



Susan S. Masterton
Attorney

Law/External Affairs
FTLH00103
1313 Blair Stone Rd.
Tallahassee, FL 32301
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

January 11, 2005

Via Electronic Mail and First Class U.S. Mail

Mrs. Blanca S. Bayo
Director, Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 040604-TL In re: Adoption of the National School Lunch Program and an income-based criterion at or below 135% of the Federal Poverty Guidelines as eligibility criteria for the Lifeline and Link-Up programs

Dear Ms. Bayo:

On January 4, 2005, BellSouth and the Staff of the Florida Public Service Commission met to discuss BellSouth's proposal for implementation of a simplified certification process in connection with the above captioned docket. During the course of the discussion, the Staff requested that BellSouth file a copy of its proposal in the docket by January 7th and that the other parties to the docket file a response to BellSouth's proposal by January 11, 2005.

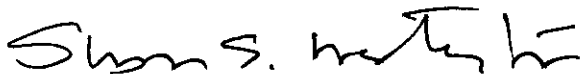
In response to BellSouth's proposal, Sprint similarly proposes to implement a simplified Lifeline certification process. Sprint's response generally conforms to BellSouth's proposal as set forth in its January 7, 2005 letter, as follows:

1. Sprint would file a tariff to implement a simplified Lifeline certification process for a period of one year. Sprint's simplified certification process would enable all customers eligible under one of the existing qualifying programs to receive the full Lifeline and Link-Up (if applicable) credit. The Lifeline/Link-Up credit would apply after Sprint receives the customer's signature on a document certifying "under penalty of perjury" that the customer participates in one of the Florida Lifeline eligible programs and identifies the qualifying program.
2. During the course of the year, Docket No. 040604-TL would be held in abeyance in its entirety, as to all parties.
3. A review of the simplified certification process would be held six months into the year. Sprint would provide its findings of the first six months to Staff and the parties to the docket.

4. If circumstances arise that warrant a review earlier than six months (e.g. indications of significant fraud), such a review would be held with the Staff and parties to the docket.
5. At the review or when the Florida Supreme Court rules on consolidated Case Nos. SC04-9, SC04-10 and SC04-946 (the rate rebalancing case), whichever is earlier, Sprint and the Staff would revisit the issue of adding the National School Lunch Program and an income-based criterion of 135% of the federal poverty level as additional eligibility criteria.
6. Sprint would commit to working with the Staff and the Office of Public Counsel to include a formal school outreach effort in the Lifeline education program.
7. If this proposal is accepted by the Commission in its entirety, Sprint would file its tariff to implement the proposal within ninety (90) days of an Order formally approving the abeyance.

In the Direct Testimony of witness Rod DeYonkers, BellSouth proposes a verification process that involves posting a list of all Lifeline customers to a secure website, which will then be reviewed by personnel at the applicable state agencies. BellSouth would then follow up with customers who are not identified by the agencies as participating in Lifeline eligible programs. Sprint is currently assessing its ability, from an administrative and cost perspective, to participate in such a process. However, to ensure that sufficient verification procedures are in place to prevent fraud and abuse of the self-certification enrollment process, Sprint commits as part of this proposal to conduct annual verification through a random sampling of Lifeline customers.

Sincerely,



Susan S. Masterton

Cc: All Parties of Record
Adam Teitzman
Kira Scott

**CERTIFICATE OF SERVICE
DOCKET NO. 040604-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. and electronic mail on this 11th day of January, 2005 to the following:

Florida Cable Telecommunications
Association, Inc.
Michael A. Gross
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303

Verizon Florida Inc.
Mr. Richard Chapkis
P.O. Box 110
Tampa, FL 33601

Florida Public Service Commission
Adam Teitzman/ Kira Scott
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc.
Nancy B. White/R. Douglas Lackey
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Office of Public Counsel
Charles J. Beck/Harold Mclean
111 West Madison Street, #812
Tallahassee, FL 32399-1400

Verizon Florida Inc.
Mr. David Christian
106 East College Avenue
Tallahassee, FL 32301-7748

TDS Telecom/Quincy Telephone
Mr. Thomas M. McCabe
P. O. Box 189
Quincy, FL 32353-0189

Rutledge Law Firm
Ken Hoffman/M. McDonnell/J.S.
Menton
P.O. Box 551
Tallahassee, FL 32302-0551

GT Com
Mr. Mark Ellmer
P. O. Box 220
Port St. Joe, FL 32457-0220

ALLTEL Communications Services,
Inc.
Ms. Betty Willis
One Allied Drive, B4F4ND
Little Rock, AR 72203-2177

AARP (Twomey)
c/o Mike Twomey
P. O. Box 5256
Tallahassee, FL 32314-5256

Blooston Law Firm
Benjamin Dickens/Mary J. Sisak
2120 L Street, NW, Suite 300
Washington, DC 20037

NEFCOM
Ms. Deborah Nobles
TTSC
505 Plaza Circle, Suite 200
Orange Park, FL 32073

AT&T
Tracy Hatch
101 N. Monroe St Ste. 700
Tallahassee, FL 32301

AARP Department of State Affairs (NC)
Senior Legislative Representative
Coralette Hannon, Esq.
6705 Reedy Creek Road
Charlotte, NC 28215-6096


FDN Communications
Matthew Feil
2301 Lucien Way, Suite 200
Maitland, FL 32751

Messer, Caparello & Self
Floyd Self
PO Box 1876
Tallahassee, FL 32302-1876

MCI
Donna McNulty, Esq.
1203 Governors Square Blvd, Ste. 201
Tallahassee, FL 32301

MCI
De O'Roark, Esq.
65 Concourse Pkwy, Ste. 600
Atlanta, GA 30328

McWhirter Reeves Davidson Kaufman
& Arnold, PA
Vicki Gordon Kaufman for FCCA
117 South Gadsden St.
Tallahassee, FL 32301



Susan S. Masterton