

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: December 4, 2008

TO: Office of Commission Clerk (Cole)

FROM: Division of Regulatory Compliance (Williams, Casey)
Office of the General Counsel (Murphy, Morrow)

RE: Docket No. 080169-TX – Application for designation as eligible telecommunications carrier (ETC) by Express Phone Service, Inc.

AGENDA: 12/16/08 – Regular Agenda – Proposed Agency Action - Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: McMurrian

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

FILE NAME AND LOCATION: S:\PSC\RCP\WP\080169.RCM.DOC

Case Background

On March 21, 2008, Express Phone Service, Inc. (Express Phone) petitioned the Florida Public Service Commission (FPSC or Commission) for designation as an eligible telecommunications carrier (ETC) in the State of Florida. In its original application, Express Phone requested that it be granted ETC status throughout the BellSouth/AT&T (AT&T), Embarq and Verizon territories for purposes of receiving federal universal service support. However, via letter dated July 11, 2008, Express Phone modified its request for certification as an ETC to exclude Embarq's service territory. The company states that it is only seeking low-income support, and that it is not requesting high-cost support from the federal Universal Service Fund (USF).

In its original application, Express Phone states that it provides local exchange and exchange access service using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through Interconnection Agreements (UNEs) that allow end-to-end switching delivery of calls. However, on September 25, 2008, Express Phone filed an "Amendment to Application for Certification as an Eligible Telecommunications Carrier." Express Phone explained that it was filing the Amendment to its Application to clarify that it does not currently provide service using UNEs, but intends to provide service utilizing UNEs upon certification as an ETC.

Express Phone signed an affidavit attesting that it will follow all Florida Statutes, Florida Administrative Rules, Florida PSC Orders, Federal Communications Commission (FCC) Rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up, Lifeline, and toll limitation service. (Attachment A)

Express Phone is a Florida corporation organized in 1999 with its headquarters in Pensacola, Florida. The company was granted certification to operate as a Competitive Local Exchange Company (CLEC) in Florida on May 4, 1998, through Order Number PSC-98-0628-FOF-TX.

As of July 2, 2008, Express Phone states that it serves 2,720 residential customers in Florida. The Commission has authority under Section 364.10(2), Florida Statutes, to decide a petition by a CLEC seeking designation as an ETC pursuant to 47 C.F.R. § 54.201.

Discussion of Issues

Issue 1: Should Express Phone be granted ETC designation in the State of Florida?

Recommendation: Yes. Staff recommends that Express Phone be granted ETC designation status in the AT&T and Verizon wire centers listed in Attachment B of this recommendation. (Williams, Casey)

Staff Analysis: Pursuant to Federal Statute, state commissions have the primary responsibility to designate providers as ETCs.¹ Designation as an ETC is required in order for a provider to be eligible to receive monies from the federal USF. Section 254(e) of the Telecommunications Act of 1996 (Act) provides that “only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific federal universal service support.”² According to Section 214(e)(1), a common carrier designated as an ETC must offer and advertise the services supported by the federal Universal Service mechanisms throughout its designated service area. Further, 47 CFR 54.405(b) specifies that ETCs must publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

ETC Certification Requirements

The Code of Federal Regulations addresses a state commission’s responsibilities related to an ETC designation:³

Upon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the state commission, so long as each additional requesting carrier meets the requirements of paragraph (d) of this section. Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the state commission shall find that the designation is in the public interest.

To qualify as an ETC, a carrier must provide nine services identified in 47 CFR 54.101. The services are:

- (1) 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;

¹ 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b).

² 47 U.S.C. § 254(e)(2).

³ 47 C.F.R. § 54.201(c).

- (2) Local Usage Local usage indicates the amount of minutes of use of exchange service, provided free of charge to end users;
- (3) 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, thus shortening call set-up time;
- (4) 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;
- (5) 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;
- (6) 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 and/or completion, of a telephone call;
- (7) 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;
- (8) 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
- (9) Toll limitation for qualifying low-income consumers Toll limitation or blocking restricts all direct-dial toll access.

In addition to providing the above services, 47 CFR 54.405(b) specifies that ETCs must publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

Additional ETC Certification Requirements

In addition to requiring the above services, the FCC, on March 17, 2005, issued a Report and Order that established additional criteria that all ETC applicants must satisfy in order to be granted ETC status by the FCC.⁴ In this Order, the FCC determined that an ETC applicant must also demonstrate:

⁴ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order FCC 05-46, Adopted: February 25, 2005, Released: March 17, 2005.

- 1) a commitment and ability to provide the supported services throughout the designated area;
- 2) the ability to remain functional in emergency situations;
- 3) ability to satisfy consumer protection and service quality standards;
- 4) provision of local usage comparable to that offered by the incumbent LEC; and
- 5) an acknowledgement that the applicant may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.

The FCC encouraged states to also adopt these criteria, and the FPSC has done so in Docket No. 010977-TL (State certification of rural telecommunications carriers pursuant to 47 C.F.R. 54.314), by Order No. PSC-05-0824-TL, issued August 15, 2005.

