

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION OF NETTALK.COM, INC.)
FOR CERTIFICATION AS AN ELIGIBLE) **DOCKET NO. _____**
TELECOMMUNICATIONS CARRIER)

NetTALK.COM, Inc. (“NetTALK” / “Applicant”), pursuant to Sections 214(e)(2), 214(e)(6) and 254 of the Communications Act of 1934, as amended (the “Act”) and Sections 54.101-54.207 of the Rules of the Federal Communications Commission (“FCC”), and Florida Statute Sections 364.10(2) and 364.025(5), hereby applies to the Florida Public Service Commission (“FPSC” or “Commission”) for approval and certification as an Eligible Telecommunications Carrier (“ETC”) in certain service areas throughout the entire State of Florida, including all tribal communities (“Designated Service Area”). NetTALK seeks certification as an ETC for the purpose of receiving Federal Universal Service Fund (“USF”) support in conjunction with providing Lifeline service to customers, including tribal communities, in Florida. A list of each rate center for which the Applicant is requesting ETC status in the State of Florida is attached hereto as “Exhibit A.” Applicant seeks only low-income support, and does not request high-cost support. NetTALK satisfies the statutory and regulatory requirements for FPSC designation as an ETC in NetTALK’s Designated Service Area. Designation of NetTALK as an ETC for its proposed Designated Service Area is consistent with and will serve the public interest by extending affordable telecommunications services to Florida consumers, including those located in Florida’s tribal communities. After the FPSC grants this petition, NetTALK will offer Lifeline and services to qualified low-income consumers, as

required by the FPSC's rules and regulations. Accordingly, NetTALK respectfully requests that the Commission approve the Application and grant ETC status to NetTALK.

I. BACKGROUND

NetTALK is a Florida corporation, incorporated in Florida in 2008, and is authorized to conduct business as a domestic for-profit corporation in the State of Florida. Proof of NetTALK's authority to transact business in the State of Florida is on file with the FPSC and is incorporated by reference. NetTALK's principle place of business is at 1080 NW 163rd Drive, Miami Gardens, FL 33169.

The FPSC granted NetTALK certification to operate as a competitive local exchange carrier ("CLEC") in Florida (Certificate No. 8854), pursuant to Order No. PSC-13-0667-PAA-TX (Docket No. 130252-TX, December 18, 2013). Authorization became final and effective on January 13, 2014, pursuant to Order No. PSC-14-0027-CO-TX. Pursuant to its authorization, NetTALK provides competitive local exchange and long distance service in its Designated Service Area using a combination of its own facilities and resale.

If the FPSC designates NetTALK as an ETC, NetTALK will be eligible to receive universal service support consistent with § 254 of the Act.¹ The requirements for designation as ETC are found in Section 214(e)(1) of the Act.

II. NETTALK SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC TO SERVE THE DESIGNATED SERVICE AREA

NetTALK is a common carrier, as defined in the Act.² NetTALK provides competitive local telecommunications services in the State of Florida, as discussed above. NetTALK offers all of the supported services enumerated in Section 254(c) of the Act using its own facilities and

¹ 47 U.S.C. § 214(e)(2).

² See 47 U.S.C. § 153(10).

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resale, via a variety of technologies. NetTALK satisfies the requirements set forth in Section 214(e)(1)(a).

The Federal Universal Service Fund supports a variety of services under Section 254(c) of the Act:³

- 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 that 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.
- 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.

³ See 47 C.F.R. §§ 54.101(a)(1)-(9).

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- Minutes of Use for Local Service Provided at no Additional Charge to End Users.

NetTALK will offer customers a basic service level that includes a monthly allowance of minutes that can be used for local service at no additional charge. Additional minutes are available for purchase.

- Toll Limitation Services to Qualifying Low-Income Customers. NetTALK will allow customers to avoid unexpected toll charges because it does not differentiate between local and long distance service.

NetTALK will comply with the obligation to submit terms and conditions of any voice telephony plans offered to subscribers, including details on the number of minutes provided as part of the plan additional charges, if any, for toll calls, and rates for each such plan.

Upon certification as an ETC, NetTALK will participate in and offer Lifeline to qualifying low-income consumers and publicize the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services, and as otherwise required by FCC rules.⁴

NetTALK will advertise the availability of the above-listed services and the charges for the services in the Designated Service Area, via media of general distribution, as required by FCC rules.⁵

III. AREA FOR WHICH ETC CERTIFICATION IS REQUESTED

NetTALK seeks ETC certification in designated exchanges throughout the entire State of Florida, including for all tribal territories located within the State of Florida. Applicant seeks ETC certification in the Designated Service Areas listed in Exhibit A.

