



RECEIVED-FPSC

10 SEP 30 AM 10: 05

COMMISSION CLERK

September 30, 2010

Via Hand Delivery

Ms. Ann Cole, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

CLAIM OF CONFIDENTIALITY  
 NOTICE OF INTENT  
 REQUEST FOR CONFIDENTIALITY  
 FILED BY OPC  
FOR DN 08162-10, WHICH IS IN LOCKED STORAGE. YOU MUST BE AUTHORIZED TO VIEW THIS DN. - CLK

RE: LifeConnex Telecom, LLC's Response to Staff's 2010 Local Competition Data Request and Claim of Confidential Treatment of Certain Portions Thereof Pursuant to Section 364.183(1), Florida Statutes, Docket No. 100000-OT

Dear Ms. Cole:

Pursuant to Section 364.183(1), Florida Statutes, LifeConnex Telecom, LLC (LifeConnex) requests confidential classification for certain portions of its response to Staff's 2010 Local Competition Data Request. The response was originally provided on September 3, 2010 and a confidentiality request was inadvertently omitted. Thus, it is submitted herewith and LifeConnex requests that the identified information be maintained as confidential.

Pursuant to Rule 25-22.006(5), F.A.C., enclosed please find two copies of LifeConnex's public responses and a sealed envelope marked "CONFIDENTIAL" which contains one copy of LifeConnex's confidential responses. As required by Rule 25-22.006(5), Florida Administrative Code, confidential information has been highlighted, while such information has been redacted from the public responses.

Pursuant to §364.183(1), Florida Statutes, LifeConnex claims that the highlighted portions of the paper copies in the sealed envelope are confidential and proprietary business information belonging to LifeConnex that should be kept confidential and exempt from public disclosure.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

DOM  
ORA  
ECR  
ADL  
JAD  
SAC  
ADM  
OPC  
CLK

850.681.3828  
850.681.3788 fax  
118 N. Gadsden Street  
Tallahassee, Florida 32301

DOCUMENT NUMBER - DATE

08161 SEP 30 09

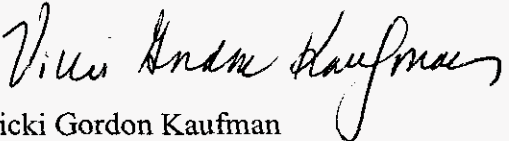
Fort Walton Beach | Destin | DeFuniak Springs | Tallahassee | Crestview

FPSC-COMMISSION CLERK

Ms. Ann Cole  
September 30, 2010  
Page Two

Thank you for your assistance with this filing and please do not hesitate to contact me if you have any questions.

Sincerely,

  
Vicki Gordon Kaufman

VGK/bjd

Enclosures

cc: Beth Salak (letter only, via e-mail)  
Christina B. Sutch  
Michele Studstill

**REDACTED**

CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2010

To assist the Public Service Commission (Commission) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Link-Up and Lifeline programs as required by Chapter 364.10, Florida Statutes, we request that you provide responses to the following by September 3, 2010.

For items 1 through 16, please provide the data for the fiscal year July 1, 2009, through June 30, 2010.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

**AMERICAN DIAL TONE, INC. ("ADT")**

1. The number of residential access lines in service each month.

June, 2009		
July, 2009		
August, 2009		
September, 2009		
October, 2009		
November, 2009		
December, 2009		
January, 2010		
February, 2010		
March, 2010		
April, 2010		
May, 2010		
June, 2010		

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

June, 2009		
July, 2009		
August, 2009		
September, 2009		
October, 2009		
November, 2009		
December, 2009		
January, 2010		
February, 2010		
March, 2010		
April, 2010		
May, 2010		
June, 2010		

3. The number of customers participating in Link-Up each month. Note: Do not include customers receiving Link-Up through resold access lines.

