

JULY 2007



SURVEY OF

Florida ILEC
Initiatives for
Limited
English
Proficiency
(LEP)
Consumers

By Authority of
The State of Florida
Public Service Commission
Division of Competitive Markets and Enforcement
Bureau of Performance Analysis

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**Florida ILEC Initiatives for
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Consumers**

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1.0 Executive Summary

1.1 Objectives

Limited English Proficient (LEP) consumers are individuals who were not born in the United States or whose native language is a language other than English. They are consumers who may face difficulties in speaking, reading, writing, or understanding English, which may be sufficient to deny them the opportunity to fully participate in society.¹ Census data reveals that over 25 percent of Florida's population speaks a language other than English at home. Additionally, more than 11 percent of Floridians report that they speak English less than "very well."²

These Florida LEP consumers face two possible disadvantages in the telecommunications marketplace. LEP consumers may not comprehend information provided by carriers, which may result in poor purchasing decisions. Consumers with language challenges are at risk for consumer fraud by sales representatives using consumer confusion and language barriers in order to make sales. Though instances of such fraudulent practices are rare in Florida, documented cases exist and the potential risk to LEP consumers remains.

A survey of Florida's Incumbent Local Exchange Companies (ILECs) was conducted to determine what initiatives are in place to assist Limited English Proficiency consumers in Florida. The survey objectives were to:

- ◆ Gain general knowledge of the need for LEP customer assistance in Florida;
- ◆ Develop awareness of ILEC initiatives and practices regarding customer education and outreach, customer service, and sales and marketing efforts.

1.2 Scope and Methodology

The survey was conducted in April 2007. The ILECs surveyed included the ten companies currently operating within Florida: AT&T, Embarq, Fairpoint, Frontier, ITS Communications, NEFCOM, Smart City, TDS, Verizon, and Windstream. Information was obtained on current LEP practices regarding customer education and outreach, sales and marketing, and customer service. The survey was a combination of 27 multiple choice and open-ended questions. ILECs were contacted individually to clarify ambiguity in survey responses.

1.3 Conclusion

To fully benefit from an evolving telecommunications competitive market, consumers need to be informed of their options and be able to ask questions. For this reason, customers who have limited proficiency in English face difficult challenges in understanding the complex

¹ Section 9101, Title IX, U. S. Code

² U.S. Census Bureau, 2005 American Community Survey Florida S1601. "Language Spoken at Home"; 2005

telecommunications market. It is an obligation of public trust that every company provides equal access to all telecommunication consumers. To do this, the companies included in this review may need to become more proactive to ensure full awareness of the size and needs of the LEP community. Based on analysis of census data and companies' estimates, staff believes ILECs may be underestimating their LEP populations. However, staff is encouraged to learn from conducting this review that larger ILECs have robust, formal programs and that the smaller ILECs report being capable of responding to LEP needs when requested.

2.0 Background And Perspective

2.1 Florida Census Data

Florida is an ethnically and linguistically diverse state, with a growing immigrant and LEP population. The 2005 U.S. Census Bureau’s American Community Survey data for Florida estimates the state’s population at 17.38 million people. Over 16.8 percent of the population is of Hispanic descent, and Spanish speakers are the largest LEP demographic segment in Florida.

2.1.1 Languages

In 2005, 4.13 million Florida residents, age five or older, spoke a language other than English at home. This represents about one quarter of Florida’s population and is significantly above the U.S. average of 19.4 percent.³

Exhibit 1 shows the increasing trend of individuals who speak languages other than English at home. This trend has experienced a slight, but steady, increase over the past five years. Correspondingly, the percentage of individuals who report that they speak English less than “very well” has been increasing over time. Over 11 percent of Florida’s population over the age of five (1.86 million) describe themselves in this way. **Exhibit 2** reveals the number and percentage of non-English speakers in Florida in 2005.

“ Florida is an ethnically and linguistically diverse state, with a growing immigrant and LEP population.”

Spanish is the most frequently spoken non-English language and comprises 73 percent of all LEP households. Over 3 million people, or more than 1 of every 6 Floridians over five years of age, speak Spanish.

