

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 19, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula, Office of the General Counsel *S.M.C.*
RE: Docket No. 20070572-TL

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

RECEIVED-FPSC
2018 JUL 19 PM 1:24
COMMISSION
CLERK

VIA ELECTRONIC AND U.S. MAIL

August 10, 2007

Kira Scott, Esq.
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



Embarq Corporation
Mailstop: FLTLH00102
1313 Blair Stone Rd.
Tallahassee, FL 32301
EMBARQ.com

RE: Proposed Amendment of Rule 25-4.0665, F.A.C., Lifeline Service
Post-Workshop Comments

Dear Ms. Scott:

This letter summarizes Embarq's comments concerning the proposed rule implementing the automatic enrollment process. Embarq generally supports the proposed rule with the following modifications:

1. In subsection (3), paragraph (e), relating to the time frame for providing a response to the Commission, Embarq suggests that the 10 days should be changed to 20 business days. Currently, this is a manual process for Embarq and 10 days would not provide sufficient time for Embarq to complete the required process.
2. Also, in subsection (3), paragraph (e), relating to information concerning the applicant that must be included in the response, Embarq's current practice is to provide the customer name, telephone number and the date of the application, which Embarq believes is sufficient to identify the applicant. Embarq suggests that only the minimum information that is necessary to identify the applicant be required in the rule, that is, that the address not be required unless it is necessary for identification purposes.

If you have any questions, or need additional information concerning these comments, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Susan S. Masterton".

Susan S. Masterton

Cc: Bob Casey, FPSC (via electronic mail only)
Curtis Williams, FPSC (via electronic mail only)
Sandy Khazraee, Embarq

Susan S. Masterton
SENIOR COUNSEL
LAW AND EXTERNAL AFFAIRS REGULATORY
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VIA ELECTRONIC AND U.S. MAIL

August 10, 2007

Kira Scott, Esq.
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



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Post-Workshop Comments

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If you have any questions, or need additional information concerning these comments, please let me know.

Sincerely,

Susan S. Masterton

Cc: Bob Casey, FPSC (via electronic mail only)
Curtis Williams, FPSC (via electronic mail only)
Sandy Khazraee, Embarq

Susan S. Masterton
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Rule 25-4.0665 - Lifeline Service)
_____)

Undocketed
Filed: August 10, 2007

POST-WORKSHOP COMMENTS OF VERIZON FLORIDA LLC

Verizon Florida LLC ("Verizon") submits these comments in compliance with Staff's direction at the workshop held in this docket on July 27, 2007 that post-workshop comments be filed by August 10, 2007. Although Staff's proposed codification of the automated Lifeline enrollment process provides a good framework for implementing the new requirements, Verizon respectfully submits that sections (3)(e) and (4) of proposed Rule 25-4.0665 (the "Proposed Rule") should be revised to permit eligible telecommunications carriers ("ETCs") to submit information and documents electronically rather than requiring facsimile submissions.

Section (3)(e) of the Proposed Rule requires ETCs to provide to the Commission via facsimile the customer name, address, telephone number, and date of application for misdirected applications, applications for customers who have been disconnected, applications for current Lifeline customers and rejected applications.¹ Alternatively, the required information may be filed with the Office of Commission Clerk, presumably on a confidential basis. Section (4) requires that misdirected hard copies of applications be sent to the Commission via facsimile.

Verizon proposes that ETCs be permitted to submit the required information and documents electronically using the Commission's secure website, which is the method used by the Commission to make information available to ETCs. Staff could determine

¹ If the customer is receiving the Lifeline discount from a CLEC providing service on a resale basis, the name of the CLEC also must be provided. For rejected applications, the reason or reasons for rejection must be provided.

a specific software and data format that ETCs could follow in making submissions to the Commission, such as by requiring that ETCs submit data using an Excel spreadsheet with specified column headings and that documents be sent using pdf format. An electronic process would be more efficient for ETCs than a facsimile process, which takes more time and is less reliable (such as when telephone lines are busy or fax machines are out of paper), and would benefit Staff by making it easier to retrieve and analyze data without having to manually enter data received by facsimile. An electronic process not only would reduce the potential errors due to manual processing of data, but also would better enable Staff to protect consumers' privacy. In short, because an electronic process would benefit ETCs, Staff and consumers, it should be adopted.

