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August 25, 2014

**VIA OVERNIGHT DELIVERY**

Florida Public Service Commission  
Office of Commission Clerk  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
(850) 413-6770

**REDACTED**

RECEIVED-FPSC  
14 AUG 26 AM 10:33  
COMMISSION  
CLERK

Re: 2014 Annual Lifeline Data Request (Nexus Communications, Inc.)  
**CONFIDENTIAL TREATMENT REQUESTED**

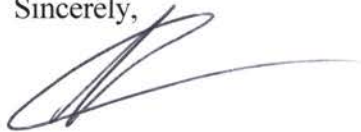
To Whom It May Concern:

Nexus Communications, Inc. (herein "Nexus") hereby files one original and two edited copies, in which the information claimed as confidential is redacted, of its responses to the 2014 Annual Lifeline Data Request.

**Nexus hereby requests confidential treatment of certain information identified herein (Exhibit A, Response to No. 12)** pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions regarding this matter, please do not hesitate to call me. Thank you for your attention to this matter.

Sincerely,



Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
Attorneys for Nexus Communications, Inc.

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**RESPONSES TO**  
**CLEC AND WIRELESS LIFELINE DATA REQUEST 2014**

1. The number of residential access lines in service each month.

**Response: See CONFIDENTIAL Exhibit A.**

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response: See CONFIDENTIAL Exhibit A.**

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

**Response: \$9.25 federal Lifeline subsidy per customer per month.**

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

**Response: See CONFIDENTIAL Exhibit A.**

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response: See CONFIDENTIAL Exhibit A.**

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines, or Lifeline customers moved to Transitional Lifeline.

**Response: See CONFIDENTIAL Exhibit A.**

7. The number of customers participating in Transitional Lifeline each month.

**Response: See CONFIDENTIAL Exhibit A.**

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

**Response: See CONFIDENTIAL Exhibit A.**

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

**Response: None; Nexus does not resale access lines to other carriers.**

10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.



- b. Procedures used to process applications received directly from customers.
- c. Procedures used to process applications received through the PSC on-line process.
- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.
- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

**Response:**

- a. **Nexus has not received an application from the Office of Public Counsel to date; however if and when Nexus does receive an application from the Office of Public Counsel, Nexus will review every individual application received directly from the Office of Public Counsel. Nexus confirms the application has been filled out correctly and that the applicant has signed and dated the application stating he/she agrees with the Lifeline Program's Terms and Conditions provided for on the application. If proof of Lifeline eligibility is not submitted with the application, Nexus will obtain the proof of Lifeline eligibility directly from the applicant. Nexus reviews and confirms that the proof of eligibility qualifies the applicant for Lifeline benefits. Nexus submits the applicant's information to the National Lifeline Accountability Database (NLAD) to check for duplicate Lifeline benefits and/or multiple Lifeline benefits at a single address. If NLAD indicates that there are multiple Lifeline benefits at a single address, Nexus will confirm whether the applicant is an Independent Economic Household at the given address, and is not already receiving Lifeline benefits. Nexus collects any additional documentation required by NLAD to confirm the address or identity of the applicant, and enrolls the applicant in NLAD. Nexus applies the Lifeline benefit to the subscriber's monthly bill only if and when the subscriber is successfully enrolled in NLAD.**
- b. **Nexus reviews every individual application received directly from customers. Nexus confirms the application has been filled out correctly and that the applicant has signed and dated the application stating he/she agrees with the Lifeline Program's Terms and Conditions provided for on the application. If proof of Lifeline eligibility is not submitted with the application, Nexus will obtain the proof of Lifeline eligibility directly from the applicant. Nexus reviews and confirms that the proof of eligibility qualifies the applicant for Lifeline benefits. Nexus submits the applicant's information to the National Lifeline Accountability Database (NLAD) to check for duplicate Lifeline benefits and/or multiple Lifeline benefits at a single address. If NLAD indicates that there are multiple Lifeline benefits at a single address, Nexus will confirm whether the applicant is an Independent Economic Household at the given address, and is not already receiving Lifeline benefits. Nexus collects any additional documentation required by NLAD to confirm the address or identity of the applicant, and enrolls the applicant in NLAD. Nexus applies the Lifeline benefit to the subscriber's monthly bill only if and when the subscriber is successfully enrolled in NLAD.**