Indo-European languages, including French Creole, are the second largest non-English speaking block in Florida. The group consists of hundreds of related languages and dialects (e.g., Albanian, Armenian, Celtic, Germanic, Greek, Indo-Iranian, and Slavic), most of the major European languages, and several from the Indian subcontinent. Florida Indo-European speakers number 821,535 residents and comprise 19.9 percent of non-English speakers. Asian-Pacific languages (e.g., Chinese, Japanese, Korean, and Vietnamese) are the third largest non-English group in Florida, numbering 210,544 and comprising just over 5 percent of all non-English households.

2000 – 2005 Language Trends in Floridians, over five years of age						
	2000	2001	2002	2003	2004	2005
Floridians Who Indicate They Speak Other than English at Home	23.1%	23.5%	24.1%	24.2%	24.3%	25.4%
Floridians Who Indicate They Speak English Less than “Very Well”	9.7%	10.0%	9.7%	9.7%	10.3%	11.4%

EXHIBIT 1

Source: U.S. Census Bureau, American Community Survey, 2000-2005

³ U.S. Census Bureau, 2005 American Community Survey Florida S1601. “Language Spoken at Home”; 2005

Non-English Languages Spoken in Florida Households 2005		
Language Group	Speakers	Percent of FL Non-English Speakers
Spanish & Spanish Creole	3,013,672	73.0
Indo-European (Includes French Creole)	821,535	19.9
Asian & Pacific Islander	210,544	5.1
Others	82,568	2.0
Florida Non-English Total	4,128,319	100.0

EXHIBIT 2

Source: U.S. Census Bureau, American Community Survey, 2005

2.1.2 Language Proficiency

Lacking the ability to speak English at a high level of understanding becomes critically problematic in daily situations. Non-English speakers may experience diminished access to goods or services compared to English speakers. Additionally, language challenged people more easily become targets for consumer fraud or deceptive advertising.

Nearly half of the more than 3 million Florida residents for whom Spanish is the primary household language (47.5 percent) describe themselves as speaking English less than “very well,” as shown in **Exhibit 3**. Over one in three (37.1 percent) Indo-European speakers, and just under half (45.7 percent) of Florida residents who speak Asian and Pacific Islander languages rate their ability to speak English as less than “very well.”

Non-English Language Proficiency in Florida Households 2005			
Language Group	Primary Language	Speak English Less than “Very Well”	Percentage Less than “Very Well”
Spanish & Spanish Creole	3,013,672	1,431,494	47.5
Indo-European	821,535	304,790	37.1
Asian & Pacific Islander	210,544	96,219	45.7
Others	82,568	24,566	29.8
Florida Non-English Total	4,128,319	1,857,069	45.0

EXHIBIT 3

Source: U.S. Census Bureau, S1601, American Fact Finder; 2005

3.0 ILEC LEP Initiatives

3.1 Overall

AT&T, Embarq, and Verizon have fully developed LEP programs. AT&T and Verizon have created goals, strategies, and procedures for LEP initiatives. Each of the three ILECs has taken steps to identify the specific needs and challenges of LEP customers, and has actively worked with local or national community-based organizations to assist LEP customers.

AT&T, Embarq, and Verizon have estimated the numbers of LEP customers in their service territories, but a fair degree of uncertainty surrounds these estimates. On the survey, each company indicated that the number of LEP customers currently serviced in their respective Florida service areas is “greater than 10,000.” This figure was the highest category available on the survey. Through further inquiry, staff sought to learn whether each company had a more accurate estimate of the number of customers speaking languages other than English, what non-English languages were involved, and the total of customers speaking each language subset.

“ Staff believes that ILECs may be underestimating their LEP populations.”

3.1.1 AT&T

AT&T Florida indicated its LEP efforts pertain primarily to Spanish speaking customers. The company has used customer requests for Spanish language billing and demographic modeling in an effort to accurately determine the number of LEP customers. The company estimates there are slightly more than 1 million Hispanic customers within its Florida service footprint. Of these, the company estimates that 300,000 to 500,000 are limited English proficient. The company further states that it believes that 1 to 2 percent of the entire customer base speak something other than English as a primary language.

