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LAW OFFICES

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December 17, 2004

BY HAND DELIVERY

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> Re: Docket 040604-TL

Dear Ms. Bayó:

Enclosed for filing in the above referenced docket are the following documents:

An original and fifteen copies of MCIMETRO Access Transmission Services, LLC 1. and MCI WORLDCOM communications, Inc.'s Petition to Intervene; 13279-04

CMP	behalf of Florid	An original and fifteen copies of la Competitive Carriers Associat	the Rebuttal Testi ion/Competitive C	mony of David L. Kaserman on arriers of the South Inc. AT&T		
COM	2_Communication	ns of the Southern States, LLC, N	ACImetro Access T	Transmission Services, LLC and		
CTR	MCI WORLD	COM Communications, Inc.,	and Florida Digi	tal network, Inc. d/b/a FDN		
ECR	Communication	ns; and		13280-04		
GCL	3.	Joint Prehearing Statement of Flo	rida Competitive C	arriers Association/Competitive		
OPC	Carriers of the South, Inc., AT&T Communications of the Southern States, LLC, MCImetro Access Transmission Services, LLC and MCI WORLDCOM Communications, Inc., and Florida Digital					
MMS						
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SCR		acknowledge receipt of these do ming the same to me.	cuments by stamp	ing the extra copy of this letter		
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Ms. Blanca Bayo December 17, 2004 Page 2

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self

FRS/amb Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of the National School Lunch)	
Program and an income-based criterion at or)	Docket No. 040604-TL
below 135% of the Federal Poverty Guidelines)	
as eligibility criteria for the Lifeline and Link-Up)	Filed: December 17, 2004
programs.)	
)	

MCI'S PETITION TO INTERVENE

MCImetro Access Transmission Services, LLC, and MCI WORLDCOM
Communications, Inc., (collectively "MCI"), pursuant to Rules 25-22.039 and 28-106205, Florida Administrative Code, hereby request leave to intervene in this proceeding, and as grounds therefore states:

- 1. Each of the MCI operating subsidiaries mentioned above are lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.
- MCI's principal place of business is 22001 Loudoun County Parkway,
 Ashburn, Virginia 20147.
- 3. Pleadings, orders, notices, and other papers filed or served in this matter should be served upon:

Donna Canzano McNulty, Esq. MCI 1203 Governors Square Blvd, Suite 201 Tallahassee, FL 32301 donna.mcnulty@mci.com De O'Roark, Esq.
MCI
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
de.oroark@mci.com

and

Floyd Self, Esq.

Messer, Caparello & Self, P.A.

Hand: 215 S. Monroe Street, Suite 701

Tallahassee, FL 32301 Mail: P.O. Box 1876

Tallahassee, FL 32302-1876

fself@lawfla.com

- 4. Both MCImetro Access Transmission Services, LLC, and MCI
 WORLDCOM Communications, Inc., are authorized by the Florida Public Service
 Commission to provide local telecommunications services in the State of Florida. MCI
 WORLDCOM Communications, Inc. also is authorized to provide intrastate long
 distance service in Florida.
- 5. 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.
 - 6. 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.
 - 7. Because this proceeding will address proposed universal service funding mechanisms, the Commission's decision in this docket will directly affect the substantial interests of MCI and its business operations in the state of Florida.

WHEREFORE, McImetro Access Transmission Services, LLC, and McI WORLDCOM Communications, Inc., respectfully request that the Commission grant them the leave to intervene for all legal purposes in this docket.

Respectfully submitted this 17th day of December, 2004.

Donna Canzano McNulty, Esq.

MCI

1203 Governors Square Blvd, Suite 201 Tallahassee, FL 32301 (850) 219-1008

De O'Roark, Esq. MCI 6 Concourse Parkway, Suite 600 Atlanta, GA 30328 (770) 284-5497

and

Floyd Self, Esq. Messer, Caparello & Self, P.A. 215 S. Monroe Street, Suite 701 Tallahassee, FL 32302 (850) 222-0720

Attorneys for MCImetro Access Transmission Services, LLC, and MCI WORLDCOM Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery and/or U. S. Mail this 17th day of December, 2004.

Kira Scott, Esq.*
Office of General Counsel, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Adam Teitzman, Esq.*
Office of General Counsel, Room 370
Florida Public Service Commission
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Tallahassee, FL 32399-0850

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Richard A. Chapkis, Esq. Verizon Florida, Inc. P.O. Box 110, FLTC 0007 Tampa, FL 33601-0110

Charles J. Rehwinkel Susan S. Masterton, Esq. Sprint-Florida, Incorporated Sprint Communications Company limited Partnership P.O. Box 2214 Tallahassee, FL 32316-2214

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Tracy W. Hatch, Esq.
AT&T Communications of the Southern States, LLC 101 N. Monroe Street, Suite 701 Tallahassee, FL 32301

Donna McNulty, Esq. WorldCom 1203 Governors Square Blvd, Suite 201 Tallahassee, FL 32301-2960

De O'Roark, Esq. MCI WorldCom Communications, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Coralette Hannon, Esq. AARP Department of State Affairs Senior Legislative Representative 6705 Reedy Creek Road Charlotte. NC 28215-6096 AARP c/o Michael B. Twomey, Esq. P.O. Box 5256 Tallahassee, FL 32314-5256

Ms. Betty Willis
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One Allied Drive, B4F4ND
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Floyd R. Self