

State of Florida



Public Service Commission

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

-M-E-M-O-R-A-N-D-U-M-

DATE: August 10, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula , Office of the General Counsel *S.M.C.*
RE: Docket No. 20040451-TP

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

RECEIVED-FPSC
2018 AUG 10 PM 12: 01
COMMISSION
CLERK

BELLSOUTH

BellSouth Telecommunications, Inc.
Suite 400
150 South Monroe Street
Tallahassee, FL 32301-1556

marshall.criser@bellsouth.com

Marshall M. Criser III
Vice President
Regulatory & External Affairs

850 224 7798
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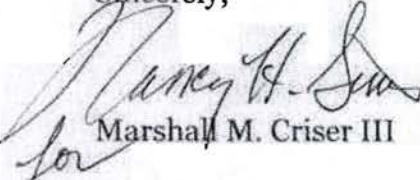
April 19, 2005

Harold McLean
Office of Public Counsel
State of Florida
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, Florida 32399-1400

Dear Harold:

Enclosed is a proposed Commitment on Lifeline/Link-Up Customer Eligibility and Subscription which is intended to resolve any issues regarding your petition filed with the Commission (Dk No. 040451). Although BellSouth does not believe that our actions and protocols have created a barrier to Lifeline subscription, we do believe it is important to put the public on notice as to what our policies are in this area. Please advise if you have any concerns about this proposal or any questions about BellSouth's Commitment on Lifeline/Link-Up Customer Eligibility and Subscription.

Sincerely,


for
Marshall M. Criser III

Attachment

BellSouth's Commitment on Lifeline/Link-Up Customer Eligibility and
Subscription Protocols

Pursuant to discussions with the Office of the Public Counsel and the Florida Public Service Commission BellSouth Telecommunications Inc. (BellSouth) hereby makes the following commitments regarding the sign-up and continued eligibility of BellSouth's customers in Florida who are eligible for Lifeline and Link-Up credits:

(1) BellSouth agrees to provide Lifeline assistance to an existing BellSouth customer who is a new Lifeline applicant within 30 days of receiving certification of eligibility from the Office of Public Counsel. If the Lifeline applicant does not have service with the company when the company receives certification of eligibility, BellSouth will provide service within the same timeframes applicable to non-Lifeline customers and shall provide the applicable Lifeline and Link-Up credit to the customer on the customer's first full billing cycle.

(2) BellSouth will not refuse Lifeline or Link-Up credit to a customer if a customer chooses to purchase optional calling plans or promotional discount packages of services so long as the plan or package includes basic local service. BellSouth reserves the right to modify this commitment to the extent that the Commission makes a determination that such credits are not required to be applied to packages or bundles that include a basic service component.

(3) BellSouth will not refuse to provide a customer Lifeline or Link-Up credit because the customer purchases more than one line from the company. The customer, however, may only receive Lifeline or Link-Up credit for one line.

(4) Unless required by a government agency in order for BellSouth to implement verification procedures pursuant to Docket No. 040604-TL, BellSouth will not require a customer to provide his social security number, to any extent greater than required for establishment of non-Lifeline service.

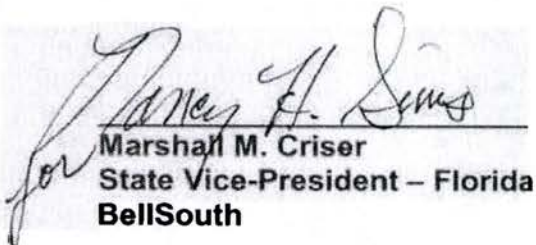
(5) In addition to utilizing and accepting the simplified enrollment form(s) developed pursuant to Docket No. 040604-TL, BellSouth agrees that Public Assistance eligibility determination letters, such as those provided for food stamps and Medicaid, and public housing lease agreements are sufficient proof of eligibility for Lifeline and Link-Up enrollment. BellSouth will not impose additional requirements on customers to prove eligibility for Lifeline or Link-Up.

(6) In accordance with the establishment of simplified certification in Docket No. 040604-TL, BellSouth may verify Lifeline Eligibility periodically, at least once a year, but no more often than every 6 months. The recertification requirements will not be more rigorous than necessary to comply with Commission or FCC requirements consistent with BellSouth's system capabilities in place at the time of any recertification that may occur.