3.1.2 Embarq

Spanish is Embarq’s largest LEP language group, and the only LEP subset Embarq has attempted to quantify within its Florida service footprint. Methods employed to accurately estimate the number of LEP customers include self-identification via the language option on the interactive customer service system, as well as requests at account initiation to receive bills in Spanish. Embarq also purchases additional demographic data from Acxiom, a company that offers assistance in identifying customer language preferences. As of April 2007, Embarq estimates that the total number of Spanish dominant customers in its Florida service territory is 144,000. Across their national system, Embarq estimates that 3.4 percent of customers speak Spanish as their primary language and are language challenged. Embarq’s non-English speaking data only concerned customers who speak Spanish. Therefore, Embarq could not provide a more specific estimate of their total number of language challenged customers in Florida.

3.1.3 Verizon

Verizon determined its number of LEP customers by using U. S. Census data, proprietary company information which tags customers’ language preferences, and tracking customer calls to the Multilingual Sales and Service Center. Verizon believes, based on current industry

standards and trends, that the needs of its LEP consumers are being appropriately addressed by company LEP initiatives. The company also stated that the current total of all LEP customers in its Florida service territory may range from 20,000 to 30,000. Spanish is the largest Verizon LEP language group with an estimated 15,000 to 20,000 customers. Other LEP languages in the Verizon Florida service footprint include those in the Asian–Pacific Islander grouping, with 5,000 to 10,000 customers. Verizon estimates that 12 to 15 percent of its Florida customers speak something other than English as the primary language.

Verizon stated that CLECs, intermodal competition, and smaller telecommunications companies specifically targeting the LEP market also play a role in adequately serving LEP needs. Verizon believes that, as a whole, the company recognizes the importance of diversity and strives to meet the needs of consumers.

3.1.4 Other ILECs

ITS reports having 1,000 to 5,000 LEP consumers. The balance of the smaller ILECs reported that they believe there are less than 1,000 LEP customers in their respective service territories. None of the small ILECs has taken steps to comprehensively identify the number or types of LEP consumers. None has taken steps to identify specific LEP needs or worked with community-based organizations to provide customer education or other targeted services. The small ILECs generally state that there has not been a demand for multilingual material.

3.2 Customer Education and Outreach

Customer service and outreach efforts are helpful in orienting new customers, particularly new, non-English speaking immigrants. Outreach efforts can make potential customers aware of solutions to language barriers and can help win business. **Exhibit 4** presents the types of customer education and outreach initiatives directed at LEP consumers for each of the ILECs surveyed.

ILEC Initiatives for LEP EDUCATION AND OUTREACH										
	AT&T	Embarq	Verizon	Fairpoint	Frontier	ITS	NEFCOM	Smart City	TDS	Windstream
Multilingual Brochures	✓		✓							✓
Multilingual Newspaper PSA	✓		✓							
Multilingual Website	✓		✓							
Multilingual TV – PSA	✓		✓							
Community Meetings	✓		✓							
Other	✓									

EXHIBIT 4

Source: ILEC Survey Response, Questions 9-12

3.2.1 AT&T

The AT&T customer education and outreach program provides information to LEP customers in Spanish, Creole, and Vietnamese. Such information includes brochures, print ads, and television or radio public service announcements in one or more of these LEP languages. The AT&T website also offers information in Spanish. AT&T determined which languages to offer education and outreach materials by studying feedback from direct mail campaigns and Spanish-only print, radio, and television advertising.

AT&T stated that weekly meetings are held by sections responsible for non-English education and outreach. The company also analyzes non-English local and long distance calling patterns, internet access, wireless calling, and satellite video product usage in an effort to determine LEP trends and consumer needs. Media used to reach potential LEP consumers residing within the AT&T footprint include television, newspaper and radio ads, direct mailings, and email notices.

