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claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

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September 19, 2011

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Verizon Florida LLC Response - 2011 Lifeline Report Data Request

Dear Ms. Cole:


Attached is Verizon Florida LLC's response to Staff's 2011 Lifeline Report Data Request date August 19, 2011.

The response to Question Nos. 1 and 15 are included in a separate envelope because they include confidential data. Verizon considers this information to be confidential because it contains proprietary information that could be used by competitors to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the information must be kept confidential until returned to Verizon.

If you have any questions or concerns, please feel free to contact me or Frank App at (813) 978-2006.

Sincerely,

COM _____
APA _____
ECR _____
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____


David M. Christian
Vice President - Regulatory Affairs

Enclosure: Confidential Envelope

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RESPONSE OF VERIZON FLORIDA LLC

FLORIDA PSC ILEC LINK- UP AND LIFELINE DATA REQUEST 2011

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

RESPONSE: This information is available in the Schedule 8 reports that have been filed with the *Division of Competitive Markets and Enforcement* under Rule 25-4.0185. The last report filed was for 1st Quarter 2011 and contains access line data through March 31, 2011. Access line data for 2nd quarter 2011 has been included with this filing and provides data through June 30, 2011. Verizon considers this information to be proprietary and confidential.

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.

RESPONSE:

<i>Lifeline Subscribers per Month</i>	
Jul	23,809
Aug	24,121
Sep	24,009
Oct	23,895
Nov	23,712
Dec	23,597
Jan	23,351
Feb	23,081
Mar	22,886
Apr	22,702
May	22,474
Jun	22,307

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

RESPONSE:

<i>Link Up Connection Credits per Month</i>	
Jul	166
Aug	183

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Sep	336
Oct	174
Nov	177
Dec	129
Jan	113
Feb	119
Mar	104
Apr	96
May	86
Jun	70

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).

RESPONSE: The reasons for denial of Lifeline are not tracked. Verizon manually tracked the information provided in denial letters for a brief time after the Commission adopted new policies and procedures in Docket No. 070572. Verizon has not tracked this data on an ongoing basis because of resource constraints and the manually intensive process that would be required.

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.

RESPONSE:

<i>Lifeline Customers Added each Month</i>	
Jul	1,129
Aug	1,487
Sep	1,080
Oct	990
Nov	792
Dec	718
Jan	628
Feb	637
Mar	609
Apr	591
May	561
Jun	482

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

RESPONSE: Please refer to the response for Question No. 3.

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

RESPONSE:

<i>Lifeline Customers Removed each Month</i>	
Jul	490
Aug	541
Sep	594
Oct	566
Nov	452
Dec	376
Jan	382
Feb	407
Mar	374
Apr	345
May	361
Jun	295

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.

RESPONSE:

As of June 30, 2011, 3,955 Verizon Lifeline customers subscribed to bundled packages. However, Verizon does not maintain historical data and does not track the types of bundled packages to which customers are subscribing.

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

RESPONSE:

<i>Transitional Lifeline Subscribers per Month</i>	
Jul	106
Aug	113
Sep	116
Oct	106
Nov	106
Dec	108
Jan	115
Feb	109
Mar	100
Apr	91
May	97
Jun	80

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

RESPONSE:

Tribal Lifeline Subscribers per Month	
Jul	1
Aug	-
Sep	-
Oct	-
Nov	-
Dec	-
Jan	-
Feb	-
Mar	-
Apr	-
May	-
Jun	-

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

RESPONSE: Verizon does not track this data, but obtained the following response from the Office of Public Counsel.

	Approved	Denied	Pending	Withdrawn	Applications Received
Jul 1, 2010 - Jun 30, 2011					
July, 2010	59	10	0	0	60
August, 2010	77	20	0	1	82
September, 2010	67	9	0	2	80
October, 2010	35	12	0	1	36
November, 2010	29	5	0	4	47
December, 2010	36	18	0	1	42
January, 2011	18	20	0	1	35
February, 2011	26	11	0	0	35
March, 2011	30	8	0	1	38
April, 2011	24	10	0	0	28
May, 2011	12	5	3	5	48
June, 2011	31	12	3	2	26

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

RESPONSE: Verizon does not track this data.

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

RESPONSE: Verizon does not track this data.

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

RESPONSE: Verizon does not track this data.

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

RESPONSE: VERIZON PROPRIETARY – Please refer to confidential filing.

16. Description of your company's procedures for enrolling customers in the Link-Up and Lifeline programs (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.
- b. Procedures used to process applications received directly from customers.
- c. Procedures used to process applications received through the PSC on-line process.
- 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.

