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From: Woods, Vickie [Vickie.Woods2@bellsouth.com]
Sent: Tuesday, February 27, 2007 4:20 PM
To: Filings@psc.state.fl.us
Subject: Undocketed Matter: Lifeline Service: AT&T Florida's Post Workshop Comments to Rule 25-4.0665, F.A.C.
Attachments: Undocket.pdf

ORIGINAL

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- B. Undocketed Matter: Proposed Amendment of Rule 25-4.0665, Lifeline Service
- C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida
 on behalf of Manuel A. Gurdian
- D. 4 pages total (includes letter)
- E. Ltr. to Samantha Cibula re: BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Post Workshop Comments on Proposed Amendment to Rule 25-4.0665, F.A.C.

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February 27, 2007

Samantha Cibula
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Dear Ms. Cibula:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's ("AT&T Florida") post-workshop comments in the above undocketed matter. As will be explained further below, the Florida Public Service Commission ("Commission") should only enact a rule that provides for the most efficient, economical, clear and concise processes and procedures for Eligible Telecommunications Carriers ("ETCs") to meet the Lifeline goals in the State of Florida. In support thereof, AT&T Florida submits the following comments:

BACKGROUND

On January 10, 2007, an informal meeting was held by Commission staff to discuss issues regarding the proposed amendments to Rule 25-4.0065, Florida Administrative Code ("the Rule"). Subsequently, a workshop was held on February 6, 2007, and the staff requested post-workshop comments be filed by February 27, 2007.

AT&T FLORIDA'S COMMENTS

Rule 25-4.0665(6)(a)(8): The proposed rule provides that, if the subscriber chooses to apply for Lifeline service by using the "Lifeline and Link-Up Florida On-Line Self Certification Form," the subscriber must provide the last 4 digits of the subscriber's social security number ("SSN"). AT&T Florida currently requests that a customer provide their full SSN to add Lifeline to an account. The main reason for requiring the full SSN is to verify Lifeline eligibility in conjunction with the Department and Children

and Families (“DCF”). In the past, it has always been our understanding that, without the full SSN, there would be no central database to reconcile AT&T Florida’s information with DCF in performing the verification process. The proposed rule, in essence, could cause some eligible users to have to re-certify unnecessarily. That is, if the full SSN is not available to match the eligible subscribers between AT&T Florida’s database and DCF’s database, the customer will be sent a letter explaining they have 60 days to provide verification of Lifeline eligibility. If the verification is not provided to AT&T Florida with 60 days, the subscriber is placed on Lifeline transitional discount. Accordingly, the proposed rule could unnecessarily delay or frustrate the verification process. It should be noted that, at the February 6, 2007 workshop, DCF representatives stated that they would inquire further into the use of the last four digits for verification purposes. AT&T Florida will defer further comments until DCF has responded to this issue.

Rule 25-4.0665(9): The proposed rule requires ETCs to provide the subscriber with an application receipt within 3 days of the ETC receiving the application. The receipt must include the date the ETC received the subscriber’s application along with a list of the documents, if any, that were provided with the application. AT&T Florida believes that an application receipt is unnecessary and recommends that the proposed language not be added to the Rule.

At the workshop, Office of Public Counsel (“OPC”) was asked to provide data on the number of calls received in its office regarding the program based Lifeline application submittals. Based on OPC’s data for the past 3.5 months, only 10% of the calls received regarding this issue are from AT&T Florida customers. Further, AT&T Florida estimates that the cost of programming and implementing the application receipt requirement into our operating systems would be a minimum of \$200,000 plus the cost of any needed system upgrades. Additionally, annual administrative costs are estimated to be approximately \$75,000 a year. While AT&T Florida understand that customers may want to ensure that their application or re-certification has been received and that they are going to receive the credit they deserve, customers will see the Lifeline benefit on their bills in approximately two billing cycles. If the subscriber has questions in the interim, they may call AT&T Florida to inquire about the status of their application. Accordingly, based on the estimated cost that AT&T Florida would incur, a review of OPC’s data, and the minimal associated benefit to subscribers to implement such a rule, AT&T Florida does not believe that the proposed requirement is warranted.

Rule 25-4.0665(11): The proposed rule states that an ETC shall be responsible for an annual verification audit of Lifeline subscribers’ continued eligibility. AT&T Florida recommends the requirement not be included because the paragraph is unnecessary. The Federal Communications Commission (“FCC”) requires ETCs to provide a certification letter demonstrating that the ETC conducted the annual Lifeline verification of Lifeline subscribers’ continued eligibility. Because this requirement is already in the FCC’s Rules, the requirement in Subsection (12) that the ETC provide a copy of the certification letter that is required by FCC rules to the Florida Commission should be sufficient.

Rule 25-4.0665(16): The proposed rule requires ETCs to provide the subscriber with an application receipt as stated in subsection (9) above. AT&T Florida recommends that this requirement not be included in this subsection, because it adds an unnecessary and burdensome requirement that substantially increases ETCs' costs of processing Lifeline orders. See AT&T Florida's comments regarding subsection (9) above.

Rule 25-4.0665(18): The proposed rule states that a subscriber may only receive Link-Up and Lifeline service for one access line, with the exception that Lifeline-eligible Deaf or Hard of Hearing subscribers, may qualify for two phone lines at Lifeline service rates if the subscriber uses a Telecommunications Device for the Deaf text phone or Voice Carry-Over phone that requires two lines. AT&T Florida recommends that this requirement not be added to the Rule at this time.

Rule 25-4.0665(25): This proposed rule requires ETCs that offer Link-Up and Lifeline service to submit quarterly reports to the Commission's Director of Competitive Markets & Enforcement no later than two weeks following the ending of each quarter. AT&T Florida recommends that (1) the reporting requirement in this subsection be no more than semi-annually; and (2) the required data only be provided if it is maintained by the ETC in the normal course of business, as there is certain data that AT&T Florida does not track. Specifically, the company does not track the following:

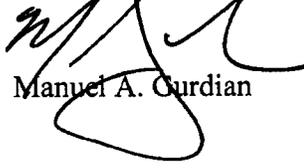
25-4.0665(25)(b) – The proposed rule requires the ETC's report to include the number of subscribers denied Lifeline service for each month during the quarter, including the reasons the subscribers were denied. AT&T Florida does not track the number of subscribers denied Lifeline service or the reason they were denied service.

25-4.0665(25)(f) – The proposed rule requires the ETC to report the number of Lifeline subscribers removed from Lifeline service for each month during the quarter by reason. While AT&T Florida attempts to track the reasons why a Lifeline subscriber is removed from Lifeline, this data is not always available. In some cases the customer does not elaborate as to why they are leaving the company or the company may never speak directly to the customer.

25-4.0665(25)(l) – The proposed rule requires the ETC to report the entity that submitted each Lifeline application during the quarter and whether the application was accepted or denied. Generally speaking, AT&T Florida does not track the entity that submitted each Lifeline application or whether it was accepted or denied.

There is also an added cost to modify AT&T Florida's operating systems to allow such tracking, and AT&T Florida does not believe that it would add any real benefit, if any, to our customers. In addition, AT&T Florida requests that the report should be required no sooner than thirty (30) days after the end of each six (6) month period.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MAG', written over the printed name.

Manuel A. Gurdian

MAG/vw
#669178

cc: Jerry Hendrix
James Meza III