- c. Nexus reviews every individual application received from the PSC On-Line Process. Nexus first determines whether or not the applicant is an existing Nexus subscriber. If the subscriber is enrolled with Nexus, then Nexus will obtain a completed application from the subscriber and applies the Lifeline benefit to the subscriber's monthly bill. If the subscriber is not already receiving Nexus' services, then Nexus mails the applicant an application, along with a return envelope, and instructions on how to complete the application and submitting valid proof of eligibility. Nexus then confirms the application has been filled out correctly and that the applicant has signed and dated the application stating he/she agrees with the Lifeline Program's Terms and Conditions provided for on the application. If proof of Lifeline eligibility is not submitted with the application, Nexus will obtain the proof of Lifeline eligibility directly from the applicant. Nexus reviews and confirms that the proof of eligibility qualifies the applicant for Lifeline benefits. Nexus submits the applicant's information to the National Lifeline Accountability Database (NLAD) to check for duplicate Lifeline benefits and/or multiple Lifeline benefits at a single address. If NLAD indicates that there are multiple Lifeline benefits at a single address, Nexus will confirm whether the applicant is an Independent Economic Household at the given address, and is not already receiving Lifeline benefits. Nexus collects any additional documentation required by NLAD to confirm the address or identity of the applicant, and enrolls the applicant in NLAD. Nexus applies the Lifeline benefit to the subscriber's monthly bill only if and when the subscriber is successfully enrolled in NLAD.
- d. Nexus has not received an application via the Department of Children and Families coordinated enrollment process to date; however if and when Nexus does receive an application from the Department of Children and Families, Nexus will review every individual application received directly from the Department of Children and Families. Nexus confirms the application has been filled out correctly and that the applicant has signed and dated the application stating he/she agrees with the Lifeline Program's Terms and Conditions provided for on the application. If proof of Lifeline eligibility is not submitted with the application, Nexus will obtain the proof of Lifeline eligibility directly from the applicant. Nexus reviews and confirms that the proof of eligibility qualifies the applicant for Lifeline benefits. Nexus submits the applicant's information to the National Lifeline Accountability Database (NLAD) to check for duplicate Lifeline benefits and/or multiple Lifeline benefits at a single address. If NLAD indicates that there are multiple Lifeline benefits at a single address, Nexus will confirm whether the applicant is an Independent Economic Household at the given address, and is not already receiving Lifeline benefits. Nexus collects any additional documentation required by NLAD to confirm the address or identity of the applicant, and enrolls the applicant in NLAD. Nexus applies the Lifeline benefit to the subscriber's monthly bill only if and when the subscriber is successfully enrolled in NLAD.
- e. Once Nexus receives an application, and the applicant is deemed eligible for Lifeline benefits by Nexus and NLAD, the Lifeline benefit is immediately applied to the subscriber's bill and the service becomes active. The time period for Nexus to determine eligibility and apply the first Lifeline benefit to a monthly bill, on average, is less than 24 hours.

11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:
- a. Time period between initial certification and annual certification.
  - b. Method(s) used to verify customer eligibility.
  - c. Frequency of periodic certification.

**Response:**

- a. **Nexus requires Lifeline end users to recertify continued eligibility annually in accordance with FCC regulations.**
  - b. **Nexus reviews Lifeline consumer proof of program participation or income eligibility as well as applications received from the state of Florida from consumers requesting service through the state's online lifeline enrollment portal.**
  - c. **Annually.**
12. Description of your company's procedures for Lifeline. Include the following in your response:
- a. Internal procedures for promoting Lifeline.
  - b. Outreach and educational efforts involving participation in community events.
  - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
  - d. Copies of Lifeline outreach materials of your company.
  - e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

**Response: Nexus does not have any marketing or promotional materials.**



13. Description of procedures associated with enrollment of Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:
- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.
  - b. Initial and annual certification procedures and requirements.
  - c. Any other terms and conditions applicable to resellers offering Lifeline that are not imposed on resellers who do not offer Lifeline.

**Response: Not applicable.**

14. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

**Response: Nexus customer service representatives are trained regarding the requirements associated with the enrollment process for initial landline Lifeline applications. Customer service representatives receive training in order to identify acceptable and unacceptable versions of documentation that demonstrate Lifeline eligibility. Customer service representatives also receive ongoing training regarding the details associated with the new and existing rules implemented on the entire wireless Lifeline Program.**

15. Please provide any link on your Web site that provides Lifeline information.

**Response: <http://tsihomephone.com/lifeline.html>**

16. Does your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

**Response: No.**