For the foregoing reasons, Verizon respectfully requests that the Proposed Rule be revised to permit ETCs to submit the required information and documents electronically using the Commission's secure website.

Respectfully submitted on August 10, 2007.

By: s/ Dulaney L. O'Roark III
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Attorney for Verizon Florida LLC

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Attorney

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150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5561

August 10, 2007



Bob Casey
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Dear Mr. Casey:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's ("AT&T Florida") post-workshop comments in the above undocketed matter.

BACKGROUND

On July 27, 2007, a rule development workshop was held to discuss issues regarding the proposed amendment to Rule 25-4.0665, Florida Administrative Code ("the Rule"). Commission Staff ("Staff") initiated the development and amendment of the Rule to implement the Lifeline service automatic enrollment program and to require Eligible Telecommunications Carriers ("ETCs") to maintain current information on the Universal Service Administrative Company's website. Staff requested that post-workshop comments be filed by August 10, 2007.

AT&T FLORIDA'S COMMENTS

Rule 25-4.0665(3): The proposed rule provides that "All eligible telecommunications shall participate in the Lifeline service Automatic Enrollment Process." In order to provide a description to the "Lifeline service Automatic Enrollment Process", AT&T Florida recommends that the following underlined language be added to Subsection (3): (3) All eligible telecommunications carriers shall participate in the Lifeline service Automatic Enrollment Process. The Lifeline service Automatic Enrollment Process is the following:

AT&T Florida also recommends that language regarding the confidentiality of the response provided to the Commission under subsection (3)(e) be added to the Rule. Accordingly, AT&T Florida suggests the addition of the following language as subsection (3)(f): Any response filed by the ETC pursuant to subsection (3)(e) is protected by Florida Statutes § 364.107 and is considered necessary to be disclosed by the ETC to the Commission pursuant to Florida Statutes § 364.107(3)(A)4.

Rule 25-4.0665(3)(e): The proposed rule provides that within 10 days of receiving the Commission's e-mail notification that the Lifeline service application is available for retrieval, the eligible telecommunications carrier ("ETC") shall provide to the Commission via facsimile or file with the Office of Commission Clerk a response identifying the customer name, address, telephone number and date of application for: "(1) misdirected Lifeline service applications; (2) disconnected Lifeline customer applications; (3) applications for customers recently receiving Lifeline service; and (4) rejected applications, which shall include the reason(s) why the applicants were rejected."

AT&T Florida believes that 10 days is unworkable because it receives a large number of applications through the Commission's current enrollment process. AT&T Florida has received approximately 16,000 applications since the Commission's enrollment process began in April 2007. In May, June and July 2007, AT&T Florida received approximately 6,000 applications per month. Thus, in order to process the large number of applications, AT&T Florida requests that the number of days in which ETCs must respond to the Commission be increased to 20 days.

In addition, AT&T Florida recommends that "(2) disconnected Lifeline customer applications" be eliminated as it is covered under (4) rejected applicants, which would include the reason(s) why the applicant was rejected.

Rule 25-4.0665(4): The proposed rule requires an ETC who receives misdirected hard copy Lifeline service applications to forward the misdirected application to the Commission's Lifeline service facsimile line. AT&T Florida recommends that the proposed rule be amended to allow the ETC the option of sending the misdirected application to the Commission or notifying the applicant directly.

