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Legal Department

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



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For DN 06354-12 which
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September 20, 2012 – VIA OVERNIGHT MAIL

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

RECEIVED-FPSC
12 SEP 21 AM 10:56
COMMISSION
CLERK

Re: Undocketed
CLEC and Wireless Link-Up and Lifeline Data Request 2012

Dear Ms. Cole:

Please find enclosed Verizon Wireless' responses to the subject data request. Also enclosed are an original and 15 copies of a Request for Confidential Classification in connection with the responses. If there are any questions regarding this filing, please call me at 678-259-1657.

Sincerely,

Dulaney L. O'Roark III

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Enclosures

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AFD	_____
APA	_____
ECO	_____
ENG	_____
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IDM	_____
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DOCUMENT NUMBER-DATE

06353 SEP 21 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: CLEC AND Wireless Link-Up and
Lifeline Data Request 2012**

) **Undocketed**
) **Filed: September 21, 2012**

**VERIZON WIRELESS' REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PROTECTIVE ORDER**

Pursuant to Commission Rule 25-22.006, F.A.C., Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of Florida d/b/a Verizon Wireless (Verizon Wireless) seek confidential classification and a protective order for certain information contained in its responses to the above-referenced data request.

All of the information for which Verizon Wireless seeks confidential treatment falls within Florida Statutes section 364.183(3), which defines "proprietary confidential business information" as:

[i]nformation, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Florida Statutes section 364.183(3)(a) expressly provides that "trade secrets" fall within the definition of "proprietary confidential business information." Florida Statutes section 364.183(3)(e) provides further that "proprietary confidential business information" includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

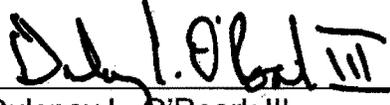
The information for which Verizon Wireless seeks confidential classification appears in its response to Data Request No. 1, which provides Verizon Wireless' residential line counts in Florida. If competitors were able to acquire this information, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon Wireless. This would afford them an unfair advantage while severely jeopardizing Verizon Wireless' competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer.

While a ruling on this request is pending, Verizon Wireless understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

A highlighted copy of the confidential information is attached as Exhibit A. Two redacted copies of the confidential information are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on September 21, 2012.

By:



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Attorney for Verizon Wireless

REDACTED

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of Florida d/b/a Verizon Wireless (Verizon Wireless) is providing the data from its FCC Form 525 filings for the September 2011 and December 2011 numbers. The company was not required to file Form 525 after March 2012, thus the March 2012 and the June 2012 numbers were calculated using the same methodology previous used to prepare the FCC Form 525 filings. Please note that this data reflects residential and single-line business lines active in the Verizon Wireless ETC designated area as of the end of each quarter. The FCC Form 525 is a quarterly report and does not provide monthly totals.

Jul-11	
Aug-11	
Sep-11	XXXXXX
Oct-11	
Nov-11	
Dec-11	XXXXXX
Jan-12	
Feb-12	
Mar-12	XXXXXX
Apr-12	
May-12	
Jun-12	XXXXXX

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL** 1 _____
- CLK _____

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of Florida d/b/a Verizon Wireless (Verizon Wireless) is providing the data from its FCC Form 525 filings for the September 2011 and December 2011 numbers. The company was not required to file Form 525 after March 2012, thus the March 2012 and the June 2012 numbers were calculated using the same methodology previous used to prepare the FCC Form 525 filings. Please note that this data reflects residential and single-line business lines active in the Verizon Wireless ETC designated area as of the end of each quarter. The FCC Form 525 is a quarterly report and does not provide monthly totals.

Jul-11	
Aug-11	
Sep-11	XXXXXX
Oct-11	
Nov-11	
Dec-11	XXXXXX
Jan-12	
Feb-12	
Mar-12	XXXXXX
Apr-12	
May-12	
Jun-12	XXXXXX

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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.

