Crystal Card

From:

YANT, ROBYN <rh0582@att.com>

Sent:

Thursday, October 17, 2013 2:04 PM

To: Cc:

Filings@psc.state.fl.us

YANT, ROBYN

Subject:

130158-TP File in Docket

Attachments:

img-X17140824-0001.pdf



AT&T Florida 150 South Monroe Street F: 850.222.8640 Suite 400 Tallahassee, FL 32301 1561

T: 850.577.5555 www.att.com

October 17, 2013

Mrs. Ann Cole Director, Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Re: Docket No. 130158-TP: 2014 State certification Section 54.313 and Section 54.314, annual reporting requirements for high-cost recipients, and certification of support for eligible telecommunications carriers. (FCC Docket No. 2013-14-C: Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.314 and Telecommunications Act Section 254(e). Federal Communications Commission CC Docket No. 96-45 (2012); and Annual Reports for ETC)

Dear Ms. Cole:

This letter is to request that the Florida Public Service Commission ("Commission") submit a letter to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") certifying that BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") is in compliance with all provisions of Section 254(e) of the Telecommunications Act.

The amount of federal high-cost support AT&T Florida will receive in 2014 will be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, AT&T Florida certifies that it will only use the federal high cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Until the FCC issued its USF/ICC Transformation Order (17 FCC Red 17663) in November 2011, AT&T Florida submitted certifications directly to the FCC, and not to this Commission, because it only received Interstate Access Support ("IAS"). In its November 2011 Order, however, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. See FCC Order at para. 614.

At the same time, the FCC expanded the state certification requirements to require state Commissions to certify that even carriers that only receive IAS support, which the FCC now calls "frozen high-cost support," are in compliance with Section 254(e) of the Telecommunications



Act. See 47 C.F.R. § 54.314(a). AT&T Florida, therefore, respectfully requests that the Commission accept this letter and the attached affidavit as self-certification that AT&T Florida is in compliance with 47 U.S.C. § 254(e) and issue a letter to the FCC certifying that AT&T Florida used its high-cost support in the preceding year and will use its high-cost support in the coming calendar year in compliance with Section 254(e) of the Act and therefore is eligible to receive federal high-cost support in 2014.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5555.

Sincerely,

Gregory R. Follensbee **Executive Director**

Gregory R Follende

AT&T Florida

Enclosure

AFFIDAVIT OF GREGORY R. FOLLENSBEE EXECUTIVE DIRECTOR

- My name is Gregory R. Follensbee. I am employed by AT&T Services, Inc. and am authorized to give this Affidavit. This Affidavit is being given to support the Florida Public Service Commission's certification as required by 47 C.F.R. § 54.314(a).
- Until the FCC's Nov. 2011 USF/ICC Transformation Order (17 FCC Rcd 17663) (hereinafter "FCC Order"), BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") submitted its certifications directly to the FCC as it only received Interstate Access Support (IAS). As part of the FCC Order, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. See FCC Order at para. 614. As a result, and in order for the Florida Public Service Commission to certify AT&T Florida's continued eligibility for high-cost support in 2014, AT&T Florida provides the following certification:

Consistent with section 254(e) of the Communications Act of 1934, as amended, AT&T Florida used in the preceding year and will use in the upcoming year all of its federal high-cost support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Gregory R Jollensbee
Executive Director

STATE OF FLORIDA)

) ss:

COUNTY OF LEON)

Subscribed and sworn to before me this | day of October 2013

NOTARY PUBLIC

My Commission Expires: 7/25/2017 Commission No.: FF 027141

(Notary Seal)

