

ORIGINAL

Matilda Sanders

From: Fatool, Vicki [Vicki.Fatool@BellSouth.com]
 Sent: Thursday, September 02, 2004 11:05 AM
 To: Filings@psc.state.fl.us
 Subject: 040451-TP BST's Post Workshop Comments
 Importance: High

A. Vicki Fatool
 Legal Secretary to Nancy B. White
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
 (305) 347-5560
vicki.fatool@bellsouth.com

B. Docket No.: 040451-TP – Petition by Citizens of Florida to initiate rulemaking that would require local exchange telecommunications companies to provide Lifeline service within 30 days of certification.

C. BellSouth Telecommunications, Inc.
 on behalf of Nancy B. White

D. 8 pages total (including letter, certificate of service, comments and attachment)

E. BellSouth Telecommunications, Inc.'s Post Workshop Comments

<<040451-T.pdf>>

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FPSC-COMMISSION CLERK

Nancy White.
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

September 2, 2004

Mrs. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

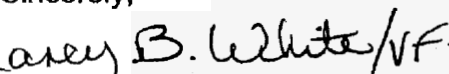
Re: **Docket No. 040451-TP**
Petition by Citizens of Florida to Initiate rulemaking that would require local exchange telecommunications companies to provide Lifeline service within 30 days of certification

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Post Workshop Comments, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Nancy B. White

Enclosures

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

**CERTIFICATE OF SERVICE
DOCKET NO. 040451-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 2nd day of September, 2004 to the following:

Samantha Cibula
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Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6202
scibula@psc.state.fl.us

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Nancy B. White

1. Enrollment Process

Applies through the Office of Public Counsel

Existing and New Customers

On a weekly basis, OPC provides BellSouth with a spreadsheet that lists new applicants who qualify for the Lifeline/Link-Up program through an income based criterion which is 125% of the federal poverty guidelines. The BellSouth service representative checks the names on the list to see if the customer has an order on hold with BellSouth. If the customer's order is on hold, and there are no outstanding final bills with BellSouth, then the service representative adds the Link-Up/Lifeline to the customer's order and releases the order. Once the list is received, it takes, at most, 3 to 5 business days to add Link-Up/Lifeline to all of the accounts on the list. Of course a Link-Up credit will not apply to a customer with existing working service; only the Lifeline credit would apply. BellSouth then returns the spreadsheet via e-mail to Ms. Wynn in the Public Counsel's office, indicating the status of the implementation of the Link-Up/Lifeline credit for each customer on the list.

| If the OPC sends proof of eligibility, but the customer does not have service currently with BellSouth, then there is nothing that BellSouth can do at that point. If the customer obtains certification under the state means test prior to applying for service with BellSouth, then the customer's name should appear on OPC's list. However, the customer's name does not continue to appear on the OPC list week after week. Therefore, depending on when the customer contacts BellSouth for service, the customer's name may not appear on the OPC list. In other words, when our Albany office receives the OPC list, and if at that time the customer does not have an order on hold but subsequently places an order, we do not go back and check the previous lists sent by the OPC. This is not a problem since the customer receives a letter from the OPC verifying proof of eligibility and provides the contact information for the local telephone company. The customer can fax or mail a copy of the letter to our Albany office. BellSouth has not experienced an occasion where Link-Up/Lifeline has been denied for a customer that certifies using the OPC process as described above (i.e., provides BellSouth with letter received from OPC as proof of eligibility.)

BST's Lifeline Application/Certification Process

When an end user calls the BellSouth business office, the end user may advise the representative that he/she wants to apply for Lifeline, or during discussions with an end user, a BellSouth representative believes that the end user may qualify for Lifeline, the representative advises the customer about the availability of Lifeline/Link-Up. In either case, the representative will advise the customer to fax or mail proof of eligibility to the BellSouth's Albany Regional Support Center (the representative will provide the fax number & mailing address at that time.)

