



CenturyLink™

February 27, 2015

VIA ELECTRONIC FILING

Ms. Carlotta Stauffer
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Proposed Lifeline Rule Development – Undocketed

Dear Ms. Stauffer:

At the conclusion of the January 21, 2015 workshop on the proposed Lifeline rule changes, staff requested post workshop comments be filed by February 27, 2015. In that regard, attached are the post-workshop comments of Embarq – Florida, Inc d/b/a CenturyLink (CenturyLink).

If you have any questions regarding CenturyLink's comments, please do not hesitate to call me at 850-847-0173.

Sincerely,

/s/ Sandra A. Khazraee
Sandra A. Khazraee
Director - State Regulatory Affairs

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FLORIDA PUBLIC SERVICE COMMISSION

Proposed Amendment of Rule 25-4.0665)	Undocketed
F.A.C., Lifeline Service and Proposed)	
Elimination of Rule 25-4.113 Refusal or)	
Discontinuance of Service by Company)	

Embarq – Florida, Inc. (CenturyLink) Post-Workshop Comments

On January 21, 2015, a rulemaking workshop was held by Commission staff to discuss proposed changes to Rule 25-4.0665 – Lifeline Service and the proposed elimination of Rule 25-4.113 Refusal or Discontinuance of Service by Company. Embarq – Florida, Inc. (CenturyLink) participated in the workshop and hereby submits the following written comments as a supplement to the verbal comments made at the workshop.

CenturyLink is generally supportive of the Commission Staff’s proposed revisions to the existing Lifeline Rules with some of the changes suggested by various industry participants and commission staff and discussed in the workshop. In addition to the comments provided below, CenturyLink suggests the staff consider adding a statement or attestation to their Lifeline application which would address the transfer of benefits process. Specifically, CenturyLink asks staff to review Page 44, Line 23 through Page 45 Line 16 of the transcript of the January 21, 2015 Lifeline Working Group Meeting for the discussion related to this request. Although not all applicants through the FPSC’s Coordinated Enrollment Process would need this attestation, having it on the form would improve response time for both ETCs and subscribers in the cases where subscribers are changing providers but keeping their Lifeline discount.

The following are CenturyLink’s suggested rule changes by paragraph:

Rule 25-4.0665 (7)(a):

CenturyLink suggests a change to the language in this paragraph on Line 18. As written, the rules state that the ETCs, as participants in the Coordinated Enrollment Process, receive an email that contains Lifeline assistance plan applications which are available for retrieval for processing. Technically, the ETCs do not receive the applications; rather, we receive data that has been culled from the customers’ online applications. We suggest the following word change to this paragraph:

(7)(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing the eligible telecommunications carrier that data from Lifeline assistance plan applications ~~are~~ is available for retrieval for processing.

Rule 25-4.0665 (7)(b):

CenturyLink supports language that was proposed during the workshop which recognizes that Lifeline credits may not be provided until after NLAD confirmation is received. We appreciate the clarification provided by staff during the workshop that if a customer's application fails NLAD, then the 60 day timeframe no longer applies because the customer did not submit a complete and/or accurate application.

We concur with the following suggested wording of this paragraph:

(7) (b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline assistance plan as soon as practicable, but no later than 60 days from the receipt of the e-mail notification. Upon completion of initial enrollment, eligible telecommunications carriers that invoice their subscribers shall credit the subscriber's bill for Lifeline assistance no later than the subscriber's enrollment date.

Rule 25-4.0665 (7)(e):

CenturyLink concurs with AT&T's suggested change to this rule that the time frame be changed from the proposed 20 calendar days to 40 calendar days. We may not know that a customer is currently receiving Lifeline assistance from another carrier until we get a rejection back from NLAD.

Rule 25-4.0665 (8):

CenturyLink finds the language in paragraph 8 acceptable given the discussion at the workshop which clarified that if the customer's application failed NLAD and the company is required to obtain additional information not previously provided by the customer, such as proof of identity or a completed IEH, then that effort is not considered to be an imposition of additional certification requirements.

Rule 25-4.0665 (9):

CenturyLink concurs that this paragraph is redundant to paragraph (8) and is not required.

Rule 25-4.0665 (10):

CenturyLink concurs with AT&T's proposal to change the time frame within this paragraph to 40 days from the proposed 30 days.

Rule 25-4.0665 (12):

CenturyLink supports AT&T's proposed change to this paragraph. That is, we suggest the proposed language be changed to the following:

(12) If a subscriber's Lifeline assistance is terminated and the subscriber subsequently presents proof of Lifeline eligibility the subscriber shall be treated as making a new application for a Lifeline credit.

Rule 25-4.0665 (13) and Rule 25-4.0665 (14)

CenturyLink believes that neither of these paragraphs is required. The advertising requirements related to Lifeline are included in the FCC's rules and ETCs are required to follow those. If however, it is determined that the advertising requirements need to be included in the FPSC rules as well, then Rule 14 should be included and Rule 13 should be deleted.

CenturyLink appreciates the opportunity to comment on these draft rule amendments and respectfully requests the modifications suggested above.