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February 27, 2015 – **VIA ELECTRONIC MAIL**

Carlotta S. Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Undocketed
Initiation of Rulemaking to Amend Rule 25-4.0665, Florida Administrative Code,
Lifeline Service, and to Repeal Rule 25-4.113, Florida Administrative Code,
Refusal or Discontinuance of Service by Company

Dear Ms. Stauffer:

Enclosed for filing in the above matter are the Post-Workshop Comments of Verizon Florida LLC. If there are any questions regarding this filing, please contact me at (678) 339-5081.

Sincerely,

s/Dulaney L. O’Roark III

Dulaney L. O’Roark III

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Enclosure

c: Rosanne Gervasi (w/enc) – via electronic mail

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Rulemaking to Amend) Docket: Undocketed
Rule 25-4.0665, Florida Administrative Code,) Filed: February 27, 2015
Lifeline Service, and to Repeal Rule 25-4.113,)
Florida Administrative Code, Refusal or)
Discontinuance of Service by Company)
_____)

POST-WORKSHOP COMMENTS OF VERIZON

Verizon Florida LLC (Verizon) files these comments in compliance with Staff's direction at the workshop held on January 21, 2015. At the workshop, BellSouth Telecommunications LLC d/b/a AT&T Florida (AT&T) and Cox Florida Telecom, L.P. (Cox) proposed changes to Commission Staff's draft revisions to Rule 25-4.0665. Verizon addresses those proposed changes below.

Section (1). AT&T proposes to change "Lifeline Assistance Plan" in the section title to "Lifeline Assistance." That change is acceptable to Verizon. Cox proposes to change subsection (c) to permit eligible telecommunications carriers (ETCs) with fewer than 1 million access lines to apply an income eligibility test of 150% of the federal poverty income guidelines. Verizon has not yet developed a position on this proposal.

Section (2). AT&T proposes to renumber this section so it would become subsection (1)(d). Staff suggested that this change should be accompanied by minor revisions to make the new subsection (d) better fit within section (1). See Transcript at 11. This approach is acceptable to Verizon.

Proposed New Section (2). AT&T proposes to add a section that would incorporate the federal requirement that the Lifeline discount is available to only one member per household. Verizon supports this addition.

Sections (4) and (6). Cox proposes adding a clarification that these sections apply to the coordinated enrollment process. These proposed changes do not appear to be necessary.

Section (7). AT&T proposes changing subsection (b) to provide that ETCs must provide Lifeline credits on customer bills “as of the subscriber’s enrollment date.” As Verizon noted at the workshop, it provides the credit effective as of the customer’s signature date, which is earlier. See Transcript at 24. Verizon therefore proposes to revise AT&T’s language to state “as of no later than the subscriber’s enrollment date.” AT&T also proposes to change subsection (e) to provide that an ETC has 40 (rather than 20) days to respond to the Commission’s e-mail notification that a customer’s Lifeline application is available for retrieval. Verizon supports that change.

Section (9). AT&T proposes to strike section (9). Verizon supports that change.

Section (10). AT&T proposes to change the time for providing a rejection notice to the customer from 30 to 40 days. Verizon supports that revision. Verizon does not support AT&T’s proposal that ETCs only be required to send rejection notices to customers who applied directly to the ETC.

Section (12). AT&T proposes that when a customer’s Lifeline discount is terminated and the customer subsequently presents proof of eligibility, the customer would be treated as making a new Lifeline application. Verizon supports that change.

Section (13). AT&T proposes to strike section (13). Verizon supports that change.

Section (16). AT&T proposes that 47 C.F.R. § 54.417 be incorporated without elaboration. Verizon concurs. Staff asked whether this section should be revised to

address the FCC waiver order that has been issued with respect to Florida's Lifeline application process. Verizon agrees that such a change would make sense and that it could be implemented by a simple revision stating that the section is subject to the FCC's waiver order.

Lifeline Applications. AT&T proposes that the statement concerning verification of a customer's temporary residential address should be deleted. Verizon agrees. AT&T also proposes that more detail be provided concerning information that may be provided to the Universal Service Administrative Company. Verizon agrees with this approach, but acknowledges that additional revisions may be needed to address concerns that the phrase "and other information" is too broad. Finally, the sentence informing customers participating in certain programs that they can complete an online Lifeline application should be retained and moved to the front of the application.

Respectfully submitted on February 27, 2015.

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