOR CERTIFICATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER

Tele Circuit Network Corporation ("Tel Circuit" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),<sup>2</sup> and §364.10(2), and §364.025(5), Florida Statutes, hereby applies to the Florida Public Service Commission ("Commission") for certification as an Eligible Telecommunications Carrier ("ETC") throughout the BellSouth/AT&T and Verizon service territories ("Designated Service Area") for the purpose of receiving federal universal service support. A list of each rate center which the Applicant is requesting ETC status in the State of Florida is attached hereto as Exhibit 1. The Applicant is seeking only low-income support, and is not requesting high cost support. As demonstrated below, Tel Circuit satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of Tel Circuit in the Designated Service Area will serve the public interest. Accordingly, Tel Circuit respectfully requests that the Commission grant this Application.

<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

## **I. Background**

1. Tel Circuit is a Georgia Corporation<sup>3</sup> and is authorized to conduct business as a foreign corporation in the State of Florida. Copies of the Applicant's Articles of Incorporation and authority to transact business in the State of Florida are on file with the Commission and incorporated herein by reference. The Applicant was granted Certification to Operate as an Alternate Local Exchange Services Company (ALEC) in Florida, which became effective on April 4, 2005, in Docket Number 050126-TX, Order Number PSC-05-0481-CO-TX. The principal office of the Applicant is located at 1815 Satellite Blvd., Suite 504, Duluth, Georgia 30097. The Applicant provides local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through commercial agreements ("UNEs") that allows end-to-end switching delivery of calls.
2. As set forth in Section 214(e)(2) of the Act, the Commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State commission."<sup>4</sup> Upon designation as an ETC, the carrier

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<sup>3</sup> Tel Circuit was organized in the State of Georgia on October 30, 2002

<sup>4</sup> 47 U.S.C. § 214(e)(2); *see* 47 C.F.R. § 54.201(b) (FCC Rules citing the Act's requirements).

shall be eligible to receive universal support in accordance with Section 254 of the Act.<sup>5</sup>

3. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- (A) offer the services that are supported by Federal universal support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using the media of general distribution.<sup>6</sup>

## **II. Tele Circuit Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area**

4. Tele Circuit is a common carrier as that term is defined in the Act.<sup>7</sup> The Applicant provides competitive local telecommunications services in the state of Florida pursuant to Order Number PSC-05-0481-CO-TX referenced as above.

5. Tele Circuit offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.<sup>8</sup> Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

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<sup>5</sup> 47 U.S.C. § 214(e)(1).

<sup>6</sup> *Id.*

<sup>7</sup> See 47 U.S.C. § 153(10) ("the term 'common carrier' or 'carrier' means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy . . . .").

<sup>8</sup> Section 54.201(f) of the FCC's Rules states, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." 47 C.F.R. § 54.201(f). The term "facilities" under Section 54.201 is defined as "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part." 47 C.F.R. § 54.201(e). Tele Circuit's use of UNEs meets this definition of "facilities."

6. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated in the rules of the Federal Communications Commission ("FCC") at 47 C.F.R. § 54.101(a)(1)-(9). These services are:

- a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;
- c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;
- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;

- e) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

- h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- i) Toll limitation for qualifying low-income consumers.

7. Upon certification as an ETC, Tele Circuit will participate in, and offer LifeLine and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services, as required by FCC Rules.<sup>9</sup>

8. Tele Circuit will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.<sup>10</sup>

### **III. Area for Which ETC Certification Is Requested**

9. Tele Circuit has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the state of Florida. Tele Circuit does not seek certification as an ETC in any areas served by rural telephone companies. Tele Circuit is not requesting to provide service in any tribal areas in the State of Florida.

### **IV. Granting Tele Circuit's Application Will Serve the Public Interest**

10. Congress requires that the Commission grant competitive ETC applications in non-rural areas.<sup>11</sup> No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.<sup>12</sup> Thus, the Act provides that the Commission "shall" designate Tele

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<sup>9</sup> See 47 C.F.R. §§ 54.401-54.417; 54.405(b) & 54.411(d).

<sup>10</sup> See 47 C.F.R. §§ 54.201(d)(2).

<sup>11</sup> See 47 U.S.C. 214(e)(2).

<sup>12</sup> See *Id.*



Circuit as an ETC upon finding that the company meets the nine-point list of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding, the designation of Tele Circuit as an ETC will serve the public interest.