Verizon Wireless response:

Listed below is the number of Verizon Wireless customers participating in Lifeline each month.

Jul-11	18
Aug-11	21
Sep-11	22
Oct-11	20
Nov-11	19
Dec-11	24
Jan-12	27
Feb-12	28
Mar-12	27
Apr-12	26
May-12	29
Jun-12	26

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Listed below is the number of Verizon Wireless customers participating in Link-Up each month.

Jul-11	1
Aug-11	1
Sep-11	0
Oct-11	1
Nov-11	2
Dec-11	2
Jan-12	2
Feb-12	2
Mar-12	0
Apr-12	0
May-12	0
Jun-12	1

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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).

Verizon Wireless response:

Verizon Wireless has not denied any qualifying customers the opportunity to participate in its Lifeline program. Verizon Wireless only tracks customers that qualified for and received Lifeline.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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.

Verizon Wireless response:

Listed below is the number of customers added to Verizon Wireless' Lifeline plan in Florida for each month of the reporting period.

Jul-11	5
Aug-11	6
Sep-11	4
Oct-11	1
Nov-11	2
Dec-11	6
Jan-12	4
Feb-12	4
Mar-12	2
Apr-12	0
May-12	3
Jun-12	0

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Listed below is the number of customers added to Verizon Wireless' Link-Up plan in Florida for each month of the reporting period.

Jul-11	1
Aug-11	1
Sep-11	0
Oct-11	1
Nov-11	2
Dec-11	2
Jan-12	2
Feb-12	2
Mar-12	0
Apr-12	0
May-12	0
Jun-12	0

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

7. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines. Customers moved from Transitional Lifeline should not be included. Customers removed from Lifeline and moved to Transitional Lifeline should be included.

Verizon Wireless response:

Listed below is the number of customers removed from Verizon Wireless' Lifeline plan in Florida for each month of the reporting period.

Jul-11	4
Aug-11	3
Sep-11	3
Oct-11	3
Nov-11	3
Dec-11	1
Jan-12	1
Feb-12	3
Mar-12	3
Apr-12	1
May-12	0
Jun-12	3

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Listed below is the number of customers participating in Verizon Wireless' Transitional Lifeline plan in Florida for each month of the reporting period.

Jul-11	0
Aug-11	1
Sep-11	0
Oct-11	6
Nov-11	5
Dec-11	5
Jan-12	6
Feb-12	5
Mar-12	4
Apr-12	4
May-12	4
Jun-12	3

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Verizon Wireless' current ETC designated area in Florida does not include Tribal Lands.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Verizon Wireless does not resell its Lifeline/Link-up service to other carriers.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

11. Description of your company's procedures for enrolling customers in the Link-Up and Lifeline programs (if same as 2011 response, just note "**Same as 2011**"). 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.
 - f. What company procedures have changed due to the FCC Lifeline Reform?
 - g. Are there any other additional company procedure changes planned due to the FCC Lifeline Reform requirements?

Verizon Wireless response:

- a. Same as 2011.
- b. Same as 2011.
- c. Same as 2011.
- d. Same as 2011.
- e. Same as 2011.
- f. The FCC's Lifeline Reform Order implemented many changes to the Lifeline enrollment process that resulted in Verizon Wireless modifying existing or implementing new procedures including, but not limited to, the following:
 - Verizon Wireless changed its Lifeline certification/re-certification forms to comply with section 54.410.d. of the FCC's revised rules.
 - Lifeline applicants are now required to present proof of participation in a qualifying program at initial signup.
 - Verizon Wireless revised its processes and application materials to reflect the FCC's definition of a Household.
 - Applicants are required to indicate whether their address is temporary or not and, if temporary, to confirm this status every 90 days.
 - The subscriber or member of the subscriber's household can participate in a qualifying program and get Lifeline.
 - Link-Up was eliminated.
- g. When the National Lifeline Accountability Database becomes active Verizon Wireless, will be required to provide and update customer information to the database.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

12. Description of your company's procedures for performing continued verification of customer eligibility after initial certification (if same as 2011 response, just note "**Same as 2011**"). 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.
 - d. What company procedures have changed due to the FCC Lifeline Reform?
 - e. Are there any other additional company procedure changes planned due to the FCC Lifeline Reform requirements?

