

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:** February 19, 2009

**TO:** Office of Commission Clerk (Cole)

**FROM:** Division of Regulatory Compliance (Mann, Casey)  
Office of the General Counsel (Brooks, Teitzman)

**RE:** Docket No. 080201-TX – Application for designation as an Eligible Telecommunications Carrier by Tele Circuit Network Corporation.

**AGENDA:** 03/03/09 – Regular Agenda – Proposed Agency Action – Interested Persons May Participate

**COMMISSIONERS ASSIGNED:** All Commissioners

**PREHEARING OFFICER:** Edgar

**CRITICAL DATES:** None

**SPECIAL INSTRUCTIONS:** None

**FILE NAME AND LOCATION:** S:\PSC\RCP\WP\080201.RCM.DOC

---

### Case Background

On April 4, 2008, Tele Circuit Network Corporation (Tele Circuit or “the Company”) petitioned the Florida Public Service Commission (FPSC or Commission) for designation as an Eligible Telecommunications Carrier (ETC) in the State of Florida. Specifically, Tele Circuit is requesting that it be granted ETC status throughout the non-rural BellSouth Telecommunications, Inc. / AT&T (AT&T) and Verizon Florida (Verizon) wire centers listed in Attachment A for the purposes of receiving federal universal service support. Tele Circuit does not own, operate, or provide service in Florida using its own facilities, however, Tele Circuit

currently has existing interconnection agreements with both AT&T<sup>1</sup> and Verizon.<sup>2</sup> According to 47 C.F.R. 54.201(d)(1), a company must offer the services that are supported by the federal universal support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. Tele Circuit plans to continue to provide service to customers through its interconnection agreement with both AT&T and Verizon. 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). Tele Circuit's primary purpose in requesting ETC status in Florida is to provide Lifeline and Link-Up services.

Tele Circuit is a privately-held corporation incorporated in the state of Georgia and is authorized to transact business as a foreign corporation in Florida. Tele Circuit provides interexchange telecommunications services to residential consumers and small business customers in eighteen different states.<sup>3</sup> Tele Circuit is a FPSC-certificated competitive local exchange carrier (CLEC) which provides prepaid local exchange service in Florida.<sup>4</sup> It provides these services using a combination of wholesale local platform (WLP)/unbundled network element (UNE) lines and resale services.

To date, Tele Circuit has not filed for ETC designation, nor is it currently seeking ETC status in any other state. Upon designation as an ETC, Tele Circuit states that it will participate in and offer Lifeline and Link-Up programs to qualifying low-income consumers in Florida. Additionally, Tele Circuit has committed to publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those consumers who would be likely to qualify for Lifeline and Link-Up services. Tele Circuit indicated that it could have Lifeline available to Florida customers within 60 days of ETC designation. The Commission has authority under Section 364.10(2), Florida Statutes, to decide a petition by a CLEC seeking designation as an eligible telecommunications carrier pursuant to 47 C.F.R. § 54.201.

On February 15, 2008, Commission staff sent a certified letter via the United States Postal Service to Tele Circuit requesting data contained in its company records. The data was required to compile the Commission's annual report to the Legislature on the status of local competition in Florida (local competition report). Tele Circuit received the certified letter, but failed to provide the requested data. On July 8, 2008, staff opened Docket 080451-TX against Tele Circuit for its apparent violation of Section 364.183(1), Florida Statutes (F.S.), Access to Company Records. On September 24, 2008, the Commission issued a Proposed Agency Action (PAA) Order PSC-08-0628-PAA-TX imposing a penalty of \$10,000 for failure to provide information for the Commission's annual report to the legislature on the status of local competition in Florida. On October 13, 2008, Tele Circuit submitted a settlement proposal, which the Commission accepted in PAA Order PSC-08-0804-PAA-TX, issued December 4,

---

<sup>1</sup> Docket 070026-TP - Request for approval of interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. and Tele Circuit Network Corporation.

<sup>2</sup> Docket 050498-TP - Request for approval of resale agreement between Verizon Florida Inc. and Tele Circuit Network Corporation.

<sup>3</sup> Docket 070610-TP - Notification by Tele Circuit Network Corp. and Actel Wireless, Inc. of an Asset Purchase Agreement and request to Waive Verification Requirements of Florida Administrative Code Rule 25-4.118.

<sup>4</sup> Order PSC-05-0481-CO-TX, Docket 050126-TX, issued April 4, 2005.

Docket No. 080201-TX  
Date: February 19, 2009

2008. The docket was subsequently closed January 13, 2009, upon Tele Circuit's compliance with all terms of the PAA Order and receipt of its \$3,500 settlement contribution.

### **Discussion of Issues**

**Issue 1:** Should Tele Circuit be granted ETC designation in the state of Florida?

**Recommendation:** Yes. Staff recommends that Tele Circuit's application for Florida ETC designation in the AT&T and Verizon wire centers listed in Attachment A of this recommendation be granted. (Mann, Casey)

**Staff Analysis:** Under Federal Communications Commission (FCC) rules, the state commissions have the primary responsibility to designate providers as ETCs.<sup>5</sup> 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 Act provides that "only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific federal universal service support."<sup>6</sup> 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 a designated service area.