RESPONSE: Same as 2010.

17. Description of your company's procedures for performing continued verification of customer eligibility after initial certification (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:

- a. Time period between initial certification and verification.
- b. Any statistical sampling method(s) used to verify customer eligibility.
- c. Frequency of periodic verification.

RESPONSE: Same as 2010.

18. Description of each bundled service offering available to Link-Up and Lifeline customers (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:
- a. Applicable recurring and nonrecurring charges.
 - b. Any policy for allowing payment of local usage component of bundled service offering by Lifeline customers to avoid disconnection.
 - c. Any terms and conditions applicable to Lifeline customers that would not apply to general service offering customers.

RESPONSE: Same as 2010.

Verizon does not track the types of bundled packages to which customers are subscribing. In Docket 080278-TP, Verizon agreed to allow Link-Up and Lifeline customers to have regulated telecommunications service packages. Service packages or bundles that include unregulated services such as high speed internet access or television may not be combined with the Lifeline discount. Verizon began this process within the 90 day time period as outlined in the final order. Verizon complies with all regulations regarding payment of the local usage component in order to avoid disconnection.

19. Description of your company's procedures for promoting Link-Up and Lifeline (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:
- a. Internal procedures for promoting Link-Up and Lifeline.
 - b. Outreach and educational efforts involving participation in community events.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
 - d. Copies of Link-up and Lifeline outreach materials of your company.
 - 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.

RESPONSE: Same as 2010.

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.
 - b. Certification and verification procedures and requirements.

- 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.

RESPONSE: Same as 2010.

- (a) All Lifeline and Link-Up credits are passed through to a reseller in the same manner as such items appear on Verizon's retail customer bills.
- (b) Verizon is not aware of what certification and verification procedures are used by resellers when they enroll a customer for Lifeline. The FCC requires that resellers comply with FCC rules 54.405(c), 54.405 (d), 54.409 (d), 54.410, and 54.416 – 54.417(b).
- (c) FCC rules require that Verizon obtain from resellers certification indicating compliance with all FCC Lifeline requirements (FCC Rule 54.417(a)). This is the only additional requirement for resellers who choose to offer Lifeline.

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.

RESPONSE: Same as 2010.

Verizon Consumer Sales and Service representatives receive initial training for handling new orders, which includes an overview of Lifeline. Representatives are instructed where and how to locate Lifeline information in the Verizon on-line reference system, how to process the Lifeline order, including hands-on practice calls, including all appropriate services. The nonrecurring and monthly charges are reviewed with representatives who are advised that they are required to offer the customer information on the eligibility requirements to qualify for Lifeline service.

Representatives receive ongoing training when there are changes to the Lifeline program. Lifeline program updates are communicated to Verizon associates by leader training, Service Alerts, and Methods and Procedures updates. Verizon associates receive timely training on Lifeline and Link-Up processes, regulations and guidelines in team meetings and leader-led training. Program changes are also made available through an internal on-line reference system.

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

RESPONSE: Same as 2010.

If a customer expresses interest in the Lifeline program, a representative will either have the simplified enrollment form mailed to the customer, direct the customer to a Verizon Plus Store to pick up a form or provide the telephone number for the Office of Public Counsel, when appropriate. Customer service representatives may also learn of customer needs by certain comments made or questions asked that may lead them to advise the availability of Lifeline and Link-Up assistance.

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

RESPONSE: WWW.VERIZON.COM/FL A "Lifeline" link is near the top right side of the webpage.

VERIZON CONFIDENTIAL INFORMATION
 Claim of confidentiality made under F.S. 364.183(1) and Rule 25-22.0006(5).

Response to Question #1 - 2011 Lifeline Report Data Request:

Name of Company: Verizon - Florida
 Schedule 8

Month: June 2011

Data reported in Channels (voice grade equivalents)

Exchange	Retail (incl. Official)			Resale			Wholesale Advantage			Pay Phones	Total Lines
	Total	Res	Bus	Total	Res	Bus	Total	Res	Bus		
Grand Total	941,315	580,764	360,551								979,508

VERIZON CONFIDENTIAL INFORMATION

Claim of confidentiality made under F.S. 364.183(1) and Rule 25-22.0006(5).

Response to Question #15 - 2011 Lifeline Report Data Request:

RESELLER CARRIER	JUL10	AUG10	SEP10	OCT10	NOV10	DEC10	JAN11	FEB11	MAR11	APR11	MAY11	JUN11
[REDACTED]												
TOTAL	[REDACTED]											