June, 2009		█
July, 2009		█
August, 2009		█
September, 2009		█
October, 2009		█
November, 2009		█
December, 2009		█
January, 2010		█
February, 2010		█
March, 2010		█
April, 2010		█
May, 2010		█
June, 2010		█

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

***Reasons would be inclusive of all mentioned above and also failure to produce a LifeLine Certification form and customers living in areas not serviced by ADT.***

June, 2009		█
July, 2009		█
August, 2009		█
September, 2009		█
October, 2009		█
November, 2009		█
December, 2009		█
January, 2010		█
February, 2010		█
March, 2010		█
April, 2010		█
May, 2010		█
June, 2010		█

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

June, 2009	
July, 2009	
August, 2009	
September, 2009	
October, 2009	
November, 2009	
December, 2009	
January, 2010	
February, 2010	
March, 2010	
April, 2010	
May, 2010	
June, 2010	
July, 2010	

6. The number of Link-Up customers added each month. Note: Do not include customers receiving Link-Up through resold access lines.

June, 2009	
July, 2009	
August, 2009	
September, 2009	
October, 2009	
November, 2009	
December, 2009	
January, 2010	
February, 2010	
March, 2010	
April, 2010	
May, 2010	
June, 2010	
July, 2010	

7. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines.



October, 2009		
November, 2009		
December, 2009		
January, 2010		
February, 2010		
March, 2010		
April, 2010		
May, 2010		
June, 2010		

8. The number of Lifeline customers subscribing to bundled service packages each month. Please list each bundled package separately including the ancillary services contained in each.

[REDACTED]

9. The number of customers participating in Transitional Lifeline each month.

[REDACTED]

10. The number of customers participating in Lifeline under the Tribal Lands provision each month.

[REDACTED]

11. The number of Lifeline customers added each month through the income-based enrollment process.

**Criteria Used: Participated in a LifeLine Program being one of the following: Household Income, Supplemental Security Income, Temp Aid For Needy Families, Public Housing, and/or LIHEAP**

June, 2009		
July, 2009		
August, 2009		
September, 2009		
October, 2009		
November, 2009		
December, 2009		
January, 2010		
February, 2010		
March, 2010		
April, 2010		
May, 2010		
June, 2010		

12. The number of Lifeline customers added each month through the program-based enrollment process.

[REDACTED]

13. The number of Lifeline customers added each month through the Commission's on-line enrollment process.

[REDACTED]

14. The number of Lifeline customers added each month through the Department of Children and Families (DCF) automatic enrollment process.

[REDACTED]

15. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

[REDACTED]

16. Description of your company's procedures for enrolling customers in the Link-Up and Lifeline programs (if same as 2009 response, just note "Same as 2009"). Include the following in your response:

a. Procedures used to process applications received from the Office of Public Counsel.

[REDACTED]

b. Procedures used to process applications received directly from customers.

[REDACTED]

c. Procedures used to process applications received through the PSC on-line process.

[REDACTED]



d. Procedures used to process applications received through the DCF automatic enrollment process.



e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.



17. Description of your company's procedures for performing continued verification of customer eligibility after initial certification (if same as 2009 response, just note "**Same as 2009**"). Include the following in your response:

a. Time period between initial certification and verification.



b. If allowed, the statistical sampling method(s) used to verify customer eligibility.



c. Frequency of periodic verification.





18. Description of each bundled service offering available to Link-Up and Lifeline customers (if same as 2009 response, just note "**Same as 2009**"). Include the following in your response:

a. Applicable recurring and nonrecurring charges.

***There is a onetime nonrecurring connection (NRC) fee of \$60.00 and a monthly recurring charge of \$33.49 (MRC) for Complete Choice Basic service. (Charges are prior to any subsidies or company promotional credits)***

b. Any policy for allowing payment of local usage component of bundled service offering by Lifeline customers to avoid disconnection.

[REDACTED]

c. Any terms and conditions applicable to Lifeline customers that would not apply to general service offering customers.

***Besides what is mandated regarding Link-Up and Lifeline policies regulated by the Florida Public Service Commission and USAC; there are no further terms and conditions applicable.***

19. Description of your company's procedures for promoting Link-Up and Lifeline (if same as 2009 response, just note "**Same as 2009**"). Include the following in your response:

a. Internal procedures for promoting Link-Up and Lifeline.

[REDACTED]

b. Outreach and educational efforts involving participation in community events.