11. A central purpose of the Telecommunications Act of 1996 was to “promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ... and encourage the rapid deployment of new telecommunications technologies.”<sup>13</sup> Designation of Tele Circuit as an ETC would further these goals. Granting ETC status to Tele Circuit would allow the Applicant to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

12. Tele Circuit will announce and advertise telecommunications services as an ETC where it provides service in its Designated Service Area in Florida and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Florida residents will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those opportunities by subscribing to Tele Circuit’s service.

13. Tele Circuit will provide universal service as an ETC in all of its Designated Service Area.

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<sup>13</sup> The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

14. Tele Circuit acknowledges it shall provide equal access if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996. The FCC's ETC Order does not impose a general equal access requirement on ETC applicants at this time, but instead suggests the applicants acknowledge that an ETC applicant may be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area. Applicant acknowledges this potential and will abide by the requirement should it occur in the future. Applicant is willing to sign an affidavit attesting to its critical responsibilities regarding carrier of last resort obligations.

15. Under FCC guidelines, an ETC Applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed Designated Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because Tele Circuit seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, and is distributed on a per-customer basis and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

16. Applicant offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

17. Under FCC guidelines, an ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 CFR §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's ETC Order. Applicant in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

18. Under FCC guidelines, an ETC Applicant must demonstrate its ability to remain functional in emergencies. 47 CFR §54.202(a)(2); FCC ETC Order at Para 25.

Since Applicant is providing service to its customers through the use of ILEC leased facilities, this arrangement allows Applicant to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

19. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service.

20. To the best of the Applicant's knowledge, its account is current with the FCC in regards to regulatory fees; and its account is current with the Universal Service Administrative Company in regards to universal service contributions. The Applicant is aware that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions. To the best of the Applicant's knowledge, it has no outstanding complaints at the FCC.

**V. Legal Authority**

This Application is filed pursuant to 47 U.S. C. §§151 *et seq.* and § 364.10(2), and §364.025(5), Florida Statutes.

**VI. Relief Requested**

For the foregoing reasons, Tele Circuit Network Corporation respectfully requests that the Commission grant its application and designate the Applicant as an ETC for the Designated Service Area.

Respectfully submitted,



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Georgia Bar No. 678222  
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Fax: 770-232-9208  
E-Mail: lsteinhart@telecomcounsel.com

***Attorney for Tele Circuit Network Corporation***

**Exhibit 1**  
**Rate Centers**

## Exhibit 1

| Company  | RateCenter | Switch       |
|--|------------|--------------|
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | ARCHER     | ARCHFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BOCA RATON | BCRTFLSADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BROOKSVL   | BKVLFLJFDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BALDWIN    | BLDWFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BELLEGLADE | BLGLFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BUNNELL    | BNNLFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BRONSON    | BRSNFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | BOYNTONBCH | BYBHFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | COCOABEACH | CCBHFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | CEDAR KEYS | CDKYFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | CHIEFLAND  | CFLDFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | CHIPLEY    | CHPLFLJADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | CANTONMENT | CNTMFLLED1   |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | COCOA      | COCOFLMEDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | CROSS CITY | CSCYFLBARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DEBARY     | DBRYFLMARS1  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DELAND     | DELDFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DELRAY BCH | DLBHFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DELEON SPG | DLSPFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DUNNELLON  | DNLNFLWMRS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DEERFLDBCH | DRBHFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | DAYTONABCH | DYBHFLPODS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | EAU GALLIE | EGLLFLIHDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | EASTORANGE | EORNFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | FLAGLERBCH | FLBHFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | FERNADNBCH | FRBHFLFPDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | FORTPIERCE | FTPRFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | GREENCVSPG | GCSPFLCNDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | GRACEVILLE | GCVLFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | GENEVA     | GENVFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | GULFBREEZE | GLBRFLMCDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | GAINESVL   | GSVLFLNW33E  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HAVANA     | HAVNFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HOBE SOUND | HBSOFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HOLLEYNVRR | HLNVFLMADS1  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | FTLAUDERDL | HLWDFLPEDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HOLLYWOOD  | HLWDFLWHDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HOMESTEAD  | HMSTFLNARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | HAWTHORNE  | HWTHFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | JAY        | JAYFLMARS0   |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | JACKSOLBCH | JCBHFLMA24E  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | JUPITER    | JPTRFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | KEYSTN HTS | KYHGFLMARS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | LAKE CITY  | LKCYFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | LYNN HAVEN | LYHNFLOHDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | MICANOPY   | M CNPFLMARS0 |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | MIDDLEBURG | MDBGFLPMDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | MIAMI      | MIAMFLWMDS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | MELBOURNE  | MLBRFLMADS0  |
| BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL | MILTON     | MLTNFLRADS0  |





