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October 15, 2004

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

Re: Docket No. 040604-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated is Sprint's Preliminary List of Issues.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Sums nothing

Enclosure

## CERTIFICATE OF SERVICE DOCKET NO. 040604-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail on this 15<sup>th</sup> day of October, 2004 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 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

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Susan S. Masterton

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of the National School	)	Docket No. 040604-TL
Lunch Program and an income-based	)	
Criterion at or below 135% of the	Ś	Filed: October 15, 2004
Federal Poverty Guideline as eligibility	Ś	
Criteria for the Lifeline and Link-up	Ś	
Programs.	Ś	
	Ś	

## SPRINT-FLORIDA INCORPORATED'S PRELIMINARY LIST OF ISSUES

Sprint-Florida, Incorporated ("Sprint") generally agrees with BellSouth's preliminary list of issues, but would suggest the following modifications and additions.

BellSouth's Issue 4 should be modified as follows:

- 4. What are the implementation issues related to the actions taken by the Commission in Order No. PSC-04-0781-PAA-TL? Can these issues be resolved? If so, how?
  - (a) What is the impact on carriers' processes and costs of the addition of the National School Lunch Program as an eligibility criterion?
  - (b) What is the impact on carriers' processes and costs of implementing selfcertification as proposed in the Commission's Order, including initial qualification procedures and annual verification procedures?
  - (c) What is the impact on carriers' processes and costs of implementing the customer contact protocols related to self-certification?
  - (d) What other implementation issues are raised by the additional qualification criteria and mechanisms in the Commission's Order? BellSouth's Issue 6 should be modified as follows:

6. Is the Commission required to implement modifications to the Lifeline qualification criteria and mechanisms through rulemaking pursuant to s. 120.54, F.S.?

In addition, Sprint suggests the following additional issues:

- 7. Are the additional qualification criteria and mechanisms proposed in the Commission's Order the most cost effective and efficient means for increasing Lifeline participation rates in Florida?
  - (a) Does an increase in Lifeline participation rates, if any, outweigh any additional administrative burdens imposed by the additional qualification criteria and mechanisms?
  - (b) Is the current certification process a barrier to participation in the Lifeline program?
- 8. Is the methodology employed in the Commission's Order for determining the effectiveness of the Lifeline program in Florida valid (i.e., a comparison of the number of wireline Lifeline subscribers to the potential number of individuals meeting one or more of the eligibility criteria)?