



January 8, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL. 32399

Re: Docket No. 001589-TL, Rule No. 25-4.047 Eligible Telecommunications Carrier (ETC)
Information Requirements for Lifeline and Link Up Service

Dear Ms. Bayo:

Enclosed for filing please find an original plus five copies of TDS TELECOM's post workshop
comments, to the above reference rule.

Questions regarding this filing may be directed to me at (850) 875-5207.

Sincerely,

Thomas M. McCabe
Manager-External Relations
TDS TELECOM/Quincy Telephone Company

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**Before the Florida Public Service Commission
Post Workshop Comments
TDS TELECOM/Quincy Telephone Company**

Docket No. 001589-TL
Revision of Rule 25-4.047,
Eligible Telecommunications Carrier (ETC)
Information Requirements for Lifeline and
Link Up Service

TDS Telecom/Quincy Telephone Company hereby submits their post workshop comments in response to the Florida Public Service Commission (FPSC) rule development workshop concerning information requirements for Lifeline and Link Up Service. TDS TELECOM supports the Commission's intent to increase participation in Lifeline and Link Up service. However, TDS TELECOM/Quincy believes that section 25-4.047 (3)(a), (b), and (c) are cost prohibitive to telecommunications carriers like TDS TELECOM and recommends they be omitted from the proposed rules.

Rule 25-4.047

In general, TDS TELECOM supports the proposed rules aimed at increasing subscribership for Lifeline and Link Up services. However, TDS TELECOM believes that the local governmental agencies that provide assistance to those that may be eligible to receive Lifeline and Link Up services are in the best position to help increase subscribership. TDS TELECOM recommends that the FPSC continue its efforts to work with these agencies in order to promote these services. Additionally, TDS TELECOM will provide the necessary forms to the agencies in order for customers to subscribe. However, we believe it is essential that the eligibility of Lifeline and Link Up recipients be verified in order to prevent misuse of these important services.

As currently drafted, TDS TELECOM is in compliance with most of the rules such as annual bill insert and directory advertising. Additionally, TDS TELECOM does not see any problems with the reporting requirements proposed in Section (7) (a-i). This information has been provided to the Commission in the past and should be readily available. However, TDS TELECOM recommends that the Commission omit section 3 (a), (b), and (c) which relates to advertising the availability of Lifeline and Link Up services via television, radio and newspapers.

TDS TELECOM operates with a very limited advertising budget that is used to promote our services to 110 local operating companies in 27 States. Today, the majority of TDS TELECOM's advertising budget is used for customer bill inserts. On occasion, radio advertising has been used in Quincy but has not been used for some time. TDS TELECOM believes that television and radio advertising is cost prohibitive especially too small local exchange companies. Although TDS TELECOM does not believe that

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advertising in the local newspaper will significantly increase customer subscribership for Lifeline and Link Up services, TDS TELECOM can support this section of the rule. As an alternative to using newspaper advertising, TDS TELECOM recommends that where possible, companies advertise the availability of these services at the local offices. TDS TELECOM believes that a one-size fits all approach does not take into account local conditions. TDS TELECOM believes that the cost for newspaper advertising can be better utilized with developing advertising to be used in the local office. TDS TELECOM/Quincy is different than most local exchange companies in that the company has a very high percentage of its customers that pay their monthly bill at the local office. Through advertising the availability of these services in the local office, TDS believes that it will reach a much larger audience.

Conclusion

TDS TELECOM supports the intent of the proposed rule. However, we believe that the rule as it currently exists will not be cost-effective, and will not provide any measurable benefits to increasing the subscribership of Lifeline and Link Up services. TDS believes that local government agencies that provide assistance to those that may be eligible to receive Lifeline and Link Up service are in the best position to increase subscribership. TDS is willing to provide the necessary forms to these agencies in order for eligible subscribers to receive these services. However, we believe that companies should be able to require verification of eligibility to protect against fraud.

Additionally, TDS TELECOM supports the proposed rule as currently drafted with the exception of the media advertising requirements. We believe that such a mandate would be cost prohibitive. Additionally, we believe the money that would be necessary for media advertising could be better utilized through advertising in the local office. A high percentage of customers visit the Quincy local office every month in order to pay their bills. We believe that focusing these advertising dollars on posters and pamphlets in the local office would better meet the needs of our customers. If the FPSC believes that some local media advertising is necessary we believe it should be limited to newspaper advertising.