From:	Khazraee, Sandy A
To:	Bob Casey
Cc:	Beth Salak; Masterton, Susan S
Subject:	CenturyLink Lifeline Working Group post-meeting comments
Date:	Friday, February 27, 2015 3:52:44 PM

Bob,

Per your request at the conclusion of the January 21, 2015 Lifeline Working Group meeting, the following are CenturyLink's additional comments. Comments related to questions 1 through 3 are included. I have not included any written comments in response to questions 4, 5 and 6 as CenturyLink has no additional responses to those questions. The input provided at the working group meeting by CenturyLink and other companies has sufficiently covered those items.

1)Has each ETC obtained access to the DCF portal? If not, why not?

CenturyLink has not obtained access to the portal. We communicated with DCF and learned this is not a true web portal but rather a machine – to – machine interface. Obtaining access to this interface would require programming resources within CenturyLink. We are an ETC in 37 states and do not believe it would be a prudent use of our IT and programming resources to build 37 different state-specific interfaces. Given that the DCF portal does not capture 100% of the Lifeline eligible population in Florida, we would be expending those resources knowing that the effort would only be used for applicants who are participating based on one of the three programs DCF handles.

2) The National Lifeline Accountability Database (NLAD) – How is it working? What are the problems? Are you receiving complaints from consumers that NLAD is providing incorrect information?

For the most part, NLAD is working but there are issues. The following is a list of some of the issues we are encountering.

1. Duplicates continue to get into NLAD. Same customer with multiple carriers receiving Lifeline from both. USAC has not clearly explained how these are happening, but they alluded to the previous TPIV override function being the culprit.
2. Higher rate than expected of TPIV failures. The TPIV process uses the Lexus Nexus data base which is a data base used for credit checks.
    a. I suspect that since most of our Lifeline (low income) customers do not have credit history, the third party (Lexus Nexus) does not have enough information to confirm the customer's identity and therefore fails them for TPIV.
    b. This requires the ETC to obtain 2 forms of identification to validate full name, SSN and DOB.
3. Reporting is not working as designed.
    a. Benefit Transfer Out email notifications are not getting mailed to the NLAD Lifeline Administrator consistently.
    b. This requires the ETC to pull all SACS each day to determine if there were any Benefit Transfers Out. (For CTL this is an issue as there are 111 SACs.)
        i. Benefit Transfers Out indicate that the customer has chosen to go with another ETC for Lifeline and the ETC receiving the Benefit Transfer

Out notification should remove the Lifeline discount.

4. Resolution Request process has been changed multiple times.
    a. This causes confusion on the part of the ETC employees and customers.
5. USAC keeps out of date information in the NLAD Duplicates Database.
    a. Customers that are no longer active on Lifeline cannot be de-enrolled once they are in the duplicates database.
    b. Customers that are undergoing some kind of duplicate mailing cannot be updated, so any address or phone number changes cannot be provided to NLAD.
6. We have noticed that address duplication sometimes occurs for apartment buildings even when the customer has provided their apartment number and CenturyLink has submitted it. NLAD only recognizes the street address and does not recognize the individual unit. So multiple applicants from the same apartment complex will be seen as duplicates

We have received complaints from a handful of customers that are upset because NLAD says they already have Lifeline with another provider, yet they claim they do not and have not had Lifeline with anyone for some time. Most are found to be in the Duplicates Database and since they cannot be removed (de-enrolled) they are still showing as having Lifeline with someone else. Therefore we cannot give the customer Lifeline, nor can we transfer the customer's Lifeline benefit.

3) TDM to IP transition – What will happen to Lifeline? When?

In areas where CenturyLink converts to a consumer VoIP offering, and the company is still required to provide Lifeline service to qualifying customers, CenturyLink intends to fulfill its Lifeline obligation through a VoIP based offering. Precise timing of when and where CenturyLink completes its conversion to VoIP based offerings have not been determined at this point. We will continue to make TDM voice services available, if a customer requests it, until such time as we are granted approval to discontinue those services by the FCC.

If these responses generate further questions, please don't hesitate to contact me.

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