

**ORIGINAL**

**Timolyn Henry**

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**From:** Woods, Vickie [Vickie.Woods2@bellsouth.com]  
**Sent:** Monday, February 05, 2007 4:02 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 060677-TL BellSouth's Answer to the Office of Public Counsel and AARP's Petition  
**Importance:** High  
**Attachments:** 060677-T.pdf

- A. Vickie Woods  
 Legal Secretary to James Meza III and Manuel Gurdian  
 BellSouth Telecommunications, Inc.  
 150 South Monroe Street  
 Suite 400  
 Tallahassee, Florida 32301  
 (305) 347-5560  
[vickie.woods2@bellsouth.com](mailto:vickie.woods2@bellsouth.com)
- B. Docket No. 060677-TL: Petition to Implement Automatic Enrollment for Lifeline Telephone Service
- C. BellSouth Telecommunications, Inc.  
 on behalf of Manuel A. Gurdian
- D. 7 pages total (including letter, pleading and certificate of service)
- E. BellSouth Telecommunications, Inc.'s Answer to the Office of Public Counsel and AARP's Petition  
  
 .pdf version attached

<<060677-T.pdf>>

*Vickie Woods*  
*Legal Secretary to James Meza III and Manuel A. Gurdian*  
*BellSouth Telecommunications, Inc.*  
*150 West Flagler Street, Suite 1910*  
*Miami, Florida 33130*  
*Tel. No. (305) 347-5560*  
*Fax No. (305) 577-4491*  
[vickie.woods2@bellsouth.com](mailto:vickie.woods2@bellsouth.com)

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ORIGINAL

Legal Department

Manuel A. Gurdian  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

February 5, 2007

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

Re: **Docket No.: 060677-TL**  
**Petition to Implement Automatic Enrollment for Lifeline  
Telephone Service**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Answer to the Office of Public Counsel and AARP's Petition, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: All Parties of Record  
Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 060677-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 5th day of February, 2007 to the following:

Adam Teitzman  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Office of Public Counsel  
Harold McLean  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
[mclean.harold@leg.state.fl.us](mailto:mclean.harold@leg.state.fl.us)

Office of the Attorney General  
Charles J. Crist, Jr.  
Jack Shreve  
Cecilia Bradley  
The Capitol – PL01  
Tallahassee, FL 32399-1050  
Tel. No. (850) 414-3300  
Fax. No. (850) 488-4872  
[jacshr@msn.com](mailto:jacshr@msn.com)  
[cecilia\\_bradley@oag.state.fl.us](mailto:cecilia_bradley@oag.state.fl.us)

Michael B. Twomey  
Attorney for AARP  
P.O. Box 5256  
Tallahassee, FL 32314-5256  
Tel. No. (850) 421-9530  
[miketwomey@talstar.com](mailto:miketwomey@talstar.com)

J. Jeffry Wahlen  
Ausley & McMullen, P.A.  
227 South Calhoun Street  
Tallahassee, FL 32302  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
Represents Windstream

Cesar Caballero  
Bettye J. Willis  
Windstream Florida, Inc.  
4001 Rodney Parham Road  
Mailstop: 1170-B1F03-53A  
Little Rock, AR 72212  
Tel. No. (501) 748-7142  
[cesar.caballero@windstream.com](mailto:cesar.caballero@windstream.com)

Tracfone Wireless, Inc.  
Richard B. Salzman  
Executive VP & GC  
8390 N.W. 25<sup>th</sup> Street  
Miami, FL 33122  
Tel. No. (305) 640-2000  
[rsalzman@tracfone.com](mailto:rsalzman@tracfone.com)

Mitchell F. Brecher  
Debra McGuire Mercer  
Greenberg Traurig, LLP  
800 Connecticut Avenue, NW  
Suite 500  
Washington, DC 20006  
Tel. No. (202) 331-3100  
Attys. for Tracfone Wireless  
[brechem@gtlaw.com](mailto:brechem@gtlaw.com)  
[mercerm@gtlaw.com](mailto:mercerm@gtlaw.com)



Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition to Implement Automatic Enrollment For Lifeline Telephone Service	)	Docket No. 060677-TL
	)	
	)	Filed: February 5, 2007