⁴ See 47 C.F.R. §§ 54.501-54.417; 54.405(b); 54.411(d).

⁵ See 47 C.F.R. § 54.201(d)(2).

IV. GRANT OF NETTALK'S APPLICATION WILL SERVE THE PUBLIC INTEREST

Before the FPSC can grant an ETC application, Congress requires that the FPSC ensure that the carrier meets the above-listed requirements. In rural areas, the Act requires a state commission to ensure that an ETC designation is consistent with the public interest, convenience, and necessity. NetTALK will offer and advertise the above services throughout the Designated Service Area. Applicant's application is factually correct and public policy supports the availability of communications to low-income individuals, who are the most financially insecure and could directly benefit from access to a telephone.

One of Congress' primary goals in adopting the Telecommunications Act of 1996 was to "promote competition and reduce regulation . . . [foster] lower prices and higher quality services . . . and encourage the deployment of new telecommunications technologies."⁶ This goal was recognized and embraced by the Florida Legislature. Florida law says that "the Legislature finds that the competitive provision of telecommunications services, including local exchange telecommunications service, is in the public interest and will serve consumers with freedom of choice, encourage the introduction of new telecommunications service, encourage technological innovation, and encourage investment in telecommunications infrastructure."⁷ Granting ETC certification will enable NetTALK to obtain Federal Universal Service Fund support, extending the availability and benefits of competitive telecommunications services to more consumers, including those in Florida tribal communities. Granting NetTALK's ETC application will enhance the overall value of the PSTN to all users in Florida, while also fostering innovative

⁶ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

⁷ Fla. Stat. § 364.01(3).

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telecommunications services at competitive prices to consumers, especially those in need, throughout the State of Florida.

If this application is granted, NetTALK will announce and advertise the availability of ETC-based telecommunications services to consumers in the State of Florida, including tribal communities, and will publicize the availability of Lifeline services. NetTALK's advertising will be reasonably designed and targeted to reach those who would likely qualify for Lifeline service. Low-income individuals and senior citizens living in Florida will be informed of the opportunities available to them under the Lifeline programs and NetTALK will offer them cost-saving opportunities.

NetTALK is financially and technically capable of providing a Lifeline service in Florida. NetTALK is a publicly traded company that has been granted a CPCN by the FPSC. The FPSC recently reviewed NetTALK's financial standing and determined that it has sufficient financial resources to provide services in Florida. *See* Order No. PSC-13-0667-PAA-TX (Docket No. 130252-TX, December 18, 2013).

NetTALK acknowledges that it may serve as a provider of last resort in areas and thereby provide universal service telephone service as an ETC in its Designated Service Area. NetTALK agrees to provide equal access if all other ETCs in NetTALK's Designated Service Area relinquish their ETC designations as permitted under the Act. While the FCC does not currently impose a general equal access requirement upon ETC applicants,⁸ it has suggested that applicants acknowledge that an ETC applicant may in the future 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 area. NetTALK recognizes and acknowledges this potential and will abide by

⁸ *See Federal-State Joint Board on Universal Service, Report and Order*, 20 FCC Rcd. 6371 (2005) ("FCC ETC Order")

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the requirement under such circumstances. Further, NetTALK is willing to sign an affidavit attesting to its critical responsibilities regarding carrier of last resort obligations.

Further, NetTALK is aware of claims of fraud, waste, and abuse of the Lifeline program. NetTALK will work to avoid fraud, limit waste, and mitigate abuse of the Lifeline program, and NetTALK is committed to ensuring that each Lifeline subscriber is limited to one Lifeline program per household.

The FCC requires an ETC applicant to submit a five-year plan that describes with specificity the proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed Designated Service Area. However, the FCC waived this requirement for applicants requesting only qualification to receive only "low-income" Federal Universal Service Fund support. NetTALK believes that it need not file a five-year plan as it is solely requests ETC designation for the purpose of reimbursement for provision of subsidized Lifeline service to eligible customers.

Applicant certifies that all support received by the carrier will be used to provide Lifeline service to consumers, thus promoting the availability of affordable telephone service for low-income citizens in the Designated Service Area. Lifeline support is designed to reduce the installation charges and monthly cost of telecommunications services for eligible low-income consumers, and support is distributed on a per-customer basis in a manner that is reflected directly in the price that eligible customers pay for service. NetTALK's designation as an ETC will further the important and well-recognized public interest goals in expanding communications access to low-income citizens and senior citizens.