AT&T has sponsored community meetings for LEP consumers related to the Lifeline Program. The company also provides education and outreach efforts for business customers in Spanish, Creole, Vietnamese, French, Indian dialects, Egyptian, and German. Additionally, the company has the Pan Asian Council for Employees (PACE) which works with Asian and Pacific Islander LEP customers, as needed. The company also sponsors the *Everybody Wins* reading mentor program in local schools and donates computers to schools with LEP programs.

3.2.2 Embarq

Embarq does not have a dedicated education or outreach program for LEP customers. The company states that while sales and marketing materials are provided in Spanish for LEP customers, the need to create educational materials has not surfaced.

3.2.3 Verizon

Verizon has a multi-faceted education and outreach program dedicated to LEP customers. This education and outreach provides multilingual brochures, newspaper and magazine ads, as well as television and radio public service announcements. The company website is offered in Spanish. The company sponsors community meetings for LEP consumers. Verizon provides education and outreach efforts in both Spanish and Vietnamese. Verizon also has representatives in call centers to service customers speaking Spanish, Russian, Chinese, Korean, and Vietnamese.

The Verizon Foundation supports many company initiatives, including those specifically dedicated to LEP customers. Through this Foundation, Verizon joins programs such as *Lee y Seras (Read and You Will Be)* in partnership with the National Council of La Raza (NCLR) to help LEP consumers learn basic English literacy. The Foundation also supports the *Young Readers* program through the League of United Latin American Citizens (LULAC) and the educational programs of ASPIRA which helps low-income Latinos improve literacy. The Cuban American National Council also receives Foundation support to help at-risk women acquire basic workplace skills, including language.

Verizon does not have a specific manager dedicated to LEP customer education and outreach. However, all Verizon customer service managers and representatives have access to Verizon Information Broker Engine (VIBE). VIBE is a software tool used by service representatives to guide them when speaking with LEP customers. Managers also have access to the Multilingual Sales and Service Center (MSSC) and the Multicultural Marketing Group which can address specific LEP customer needs.

3.2.4 Other ILECs

Windstream is the only small ILEC which states that it has an education and outreach program aimed at LEP customers. The program is focused, offered in Spanish, and consists of brochures that provide information on available Windstream telephone services and consumer rights. The other smaller ILECs address education and outreach on an as-needed basis; most stated that they do not provide non-English education materials because they do not perceive a need for such services.

3.3 Sales and Marketing

All Florida ILECs rely on various marketing efforts to attract and retain customers. Targeted efforts and tailored programs are needed to reach most LEP prospects. **Exhibit 5** represents the LEP sales and marketing program initiatives for each of the ILECs surveyed.

ILEC LEP Programs For LEP SALES AND MARKETING										
	AT&T	Embarq	Verizon	Fairpoint	Frontier	ITS	NEFCOM	Smart City	TDS	Windstream
Multilingual Contracts	✓	✓	✓							
Multilingual Explanation of Terms & Conditions	✓	✓	✓		✓					
Multilingual Explanation of Products & Services	✓	✓	✓		✓	✓				✓
Multilingual Explanation of Costs for Products & Services	✓	✓	✓		✓					
Multilingual Outbound Sales Personnel	✓	✓	✓							
Multilingual Inbound Sales Personnel	✓	✓	✓		✓					
Multilingual Direct Mail	✓	✓	✓							
Multilingual Marketing Website	✓	✓	✓							
Multilingual Sales Materials & Brochures	✓	✓	✓							✓
Multilingual Newspaper Ads	✓	✓	✓							
Multilingual Television Ads	✓									
Multilingual Radio Ads	✓	✓								
Multilingual Community Events	✓	✓								✓

EXHIBIT 5

Source: ILEC Survey Response, Questions 13-18

3.3.1 AT&T

AT&T's LEP sales and marketing program is offered in Spanish. The company provides multilingual contracts, explanations of contract terms and conditions, details of products and services, and pricing information. AT&T also employs multilingual outbound and inbound sales personnel. Direct mailing campaigns, multilingual website marketing, and written sales materials are all offered in Spanish. The company also uses Spanish newspapers, television, and radio advertisements.

