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DIVISION OF REGULATORY ANALYSIS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

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# Public Service Commission

February 14, 2011

Mr. Stanley Q. Smith  
WATKINS LULAM WINTER & STENNIS, PA  
190 E. Capitol Street, Suite 800  
Jackson, Mississippi 39201

**Re: Docket No. 100375-TP – Petition for Supplemental Authority for Designation as Eligible Telecommunications Carrier (ETC) for Purposes of Providing Low-Income Support for Wireless Service by Easy Telephone Service Company.**

Dear Mr. Smith:

Staff is seeking additional information regarding Easy Telephone Company's (Easy Telephone) petition for ETC designation. Please provide a written response to each of the questions in the enclosed data request (**Second Data Request for Docket No. 100375-TX – Easy Telephone Services ETC Wireless Petition**) on or before March 4, 2011. Also, please complete and sign the enclosed certification form.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have questions, please contact Curtis Williams at (850) 413-6924 or Bob Casey at (850) 413-6974. Thank You.

Sincerely,  
  
Beth Salak  
Director

BWS/CJW  
Enclosures

cc: Division of Regulatory Analysis (C. Williams, Casey)  
Office of General Counsel (P. Evans, A. Teitzman)  
Joseph Fernandez  
Docket No. 100375-TX

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

27. Provide the following customer information for each Easy Telephone landline Lifeline customer for the months of June 2010, through January 2011 in the state of Florida:

- a) Customer Name
- b) Customer Address
- c) Customer Telephone Number
- d) Date customer became a Lifeline customer
- e) Date customer ceased being a Lifeline customer (If no longer a Lifeline customer)
- f) If customer was disconnected, the reason customer was disconnected

28. Provide copies of the Lifeline certification records which provide proof of Lifeline eligibility for each Florida Easy Telephone landline Lifeline customer receiving service from June 2010, through January 2011. Include self-certification and/or income completed certification forms. For efficiency purposes, PDF or other electronic copies are acceptable.

29. An eligible telecommunications carrier (ETC) in Florida must notify a Lifeline subscriber of impending termination of Lifeline service if the company has a reasonable basis for believing that the subscriber no longer qualifies. Notification of pending termination must be in the form of a letter that is separate from the subscriber's bill. Provide copies, if any, of all pending termination letters to Florida Lifeline subscribers.

30. An ETC in Florida must allow a subscriber 60 days following the date of the pending termination letter to demonstrate continued eligibility. The subscriber must present proof of continued eligibility. How many Florida Lifeline subscribers were able to provide proof of eligibility after receiving the pending termination letter?

31. Each Florida ETC is required to provide to each state and federal agency providing benefits to persons eligible for Lifeline service applications, brochures, pamphlets, or other materials that inform the persons of their eligibility for Lifeline. Please provide copies of all brochures, pamphlets, or other materials provided to state and federal agencies and list what agencies these materials were provided to.

32. Each ETC in Florida is required to offer discounted residential basic local telecommunications service at 70 percent of the residential local telecommunications service rate for any Lifeline subscriber who no longer qualifies for Lifeline for a period of one year after the date the subscriber ceases to be qualified for Lifeline. List the Florida customers (with their telephone numbers) who received this discount each month from June 2010, through January 2011.

33. Provide copies of all written notices sent to Florida customers who have been terminated for nonpayment of bills for telephone service during the period of June 2010, through January 2011.

Docket No 100375-TP  
Easy Telephone Services ETC Wireless Petition  
Data Request No. 2

34. If a Florida Lifeline subscriber has been moved between Easy Telephone Service and another company serviced by Telecom Service Bureau during the period of June 2010, through January 2011, provide the name of the company each customer was moved to, and provide a copy of each customer's authorization to do so.

35. The Commission has received Notification from AT&T that Easy Telephone Services may be disconnected by March 15, 2011, if certain payments are not made by February 23, 2011. Please explain Easy Telephone's plan to respond to this Notification.

36. In response to Data Request No. 11, Easy Telephone Services stated that it would conduct a 60-day activity check and place the customer in suspended status pending further disconnection if no response is received. Please confirm that Easy Telephone Services would not file for reimbursement at USAC if a customer is placed in suspended status.

37. In response to Data Request No. 26, Easy Telephone Services stated that it would immediately correct the pricing on its website to reflect a \$13.50 discount for Lifeline customers. Although pricing for the Lifeline basic package now reflects a \$13.50 discount, the prices are not the same as stated in your response to Data Request No. 26. Also, the Lifeline premier package still does not show a \$13.50 discount for Lifeline customers. Please explain.

38. Please sign the enclosed current ETC Certification Form and return it with your responses.

39. Please review each of Easy Telephone Services' responses to staff data request Nos. 1-26 and update any responses that need to be updated.

40. Easy Telephone Services' Amendment to its petition for wireless ETC designation states that customers will now be charged a \$30 activation fee (1/2 of \$60.00 customary charge) to activate service. Please confirm that Easy Telephone Service will not be providing any type of \$30 credit to customers to offset this amount and make the activation fee \$0.

41. Easy Telephone Services' on-line Lifeline application contains "Below Federal Poverty Level (FL Only)" as a Lifeline-eligible program that could be checked by a Lifeline applicant. This must be removed since an applicant cannot check this box and be qualified for Lifeline. Income-based eligibility for Lifeline must be proven by submittal of income verification documents.

## APPLICANT CERTIFICATION

State of \_\_\_\_\_  
County of \_\_\_\_\_

My name is \_\_\_\_\_, I am employed by \_\_\_\_\_, located at \_\_\_\_\_ as its \_\_\_\_\_ . I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireless Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers, and the Florida Link-Up and Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for wireless ETC designation is approved, it will be for limited ETC designation to provide wireless-only Link-Up, Lifeline, and toll-limitation service, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
5. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to the change of ownership and make a showing of public interest to maintain the ETC designation.
6. Company understands that it may only receive reimbursement from the Universal Service Administrative company (USAC) for active customer Link-Up and Lifeline access lines which are provided using its own facilities or a combination of its own facilities and resold access lines obtained from another carrier. The Company shall not apply to USAC for reimbursement of any Link-Up and Lifeline access lines obtained from an underlying

carrier which already receive a Lifeline and/or Link-Up credit provided by the underlying carrier.

7. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers.
8. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
9. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
10. Company understands that low income support reimbursed by USAC for toll limitation service is available only for the incremental costs that are associated exclusively with toll limitation service.
11. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC to:  
  
Florida Public Service Commission  
Division of Regulatory Analysis, Market Practices Section  
2540 Shumard Oak Drive  
Tallahassee, Florida 32399-0850
12. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bills, \$3.50 of which is provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

**I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

Business Address:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_