Public Interest Determinations

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Section 214 or Section 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.⁵ Staff believes that before designating a carrier as an ETC, the FPSC should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

Express Phone's Petition

Express Phone is requesting that it be granted ETC status throughout the non-rural wire centers of AT&T and Verizon territories (Attachment B) for the purpose of receiving federal universal service support. The company maintains that it is only seeking low-income support, and it is not requesting high-cost support from the federal USF. Express Phone's primary purpose in requesting ETC status in Florida is to provide Lifeline and Link-Up services.

Express Phone has acknowledged the requirements of the Florida Lifeline program, and it has agreed to adhere to the program which provides qualified customers a total of \$13.50 in Lifeline assistance credits consisting of: \$6.50 in federal subscriber line charges, \$1.75 in federal support for states that have approved the credit, and \$1.75 which is a 50% match of federal support for having a state Lifeline program requiring a \$3.50 credit under the Florida eligibility criteria. Express Phone indicates that it will provide the \$3.50 credit to qualified clients,

⁵ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order FCC 05-46 (¶40), Adopted: February 25, 2005, Released: March 17, 2005.

advertise the availability of Lifeline, and begin offering these services within 60 days of receiving ETC status.

Express Phone states that it can provide local exchange and exchange access services using a combination of resale and unbundled network elements (UNEs). Federal rules do not require companies to lease UNEs prior to ETC designation. However, Federal rules do require that ETCs provide local exchange and exchange access services using a combination of resale and UNEs prior to requesting reimbursement from the USF.

Express Phone has also indicated that its accounts with the FCC and the Universal Service Administrative Company (USAC) are current, and it is not aware of any outstanding complaints or violations with either entity. As part of the petition process, Express Phone has agreed to abide by the Commission's rules, such as the procedures for approving, denying, and terminating recipients, timelines for submitting reports, and expectations pertaining to the Lifeline and Link-Up programs. Express Phone commits to use federal universal service support only for the provision of services for which the support is intended.

Staff reviewed Express Phone's payment history of regulatory assessment fees, consumer complaint incidents and the timely resolution of those complaints, compiled financial statements, and the company's status with the Florida Department of State Division of Corporations, among other sources. On August 29, 2008, the Commission issued Order No. PSC-08-0562-PAA-TX which addressed Express Phone's first-time violation of Rule 25-4.0161(10), Florida Administrative Code, which enforces the timely payment of Regulatory Assessment Fees.⁶

Express Phone was delinquent on its most recent Regulatory Assessment Fee, and was assessed the applicable fine of \$500.00 pursuant to Rule 25-4.0161(10), Florida Administrative Code. To comply with Order No. PSC-08-0562-PAA-TX, Express Phone was directed to pay the \$500.00 fine, or provide justification why it should not be fined by September 19, 2008. Express Phone paid the fee and applicable fine associated with the first time violation.

Conclusion

Staff acknowledges that concern was raised in light of the issuance of Order No. PSC-08-0562-PAA-TX regarding Express Phone's Regulatory Assessment Fee violation. However, staff took into consideration that this was Express Phone's first time violation, and the fee and applicable fine were paid. If Express Phone should decide to seek any high-cost universal service funds, or seek ETC status in any rural service areas in the future, it should be required to file a petition and make a showing that it would be in the public interest to grant such a request.

Based on staff's review, along with Express Phone's commitment to abide by both state and federal rules and procedures, staff believes that Express Phone's petition to be designated as an ETC is in the public interest and should be approved. Staff believes that public interest

⁶ Order No. PSC-08-0562-PAA-TX - Notice of Proposed Agency Action Order Imposing Penalties and Collection Costs, and Requiring Payment of Delinquent Regulatory Assessment Fees, or Cancelling Competitive Local Exchange Company Certificates for Violation of Rule 25-4.0161, Florida Administrative Code.

benefits of a particular ETC designation should be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas. Upon a decision by the Commission, staff will continue the necessary oversight to ensure that Express Phone, along with all other ETCs in Florida, are upholding these principles and attaining the goals and objectives of both the state and federal universal service programs. Therefore, staff recommends that Express Phone be granted ETC designation status in the AT&T and Verizon wire centers listed in Attachment B of this recommendation.

Docket No. 080169-TX
Date: December 4, 2008

Issue 2: Should this docket be closed?

Recommendation: Yes. If no person whose substantial interests are affected files a protest to the Commission's Proposed Agency Action within 21 days of the issuance of the Commission Order, this docket should be closed upon issuance of a consummating order.

(Murphy, Morrow)

Staff Analysis: If no person whose substantial interests are affected files a protest to the Commission's Proposed Agency Action within 21 days of the issuance of the Commission Order, this docket should be closed upon issuance of a consummating order.

AFFIDAVIT

State of Florida
County of Escambia

BEFORE ME, the undersigned authority, appeared Thomas M. Armstrong, who deposed and said:

My name is Thomas M. Armstrong, I am employed by Express Phone Service, Inc., located at 1803 W. Fairfield Drive, Penscola, Florida, 32501, as its President. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the 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 status 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 status.
4. Company understands that if its petition for ETC status is approved, it will be for limited ETC status to provide Link-Up, Lifeline, and toll-limitation service only, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
5. 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 using access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. The Company shall not apply to USAC for reimbursement of 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.