NetTALK offers a local usage plan comparable to the one offered by ILECs in the Designated Service Area. NetTALK will satisfy all consumer protection and service quality

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standards.⁹ NetTALK also agrees to abide by the service quality and consumer protection rules of the FPSC. NetTALK will also report information on the number of consumer complaints per 1,000 lines on an annual basis, consistent with the FCC's ETC Order.¹⁰

NetTALK will abide by the FCC's regulations regarding its ability to remain functional in emergency situations.¹¹ NetTALK will ensure its Lifeline customers have access to emergency services, including 911. NetTALK will provide its customers the same ability to remain functional in emergency situations as currently provided by the ILEC to its own subscribers. This includes access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capacity to manage traffic spikes during emergencies. This satisfies the FCC's requirement regarding access to service in emergency circumstances.

Further, FCC guidelines require an ETC applicant to commit to providing service throughout its proposed designated service area to all customers making a reasonable request for such service.¹² NetTALK commits to provide service throughout its Designated Service Area to all customers making a reasonable request for service, consistent with the FCC's guidelines.

NetTALK asserts that, to the best of its knowledge and belief, its account is current regarding FPSC Regulatory Assessment Fees. NetTALK understands that there may be an audit of use of universal service funds and that ETC designation is reviewed annually by the FPSC. To the best of NetTALK's knowledge and belief, it has no outstanding complaints at either the FCC or before the FPSC.

⁹ See 47 C.F.R. § 202(a)(3); *FCC ETC Order*, ¶ 28.

¹⁰ See *FCC ETC Order*, ¶ 14.

¹¹ See 47 C.F.R. § 202(a)(2); *FCC ETC Order*, ¶ 25.

¹² See 47 C.F.R. § 202(a)(1)(i); *FCC ETC Order*, ¶ 22.

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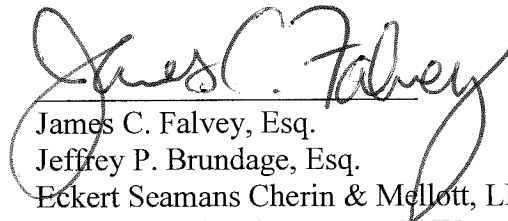
In order to maintain compliance with FCC and FPSC rules and regulations, NetTALK has retained GSA Associates. GSA Associates will be responsible for ensuring that all state and federal requirements are met and that full regulatory compliance is maintained prospectively. NetTALK understands the importance of compliance with all relevant regulations, and is committed to remaining compliant with all pertinent state and federal requirements.

NetTALK files the application pursuant to 47 USC § 151, *et seq.*, and Florida Statute §§ 364.10(2) and 364.025(5).

IV. CONCLUSION

Based on the foregoing, NetTALK respectfully requests that the Commission grant its Application and designate the Applicant as an ETC for the Designated Service Area in the State of Florida, including tribal areas.

Respectfully submitted,



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ATTACHMENT A

RATE CENTERS

Company	Rate Center	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	BROKSVL	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	BNNFLMARS0
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	COCOFMEDS0
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	DLSPFMLARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DUNNELLO	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	EGLLFLHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EASTORANGE	EORNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLAGLERBCH	FLAGFLMARS0
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	GCSPFLCND0
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	HBSDFLMADS0
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	MCNPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIDDLEBURG	MDBGFLPMD0
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
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSONVL	MNDRELODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLWR0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MUNSON	MNSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MAXVILLE	MXVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NORTH DADE	NDADFL0DS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWSMYRNBCH	NSBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NEWBERRY	NWBYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OAK HILL	OKHLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OLD TOWN	OLTWFLNRS0