Verizon Wireless response:

- a. Same as 2011.
- b. Same as 2011.
- c. Same as 2011.
- d. The FCC's Lifeline Reform Order implemented many changes to the annual re-certification process which resulted in Verizon Wireless modifying existing or implementing new procedures including, but not limited to, the following:
 - All Lifeline customers on record as of June 1 of each year must re-certify their eligibility for Lifeline by the end of that year. Verizon Wireless sent letters and re-certification forms to all Lifeline customers on record as of June 1, 2012.
 - Verizon Wireless enhanced its verification form to incorporate the requirements described in section VI.C.2.b. of the FCC's Lifeline Reform Order.
 - Lifeline customers no longer have to provide proof of qualifying program participation or proof of income eligibility for the annual re-certification.
 - Verification reporting will be provided to the FCC, USAC, applicable tribal entities and the appropriate state commission by January 31, 2013.
 - Customers that are believed to be ineligible have 30 days, rather than 60, to prove eligibility.
 - ETC's must remove a customer's Lifeline discount within 5 days of the expiration of the 30-day period.
- e. None

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

13. Description of your company's procedures for promoting Link-Up and Lifeline (if same as 2011 response, just note "**Same as 2011**"). 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.
 - f. What company procedures have changed due to the FCC Lifeline Reform?
 - g. Are there any other additional company procedure changes planned due to the FCC Lifeline Reform requirements?

Verizon Wireless response:

- a. Same as 2011.
- b. Same as 2011.
- c. Same as 2011.
- d. Same as 2011.
- e. Same as 2011.
- f. Changes to the outreach process resulting from the FCC's Lifeline Reform order include, but are not limited to, the following:

Verizon Wireless has revised its marketing materials to incorporate the requirements described in paragraph 275 of the FCC's Lifeline Reform Order.
- g. None.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

14. 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.
 - d. What company procedures have changed due to the FCC Lifeline Reform?
 - g. Are there any other additional company procedure changes planned due to the FCC Lifeline Reform requirements?

Verizon Wireless response:

Verizon Wireless does not resell its Lifeline/Link-up service to other carriers or to customers of other carriers, nor does it purchase Lifeline services from other carriers.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

15. 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.

Verizon Wireless response:

All Verizon Wireless Lifeline customer interactions are handled by a centralized dedicated Lifeline customer care center. New staff members are trained utilizing a "Participant Guide" that provides a detailed description of the Verizon Wireless Lifeline plan, including policies and procedures on a state-by-state basis. Additionally, the staff has Lifeline reference material available online through Verizon Wireless' intranet application. Any ad hoc training requirements resulting from changes in laws, regulations or rules are developed and implemented as needed.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Information about Verizon Wireless' Lifeline offering, including the Florida brochure and application, can be found at:

<http://www.verizonwireless.com/lifeline>

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

17. 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.

Verizon Wireless response:

Verizon Wireless does not resell Lifeline/Link-Up lines obtained from an underlying carrier.

VERIZON WIRELESS

Response to

FLORIDA PSC - CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2012

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

Verizon Wireless response:

Verizon Wireless does not receive reimbursement for Toll-Limitation Services.

EXHIBIT C

CONFIDENTIAL INFORMATION	LINE(S)/COLUMN(S)	REASON
Response to Data Request No. 1	All highlighted information	This information provides Verizon Wireless' residential line counts in Florida. If competitors were able to acquire this information, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon Wireless, affording them an unfair advantage while severely jeopardizing Verizon Wireless' competitive position.