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|            |             |
|------------|-------------|
| HUDSON     | MNLKFLXA85H |
| MYAKKA     | MYCYFLXA32H |
| NORTH PORT | NRPTFLXA42H |
| TAMPAWST   | OLDSFLXA85H |
| POLK CITY  | PKCYFLXARSA |
| BRADENTON  | PLSLFLXA79H |
| HAINESCITY | POINFLXARSA |
| PALMETTO   | PRSHFLXARSA |
| PLANT CITY | PTCYFLXA75H |
| STPETERSBG | SPBGFLXS86H |
| TAMPA      | TAMPFLXA1JB |
| CLEARWATER | TAMPFLXAW44 |
| NWPTRICHEY | TAMPFLXAW44 |
| SARASOTA   | TAMPFLXAW44 |
| TAMPACEN   | TAMPFLXEDS0 |
| TARPON SPG | TRSPFLXA93H |
| VENICE     | VENCFLXSDS0 |
| WINTER HVN | WNHNFLXC29H |
| ZEPHYRHILS | ZPHYFLXA78H |

State of Georgia )  
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County of Gwinnett )

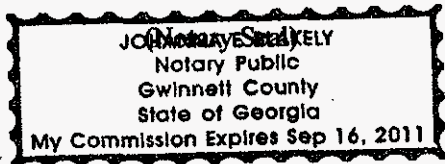
Certification

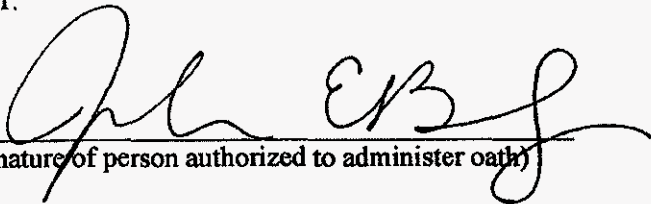
I, Ashar Syed, certify that I am the company officer/employee responsible for this request and that I have examined/formulated the foregoing request. To the best of my knowledge, information and belief, all statements of fact contained in said request are correct statements of the business and affairs of the requesting carrier with respect to each and every matter set forth.

Dated: 05/25/2011

  
\_\_\_\_\_  
Ashar Syed, CEO

Subscribed and sworn to before me, a Notary Public in the State and County above named, this 26<sup>th</sup> day of May 2011.



  
\_\_\_\_\_  
(Signature of person authorized to administer oath)

My Commission Expires: Sept. 16, 2011

FLETC

## APPLICANT CERTIFICATION

State of Georgia  
County of Gwinnett

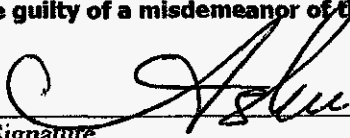
My name is Ashar Syed, I am employed by Tele Circuit Network Corporation, located at 1815 Satellite Blvd., Suite 504, Duluth, Georgia 30097 as its Chief Executive Officer. I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireless Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers, and the Florida Link-Up and Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for ETC designation is approved, it will be for limited ETC designation to provide landline-only Link-Up, Lifeline, and toll-limitation service, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
5. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. *If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to the change of ownership and make a showing of public interest to maintain the ETC designation.*
6. Company understands that it may only receive reimbursement from the Universal Service Administrative company (USAC) for active customer Link-Up and Lifeline access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. The Company shall not apply to USAC for reimbursement of any Link-Up and Lifeline access lines obtained from an underlying carrier which already receive a Lifeline and/or Link-Up credit provided by the underlying carrier.

7. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline/Link-Up programs for as long as the consumer receives Lifeline service plus three years.
8. Company understands that low income support reimbursed by USAC for toll limitation service is available only for the incremental costs that are associated exclusively with toll limitation service.
9. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
10. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
11. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC, along with supporting signed customer Lifeline certifications to:  
  
 Florida Public Service Commission  
 Division of Regulatory Analysis, Market Practices Section  
 2540 Shumard Oak Drive  
 Tallahassee, Florida 32399-0850
12. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bills, \$3.50 of which is provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

**I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.**

  
 \_\_\_\_\_  
 Signature  
 Ashar Syed  
 \_\_\_\_\_  
 Printed Name

05/25/2011  
 \_\_\_\_\_  
 Date

Business Address:  
 1815 Satellite Blvd., Suite 504  
 Duluth, Georgia 30097