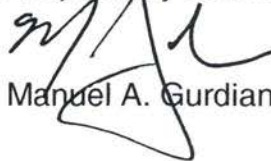
Upon receipt of applications, AT&T Florida manually processes and determines whether the applicant is its customer. If the applicant is not a customer, AT&T Florida automatically generates correspondence which is sent to the applicant advising them that they need to contact their local phone company because they are not currently a customer. The forwarding of the misdirected hard copy application to the Commission via facsimile would add another step in AT&T Florida's process that is burdensome for the Company. Accordingly, AT&T

Florida recommends that the following language be added to the rule: "or the ETC may forward correspondence to the Lifeline applicant advising that the applicant is not a customer of the ETC and that the applicant should contact their service provider."

CONCLUSION

In conclusion, AT&T Florida looks forward to working with the Commission and its Staff on the amendment of the Rule as well as increasing Lifeline enrollment in Florida.

Respectfully submitted,



Manuel A. Gurdian

cc: Jerry Hendrix
James Meza III
Kira Scott

MANUEL A. GURDIAN
Attorney

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150 South Monroe Street
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August 10, 2007

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Respectfully submitted,

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

Manuel A. Gurdian

cc: Jerry Hendrix
James Meza III
Kira Scott

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Proposed Amendment of Rule 25-4.0665)	
Florida Administrative Code,)	Undocketed
Lifeline Service)	
)	

POST-WORKSHOP COMMENTS OF SPRINT NEXTEL

Sprint Nextel Corporation on behalf of its wholly-owned subsidiaries providing wireless telecommunications services in the State of Florida (“Sprint Nextel” or “Company”) provide the following brief Post-Workshop comments on the draft Lifeline rules prepared by distributed on or about July 13, 2007 and discussed at the July 27, 2007 Rule Development Workshop.

I. Introduction

Sprint Nextel is a national commercial mobile radio service (“CMRS”) provider and is designated as an ETC in twenty-four (24) jurisdictions. Sprint Nextel offers wireless telecommunications services in Florida, and two of its operating entities have been designated as eligible telecommunications carriers (“ETCs”) in portions of Florida by the Federal Communications Commission (“FCC”), authorizing them to provide Lifeline service in those areas.¹ NPCR, Inc. (“Nextel Partners”) is designated as an ETC in portions of the panhandle of Florida, mostly to the north and west of Tallahassee. Sprint Spectrum L.P., d/b/a Sprint PCS (“Sprint PCS”) is designated as an ETC and

¹ *In the Matter of Federal-State Joint Board on Universal Service; Sprint Corporation; Application for Designation as an Eligible Telecommunications Carrier in the State of Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia*, CC Docket No. 96-45, Order, DA 04-3617 (rel. Nov. 18, 2004); *In the Matter of Federal-State Joint Board on Universal Service; NPCR, Inc. d/b/a Nextel Partners; Application for Designation as an Eligible Telecommunications Carrier in the State of Alabama, Florida, Georgia, New York, Pennsylvania, Tennessee and Virginia*, CC Docket No. 96-45, Order, DA 04-2667 (rel. Aug. 25, 2004), corrected by Erratum (Sept. 13, 2004); see also 47 C.F.R. § 54.401.

authorized to provide Lifeline service in a broader area covering roughly 50% of the state.

Sprint Nextel has participated regularly in the development process for Lifeline rules and previously attended the Rule Development Workshop held on February 6, 2007. In its Comments filed after that prior Workshop, Sprint Nextel included a discussion of the jurisdictional limitations of the Florida Public Service Commission ("FPSC") in developing Lifeline rules to apply to wireless ETCs. To avoid redundancy, we incorporate those comments by reference here and note that Sprint Nextel fully reserves its rights to assess jurisdiction as the rulemaking process continues. Sprint Nextel reiterates its commitment to active participation in Lifeline rule development and restates its belief that jurisdictional limits need not be a hindrance to the development of final rules that are both effective in their purpose and legally defensible.

Sprint Nextel also reiterates the guidelines proposed in its previous Comments that the Commissioners and Staff may wish to consider as they develop the rules further:

1. Be consistent with FCC default rules wherever possible and provide ETCs who operate in multiple jurisdictions the flexibility to maintain consistent Lifeline programs and practices throughout.
2. For each proposed rule or portion thereof that is to be applied to wireless ETCs, consider whether the rule is consistent with the Commission's authority.
3. Minimize information gathering to what is essential for administering and improving the program and avoid requiring providers to create costly new reporting processes.