**BELLSOUTH'S ANSWER TO THE OFFICE OF PUBLIC COUNSEL  
AND AARP'S PETITION**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through undersigned counsel, and pursuant to Rule 28-106.203, Florida Administrative Code, hereby answers the Petition filed by The Citizens of Florida, through Harold McLean, Public Counsel, ("OPC") and AARP, and states as follows:

**ANSWER**

Responding to the specific allegations in the Petition, BellSouth alleges and says that:

1. BellSouth admits that OPC is authorized to represent the people of the State of Florida before the Florida Public Service Commission ("Commission") in certain matters. BellSouth admits that the statute cited in paragraph 1 speaks for itself and does not require a response from BellSouth
2. BellSouth is without knowledge as to the allegations contained in paragraph 2 and therefore denies same.
3. BellSouth denies the allegations of paragraph 3 except to admit that the report cited in paragraph 3 speaks for itself and does not require a response from BellSouth and that standards for Lifeline eligibility have been expanded over the past ten years so that more households are eligible.
4. BellSouth denies the allegations of paragraph 4 except to admit that it has participated in numerous efforts with OPC, AARP and Florida

telecommunications companies to increase Lifeline awareness and participation during the past ten years and that OPC and AARP actively participated in the recent Connect Florida campaign events.

5. BellSouth admits the allegations contained in paragraph 5.

6. BellSouth admits that the Commission has been extremely supportive of Lifeline awareness programs and has taken numerous steps toward that end. BellSouth further admits that the Commission's actions in support of Lifeline awareness programs and its report on Lifeline cited in paragraph 6 speak for themselves and do not require a response from BellSouth.

7. BellSouth denies the allegations contained in paragraph 7.

8. BellSouth admits that the Recommended Decision and Order cited in paragraph 8 speak for themselves and do not require a response from BellSouth. BellSouth is without knowledge as to the remainder of the allegations in paragraph 8 and therefore denies same.

9. BellSouth is without knowledge as to the allegations contained in paragraph 9 and therefore denies same.

10. BellSouth admits that the reports and documents cited in paragraph 10 speak for themselves and do not require a response from BellSouth. BellSouth is without knowledge as to the remainder of the allegations in paragraph 10 and therefore denies same.

11. The statutes cited by OPC and AARP speak for themselves and do not require a response from BellSouth. BellSouth admits that the Commission has no authority over the Department of Children and Families, that the

Commission has authority over local exchange telecommunications companies and that Lifeline is an important part of providing telephone service to all consumers at reasonable and affordable prices. BellSouth denies the remainder of the allegations contained in paragraph 11.

12. The allegations contained in paragraph 12 are denied.

13. BellSouth denies each and every allegation in the Petition not specifically admitted herein, and demands strict proof thereof.

#### **AFFIRMATIVE DEFENSE**

14. The Commission cannot grant the relief requested in the Petition because it does not have authority or jurisdiction over the Department of Children and Families.

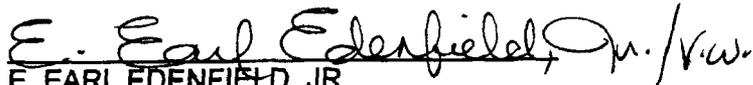
WHEREFORE, BellSouth respectfully requests the Commission to enter an Order in BellSouth's favor, deny OPC and AARP the relief sought, and grant BellSouth such other relief as the Commission deems just and proper.

Respectfully submitted this 5th day of February, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC.



JAMES MEZA III  
AUTHORIZED HOUSE COUNSEL NO. 426260<sup>1</sup>  
MANUEL A. GURDIAN  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558



E. EARL EDENFIELD, JR.  
Suite 4300, BellSouth Center  
675 W. Peachtree Street, NE  
Atlanta, GA 30375  
(404) 335-0763

665968

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<sup>1</sup> The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, has been granted qualified representative status by the Commission for 2006 in Order No. PSC-06-0165A-FOF-OT, and has filed an Application for Qualified Representative Status for 2007 in Docket No. 070008-OT per Commission Order No. 07-0008-PCO-OT.