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORLANDO	ORLDFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORANGEPARK	ORPKFLRWDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PACE	PACEFLPVR00
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PAHOKEE	PAHKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNAMACYBCH	PCBHFLNTDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALM COAST	PLCSFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALATKA	PLTKFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CORAL SPG	PMBHFLCSDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMPANOBCH	PMBHFLTADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMONAPARK	PMPKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PANAMACITY	PNCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PENSACOLA	PNSCFLWADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNTVDRABCH	PNVDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PERRINE	PRRNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOG0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SEBASTIAN	SBSTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYS	SGKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OVIEDO	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SANFORD	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STAUGUSTIN	STAGFLSHRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ST JOHNS	STAGFLWGRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JENSEN BCH	STRTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STUART	STRTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SUNNYHILLS	SYHSFLCCRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TRENTON	TRENFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TITUSVILLE	TTVLFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERNON	VERNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERO BEACH	VRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WELAKA	WELKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WPALMBEACH	WPBHFLRPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WEEKICHSPG	WWSPFLSHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YONGSTFNTN	YNFNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YANKEETOWN	YNTWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YULEE	YULEFLMARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	ALFORD	ALFRFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	BAKER	BAKRFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	BONIFAY	BNFYFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	CRAWFORDVL	CFVLFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	SOPCHOPPY	CFVLFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	CHERRYLAKE	CHLKEFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	CRESTVIEW	CRVWFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	COTTONDALE	CTDLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	DESTIN	DESTFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	DFUNIAXSPG	DFSPFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	FREEPORT	FRPTFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	FTWALTNBCH	FTWBFLXCRS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	GRANDRIDGE	GDRGFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	GLENDALE	GLDLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	GREENVILLE	GNVFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	GREENWOOD	GNWDFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	KINGSLEYLK	KGLKFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	LEE	LEE FLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	MALONE	MAJNFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	MADISON	MDSNFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	MONTICELLO	MNTIFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	MARIANNA	MRNNFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	PANACEA	PANCFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	PONCE LEON	PNLNFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	REYNOLDSHL	RYHLFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	SEAGRV BCH	SGBHFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO. OF FLORIDA	SHALIMAR	SHLMFLXADS0

ATTACHMENT B

APPLICANT CERTIFICATION

Florida
Dade County

My name is Kenneth A. Hosfeld, I am employed by NetTALK.Com, Inc., ("NetTALK") located at 1080 NW 163rd Drive, Miami Gardens, FL 33169, as its Director and Vice President. I am a director of NetTALK and am authorized to provide the following certifications. This certification is given to support the Eligible Telecommunications Carrier petition filed by NetTALK with the Florida Public Service Commission ("FPSC").

NetTALK hereby certifies the following:

1. It will follow all Florida statutes, Florida administrative rules, and FPSC orders relating to universal service, Eligible Telecommunications Carriers ("ETCs"), and the Florida Lifeline and program.
2. NetTALK will follow all Federal Communications Commission ("FCC") rules, orders, and regulations regarding universal service, ETCs, Lifeline, and toll limitation service.
3. NetTALK agrees that the FPSC may revoke a carrier's ETC status for good cause after notice and opportunity for hearing, for violations of any applicable Florida statute, administrative rule, FPSC order, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the FPSC determines that it is no longer in the public interest for the company to retain ETC status.
4. NetTALK understands that if its petition for ETC status is approved, it will be for a limited ETC status to provide Lifeline, and toll-limitation service only, and NetTALK will be eligible only to receive low-income support from the Universal Service Fund.
5. NetTALK understands that it may only receive reimbursement from the Universal Service Administrative Company ("USAC") for active customer Lifeline access lines which are provided using its own facilities or using access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. NetTALK shall not apply to USAC for reimbursement of Lifeline access lines obtained from an underlying carrier which already receives a Lifeline and/or credit provided by the underlying carrier.
6. NetTALK understands that the FPSC shall have access to all books of account, records, and property of all ETCs.
7. NetTALK 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.

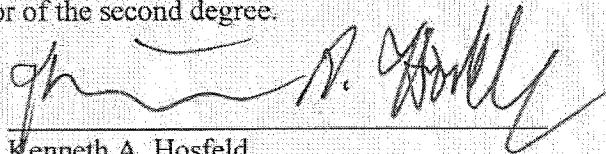
NetTALK ETC Application
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8. NetTALK agrees that upon request, it will submit to the FPSC a copy of Form 497 forms filed with USAC to:

Florida Public Service Commission
Division of Regulatory Compliance, Market Practices Section
3540 Shumard Oak Drive
Tallahassee, Florida 32399-0850

9. NetTALK understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bill, \$3.50 of which is provided by the ETC, and \$9.25 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.




Kenneth A. Hosfeld
Executive Vice President
NetTALK.Com, Inc.

Dated: February 4, 2014

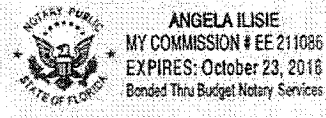
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I, Kenneth A. Hosfeld, certify that I am the company officer responsible for preparing this Application by NetTALK.Com, Inc. for Certification as an Eligible Telecommunications Carrier in the State of Florida, and that I have examined/formulated the foregoing Application. To the best of my knowledge, information, and belief, all statements of fact contained in the Application are correct statements of the business and affairs of NetTALK with respect to each and every matter set forth herein.

Date: FEB 4, 2014
Signature: 
Telephone: 305-621-1200 EXT 103

Subscribed and sworn to before me, a Notary Public in MIAMI - DASE, this 4th day of Feb, 2014.


Notary Signature



Seal:
My Commission Expires: 10/23/2016