- 8. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC to:
Florida Public Service Commission
Division of Regulatory Compliance, Market Practices Section
2540 Shumard Oak Drive
Tallahassee, Florida 32303
- 9. Company 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 \$10.00 of which is reimbursable from the Federal Universal Service Fund.

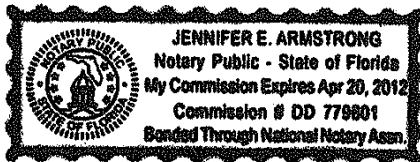
FURTHER AFFIANT SAYETH NOT.

Thomas M. Armstrong, President 7/10/08
 Signature Date
Thomas M. Armstrong, President
 Printed Name

Business Address:
1803 W. Fairfield Drive
Pensacola, FL 32501

State of Florida
 County of Escambia

Acknowledged before me this 7th day of July, 2008, by Thomas M. Armstrong, as President of Company, who is personally known to me or produced identification and who did take an oath.



Jennifer E. Armstrong
 NOTARY PUBLIC
Jennifer E. Armstrong
 Printed Name of Notary

Personally Known ✓
 Produced Identification _____
 Type of Identification Produced _____

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	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	CNTMFLLED1S
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	GCSPFLCND0S
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRACEVILLE	GCVFLMARS0
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	MIDRFLMADS0

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSONVL	MNDRFLLODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLLWRS0
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	NDADFLOLDS0
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	OLTWFLLRSD0
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	PACEFLPVRS0
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	POMPANOCH	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	PRRNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLFDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOCG0
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	TTVFLMADS0
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	BAKFLMARS0

SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	DESTIN	DESTFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	DFUNIAKSPG	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	MALNFLXARS0
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
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SNEADS	SNDSFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	SANROSABCH	SNRSFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	ST MARKS	STMKFLXARS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	STARKE	STRKFLXADS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	TALLAHASSE	TLHSFLXHDS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	VALPARAISO	VLPRFLXBRS0
SPRINT-FLORIDA, INC. DBA CENTRAL TEL CO.OF FLORIDA	WESTVILLE	WSTVFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	APOPKA	APPKFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ARCADIA	ARCDFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ASTOR	ASTRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	AVON PARK	AVPKFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BOCAGRANDE	BCGRFLXARS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BELLEVIEW	BLVWFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BONITA SPG	BNSPFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BUSHNELL	BSHNFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BEVERLYHLS	BVHLFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	BOWLNGGREN	BWLGFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CLERMONT	CLMTFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CLEWISTON	CLTNFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CAPE CORAL	CPCRFLEXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	NCAPECORAL	CPCRFLEXBDS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CAPE HAZE	CPHZFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	CRYSTALRIV	CRRVFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	DADE CITY	DDCYFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	EUSTIS	ESTSFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	EVERGLADES	EVRGFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FTMYERSBCH	FTMBFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FORT MEADE	FTMDFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FOY	FOYFLXARS0

SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	KENANSVL	KNVFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	REEDYCREEK	KSSMFLXBDS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WKISSIMMEE	KSSMFLXBDS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	KISSIMMEE	KSSMFLXDRS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	LA BELLE	LBLFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WEIRSDALE	LDLKFLXAPS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	LADY LAKE	LDLKFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	LEHIGHACRS	LHACFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	LAKEPLACID	LKPCFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	LEESBURG	LSBHFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	MARCO IS	MOISFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	MOOREHAVEN	MRHNFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	MOUNT DORA	MTDRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	MONTVERDE	MTVRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	NOFT MYERS	NFMYFLXBRS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	NO NAPLES	NNPLFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	NAPLES	NPLSFLXDDS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FOREST	OCNFFLXARP0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	OKEECHOBEE	OKCBFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	OCKLAWAHA	OKLWFLXAPS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ORANGECITY	ORCYFLXCRS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	PUNTAGORDA	PNGRFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	PINEISLAND	PNISFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	PTCHARLOTT	PTCTFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SEBRING	SBNGFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	FORT MYERS	SCPCKFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SPRINGLAKE	SLHLFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SANANTONIO	SNANFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SNCPVISNDS	SNCPFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SALT SPG	SSPRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ST CLOUD	STCDFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	OCALA	SVSPFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	SLRSPGSHRS	SVSSFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	TRILACOCHE	TLCHFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	TAVARES	TVRSFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	UMATILLA	UMTLFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WAUCHULA	WCHLFLXAPS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WILLISTON	WLSTFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WILDWOOD	WLWDFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WINDERMERE	WNRFLXARS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WINTERGRDN	WNGRFLXADS0
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	WINTERPARK	WNPFLXADS1
SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA	ZOLFO SPG	ZLSPFLXARP0
VERIZON FLORIDA INC.	BARTOW	BRTWFLXA53H
VERIZON FLORIDA INC.	ENGLEWOOD	ENWDFLXA47H
VERIZON FLORIDA INC.		

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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