Once the Albany Regional Support Center receives an end users request for Lifeline, the clerical person identifies the document as a Lifeline request. It is tracked in a spreadsheet and then placed in queue to be worked by a service representative. Next, the service representative assigned to that request will evaluate the document and determine if it meets the eligibility criteria as outline in Table I below. If the documentation meets the eligibility criteria, the representative adds the Lifeline discount to the account

and documents the account. If the documentation does not meet the eligibility criteria, the representative sends a rejection letter (Attachment I) to the customer advising what is needed to process their request. An insert listing acceptable Lifeline qualifying eligibility programs and a return envelope are included with the letter. The customer's records are documented as to what action was taken regarding the request.

If the customer has a pending order, but has an outstanding final bill with BellSouth, the customer may require special handling. If a customer has an outstanding final bill with BellSouth, pursuant to section A3.31 of BellSouth's GSST tariff, the customer may obtain local service with toll blocking at no charge, and the toll blocking shall not be removed prior to receipt of full payment of all outstanding toll charges. The outstanding regulated non-toll balance may be paid in up to twelve installment payments with a minimum per month payment of \$5.00. The deposit requirement in the tariff is not applicable to a Lifeline customer who subscribes to toll blocking. However, if a Lifeline customer removes toll blocking prior to establishing an acceptable credit history, a deposit may be requested. Additionally, pursuant to section A4.2.7 of BellSouth's GSST tariff, if a Lifeline customer chooses to pay his non-recurring charges in up to 12 monthly installments, the installment billing fee of \$1.00 is not applicable.

BellSouth does not specify a specific period of time between the establishment of Lifeline eligibility and an application for telephone service. However, if the BellSouth service representative checks the customer's name on the OPC list, and finds that the customer does not have an order on hold with BellSouth, there is nothing more that BellSouth can do until such time as the customer calls to place an order. When the customer subsequently places an order, BellSouth does not go back to previous lists sent by the OPC. However, the customer can provide BellSouth the proof of eligibility letter that was provided to them by the OPC when they apply for service with BellSouth.

2. Program Verification Process to Ensure Eligibility of Participants

- 1. Time period between acceptance and verification**
- 2. Statistical sampling method**
- 3. Frequency of periodic verification**

BellSouth recommends that Lifeline eligibility for end users be verified on an annual basis. BellSouth currently is working on a verification process with the Florida Department of Children and Families that provides for the verification process that is required by the FCC. If the end user's eligibility is not confirmed by the verification process, a letter is sent to the end user asking them to contact BellSouth within 60 days of the date of the letter to provide proof of eligibility under any of the criteria listed in the letter. If no response is received from the end user, a letter is sent to the end user explaining that based on their previous eligibility in one of the required programs, a Lifeline credit has appeared on their monthly bill. While this credit has been discontinued, a Lifeline Transitional Discount of 30% plus tax will be applied to the customer's basic residential line. The Lifeline Transitional Discount will continue for 12 consecutive months and will appear on the bill under monthly service charges.

Listed below are the various programs along with a description of the type of eligibility criteria required to enroll in Link-Up/Lifeline in Florida.

Table I – Lifeline Eligibility Criteria

Type of Verification	Description
Medicaid	A current copy of your Medicaid eligibility/award letter.
Food Stamp Card	Send your Food Stamp Eligibility letter, referred to as "Notice of Case Action" or Copies of the food stamp card, food stamp debit card and a current grocery receipt.
Supplemental Security Income (SSI)	Send your annual "Statement of Benefits." It is sometimes referred to as an "SSI Award Letter".
Temporary Aid to Needy Families (TANF)	Send your most current "Statement of Benefits."
Low Income Home Energy Assistance Program (LIHEAP)	Send most recent copy of "proof of eligibility".
Federal Public Housing (FPH)	Must have Federal Public Housing on the letter. Section 8 housing also applies.
State Means Test	Application should be made directly to the Florida Office of Public Counsel.

3. Establishment of Lifeline subscribership Goals

- 1. Company versus statewide goals**
- 2. Incentive or penalty depending on whether goal is met**

BellSouth does not believe that goals for Lifeline subscribership should be set. It is difficult to determine the number of total eligible customers in Florida due to the duplication of applicants under various programs. BellSouth does not believe that penalties should be assessed if a goal is set and not met. Moreover, if the local exchange company has done everything within its power to make the process simple and has encouraged Lifeline participation, the local exchange company should not be penalized for what, at the end of the day, is something over which it has no control.

