

Eric Fryson

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Friday, September 14, 2012 3:50 PM
To: Filings@psc.state.fl.us
Subject: Undocketed Matter (file under 120000-OT) AT&T Florida's letter to Ann Cole re: USF-IAS High Cost Certification

Importance: High

Attachments: Document.pdf



Document.pdf
(828 KB)

- A. Vickie Woods
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- B. Undocketed Matter: File under Docket No. 120000-OT
USF-IAS High Cost Certification
- C. BellSouth Telecommunications, LLC d/b/a AT&T Florida
on behalf of Suzanne L. Montgomery
- D. 3 pages total (includes letter, certificate of service and Affidavit)
- E. BellSouth Telecommunications, LLC d/b/a AT&T Florida's Letter to Ann Cole re: USF-IAS High Cost Certification
.pdf

DOCUMENT NUMBER-DATE

06197 SEP 14 2012

FPSC-COMMISSION CLERK



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September 14, 2012

Ms. Ann Cole, Commission Clerk
Division of Communications Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Undocketed Matter: File under Docket No. 120000-OT
USF-IAS High Cost Certification

Dear Ms. Cole:

On November 18, 2011 the Federal Communications Commission ("FCC") released its *USF/ICC Transformation Order* in WC Docket No. 10-90 et al. With that Order, and subsequent clarification Orders, the FCC began a transition to a national framework for certification of Eligible Telecommunications Carriers ("ETCs") required for the ETCs' continued receipt of federal high cost support.

BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") has received federal support only from the Interstate Access Support ("IAS") portion of the federal high cost program. As part of the *USF/ICC Transformation Order*, the FCC froze all federal high cost support mechanisms at 2011 levels and combined them into a single fund. Previously, AT&T Florida certified its use of IAS directly to the FCC and the Universal Service Administrative Company ("USAC"). However, beginning in 2012, the FCC is requiring companies who receive only IAS to obtain that certification from state commissions. For 2013 the state must provide this certification to the FCC and USAC by October 1, 2012.

AT&T Florida is requesting that the Commission certify to the FCC by October 1, 2012 that AT&T Florida's IAS was used in the preceeding calendar year and will be used in the coming year for the provision, maintenance, and upgrading of the facilities and services for which the support is intended, in accordance with 47 C.F.R §54.314. In support of this certification, AT&T Florida is providing the attached Affidavit, which is consistent with the certification previously filed directly with the FCC and USAC.

Under the *USF/ICC Transformation Order*, and subsequent clarification Orders, ETCs receiving only IAS funds do not have any additional reporting requirements for 2012. However, beginning in 2013, all ETCs who receive federal high cost support will be required to comply with the reporting requirements in 47 C.F. R. §54.313 for their state ETC certification filings.

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If you have any questions regarding this filing, please contact me.

Sincerely,



Suzanne Montgomery

**AFFIDAVIT OF GREGORY R. FOLLENSBEE
EXECUTIVE DIRECTOR – REGULATORY
ON BEHALF OF
BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T FLORIDA**

1. My name is Gregory R. Follensbee. I am an Executive Director-Regulatory of AT&T Services, Inc., and am authorized to make this Affidavit on behalf of BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida"). This Affidavit is being given to support the Florida Public Service Commission's certification as required by 47 C.F.R. § 54.314(a).
2. Until the FCC's Nov. 2011 USF/ICC Transformation Order (17 FCC Rcd 17663) (hereinafter "*FCC Order*"), 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 eliminated the corresponding requirement for carriers to file IAS certifications. See *FCC Order* at para. 614. As a result, and in support of its request that the Florida Public Service Commission certify AT&T Florida's continued eligibility for high-cost support in 2013, AT&T Florida provides the following certification:

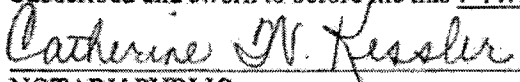
Consistent with section 254(e) of the Communications Act of 1934, as amended, AT&T Florida used in the preceding calendar year and will use in the upcoming calendar year all of its federal high-cost support only for the provision, maintenance, and upgrading of facilities and services for which the support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



Gregory R. Follensbee
Executive Director – Regulatory

STATE OF FLORIDA)
) ss:
COUNTY OF LEON)

Subscribed and sworn to before me this 14th day of September 2012.



NOTARY PUBLIC

My Commission Expires: _____
Commission No.: _____

(Notary Seal)

