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February 1, 2016

Ms. Carlotta S. Stauffer  
Commission Clerk  
Division of Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Re: 2016 FCC Form 555 for BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT& Southeast ("AT&T Florida") - Annual Lifeline Eligible Certification

Dear Ms. Stauffer:

Attached is a copy of the Annual Lifeline Eligible Telecommunications Carrier Certification ("FCC Form 555<sup>1</sup>") for AT&T Florida that was filed with the Federal Communications Commission ("FCC") on January 29, 2016, along with the cover letter accompanying that filing.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5553.

Sincerely,

A handwritten signature in blue ink that reads "MaryRose Sirianni".

MaryRose Sirianni  
External Affairs Manager  
AT&T Florida

Enclosure

<sup>1</sup>AT&T filed its FCC Form 555 online with the Universal Service Administrative Company (USAC). Once a carrier enters its six-digit study area code (SAC) into USAC's online FCC Form 555, the online tool automatically populates a name associated with that SAC. In some cases, this automatically generated name differs from (e.g., is an abbreviated version of) the legal entity name for AT&T's eligible telecommunications carrier affiliate.)



Anisa A. Latif  
Associate Director  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, N.W.,  
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January 29, 2016

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, D.C. 20554

**Re: AT&T Annual Lifeline Eligible Telecommunications Carrier Certification  
Form – FCC Form 555  
WC Docket No. 14-171**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 54.416, AT&T Services, Inc., on behalf of its affiliates BellSouth Telecommunications, LLC,<sup>1</sup> Illinois Bell Telephone Company,<sup>2</sup> Indiana Bell Telephone Company,<sup>3</sup> Michigan Bell Telephone Company,<sup>4</sup> Nevada Bell Telephone Company,<sup>5</sup> The Ohio Bell Telephone Company,<sup>6</sup> Wisconsin Bell,<sup>7</sup> and Southwestern Bell Telephone Company<sup>8</sup> hereby submits its 2016 Annual Lifeline Eligible Telecommunications Carrier Certification Form via the Commission's Electronic Comment Filing System. As required, AT&T also submitted its filing to the Universal Service Administrative Company.

Should you have any questions, feel free to contact me.

Sincerely,

**/s/ Anisa A. Latif**  
Anisa A. Latif

Attachment

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<sup>1</sup> SAC Nos. 255181, 215191, 225192, 265182, 275183, 285184, 235193, 245194, and 295185.

<sup>2</sup> SAC No. 345070.

<sup>3</sup> SAC No. 325080.

<sup>4</sup> SAC No. 315090.

<sup>5</sup> SAC No. 555173.

<sup>6</sup> SAC No. 305150.

<sup>7</sup> SAC No. 335020.

<sup>8</sup> SAC Nos. 405211, 415214, 425213 and 435215.



Paul Stephens – Sr.VP & Controller  
AT&T  
208 S. Akard St. Suite 2702  
Dallas, TX 75202

January 22, 2016  
Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: Lifeline Compliance Filings, WC Docket No. 14-171  
2016 FCC Form 555 for **BellSouth Telecommunications, LLC** (Study Area Codes: 215191, 225192, 235193, 245194, 255181, 265182, 275183, 285184, 295185); **Southwestern Bell Telephone Company** (Study Area Codes: 405211, 415214, 425213, 435215); **Nevada Bell Telephone Company** (Study Area Code 555173); **Illinois Bell Telephone Company** (Study Area Code 345070); **Indiana Bell Telephone Company** (Study Area Code 325080); **Michigan Bell Telephone Company** (Study Area Code 315090); **The Ohio Bell Telephone Company** (Study Area Code 305150); and **Wisconsin Bell, Inc.** (Study Area Code 335220)

Dear Ms. Dortch:

Attached please find AT&T's 2016 FCC Form 555 on behalf of the above referenced affiliated eligible telecommunications carriers ("ETCs").<sup>1</sup>

The 2016 FCC Form 555 requires ETCs to report the number of subscribers claimed on its February 2015 FCC Form 497, among other data elements. In accordance with ¶ 17(a) of the Consent Decree in DA 15-485, in preparing the February 2015 Forms 497, AT&T performed its monthly statistically significant sample of the eligibility records for new Lifeline subscribers. In reviewing that sample, AT&T confirmed whether it had a complete, current, and accurate eligibility certification for each subscriber. AT&T also compared the sample to the NLAD database to confirm eligibility. In accordance with the Consent Decree, AT&T reduced the number of retail subscribers for whom it sought Lifeline reimbursement on its February 2015 FCC Forms 497 by applying the upper limit of the February 2015 weighted average error rates to the total number of retail subscribers. For this reason, the sum of the numbers reported in Block F and Block K of the AT&T affiliated ETCs FCC Forms 555 do not equal the numbers reported in Block E.

AT&T is providing this information by cover letter rather than on the affiliated ETCs FCC Forms 555 based on advice from USAC in 2014 that modifications on FCC or OMB approved forms without written approval from the Commission are not accepted. Both USAC and Commission staff had no objection to AT&T providing this information in a cover letter.

