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August 10, 2007

Bob Casey
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: AT&T Florida's Post-Workshop Comments on Proposed
Amendment of Rule 25-4.0665, Florida Administrative Code,
Lifeline Service

Dear Mr. Casey:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's ("AT&T Florida") post-workshop comments in the above undocketed matter.

BACKGROUND

On July 27, 2007, a rule development workshop was held to discuss issues regarding the proposed amendment to Rule 25-4.0665, Florida Administrative Code ("the Rule"). Commission Staff ("Staff") initiated the development and amendment of the Rule to implement the Lifeline service automatic enrollment program and to require Eligible Telecommunications Carriers ("ETCs") to maintain current information on the Universal Service Administrative Company's website. Staff requested that post-workshop comments be filed by August 10, 2007.

AT&T FLORIDA'S COMMENTS

Rule 25-4.0665(3): The proposed rule provides that "All eligible telecommunications shall participate in the Lifeline service Automatic Enrollment Process." In order to provide a description to the "Lifeline service Automatic Enrollment Process", AT&T Florida recommends that the following underlined language be added to Subsection (3): (3) All eligible telecommunications carriers shall participate in the Lifeline service Automatic Enrollment Process. The Lifeline service Automatic Enrollment Process is the following:

AT&T Florida also recommends that language regarding the confidentiality of the response provided to the Commission under subsection (3)(e) be added to the Rule. Accordingly, AT&T Florida suggests the addition of the following language as subsection (3)(f): Any response filed by the ETC pursuant to subsection (3)(e) is protected by Florida Statutes § 364.107 and is considered necessary to be disclosed by the ETC to the Commission pursuant to Florida Statutes § 364.107(3)(A)4.

Rule 25-4.0665(3)(e): The proposed rule provides that within 10 days of receiving the Commission's e-mail notification that the Lifeline service application is available for retrieval, the eligible telecommunications carrier ("ETC") shall provide to the Commission via facsimile or file with the Office of Commission Clerk a response identifying the customer name, address, telephone number and date of application for: "(1) misdirected Lifeline service applications; (2) disconnected Lifeline customer applications; (3) applications for customers recently receiving Lifeline service; and (4) rejected applications, which shall include the reason(s) why the applicants were rejected."

AT&T Florida believes that 10 days is unworkable because it receives a large number of applications through the Commission's current enrollment process. AT&T Florida has received approximately 16,000 applications since the Commission's enrollment process began in April 2007. In May, June and July 2007, AT&T Florida received approximately 6,000 applications per month. Thus, in order to process the large number of applications, AT&T Florida requests that the number of days in which ETCs must respond to the Commission be increased to 20 days.

In addition, AT&T Florida recommends that "(2) disconnected Lifeline customer applications" be eliminated as it is covered under (4) rejected applicants, which would include the reason(s) why the applicant was rejected.

Rule 25-4.0665(4): The proposed rule requires an ETC who receives misdirected hard copy Lifeline service applications to forward the misdirected application to the Commission's Lifeline service facsimile line. AT&T Florida recommends that the proposed rule be amended to allow the ETC the option of sending the misdirected application to the Commission or notifying the applicant directly.

Upon receipt of applications, AT&T Florida manually processes and determines whether the applicant is its customer. If the applicant is not a customer, AT&T Florida automatically generates correspondence which is sent to the applicant advising them that they need to contact their local phone company because they are not currently a customer. The forwarding of the misdirected hard copy application to the Commission via facsimile would add another step in AT&T Florida's process that is burdensome for the Company. Accordingly, AT&T

Florida recommends that the following language be added to the rule: “or the ETC may forward correspondence to the Lifeline applicant advising that the applicant is not a customer of the ETC and that the applicant should contact their service provider.”

CONCLUSION

In conclusion, AT&T Florida looks forward to working with the Commission and its Staff on the amendment of the Rule as well as increasing Lifeline enrollment in Florida.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. A. Gurdian', written over a large, stylized, hand-drawn signature line.

Manuel A. Gurdian

cc: Jerry Hendrix
James Meza III
Kira Scott