From: McCall, Angie
To: Bob Casey
Subject: FW: Lifeline Working Group Comments
Date: Tuesday, February 24, 2015 10:40:22 AM

Hi Bob,

Frontier provides the following comments relative to the request for feedback pertaining to problems experienced with the NLAD database. We are taking our comments a step further and including USAC.

- We feel mirroring Federal rules and keeping any state specific rules to a minimum greatly reduces the margin for error. Managing different rules for different states creates more complexity for multi-state companies.
- Consumers are not aware of NLAD's role and responsibility with respect to Lifeline. Consumers are getting confused by all the duplicate household correspondence letters they are receiving from both USAC and Frontier. There have been several rounds of duplicate resolutions, i.e. duplicate address, duplicate subscriber. These are determined by what appears as a duplicate in NLAD. Where a customer's address appears to be duplicate, but may not be, the customer must file a duplicate household worksheet. Many of the customers are elderly and don't understand all this correspondence and they may receive their recertification mailing in the midst of it as well which adds to the confusion. We are finding in these type cases, the consumer fails to recertify.
- Similar comments apply to USAC. Frontier started using USAC for their recertification last year. Consumers do not realize correspondence from USAC in regards to recertification represents recertification notification from Frontier. The response USAC provides to Frontier why a consumer is not recertified does not indicate the method of attempted recertification and does not indicate a distinction between "non-response" and "late response". Some customers think they successfully recertified, when in fact, they did not.

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