(7) BellSouth agrees that Lifeline or Link-Up customers may submit their eligibility documentation to the company or the Office of Public Counsel via mail, fax, e-mail or hand delivery if available.

(8) BellSouth will not discontinue lifeline assistance to customers without (a) first determining that the customer is no longer eligible for Lifeline, (b) notifying the customer that the company has determined they are ineligible, and (c) providing a sixty day period for the customer to provide proof of eligibility to the company.

(9) BellSouth requires Lifeline accounts to be in the name of the Lifeline eligible subscriber. However, BellSouth will not charge the customer to change the billing name on the account, nor will BellSouth require the customer to have the listing name the same as the billing name. This provision will allow Lifeline customers to retain the listing in the name of a deceased spouse without incurring any extra charges, even if the account is changed to the name of a surviving spouse who is eligible for Lifeline service.


Marshall M. Criser
State Vice-President – Florida
BellSouth

April 19, 2005

David M. Christian
Vice President - Regulatory Affairs



106 East College Avenue, Suite 810
Tallahassee, FL 32301

Phone 850 224-3963
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david.christian@verizon.com

April 22, 2005

The Honorable Harold McLean
Public Counsel
Office of Public Counsel
The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, FL 32399-1400

Re: Verizon's Commitment on Lifeline/Link-Up Customer Eligibility and
Subscription Protocols

Dear Mr. McLean:

Pursuant to recent discussions regarding Lifeline rulemaking Docket No. 040451-TP on March 21, 2005, and on April 19, 2005 in your office, enclosed is Verizon Florida's proposed Commitment on Lifeline/Link-Up Customer Eligibility and Subscription. Also, I have responded to the questions raised during our most recent meeting. I believe that these documents will ensure to the Office of Public Counsel of Verizon's commitment to an effective, barrier-free Lifeline assistance program and will resolve all issues raised in this docket.

Regarding your question as to Lifeline policy disclosures to customers subscribing to bundled services, Verizon immediately discloses that Lifeline discounts are not available on such services. As noted in the attachment, Verizon does not charge a fee or penalty if the Lifeline customer chooses to unsubscribe from the bundled package.

Another question raised was whether customers eligible for Link-Up are informed that their services will not be disconnected for failure to pay the full installation fee while waiting on the Link-Up discount/credit to appear on their bill. Verizon associates cannot automatically determine whether a customer's service will be disconnected for nonpayment of the installation charges on their first bill. This is due to the fact that installation charges may vary in amount depending on what has been ordered, pro-rated charges, outstanding balances, etc. Whether an

account is in danger of being disconnected will depend on the amount of any delinquent balance after the first billing cycle. However, Verizon associates do offer payment arrangements for installation charges to all customers for a two to six month period, depending on the customer's needs.

During our discussion, I agreed to clarify that Verizon provides information regarding Transitional Lifeline Assistance to those customers no longer eligible for traditional Lifeline. Attached is a sample recertification letter which includes that information for the customer.

Verizon continues its commitment to ensuring that Lifeline benefits are administered to all eligible customers in the most efficient manner possible, and I would hope that the issue of closing the docket can now be resolved. If you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David Christian", written over the word "Sincerely,".

David Christian

**Verizon's Commitment on Lifeline/Link-Up Customer Eligibility and Subscription
Protocols**

Pursuant to discussions with the Office of the Public Counsel and the Florida Public Service Commission and the letter to Harold McLean, Dated April 22, 2005, Verizon Florida Inc. (Verizon) hereby makes the following commitments regarding the initial enrollment and continued eligibility of Verizon's Lifeline and Link-Up customers in Florida:

(1) Verizon agrees to provide Lifeline assistance to an existing Verizon customer who is a new Lifeline or Link-Up applicant within 30 days of receiving complete and accurate certification of eligibility from the Office of Public Counsel (OPC). If the Lifeline applicant does not have service with the company when the company receives certification of eligibility, Verizon will provide service within the same timeframes applicable to non-Lifeline customers and shall provide the applicable Lifeline and Link-Up credit to the customer on the customer's bill during the customer's first full billing cycle.

(2) Verizon will provide Lifeline or Link-Up credit to an eligible customer that subscribes to basic local service. No restrictions will be placed on vertical services the Lifeline customer wishes to purchase. However, if an existing customer that subsequently enrolls in Lifeline is currently subscribed to a non-basic service bundle, the customer must either drop the bundled service and

receive Lifeline credit on basic local service only or continue to subscribe to the non-basic bundle and not receive a Lifeline credit. This information is immediately disclosed to the customer. Verizon does not impose fees or penalties if a customer chooses to unsubscribe from the bundled service. Verizon's position is consistent with state and Federal law.

(3) Verizon will not refuse to provide Lifeline or Link-Up credit when the customer purchases more than one line from the company. The customer, however, may only receive Lifeline or Link-Up credit for one line per household.

(4) Unless required by a government agency in order for Verizon to implement verification procedures pursuant to Docket No. 040604-TL, a social security number will not be required, consistent with the current procedures for non-Lifeline customers.

(5) In addition to utilizing and accepting the simplified enrollment form(s) developed pursuant to Docket No. 040604-TL, Verizon agrees that Public Assistance eligibility determination letters, such as those provided for food stamps and Medicaid, and public housing lease agreements are sufficient proof of eligibility for Lifeline and Link-Up enrollment and verification.

(6) If the need arises, Verizon may conduct recertification of Lifeline customers more frequently than once each year. The recertification requirements will not be

more rigorous than necessary to comply with Commission or FCC requirements and will be consistent with Verizon's system capabilities in place at the time of any recertification.

(7) Verizon agrees that Lifeline or Link-Up customers may submit their eligibility documentation to the company via mail, fax, or hand-delivery.

(8) Verizon will not discontinue Lifeline assistance to any customer without (a) determining that the customer may no longer be eligible for Lifeline, (b) notifying the customer that the company has determined the customer may no longer be eligible, and (c) providing a sixty day period for the customer to provide proof of eligibility to the company. Customers no longer eligible for Lifeline are notified of the availability of Transitional Lifeline Assistance and how to receive it in the recertification letter (see attachment).

(9) Verizon requires Lifeline accounts to be in the name of the Lifeline eligible subscriber. However, Verizon will not charge the customer to change the billing name on the account, nor will Verizon require the customer to have the listing name the same as the billing name. For example, this provision will allow Lifeline customers to retain the listing in the name of a deceased spouse without incurring any extra charges, even if the account is changed to the name of a surviving spouse who is eligible for Lifeline service.



May 16, 2005

Dear Verizon customer,

It is again time to re-certify your Lifeline eligibility. Verizon re-certifies all current Lifeline customers periodically to insure that every Lifeline recipient is eligible for discounted basic local residential telephone service. Using the enclosed envelope, please return this form with proof of your eligibility to Verizon no later than July 15, 2005.

Please provide a copy of a document (such as a card or award letter) stating you currently receive assistance under one of the six programs listed below. In addition, please place a check by each of the programs you participate in.

- Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Security Income (SSI)
- Temporary Aid for Needy Families (TANF)
- Federal Public Housing Assistance Program or Section 8.

If your household income is less than 125% of the federal poverty income guidelines you may also qualify for Lifeline. You would need to call the Florida Office of Public Counsel at 1-800-540-7039 for details.

Name: _____
(Please print) (last) (first) (middle) (social security #)

Address: _____
(street) (city) (state) (zip code)

Phone # _____ Daytime Phone # _____
(area code and number) (area code and number)

If Verizon does not receive proof of your Lifeline eligibility by July 15, 2005, the Lifeline discount will no longer be applied to your monthly bill. However, if you no longer qualify for Lifeline, Transitional Lifeline Assistance is available to help you with the transition away from your current Lifeline discount. Transitional Lifeline Assistance offers a 30% reduction of the price of basic local residential service for a one-year period.

If you no longer qualify for Lifeline and do not wish to receive Transitional Lifeline Assistance, there is no need to send us anything. However, if you still qualify for Lifeline or would like to request the Transitional Lifeline Assistance, please check the appropriate box below and return this letter with any attachments in the enclosed envelope.