<sup>1</sup> BellSouth Telecommunications, LLC does business in nine states under a different name as follows: AT&T Alabama (SAC 255181), AT&T Florida (SAC 215191), AT&T Georgia (SAC 225192), AT&T Kentucky (SAC 265182), AT&T Louisiana (SAC 275183), AT&T Mississippi (SAC 285184), AT&T North Carolina (SAC 235193), AT&T South Carolina (SAC 245194), and AT&T Tennessee (SAC 295185). Southwestern Bell Telephone Company does business in each of the four states under a different name as follows: AT&T Arkansas (SAC 405211), AT&T Kansas (SAC 415214), AT&T Missouri (SAC 425213) and AT&T Oklahoma (SAC 435215). The remaining affiliated ETCs do business in each state using the following names: AT&T Nevada (SAC 555173), AT&T Illinois (SAC 345070), AT&T Indiana (SAC 325080), AT&T Michigan (SAC 315090), AT&T Ohio (SAC 305150) and AT&T Wisconsin (SAC 335220).



Paul Stephens -- Sr.VP & Controller  
AT&T  
208 S. Akard St. Suite 2702  
Dallas, TX 75202

Please do not hesitate to contact me if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,

A handwritten signature in cursive script that reads "Paul W. Stephens".

Paul W. Stephens  
Senior Vice President & Controller

Attachments

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**  
All carriers must complete all or portions of all sections  
Form must be submitted to USAC and filed with the Federal Communications Commission  
**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**  
*Deadline: January 31<sup>st</sup> (Annually)*

215191 Study Area Code (SAC) <i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).</i>	
Florida State	BellSouth Telecommunications, LLC ETC Name
AT&T Florida DBA, Marketing or Other Branding Name <i>(If same as ETC name, list "N/A" Do <u>not</u> leave blank)</i>	AT&T Inc. Holding Company Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i>

Does the reporting company have affiliated ETCs?      Yes       No

*Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.*

Affiliated ETC's SAC	Affiliated ETC's Name
See page 4.	See page 4.

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial     *aws*

**Section 2: Annual Recertification**

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year <i>(February data month)</i>	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <b>initially</b> enrolled in the current Form 555 calendar year  <i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i>	Number of subscribers de-enrolled <b>prior</b> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
13,635	944	319	2,779	9,593

**Recertification Results:**

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible  <i>(This should be a subset of Block G.)</i>	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
10,575	5,911	4,664	9	4,673

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

*Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.*

*The total of Block F and Block K should equal the number reported in Block E.*

**Certification:**

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial     

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: (List database or name of administrator here). Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial     

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

**Section 3: De-enroll Percentage**

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC  (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
10,575	4,673	44.2

**Section 4: Pre-Paid ETCs**

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes  No

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	
Total Subscribers	

**Signature Block**

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,



Signature of Officer

ps0278@att.com

Email Address of Officer

Ronald L. Hilyer

Person Completing This Certification Form

Paul W. Stephens, Senior Vice President & Controller  
Printed Name and Title of Officer

Date

1/25/16

404-927-8120

Contact Phone Number

### Affiliated ETCs

SAC	Name
549004	AT&T CORP
639005	AT&T MOBILITY PUERTO RICO, INC.
259908	AT&T MOBILITY, LLC
399015	AT&T MOBILITY, LLC
529910	AT&T MOBILITY, LLC
539010	AT&T MOBILITY, LLC
225192	BELLSOUTH TELECOMMUNICATIONS, LLC
235193	BELLSOUTH TELECOMMUNICATIONS, LLC
245194	BELLSOUTH TELECOMMUNICATIONS, LLC
255181	BELLSOUTH TELECOMMUNICATIONS, LLC
265182	BELLSOUTH TELECOMMUNICATIONS, LLC
275183	BELLSOUTH TELECOMMUNICATIONS, LLC
285184	BELLSOUTH TELECOMMUNICATIONS, LLC
295185	BELLSOUTH TELECOMMUNICATIONS, LLC
345070	ILLINOIS BELL TELEPHONE COMPANY
325080	INDIANA BELL TELEPHONE COMPANY, INC.
315090	MICHIGAN BELL TELEPHONE COMPANY
555173	NEVADA BELL TELEPHONE COMPANY
209012	NEW CINGULAR WIRELESS PCS, LLC
269905	NEW CINGULAR WIRELESS PCS, LLC
279010	NEW CINGULAR WIRELESS PCS, LLC
289912	NEW CINGULAR WIRELESS PCS, LLC
319026	NEW CINGULAR WIRELESS PCS, LLC
389015	NEW CINGULAR WIRELESS PCS, LLC
409004	NEW CINGULAR WIRELESS PCS, LLC
449022	NEW CINGULAR WIRELESS PCS, LLC
479006	NEW CINGULAR WIRELESS PCS, LLC
619004	NEW CINGULAR WIRELESS PCS, LLC
545170	PACIFIC BELL TELEPHONE COMPANY
405211	SOUTHWESTERN BELL TELEPHONE COMPANY
415214	SOUTHWESTERN BELL TELEPHONE COMPANY
425213	SOUTHWESTERN BELL TELEPHONE COMPANY
435215	SOUTHWESTERN BELL TELEPHONE COMPANY
445216	SOUTHWESTERN BELL TELEPHONE COMPANY
305150	THE OHIO BELL TELEPHONE COMPANY
335220	WISCONSIN BELL, INC.