

Eric Fryson

From: McCabe, Thomas M. [thomas.mccabe@tdstelecom.com]
Sent: Tuesday, October 09, 2012 9:43 AM
To: Filings@psc.state.fl.us
Cc: Bob Casey; Bettye J Willis (Bettye.J.Willis@windstream.com)
Subject: RE: TDS Telecom Post Workshop Lifeline Comments
Attachments: TDS Telecom-Windstream Post-workshop comments 10-8-12 (2).doc

Electronic Filing

a. Person responsible for this electronic filing:

Thomas M. McCabe, External Affairs Manager
TDS Telecom/Quincy Telephone
107 W. Franklin St.
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b. _undocketed_ In re: Rule 25.4.0665 TDS Telecom/Quincy and Windstream Florida Post Workshop Lifeline Comments

c. Document being filed on behalf of TDS Telecom

d. There are a total of 2 pages.

e. The document attached for electronic filing is TDS Telecom – Windstream Post Workshop Comments 10-8-12.

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DOCUMENT NUMBER-DATE

06870 OCT-9 2012

FPSC-COMMISSION CLERK

10/9/2012



October 8, 2012

Mrs. Ann Cole
Director Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL. 32399

Re: Proposed Lifeline Rule Changes - Undocketed

Dear Mrs. Cole:

Enclosed for filing are joint comments filed on behalf of TDS Telecom/Quincy and Windstream, Florida.

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

Sincerely,

s/ Thomas M. McCabe

Thomas M. McCabe
Manager- State Government Affairs
TDS TELECOM/Quincy Telephone Company

DOCUMENT NUMBER-DATE

06870 OCT-9 2

FPSC-COMMISSION CLERK

FLORIDA PUBLIC SERVICE COMMISSION

Proposed Amendment of Rule 25-4.0665) Undocketed
F.A.C., Lifeline Service, to Repeal Rule)
25-4.113, Refusal or Discontinuance of)
Service by Company)

**TDS TELECOM/Quincy Telephone Company and Windstream Florida Post Workshop
Comments**

TDS TELECOM/Quincy Telephone Company (“TDS”) and Windstream Florida (“Windstream”) hereby files these post workshop comments on the Florida Public Service Commission’s (“FPSC”) Proposed Amendment of Lifeline Rule 25-4.0665. TDS and Windstream support the FPSC’s intent to amend the Lifeline rules to conform with the FCC Lifeline Order and recent changes to Chapter 364.

While Windstream was unable to participate in the September 19, 2012 staff workshop, TDS participated and both companies support the recommended changes offered at the workshop as well as the written comments following the January 18, 2012 workshop by ATT, Verizon and CenturyLink. In addition, the companies offer the following written comments.

Proposed Changes to Rule 25-4.0665

Rule 25-4.0665(1)(b):

As currently drafted Rule 25-4.0665(1)(b) requires companies with more than 1 million access lines to provide Lifeline service to subscribers whose household income is at or more than 150% of the federal poverty level. While this is consistent with FL Statutes, the FCC Lifeline Order now requires that all Eligible Telecommunications Carriers (ETCs) offer Lifeline to subscribers whose household income is at or more that 135% of the federal poverty level.

TDS and Windstream recommend that the language in this rule be modified to be consistent with FCC order as follows:

(b) The subscribers *local exchange carrier that has been designated as an* eligible telecommunications carrier *that* has more than 1 million access lines and the subscriber’s household income is at or above 150% of the federal poverty income guidelines, *or the subscribers eligible telecommunications carrier has less than 1 million access lines and the subscriber’s household income is at or above 135% of the federal poverty income guidelines.*

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FPSC-COMMISSION CLERK

Given the addition of new competitive ETC's offering Lifeline service, the companies suggest clarifying the rule that the 150% income requirement only applies to local exchange carriers designated as ETC. This is consistent with Florida Statute 364.10.

Rule 25-4.0665(14):

The companies recommend that the following language be removed from the rule:

..., that documentation is necessary for enrollment and that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

The companies acknowledge that the underlined pieces are mentioned in paragraph 275 of the Federal Lifeline Order, however, the language does not appear in the final order. Given that both companies operate in multiple states, it's overly burdensome to have rules that are different from the FCC or other state requirements.

Rule 25-4.0665(15):

It is our understanding based on discussion at the workshop that Rule 25-4.0665(15) page 12 lines 3-5 are suggestions locations for advertisement. The companies recommend that the language be clarified that the locations identified in the rule are merely suggestions.

Rule 25-4.0665(20):

The companies support eliminating the quarterly Lifeline reporting requirements.

Conclusion

TDS and Windstream appreciate the opportunity to provide these post-workshop comments. In addition, we support the suggested changes offered at the workshop as well as the written comments provided by ATT, Verizon and CenturyLink.