- I still qualify for Lifeline Assistance and I have attached proof.
- I request Transitional Lifeline Assistance for the one-year period.

If you have any questions, please call our Service Representatives at 1-800-483-4000.

Verizon SRC
MC: FLSP-2193/LL
P.O. Box 11328
St. Petersburg, FL 33733

JAMES E. "JIM" KING, JR.
President



Harold McLean
Public Counsel

STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL

c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
ROOM 812
TALLAHASSEE, FLORIDA 32399-1400
850-488-9330

JOHNNIE BYRD
Speaker



June 2, 2004

David Christian, Regulatory Manager
Verizon Florida, Inc.
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7740

Dear Mr. Christian:

Recent contacts from potential telephone subscribers have drawn our attention to an issue that may impede our mutual goal of giving full effect to the Lifeline and Linkup programs.

The impediment arises in several factual scenarios, which are best illustrated by example:

- 1) A customer qualifies with the Office of Public Counsel (OPC) as eligible for Lifeline/Linkup. The customer then calls the telephone company and is told that they must "front" the money for the connection charges, but that they will receive a credit at some later time; or,
- 2) A customer qualifies with OPC as eligible for Lifeline/Linkup. The customer then calls the telephone company, but finds that he or she has "waited too long" between establishing eligibility and seeking a connection; or,
- 3) A customer qualifies with OPC as eligible for Lifeline/Linkup. The customer then calls the telephone company, is connected but then receives a bill which does not reflect the Linkup credit. The customer calls the telephone company, is told to deduct the Linkup credit, but the customer is terminated at a later time because they failed to pay the entire connection charges.

There are other variations on this theme – a theme which we think could be entirely eliminated by your companies' entering a credit in your billing system when the customer establishes eligibility for Linkup and subscribes to your service such that the customer is relieved of the obligation to front the money in both an economic and cash flow sense.

David Christian, Regulatory Manager
June 2, 2004
Page 2

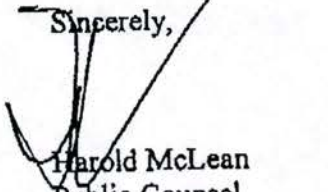
For most of us, the notion that we will receive an eventual credit lessens the burden of putting up front money for all manner of commodities. But Lifeline/Linkup programs are not designed for us: they are designed for folks to whom the promise of an eventual credit is not comfort to meeting ongoing financial obligations. In other words, the real or apparent need to put up all of the front money to establish service is a grave disincentive to many of the folks the Lifeline/Linkup programs were expressly designed to serve.

May I have your thoughts on this issue? I am considering amending our petition for rulemaking (Docket No. 040451-TP), but earnestly hope that you share my concerns on this issue such that we can remedy the situation by agreement.

Each of you will recall a committee appearance in which I was asked specifically whether Lifeline/Linkup was specifically designed to induce folks who might otherwise do so to subscribe to telephone service. In my opinion, the impediment herein discussed is a material reason why we have so few Lifeline subscribers.

Please feel free to call me at any time.

Sincerely,


Harold McLean
Public Counsel



Charles J. Rehwinkel
State Vice President - Florida

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June 9, 2004

Harold McLean
Office of Public Counsel
State of Florida
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, Florida 32399-1400

Dear Harold:

Thank you for your letter of June 2, 2004. I have forwarded the concerns outlined in the letter to the appropriate operations and policy groups for their review and response.

While we have not completed our review of the issues you have raised, our initial review indicates that you have raised legitimate concerns. Sprint believes that we have taken measures to address these issues. Nevertheless we will advise you as soon as possible of our findings, comments and suggestions so that any true impediments to Lifeline service can be removed to the greatest extent possible.

I look forward to working with you on this issue.

Sincerely,

Charles J. Rehwinkel

David M. Christian
Vice President - Regulatory Affairs



106 East College Avenue, Suite 810
Tallahassee, FL 32301

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david.christian@verizon.com

June 30, 2004

The Honorable Harold McLean
Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, FL 32399-1400

RECEIVED

JUN 30 2004

Office of
Public Counsel

Re: Verizon Response to June 2, 2004 Letter

Dear Mr. McLean:

Please accept this response to your June 2, 2004, letter regarding Verizon's Link-Up/Life-Line program.