4 Ensure that the Rules are competitively and technologically neutral.

Finally, Sprint is concerned that the draft rules under consideration will impose additional and unnecessary regulatory costs upon the Company. Manual processes in particular may be expensive to implement. Accordingly, Sprint believes that there likely is a lower cost regulatory alternative to some of the processes now under discussion.

II. Comments on Specific Rules Proposed for Development

A. Proposed Rule 25-4.0665 (3), Lifeline Service Automatic Enrollment Process

Sprint Nextel notes that the proposed rules seek to formally incorporate the automatic enrollment process that Commission Staff has developed over the past several months in which ETCs are notified by email that data files on prospective Lifeline subscribers are available for download from a secure website maintained by the Commission. ETCs then go about enrolling subscribers who are eligible according to their own process. It is Sprint Nextel's understanding that the data files on prospective Lifeline subscribers are obtained by Commission Staff through the Lifeline website maintained by the FPSC and also through referrals from the Department of Children and Family Services ("DCF"). Sprint Nextel and other ETCs have thus far complied voluntarily with the process during what could be described as a testing phase of development.

Although the automatic enrollment process that Commission Staff has been developing has required Sprint Nextel and other ETCs to adopt additional manual

processes to receive Lifeline applications, it has two main advantages: First, Commission Staff has been thoughtful in providing a single interface for ETCs to receive referrals (through the secure website) so that applications received by both the website and the DCF come in through the same channel. Second, the process is flexible in that it acts as a referral of Lifeline subscribers and does not seek to implement a one-size-fits-all internal enrollment process once the subscriber's information is referred. ETCs can develop their own processes for determining whether the subscriber is a customer, determining whether the subscriber is in an ETC designated area, etc.

The process, however, is not perfect, and Sprint Nextel urges the Commission Staff to allow more time to iron out the rough edges under the current voluntary arrangement before formally incorporating the process by rulemaking. It is Sprint Nextel's understanding that most ETCs are voluntarily complying with the process today, so there is little need to rush to implement the process through formal rules. Following are a few examples of the problems Sprint Nextel has experienced: **The Company has not received email notifications consistently when there are applications in the queue. On some occasions, Sprint Nextel has had trouble verifying whether Lifeline applicants are existing customers based on the information in the data file provided by the FPSC (e.g. the address, account name, and/or the telephone number provided may not match Sprint Nextel's records).** In some cases, applicants may give a landline number on the application instead of their Sprint Nextel wireless number. Unfortunately, account number and/or full social security numbers would be the most effective way to eliminate the confusion, although there are policy and legal reasons why requiring such information

may be inadvisable. These are issues that may be worked out over time, which is precisely why the voluntary testing period should be extended.

As the rules are developed, Sprint Nextel agrees with the comments made during the Rule Development Workshop that the term “Automatic Enrollment Process” should be defined and should specifically reference the process discussed above that Commission Staff has developed over the past several months to refer prospective Lifeline subscribers through an email notification to ETCs who then may download the information from the secure website.

Sprint Nextel encourages the Commission to avoid defining the Automatic Enrollment Process so narrowly that it would not permit the process to evolve. For example, as ETCs develop their own Lifeline enrollment websites, the Commission may wish to incorporate links to those sites into the Commission’s own “Lifeline and Link-Up Florida On-Line Self Certification Form” webpage. This would allow the Commission and ETCs to further streamline the Lifeline application process and allow ETCs to develop standard online applications processes for all jurisdictions where they are designated as an ETC. By linking the “Lifeline and Link-Up Florida On-Line Self Certification Form” webpage to ETC-specific Lifeline websites for ETCs who elect to maintain such websites, the Commission may be able eventually to eliminate the intermediate step in which the Commission forwards notice of the online application to the ETC and an ETC employee retrieves the information from the FPSC website. By directing the consumer directly to the ETC’s website, the consumer is also able to receive detailed information on the Lifeline service plan and the serving carrier can obtain the prospective customer’s self-certification of eligibility. Furthermore having multiple web

links would allow the prospective customer to compare the different ETCs' offerings thus providing the end user with a competitive choice. This website interface will assist not only individual consumers, but also social service agency workers in obtaining information about the Company's Lifeline offerings. For example, a social worker could help a qualified consumer download, fill out and submit the applications materials before the consumer left the social worker's office.

