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STEVE CRISAFULLI  
*Speaker of the House of Representatives*



February 25, 2015

**VIA ELECTRONIC MAIL**

Mr. Bob Casey  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0850

Re: Docket No. 150001-OT

Dear Mr. Casey:

Enclosed; please find a copy of the Office of Public Counsel's comments in response to the Commission's working group meeting held on January 21, 2015 that were filed electronically in Docket No. 150001-OT today.

If you have any questions, please call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa L. Steffens".

Lisa L. Steffens

LLS:

Enclosure

cc: J.R. Kelly

## **Office of Public Counsel (OPC) Comments-Lifeline Working Group Meeting**

**February 25, 2015**

The Office of Public Counsel (OPC) provides the following written comments as requested in response to the questions asked by the Commission at the January 21, 2015 Lifeline Working Group Meeting. In response to the following 6 questions, OPC has comments on questions 2 and 6.

- 1) Has each ETC obtained access to the DCF portal? If not, why?
- 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?
- 3) TDM to IP transition-What will happen to Lifeline? When?
- 4) What is the status of Incumbent Local Exchange Company request to FCC to make provision of Lifeline voluntary?
- 5) How will each Florida ETC perform the required 2014 Lifeline customer service recertifications? Will the recertifications be accomplished in person, in writing, by phone, by text message, by e-mail, or otherwise through the internet? Did your ETC elect to have USAC conduct the 2014 annual recertification of your lifeline customers?
- 6) Any other ideas to streamline the Lifeline enrollment process for both applicant and ETC?

### **Comments:**

2) Below is a list of problems identified by OPC that lifeline subscribers have experienced in relation to 2014 NLAD verification process:

- 1) OPC has received hundreds of calls from consumers that were misdirected to OPC by provider representatives after completion of their re-verification process. In addition, many of these callers were not Florida residents.

- 2) Once dedicated re-verification phone lines were shut down, customers had no entity to contact to ask questions
- 3) Customers who kept copies of their submitted documents to re-verify had lifeline removed with no explanation provided.
- 4) Customers who failed the NLAD verification were given no justification or explanation for removal.
- 5) Many customers expressed frustration that they had no one to speak to directly in reference to their lifeline subscription termination.
- 6) Many customers stated they received rude and discourteous treatment from provider representatives when they attempted to find out why they were denied lifeline benefits.
- 7) OPC had contacted multiple providers multiple times regarding the misdirected calls to OPC's toll free number; however, the problems persist. The providers need to increase their in-house educational and training programs to appropriately address the consumer calls and cease providing the OPC's toll free number as the clearinghouse for lifeline complaints, especially to non-Floridians.

6) In order to streamline the lifeline enrollment process there needs to be accurate information given to applicants by all involved in the process. Misinformation results in applicants getting frustrated and causes delays in getting their lifeline credit approved. The various Lifeline applications do not seem difficult to understand no matter where they come from, it is the follow-up on the completed applications that is appears to be causing problems.