I appreciate the continued dialog between the Office of Public Counsel and Verizon regarding these important issues. I hope this response will provide you with a better understanding of Verizon's Lifeline and Link-Up enrollment procedures and how we may continue to work together to refine the current program.

First, I would like to clarify one issue that was raised in your correspondence regarding Link-Up. Link-Up is a federal program that is designed to assist low-income customers with the cost of establishing service with Verizon. Verizon's Link-Up program offers a 50% discount of the \$55 initial service connection fee for eligible customers, including customers eligible under the OPC income procedures. Link-Up is a separate program from Lifeline that is intended to provide a credit and/or a deferred schedule of payments to help defray the cost of the installation and connection charges applicable to the establishment of residential service. It's important to note that a customer must have an active account before Lifeline credit will be applied by Verizon.

Even with the full Link-Up credit, a remaining balance of \$27.50 is due from the customer. However, Verizon will permit customers to pay the service connection charge in equal monthly installments over a period of at least three months, per FPSC Rule 25-4.108. Verizon also will extend the installments for three additional months at the customer's request. The payments would average \$4.58 per month over a six month period. If the customer qualifies for the Link-Up credit, the credit will be applied to their account after the

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Verizon Response
June 30, 2004

order is issued by the Verizon Support and Response Center (SRC), a special center dedicated to processing all Lifeline and Link-Up inquiries.

It may be worthwhile to share with customers who contact OPC that Verizon offers a deferred payment plan for service connection charges. Additionally, the following points below highlight the current procedures Verizon follows for establishing service and providing Link-Up credit.

- A customer approved for Lifeline by OPC that does not currently have service must first call Verizon's Customer Service Support Center (CSSC) to set-up their account. At that time, a Verizon Representative will inform the customer of the \$55 service connection fee that is required to set-up the account. The CSSC does not process Lifeline or Link-Up requests and will be unable to assist the customer further with regard to any credits he/she may be eligible to receive.
- The Lifeline eligible customer could request a deferred payment scheduled when speaking with the Verizon Representative. If payment arrangements are not made by the customer at the time of establishing service, the total charge of \$55 will apply on the first bill statement.
- After setting up the account, the customer should contact your office indicating that service has been established. OPC would then submit the customer's information to Verizon for processing of the Lifeline and Link-Up credits immediately after confirming with the customer that service has been established.
- Following receipt of the customer's information (and after service has been established), Verizon will do two things: 1) apply the Lifeline credit on the customer's account retroactive to the date first certified by OPC; and 2) apply the Link-Up credit if applicable.

With regard to the scenarios you outlined in your letter, Verizon believes these issues are not indicative of Verizon's Lifeline and Link-Up procedures, and hopefully any misunderstandings can be avoided in the future. With regard to the three scenarios noted in your letter, I have addressed each one individually.

1) A customer qualifies with the Office of Public Counsel as eligible for Lifeline/Link-Up. The customer then calls the telephone company and is told they must "front" the money for the connection charges, but that they will receive a credit at some later time.

Page 3

Verizon Response

June 30, 2004

Response:

Under Verizon's procedures eligible customers will be placed on Lifeline service with no further action required by the customer, if all of the information submitted by OPC is accurate and complete, service has been established, and the customer does not have a Verizon calling package. The Lifeline credit is applied to their account once notice is received by Verizon from OPC. However, if a customer does not have an account with Verizon, they must first establish phone service with Verizon before any credits are applied. As discussed above, Link-Up credits will be applied following the establishment of service, and customers who qualify for Link-Up are required to pay some establishment charges. However, the customer impact to "front" any money is lessened with payment arrangements spread over a period of time, up to six months.

When a credit appears on the customer's bill depends upon their billing cycle. Verizon's billing procedures are cyclical in nature. Each customer is assigned a billing cycle that determines the date the bill is mailed. Even after the customer is enrolled, the credit may not appear on the very first bill after the Link-Up credit is applied to the account.

2) A customer qualifies with OPC as eligible for Lifeline/Link-Up. The customer then calls the telephone company, but finds that he or she has "waited too long" between establishing eligibility and seeking a connection.

Response:

When an eligible customer is approved by OPC and submitted to Verizon, the Lifeline credit is applied to the date the customer is approved by OPC.