#### **ETC Certification Requirements**

The Code of Federal Regulations addresses a state commission's responsibilities related to an ETC designation.<sup>7</sup>

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. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz – Tele Circuit states that it meets this requirement by providing voice-grade access to the public switched telephone network (PSTN) through

---

<sup>5</sup> 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b).

<sup>6</sup> 47 U.S.C. § 254(e)(2).

<sup>7</sup> 47 C.F.R. § 54.201(c)

its interconnection agreement with AT&T and Verizon, all customers of Tele Circuit are able to make and receive calls on the PSTN within the specified bandwidth;

- (2) Local Usage “Local usage” means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users – Tele Circuit offers unlimited local service in the AT&T and Verizon service areas of Florida, permitting the customer to make an unlimited amount of local calls within his/her local calling area;
- (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, shortening call set-up time – Tele Circuit provides DTMF in Florida;
- (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 – Tele Circuit meets the requirement of single-party service by providing its customers with exclusive use of a wireline subscriber loop for each call placed, through its interconnection agreement with both AT&T and Verizon;
- (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. 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 – in satisfaction of this requirement, Tele Circuit currently provides all of its customers with access to emergency services by dialing 911 through its interconnection agreement with both AT&T and Verizon;
- (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 or completion, or both, of a telephone call – Tele Circuit meets this requirement by providing all of its customers with access to operator services provided by both AT&T and Verizon through its interconnection agreements;
- (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 – Tele Circuit meets this

requirement by providing all of its customers with the ability to connect with an interexchange carrier;

- (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 – Tele Circuit meets this requirement by providing its customers with access to directory assistance; and
- (9) Toll limitation for qualifying low-income consumers Toll limitation or blocking restricts all direct dial toll access – Tele Circuit provides toll blocking services to requesting Lifeline eligible customers in Florida free-of-charge via its interconnection agreements with AT&T and Verizon.

In addition to providing the above services, ETCs must advertise the availability of such services and the associated charges using media of general distribution. Tele Circuit has provided evidence to support that it will offer these services and will advertise the availability of Lifeline and Link-Up offerings in media of general distribution as required in §214(e)(1).

Tele Circuit has the ability and has committed to provide the nine-point list of services that are supported by federal universal support mechanisms using its own facilities or a combination of its own facilities and the resale of another carrier’s services. Staff believes that the leasing of the physical components of the telecommunications network for the transmission or routing of services, whether as UNEs or through commercial agreements, meets the statutory definition of “own facilities” for universal service purposes. Tele Circuit has provided proof of the interconnection agreements it has with AT&T and Verizon.

#### 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. In this Order, the FCC determined that an ETC applicant must also demonstrate:

- 1) a commitment and ability to provide the supported services throughout the designated area;
- 2) the ability to remain functional in emergency situations;
- 3) the 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 did so in Docket No. 010977-TL, by Order No. PSC-05-0824-TL, issued August 15, 2005. Tele Circuit was provided an affidavit to sign attesting that it will follow all Florida Statutes, Florida Administrative Rules, Florida PSC Orders, FCC Rules and Orders. In addition, Tele Circuit has committed to follow all regulations contained in the Telecommunications Act of 1996 regarding Universal Service,

ETCs, Link-Up and Lifeline, and toll limitation service. Tele Circuit has filed an affidavit certifying that it will perform these additional duties required of an ETC (see Attachment B).

### 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. 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.

### Tele Circuit's Petition

Tele Circuit is requesting designation as an ETC in the non-rural AT&T and Verizon territories for purposes of providing Lifeline and Link-Up service to Florida consumers and receiving federal universal service support. Tele Circuit is not seeking ETC status in any rural exchange, nor is it attempting to obtain high-cost funding from the Universal Service Administrative Company (USAC).

Tele Circuit has indicated that its accounts with the FCC and the USAC are current, and it is not aware of any outstanding complaints or violations with either entity. As part of the petition process, Tele Circuit 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. Tele Circuit commits to use federal universal support only for the provision of services for which the support is intended.

Tele Circuit 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 percent match of federal support for having a state lifeline program requiring a \$3.50 credit under the Florida eligibility criteria. Tele Circuit indicates that it will provide the \$3.50 credit to qualified clients, advertise the availability of Lifeline, and begin offering these services within 60 days of receiving ETC status. Tele Circuit plans to advertise the services supported by the Federal Universal Service mechanisms throughout the area where designated, as required in Section 214(e)(1).

Tele Circuit states that it will pass through all applicable state and federal service discounts and mandated service support to its Lifeline and Link-Up customers, thus reducing the price of access to telecommunications services for the Lifeline and Link-Up eligible customers in

Florida.<sup>8</sup> Tele Circuit commits to apply the Lifeline discount to bundled packages, as well as non-bundled services.