Such an arrangement accomplishes two goals: First, it provides a single Commission website to be publicized as part of the Commission's outreach efforts and a single portal to funnel Lifeline applicants to all ETCs, even those without websites. Second, it provides the flexibility to put the consumer directly in touch with ETCs that maintain Lifeline websites, thereby facilitating the exchange of information and expediting the application process. **Sprint Nextel stresses that it is not advocating that such a process be mandated, just that any definition of "Automatic Enrollment Process" not preclude voluntary development and evolution of the online Lifeline application process.**

Sprint Nextel agrees that sixty (60) days from the date the email notification is received should be long enough to enroll a subscriber. However, the timeline should not apply if the ETC is unable to complete the enrollment due to a failure of the prospective Lifeline subscriber to respond with required information. For example, Sprint Nextel's enrollment process involves first screening applicants to ensure they reside in our ETC designated area, then sending a Lifeline application packet to inform the applicant of the rates, terms and conditions of the Lifeline plan and obtain a signature certifying that they

are eligible. The first step of confirming they are in our designated area takes less than a week and an application is promptly sent. If the applicant responds in a timely fashion, the enrollment will be completed well within sixty (60) days. However, if the applicant does not return the application or returns it late, the deadline will not be met.

Sprint Nextel agrees with many of the comments made during the Rule Development Workshop that 25-4.0665(3)(e) is problematic. First, the detail required to categorize applications as misdirected, disconnected, etc. would create burdensome new manual processes. The Company encourages the Commission to consider whether the information is truly necessary before doing so. To the extent reporting on any of the categories is necessary, Sprint Nextel supports simplifying and consolidating the categories as much as possible. Specifically, Sprint Nextel supports the comments of Mr. McCabe of TDS and Mr. Casey of the Commission Staff that the category of “disconnected Lifeline customer applications” (25-4.0665(3)(e)(2)) be consolidated with the category for “rejected applicants” (25-4.0665(3)(e)(4)). Second, the Company agrees that ten (10) days is not enough to have feedback on the status of applications. For instance, the difficulty discussed above in determining whether the applicant is an existing customer based on the information provided by the PSC is causing substantial delay. Third, Sprint Nextel agrees that both choices for providing the information called for in proposed rule 25-4.0665(3)(e) - - confidentially filing the information with the Office of Commission Clerk or faxing the information - are burdensome. Sprint Nextel supports the suggestion that the secure website be modified to allow ETCs to provide such information electronically in a standard format as long as it can be accomplished by the same simple login process that is used to retrieve applicant information.

B. Proposed Rule 25-4.0665 (4), Faxing of “Misdirected” Hard Copies of Lifeline Service Applications

Sprint Nextel agrees with the comments of Ms. Sirianni of BellSouth that ETCs be given the choice of notifying “misdirected” applicants who have submitted applications outside of Automatic Enrollment Process directly instead of requiring the ETC to go through the extra manual process of faxing the misdirected application to the PSC. Like BellSouth, Sprint Nextel presently sends a letter to applicants who are not in Sprint Nextel’s ETC designated area.

III. Conclusion

Sprint Nextel appreciates the opportunity to submit these comments on the July 27, 2007 Rule Development Workshop, and is also willing to provide any further information or clarification to the Staff or Commissioners to assist in developing the rules.

Respectfully submitted this 10th day of August, 2007,

/s/ Douglas C. Nelson

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Atlanta, GA 30303
(404) 649-0003

Attorney for Sprint Nextel