4. SHOULD RURAL ETCS BE TREATED DIFFERENTLY FROM NON-RURAL ETCS?

1. Definition of Rural ETC

An ETC would qualify as rural if the study area served met the following definition as set forth by the FCC:

Based on a Joint Board recommendation, in 1997 the Federal Commission adopted, for universal service purposes, a definition of rural carrier that mirrored the definition of "rural telephone company" found in section 153 of the Act. *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 8943-44, para. 310 (1997) (*Universal Service First Report and Order*). Pursuant to this definition, a rural telephone company is a local exchange carrier operating entity to the extent that the entity:

(1) Provides common carrier service to any local exchange carrier study area that does not include either:

(i) Any incorporated place of 10,000 inhabitants or more, or any part thereof, based on the most recently available population statistics of the Bureau of the Census; or

(ii) Any territory, incorporated or unincorporated, included in an urbanized area, as defined by the Bureau of the Census as of August 10, 1993;

(2) Provides telephone exchange service, including exchange access, to fewer than 50,000 access lines;

(3) Provides telephone exchange service to any local exchange carrier study area with fewer than 100,000 access lines; or

(4) Has less than 15 percent of its access lines in communities of more than 50,000 on February 8, 1996.

2. Exempt from state funding

Since the qualifications for all ETCs, whether rural or non-rural, are the same, they should be treated equally as to state or federal support.

3. **Different funding amount**
Response to number 2 above also applies.

5. ADDITIONAL ISSUES

Use of Social Security Number (SSN)

During the workshop, Staff asked if a customer's SSN was required to add Lifeline to their account, and if so, whether the last four digits of the SSN would be sufficient. BellSouth responded at the workshop that it requires the full SSN to add Lifeline to an account. BellSouth does not believe that using the last four digits of the customer's SSN is acceptable. There are several reasons BellSouth requires the SSN. First, the FCC rules allow for only one Lifeline account per household, and per person. Without the full SSN, there is no way for BellSouth to know if a customer is receiving more than one Lifeline credit. Second, BellSouth utilizes the SSN to perform its verification process. Without the full SSN, there will be no central data to use to compare with the State agencies in performing the verification process in order to determine eligibility.

Link-Up Credit in Georgia

Pursuant to Section A4.7.3 of the Georgia tariff, Link-Up Rates and Charges, the tariff states that in addition to the federal credit for Link-Up of 50% or a maximum of \$30.00 for the service installation, the company will provide an additional credit of the remaining balance after the federal credit is applied. This results in a total Link-Up credit of 100% of the applicable service and installation charges from the tariff. This tariff provision has been in the Georgia tariff since the first quarter of 1991. The 100% waiver is a result of a 1990 voluntary settlement between BellSouth and the Georgia Commission.

****Please return this notice with your material so we can promptly process your request****

BellSouth Consumer Support Center
4th Floor
304 Pine Avenue
Albany, GA 31702

September 1, 2004

Customer Telephone No

Dear Customer:

We received your Lifeline Linkup request; however, we need more information before we can process your request. Upon receipt of the requested information, we will be able to process your request to determine whether you are eligible for the Lifeline and/or Linkup credit. The reason your request was not processed is checked below.

- The name on the DSS 8168 form did not match the billing name on the BellSouth telephone account.
- Please provide the applicant's social security number SS# _____.
- Copy received was illegible; please provide a copy of your material that can be read.
- Only one (1) low income credit per household and per billing name.
- Area of eligibility was not designated on the DSS 8168 form.
- You will need to submit the Lifeline/Linkup Eligibility Affidavit.
- Submitted documents do not qualify for discount. Please contact your caseworker and request a DSS 8168 form.
- Qualified program was not selected on the DSS8168. Please contact your caseworker and have the form update and resubmit the DSS 8168 form.
- Remark(s): None
- Other:

Enclosed are the lifeline/linkup guidelines. Following these guidelines will ensure the information you provide is accurate and complete. This will enable us to process your request more quickly. A self-addressed envelope has been provided for your convenience. We appreciate you choosing BellSouth.

Sincerely,

Specialty Representative

BellSouth Consumer Service Representative