

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of the National School)	
Lunch Program and an Income-based)	Docket No.040604-TP
Criterion at or below 135% of the Federal)	
Poverty Guidelines as Eligibility Criteria)	Filed: December 17, 2004
<u>For the Lifeline and Link-up Programs</u>)	

FLORIDA COMPETITIVE CARRIERS ASSOCIATION AND THE
COMPETITIVE CARRIERS OF THE SOUTH, INC.
PETITION TO INTERVENE

COMES NOW the Florida Competitive Carriers Association and the Competitive Carrier of the South, Inc.¹ (hereinafter "FCCA/CompSouth"), pursuant to Rules 25-22.039 and 28-106-205, Florida Administrative Code, and files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. Petitioner respectfully requests that the Commission grant this petition, designating FCCA/CompSouth as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, Petitioners respectfully show the following:

1. Petitioner's principal place of business is:

FCCA/CompSouth
C/o Vicki Gordon Kaufman
117 South Gadsden Street
Tallahassee, Florida 32301

¹ The members of FCCA include AT&T, MCI, Access Integrated Networks, Inc., ICG Communications, Inc., IDS Telecom LLC, ITC DeltaCom, Inc., KMC Telecom, Network Telephone Corporation, NewSouth Communications, Inc., Supra Telecommunications and Information Systems, Inc., and Z-Tel Communications, Inc. With the exceptions of Supra and ICG, each of these members, is also a member of the Competitive Carriers of the South, Inc. (CompSouth). The members of CompSouth participating in this proceeding include: Access Integrated Networks, Inc., Access Point Inc., MCI, Birch Telecom, Covad Communications Company, AT&T, Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Telecom, Inc., Network Telephone Corp., KMC Telecom, LecStar Telecom, Inc., Z-Tel Communications, Inc., InLine and IDS Telecom LLC. As of January 1, 2005, FCCA will merge and become a part of CompSouth. At that time, Supra will also become a member of CompSouth.

2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Vicki Gordon Kaufman
McWhirter Reeves Davidson Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
850.222.2525 (telephone)
850.222.5606 (fax)
vkaufman@mac-law.com

3. FCCA/CompSouth is an association of telecommunications companies that have been duly certificated by the Commission as competitive local exchange telecommunications companies ("CLECs") or interexchange companies ("IXCs") in Florida. As such, FCCA/CompSouth's members are subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact FCCA/CompSouth's members' ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.

4. In this docket, the Commission is set to address whether to expand eligibility criteria for Lifeline and Link-Up assistance. The Commission is also expected to address whether Florida Incumbent Local Exchange Companies (ILECs) should be required to offer Lifeline credits to customers based on the newly expanded eligibility criteria and whether to adopt a new self-certification process to be implemented by the ILECs to determine eligibility for Lifeline and Link-Up assistance.

5. Some of the parties to this proceeding have stated a need for a state universal service fund or alternative cost recovery mechanism to recover the cost of the \$3.50 state discount for Lifeline customers.

6. Because this proceeding will address, *inter alia*, proposed universal service funding mechanisms, the Commission's decision in this docket may or will directly affect the substantial interests of FCCA/CompSouth members and their business operations in the state of Florida.

WHEREFORE, FCCA/CompSouth, on behalf of its member companies, respectfully requests that the Commission grant them the leave to intervene for all legal purposes in this docket.

S/Vicki Gordon Kaufman

Vicki Gordon Kaufman
McWhirter Reeves Davidson Kaufman &
Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
850.222.2525 (telephone)
850.222.5606 (fax)
vkaufman@mac-law.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FCCA/CompSouth Petition to Intervene has been furnished by electronic mail and US Mail to the following parties of record this 17th day of December 2004:

Adam Teitzman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Betty Willis
ALLTEL Communications Services, Inc.
One Allied Drive, B4F4ND
Little Rock, AR 72203-2177

Mark Ellmer
GT Com.
P. O. Box 220
Port St. Joe, FL 32457-0220

Harold McLean
Charles Beck
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Thomas M. McCabe
TDS Telecom/Quincy Telephone
P. O. Box 189
Quincy, FL 32353-0189

Nancy B. White
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Michael A. Gross
Florida Cable Telecommunications Association,
Inc.
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303

Susan Masterton
Sprint-Florida, Incorporated
P.O. Box 2214
Tallahassee, FL 32316-2214

Charles J. Rehwinkel
Sprint Communications Company Limited
Partnership
P.O. Box 2214
Tallahassee, FL 32316-2214

Kenneth Hoffman
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302-0551

Mike B. Twomey
AARP
P. O. Box 5256
Tallahassee, FL 32314-5256

Coralette Hannon
AARP Department of State Affairs (NC)
Senior Legislative Representative
6705 Reedy Creek Road
Charlotte, NC 28215-6096

Richard Chapkis
Verizon Florida Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601

David Christian
Verizon Florida Inc.
106 East College Avenue
Tallahassee, FL 32301-7748

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman