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January 8, 2001

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 001589-TL
Eligible Telecommunications Carrier (ETC) Information Requirements for
Lifeline and Link Up Service

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of the Comments of Verizon Florida
Inc. for filing in the above matter. Service has been made as indicated on the
Certificate of Service. If there are any questions regarding this matter, please contact
me at 813-483-2617.

Sincerely,

Kimberly Caswell
Kimberly Caswell

KC:tas
Enclosures

APP	<u>Belton</u>
CAF	_____
CMP	_____
COM	_____
CTR	_____
ECR	_____
LEG	<u>1</u>
OPC	_____
PAI	_____
RGO	_____
SEC	<u>1</u>
SER	_____
OTH	_____

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00279 JAN-85

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Eligible Telecommunications Carrier) Docket No. 001589-TL
(ETC) Information Requirements for Lifeline) Filed: January 8, 2001
and Link Up Service)
_____)

COMMENTS OF VERIZON FLORIDA INC.

Verizon Florida Inc. (Verizon) responds to the questions posed by Staff at the November 29, 2000 workshop in this docket.

- (1) What does Verizon currently do to encourage/increase subscribership in Florida? What future plans do we have?
- A. Today, Verizon distributes an annual bill insert designed to inform all Verizon customers of the availability of Lifeline service. Verizon also dedicates one-half of a page of the local telephone directory to inform the reader of the availability of Lifeline service and its associated costs. In the near term, we plan to partner with community-based organizations in the Verizon service area and request their assistance in distributing fliers on Lifeline service. A sample draft flier has been attached as Attachment A.
- (2) What does Verizon do in other states where we operate to encourage/increase subscribership?
- A. In each state, Verizon publicizes Lifeline service as required by state and federal mandates. In most states, Lifeline service is included in the directory pages. In many states, an annual bill insert or message is run, and/or an annual legal ad is placed in the major daily newspapers.

In California, Verizon is required to do the following:

- Advise customers about Lifeline service on every order and move call.
- Send a Lifeline brochure to all residential customers each year during the annual recertification process.
- Target ad campaigns in a variety of media to the African-American, Asian, and Latino markets.

In Nevada and Oregon, Verizon provides automatic enrollment into the Lifeline program. Essentially, partnerships have been formed with state agencies that administer Lifeline-qualifying programs to provide client lists to Verizon (this varies from state-to-state, from monthly reports to annual reports). Verizon then does the following:

DOCUMENT NUMBER-DATE

00279 JAN-8 01

FPSC-RECORDS/REPORTING

- ADDs - If customer has phone service - notify through direct mail that customer is eligible to receive discounted phone service and unless they notify the company that they do not wish to receive Lifeline, they will be automatically migrated to Lifeline service within a specified timeframe.
- ADDs - If customer DOES NOT have phone service - notify through direct mail that customer is eligible to receive discounted phone service and to contact the company at the toll free number to establish service and receive the Lifeline discounts.
- DELETES - If customer appears on state agency DELETE list - notify customer through direct mail that he will be removed within a specific timeframe unless he can prove ongoing eligibility. If the customer fails to prove continued eligibility within the established timeframe, he will be automatically migrated to regular basic residential phone service, but will not be disconnected.

In Maine, Verizon does the following:

- Residence service representatives explain low cost services such as Lifeline on every order, move and change of billing party customer contacts.
 - Once a year in the "Verizon EXTRA" bill insert, we send out Lifeline information to all customers receiving a bill.
 - Each customer who applies for new telephone service is mailed a booklet once their service is installed ("Your Rights and Responsibilities as a Verizon Customer") informing them about Lifeline/Link Up.
 - All telephone directories carry information about the availability of the Lifeline program and what discounts are available under the program.
 - Collection notices advise customers that they may be eligible for the Lifeline program; the reverse side of Verizon Maine's bills also advises customers about Lifeline/Link Up.
 - Verizon Maine does not do any specific publicity advertising (newspaper advertising etc.), but the Maine PUC and Maine Department of Human Services do.
- (3) If Verizon has advertised Lifeline and Link Up in other states, include information on what type advertising was done and whether it was successful or not in increasing subscribership.

- A. Verizon California has used a variety of advertising media, including newspapers, billboards, brochures, radio, door hangers and displays in various locations, including check-cashing locations, convenience stores, and fast-food outlets.

Verizon has not conducted studies assessing the effect of Lifeline advertising on Lifeline subscribership. While there are studies supporting the idea that advertising is effective in influencing consumers' decisions about telecommunications purchases (e.g., toll services), this kind of research may not translate to the Lifeline environment for various reasons. For instance, Lifeline is not a "product" per se, but rather a discounting program; and the target audience for Lifeline services may be distinct from the broader advertising audience.