[REDACTED]

c. Outreach and educational efforts involving mass media (newspaper, radio, television).

***Please see attached mass media print copy and television commercial.***

d. Copies of Link-up and Lifeline outreach materials of your company.

***Please see attached sampling of the outreach materials sent to organizations to promote the Link-up and Lifeline program.***

e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Link-Up and Lifeline.

[REDACTED]

[REDACTED]

20. Description of procedures associated with enrollment of Link-Up and Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:

a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.

**Eligible customers will receive a bill reflecting the \$30.00 Link Up credit and a \$30.00 company promotional credit as a line item credit towards the \$60.00 activation fee. The Lifeline credit of \$13.50 composed of the \$10.00 USAC credit and a \$3.50 company credit for eligible customers is reflected in a line item credit towards the customer's monthly service charge.**

b. Certification and verification procedures and requirements.

[REDACTED]

c. Any other terms and conditions applicable to resellers offering Link-Up and Lifeline that are not imposed on resellers who do not offer Link-Up and Lifeline.

**Besides what is mandated regarding Link-Up and Lifeline policies regulated by the Florida Public Service Commission and USAC; there are no further terms and conditions applicable.**

21. Please describe the training you provide to your customer service representatives regarding Link-Up and Lifeline and provide the script used by your company's representatives.

[REDACTED]

22. Please describe the circumstances in which customer service representatives advise customers that Lifeline and Link-Up is available.

**Customer Service Representatives advise customers that Lifeline and Link-Up is available by asking if the customer qualifies for government assistance by**

qualifying for one of the following:

- **Medicaid**
- **Food Stamps**
- **Temporary Assistance to Needy Families Program (TANF)**
- **Federal Public Housing Assistance (Section 8)**
- **Household Income Based On Federal Poverty Guidelines**
- **Supplemental Security Income (SSI)**
- **Low-Income Home Energy Assistance Program (LIHEAP)**
- **National School Lunch Free Lunch Program (NSLP)**
- **Resident of Federally Recognized Tribal Land**

23. Please provide any link on your Web site that provides Lifeline information.

**Customers can go to ADT's website at <http://www.adttel.com/service.html> for a brief description of the Lifeline program. From this page the customer is able to see the states where Lifeline service is available and download the form to fill out for eligibility.**

24. Does your company provide Lifeline services using its own facilities? If so, describe the facilities in detail, and provide the number of customers provided Lifeline service through these facilities each month.

**Yes, the FCC interpreted the term "facilities" to mean "any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support under section 254(c)(1)." Therefore the leasing of the physical components of the telecommunications network for the transmission or routing of services, whether as UNEs or through commercial agreements, meet the statutory definition of "own facilities" for universal service purposes.**

**The number of customers provided Lifeline service through this facility each month:**

June, 2009		██████████
July, 2009		██████████
August, 2009		██████████
September, 2009		██████████
October, 2009		██████████
November, 2009		██████████
December, 2009		██████████
January, 2010		██████████
February, 2010		██████████
March, 2010		██████████
April, 2010		██████████
May, 2010		██████████
June, 2010		██████████
July, 2010		██████████

25. Does your company provide Lifeline services using unbundled network elements leased from an ILEC? If so, identify the ILECs, and the number of UNE lines leased each

month from each.

**Yes, the ILECs are AT&T and 321 Communications, the number of UNE lines leased each month:**

June, 2009		
July, 2009		
August, 2009		
September, 2009		
October, 2009		
November, 2009		
December, 2009		
January, 2010		
February, 2010		
March, 2010		
April, 2010		
May, 2010		
June, 2010		
July, 2010		

26. Does your company provide Lifeline services using resale Lifeline/Link-Up lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

[Redacted]

27. Does your company receive reimbursement for Toll-Limitation Services (TLS)? If so from who? List a breakdown of incremental costs claimed for providing TLS.

[Redacted]

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

Vicki Gordon Kaufman  
118 N. Gadsden Street  
Tallahassee FL 32301

**Re: Acknowledgement of Confidential Filing in Docket No. 100000-OT**

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on September 30, 2010, in the above-referenced docket.

Document Number 08162-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.