

## Crystal Card

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**From:** YANT, ROBYN <rh0582@att.com>  
**Sent:** Thursday, October 17, 2013 2:04 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** YANT, ROBYN  
**Subject:** 130158-TP File in Docket  
**Attachments:** img-X17140824-0001.pdf



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October 17, 2013

Mrs. Ann Cole  
Director, Division of Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Re: Docket No. 130158-TP: 2014 State certification Section 54.313 and Section 54.314, annual reporting requirements for high-cost recipients, and certification of support for eligible telecommunications carriers. (FCC Docket No. 2013-14-C: Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.314 and Telecommunications Act Section 254(e), Federal Communications Commission CC Docket No. 96-45 (2012); and Annual Reports for ETC)

Dear Ms. Cole:

This letter is to request that the Florida Public Service Commission ("Commission") submit a letter to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") certifying that BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") is in compliance with all provisions of Section 254(e) of the Telecommunications Act.

The amount of federal high-cost support AT&T Florida will receive in 2014 will be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, AT&T Florida certifies that it will only use the federal high cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Until the FCC issued its USF/ICC Transformation Order (17 FCC Red 17663) in November 2011, AT&T Florida submitted certifications directly to the FCC, and not to this Commission, because it only received Interstate Access Support ("IAS"). In its November 2011 Order, however, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. *See FCC Order* at para. 614.

At the same time, the FCC expanded the state certification requirements to require state Commissions to certify that even carriers that only receive IAS support, which the FCC now calls "frozen high-cost support," are in compliance with Section 254(e) of the Telecommunications



Act. See 47 C.F.R. § 54.314(a). AT&T Florida, therefore, respectfully requests that the Commission accept this letter and the attached affidavit as self-certification that AT&T Florida is in compliance with 47 U.S.C. § 254(e) and issue a letter to the FCC certifying that AT&T Florida used its high-cost support in the preceding year and will use its high-cost support in the coming calendar year in compliance with Section 254(e) of the Act and therefore is eligible to receive federal high-cost support in 2014.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5555.

Sincerely,

A handwritten signature in cursive script that reads "Gregory R. Follensbee".

Gregory R. Follensbee  
Executive Director  
AT&T Florida

Enclosure