In California, Lifeline subscribership for some minority groups (e.g., Vietnamese) has increased significantly for those with incomes under \$20,000 a year, although it is difficult to say what factors may have caused this increase. In addition, the State itself has undertaken a Lifeline outreach program.

- (4) Provide a breakdown of the costs by media type to implement the rule as proposed.
- A. See Attachment B. Please note that these costs include only placement, and not production, expenses. Production expenses can be substantial, particularly for media such as television.
- (5) What type of information on Lifeline and Link Up is available at Verizon's payment center locations?
- A. Verizon's payment center locations are the Company's Phone Marts. The Phone Marts are staffed by sales associates who refer Lifeline customers to Verizon's contact center. We currently do not have information posted in the Phone Marts on Lifeline, but the fliers we have created could be used at these locations to further raise awareness about Lifeline availability.
- (6) Attach a copy of any certification application used by Verizon.
- A. Verizon does not have any forms, as Lifeline is self-certified in Verizon's territory here.
- (7) Identify parts of the proposed rule Verizon can support. Indicate the parts Verizon objects to and provide any alternatives we might want to see. Provide any suggested wording changes to the rule.
- A. Verizon Florida will continue to provide annual bill inserts (section 25-4.047(3)(d)) and is willing to expand the directory information to cover one full page (currently, we cover one-half page), as the rule would require (section 25-4.047(4) & (5)). Additionally, Verizon Florida has developed fliers for use in publicizing the

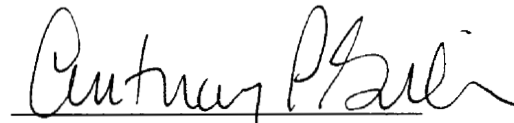
availability of Lifeline service. These could be distributed to (but not limited to) the following: Verizon Phone Marts, state agency offices that administer Lifeline-qualifying programs, legal aid offices, community-based organizations, discount retail locations, food pantries, etc. However, Verizon cannot support the suggested requirements to advertise in radio, television, and newspapers (section 25-4.047(3)(a)(b) & (c)) without any means of recovering the costs of doing so. If the intent of this proposal is to increase participation in these programs, perhaps non-ETCs should also be required to participate (as they do in California).

- (8) Include a copy of what is currently in the directory on Lifeline and Link Up.
- A. See Attachment C.

Respectfully submitted on January 8, 2001.

By:

Kimberly Caswell



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Attorney for Verizon Florida Inc.



In Florida **YOU**

MAY QUALIFY FOR
DISCOUNTS ON PHONE SERVICE

Lifeline discounts can save you \$11.35 per month.

- Lifeline is a federal program that reduces your monthly local phone bill.
- If you receive **SSI, food stamps, Medicaid, HEAP, Federal Public Housing Assistance or Temporary Assistance to Needy Families (TANF)** you are eligible to get Lifeline discounts.

If you are no longer eligible for Lifeline, you can get **Transitional Lifeline** for up to one year, which gives a 30% discount on local service.

There's also a program to help get service installed.

- If you don't have phone service, the **Link-Up** program might help you pay to get connected.

For more information contact:

- your local phone company:
Verizon Customers call 1.800.483.4000

Or look in the customer information guide section of your Verizon directory, or visit www.lifelinesupport.org.

Florida Lifeline Cost Analysis

County	Newspaper	1x Net 1/4 Page B/W		2x Net 1/4 Page B/W	
		Daily	Sun	Daily	Sun
Charlotte	Charlotte Harbor Sun-Herald	\$739	\$810	\$1,479	\$1,620
Hillsborough	Tampa Tribune, Tribune & Times	\$4,326	\$6,045	\$8,652	\$12,090
Manatee	Bradenton Herald	\$808	\$985	\$1,615	\$1,971
	Sarasota Herald-Tribune	\$1,891	\$2,186	\$3,783	\$4,372
Pasco	St Petersburg Times	\$5,485	\$7,421	\$10,970	\$14,841
	Tampa Tribune, Tribune & Times	N/C*	N/C*	N/C*	N/C*
Pinellas	St Petersburg Times	N/C*	N/C*	N/C*	N/C*
Polk	Lakeland Ledger	\$1,534	\$1,623	\$3,067	\$3,246
Sarasota	Sarasota Herald Tribune	N/C*	N/C*	N/C*	N/C*

* No charge, already buying paper for another county

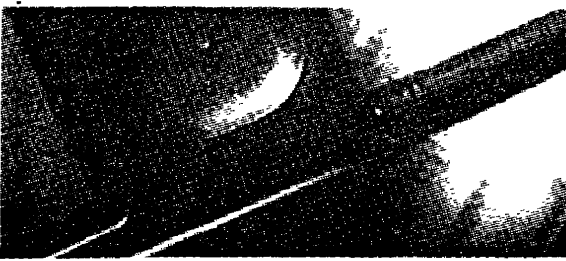
Florida Lifeline Cost Analysis

<u>County</u>	<u>TV DMA</u>	<u>Total Cost/ Quarter</u>				
		<u>1Q</u>	<u>2Q</u>	<u>3Q</u>	<u>4Q</u>	<u>Year</u>
Hillsborough	Tampa- St. Pete., Sarasota	\$3,069	\$4,604	\$3,410	\$4,263	\$15,345
Pinellas	Tampa- St. Pete., Sarasota	N/C*	N/C*	N/C*	N/C*	N/C*
Manatee	Tampa- St. Pete., Sarasota	N/C*	N/C*	N/C*	N/C*	N/C*
Sarasota	Tampa- St. Pete.	N/C*	N/C*	N/C*	N/C*	N/C*
Polk	Tampa- St. Pete., Sarasota	N/C*	N/C*	N/C*	N/C*	N/C*
Pasco	Tampa- St. Pete., Sarasota	N/C*	N/C*	N/C*	N/C*	N/C*
Charlotte	Ft. Myers- Naples	\$882	\$1,323	\$980	\$1,225	\$4,410

* No charge for Pinellas, Manatee, Sarasota, Polk or Pasco when buying TV for Hillsborough County as they are covered by the same stations

<u>Radio Metro</u>	<u>Total Cost/ Quarter</u>				
	<u>1Q</u>	<u>2Q</u>	<u>3Q</u>	<u>4Q</u>	<u>Year</u>
Tampa- St. Pete., Clearwater	\$774	\$860	\$1,161	\$1,075	\$3,870
Tampa- St. Pete., Clearwater	N/C**	N/C**	N/C**	N/C**	N/C**
Sarasota - Bradenton	N/C**	N/C**	N/C**	N/C**	N/C**
Sarasota - Bradenton	N/C**	N/C**	N/C**	N/C**	N/C**
Lakeland- Winter Haven	N/C**	N/C**	N/C**	N/C**	N/C**
Tampa- St. Pete., Clearwater	N/C**	N/C**	N/C**	N/C**	N/C**
none	\$225	\$250	\$338	\$313	\$1,125

** No charge for Pinellas, Manatee, Sarasota, Polk or Pasco when buying Hillsborough County. Note that top stations in Tampa- St. Pete., Clearwater radio market covers Sarasota- Bradenton and Lakeland - Winter Haven



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ATTACHMENT C



Installation Charges

There is a charge to start your new telephone service. Please talk to GTE's Customer Contact Center to find out the charges in your area. Installation charges generally appear on your first telephone bill.

Lifeline and Link-up programs help make telephone service more affordable.

With Lifeline and Link-up programs, qualified residential telephone customers receive a discount on the installation for new service and/or discount on their monthly local telephone service. You may be eligible to receive Lifeline service at a reduced rate, even if you have prior unpaid telephone bills and do not have telephone service today.

Qualifiers

Residential customers who receive any of the following:

- Temporary Assistance for Needy Families (TANF)
- Medicaid
- Federal Public Housing Assistance (Section 8)
- Supplemental Security Income (SSI)
- Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)

Lifeline Service

Helps make residential local telephone service available to people who might not be able to afford phone service. If you qualify for Lifeline Assistance, you will receive a credit in the amount of \$10.50 on your GTE monthly phone bill.

Toll blocking service is available to Lifeline customers at no charge.

Link-up

Provides for a discount of 50% of installation charges, up to \$30, for new service at your primary place of residence.

For more information call GTE at **1-800-483-4000**.

GTE will periodically verify your eligibility with your appropriate government agency.

Billing

If you have billing questions, please contact us at one of these toll-free numbers:

- Residential customers **1-800-483-3000**
- Business customers **1-800-483-5000**

Text Telephone (TTY) customers call GTE through the Florida Relay Service. (Please see pages 33-34 for calling instructions.)

For your convenience, you can also use GTE's automated system to check the status of your bill; find the payment location nearest you; and make payment arrangements. Before you call, please locate your customer ID number. You'll find it on the first page of your bill next to your telephone number. The automated system is accessed by calling the telephone number (listed above) for residential customers. (This service is only available to residential customers.)

You are billed monthly. Look for standard charges, including local service (billed one month in advance), long-distance calls (if applicable), optional services, and any past due amount. Your first bill will also include charges for installation costs and prorated local service. You are responsible for all long-distance calls made from a telephone number for which you have billing

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Comments of Verizon Florida Inc. in Docket No. 001589-TL were sent via U.S. mail on January 8, 2001 to the parties on the attached list.



Kim Kimberly Caswell

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