It is Verizon's policy that the customer has 90 days to establish service in order to be eligible to receive the Link-Up credit following OPC certification. This is due to a records and system issue that will not be easily addressed.

3) A customer qualifies with OPC as eligible for Lifeline/Link-Up. The customer then calls the telephone company, is connected but receives a bill which does not reflect the Link-Up credit. The customer calls the telephone company, is told to deduct the Link-Up credit, but the customer is terminated at a later time because they failed to pay the entire connection charges.

Response:

Verizon does not automatically disconnect a Lifeline customer for non-payment of connection charges. The remaining balance (\$27.50) may be paid in equal monthly

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Verizon Response
June 30, 2004

installments over a period of at least three months per *FPSC Rule 25-4.108*, and at the customer's request for up to six months. The Lifeline customer will not be disconnected from the Verizon network during this period for non-payment of connection charges. However, if the customer has *not* elected a deferred payment schedule, disconnection is possible if the customer does not remit payment in a timely manner, or call to establish payment arrangements.

Verizon is committed to enrolling all eligible customers in Lifeline. To that end, Verizon would like to offer the following suggestions to OPC to further enhance the established procedures:

- At the point of initial contact with a potential Lifeline customer OPC should inquire if the customer has an active account. If not, the customer will have to first establish service before any credits are applied to the account. To the extent possible, OPC should refrain from submitting any customer information to Verizon until the customer has confirmed with OPC that service has been established. Verizon will not establish service until the customer has contacted the CSSC and placed an order.
- On occasion Verizon has received incorrect information from OPC and cannot process the request to add Lifeline. The name and or telephone number submitted by OPC must match the name on the existing account.
- OPC should submit lists of qualified customers on a weekly basis. More frequent submissions of qualified customers could potentially avoid customer confusion of when credits are applied to an account.

I hope this information will provide you with a greater understanding of our procedures, and that if there are specific concerns with Verizon or the customers we serve that you will contact me immediately for resolution. Please do not hesitate to contact me with any further questions.

Sincerely,

David Christian *DW*

David Christian
Vice President
Regulatory Affairs - Florida

BELLSOUTH

BellSouth Telecommunications, Inc.
Regulatory & External Affairs
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

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Marshall M. Criser III
Vice President
Regulatory & External Affairs

840 224 7798
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RECEIVED

JUL 09 2004

Office Of
Public Counsel

July 6, 2004

Harold McLean
State of Florida, Office of Public Counsel
111 West Madison St.
Room 812
Tallahassee, FL 32399

Dear Mr. McLean,

Thank you for your letter to Mr. Criser of June 2, 2004. Based on the various scenarios that were provided in your letter, BellSouth reviewed its current procedures and processes regarding the implementation of Link-Up and Lifeline. BellSouth has not found any occurrences related to the type of activity that you described. BellSouth makes every effort to ensure that service is established in the most efficient manner for Link-Up/ Lifeline eligible customers, and that the Link-Up and Lifeline credits appear on the bill in a timely manner. To aid in understanding how BellSouth handles the various scenarios you described in your letter, described below are BellSouth's policy and procedures for handling such situations.

On a weekly basis, Ms. Wynn of your office provides BellSouth with a spreadsheet that lists new applicants who qualify for the Lifeline/Linkup program through the 125% of Poverty Level Income criteria. The BellSouth service representative checks the names on the list to see if the customer's have 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 representation adds the Link-up/Lifeline to the customers order and releases the order. Once the list is received, it takes, at most, 3 days to add Linkup to all of the accounts on the list. Of course a Linkup credit will not apply to a customer with existing working service; only the Lifeline credit would apply.

If the customers 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 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

July 6, 2004

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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 have a specified amount of time that a customer must establish Lifeline eligibility and apply 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 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 at such time they apply for service with BellSouth.

As stated above, BellSouth has not found any occurrences related to the type of activity that you described. However, if your office has any specific examples/occurrences that have been brought to your attention, we would be glad to review the specific situation and provide a response. If you have any further questions or concerns, please call me or MaryRose Sirianni at (850) 224-5244.

Sincerely,

Marshall M. Ciseu III MRS

Regulatory Vice President