Granting Tele Circuit ETC status in Florida, would give Lifeline eligible customers in Florida another option for landline telephone service. For customers who have been disconnected from other carriers due to non-payment, Tele Circuit provides alternative service. Tele Circuit also provides optional prepaid long-distance services and toll restriction services to customers. Per FCC rules, carriers cannot charge for toll blocking, and Tele Circuit complies with this rule. Tele Circuit intends to educate customers about the option of toll blocking and prepaid long-distance, in hopes of reducing toll charges for customers.<sup>9</sup>

### Conclusion

Staff believes that Tele Circuit will promote the availability of universal service to the underserved, economically disadvantaged telephone customers in Florida. If Tele Circuit 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 Tele Circuit's commitment to abide by both state and federal rules and procedures, staff believes that Tele Circuit's petition to be designated as an ETC is in the public interest and should be approved. Staff believes that public interest 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 Tele Circuit, 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 Tele Circuit's application for ETC status in the Florida AT&T and Verizon wire centers listed in Attachment A of this recommendation be granted.

---

<sup>8</sup> Tele Circuit's response to staff's 1<sup>st</sup> data request, pg. 9, line 1.

<sup>9</sup> Tele Circuit application for ETC status, page 7.



Docket No. 080201-TX  
Date: February 19, 2009

**Issue 2**: Should this docket be closed?

**Recommendation**: If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, this docket should be closed upon the issuance of a consummating order. (Brooks, Teitzman)

**Staff Analysis**: At the conclusion of the protest period, if no protest is filed this docket should be closed upon the issuance of a consummating order.

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	COCOFMLMEDS0
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	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	JAY FLMARS0
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	LYHNFLHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MICANOPY	MCNPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIDDLEBURG	MBOFLMARS0

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSONVL	MNDRFLLODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLWRS0
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	NDADFLLODS0
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	ORPKFLRWDSD0
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	PRRNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLFDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOCS0
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	STRTRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STUART	STRTRFLMADS0
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

VERIZON FLORIDA INC.	BARTOW	BRTWFLXA53H
VERIZON FLORIDA INC.	ENGLEWOOD	ENWDFLXA47H
VERIZON FLORIDA INC.	FROSTPROOF	FRSTFLXA63H
VERIZON FLORIDA INC.	INDIANLAKE	INLKFLXARSA
VERIZON FLORIDA INC.	LAKELAND	LKLDLFXN85H
VERIZON FLORIDA INC.	LAKE WALES	LKWFLXERSA
VERIZON FLORIDA INC.	TAMPANTH	LNLKFLXA99H
VERIZON FLORIDA INC.	MULBERRY	MLBYFLXARSA
VERIZON FLORIDA INC.	HUDSON	MNLKFLXA85H

VERIZON FLORIDA INC.	MYAKKA	MYCYFLXA32H
VERIZON FLORIDA INC.	NORTH PORT	NRPTFLXA42H
VERIZON FLORIDA INC.	TAMPAWST	OLDSFLXA85H
VERIZON FLORIDA INC.	POLK CITY	PKCYFLXARSA
VERIZON FLORIDA INC.	BRADENTON	PLSLFLXA79H
VERIZON FLORIDA INC.	HAINESCITY	POINFLXARSA
VERIZON FLORIDA INC.	PALMETTO	PRSHFLXARSA
VERIZON FLORIDA INC.	PLANT CITY	PTCYFLXA75H
VERIZON FLORIDA INC.	STPETERSBG	SPBGFLXS86H
VERIZON FLORIDA INC.	TAMPA	TAMPFLXA1JB
VERIZON FLORIDA INC.	CLEARWATER	TAMPFLXAW44
VERIZON FLORIDA INC.	NWPTRICHEY	TAMPFLXAW44
VERIZON FLORIDA INC.	SARASOTA	TAMPFLXAW44
VERIZON FLORIDA INC.	TAMPACEN	TAMPFLXEDS0
VERIZON FLORIDA INC.	TARPON SPR	TRSPFLXA03H

AFFIDAVIT

State of GEORGIA  
County of FULTON

BEFORE ME, the undersigned authority, appeared July 11th, 2008,  
who deposed and said:

My name is ASHAR SYED, I am employed by  
TELE CIRCUIT NETWORK CORP., located at  
3050 ROYAL BLVD S. STE 145, ALPHARETTA, GA 30022 as its  
Primary Location. 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.

7. 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.
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:

*Ashar Syed*                      07/11/08  
Signature                                      Date  
ASHAR SYED  
Printed Name

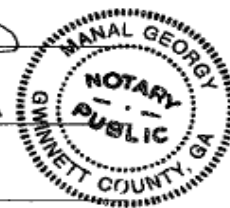
Business Address:  
3050 ROYAL BLVD S. STE 145  
ALPHARETTA, GA  
30022

State of GA  
County of Gwinnett

Acknowledged before me this 11<sup>th</sup> day of July, 2008, by ASHAR SYED, as CEO of Company, who is personally known to me or produced identification and who did take an oath.

*Manal Georgy*  
NOTARY PUBLIC

Manal Georgy  
Printed Name of Notary



Personally Known \_\_\_\_\_  
Produced Identification   
Type of Identification Produced GADL056752331