AT&T Southeast's Customer Operations Measuring Performance and Service Skills (COMPASS) and On-Line Reference By Internet Technology (ORBIT) systems contain operating standards, methods, procedures, and job aids used by service representatives or sales associates when handling LEP customer calls.

AT&T is the only company to acknowledge complaints from customers alleging unfair or fraudulent marketing tactics targeting LEP customers. The company received five such complaints in late 2005.⁴ AT&T remedied each complaint to the satisfaction of the customer. None appeared to be the result of systematic company fraudulent sales or marketing practices.

3.3.2 Embarq

Embarq has an assigned manager for its LEP sales and marketing programs, which are offered in Spanish. Embarq also provides Spanish translations of contracts, terms and conditions, details of products and services, and pricing information. Additionally, the company employs multilingual outbound and inbound sales personnel, uses direct mail campaigns, buys radio and newspaper ads, and features multilingual marketing on the Embarq website. Non-English versions of sales materials and marketing brochures, including guides to new service, pricing information, explanation of packages and discounts, and general subscriber information, are also distributed throughout the LEP community. Embarq also sponsors, or takes part in, several annual multilingual public events, such as job fairs, community meetings, and festivals.

3.3.3 Verizon

Verizon has an assigned manager for its LEP sales and marketing programs, which are offered in Spanish, Vietnamese, Chinese, and Korean. The company provides multilingual contracts, explanation of contract terms and conditions, details of products and services, and pricing information. The company employs multilingual outbound and inbound sales personnel. Direct mail campaigns, newspaper advertisements, and multilingual website marketing are also used. Sales materials and marketing brochures covering such things as products and pricing guides, information on how to contact customer service, and Lifeline are distributed in the community. Verizon sponsors and/or hosts several multilingual public events annually.

3.3.4 Other ILECs

Of the remaining seven ILECs, only Frontier responded that it has a sales and marketing program aimed at LEP customers. The company provides Spanish translations of contract terms

⁴ FPSC complaints 676864T, 677055T, 677111T, 675942T, and 676991T

and conditions, as well as costs and details of products and services. ILECs without a sales and marketing program specifically designed for LEP customers are: Fairpoint, ITS, NEFCOM, Smart City, TDS, and Windstream. TDS states that though the company has no standing LEP-specific sales and marketing team, it acts on all identified LEP needs. LEP customers are accommodated through services such as Language Line, to which TDS subscribes. Language Line provides sales and service capabilities in the consumer’s predominant language.

Although ITS and Windstream stated that they do not have a dedicated LEP program, both have some sales and marketing options available for LEP customers. ITS has, in the past, produced explanations of products and services in Spanish. Windstream offers some written sales materials, as well as explanations of products and services, in Spanish.

3.4 Customer Service

Key to effective customer service is understanding and communication between the service provider and the consumer. LEP initiatives promote both, making the typical barriers faced by non-English speakers more manageable. Such initiatives can lead to increased satisfaction within this particular demographic while simultaneously increasing the customer base for an ILEC. **Exhibit 6** represents the types of customer service initiatives directed at LEP consumers for each of the ILECs surveyed.

None of the ILECs tracked the number or type of LEP customer complaints. However, seven of the ten respondents stated that they have a customer service program which addresses the needs of LEP customers. Fairpoint, NEFCOM, and TDS do not offer LEP customer service choices.

ILEC Initiatives For LEP CUSTOMER SERVICE										
	AT&T	Embarq	Verizon	Fairpoint	Frontier	ITS	NEFCOM	Smart City	TDS	Windstream
Language Choice, Inbound Calls	√	√	√		√					√
Multilingual Customer Service Personnel Available	√	√	√			√		√	√	√
Multilingual Welcome Materials Available	√		√							
Multilingual Info on the Website	√	√	√							
Multilingual Language Choice, Billing Statements	√	√	√							
Multilingual Language Choice, Opening an Account	√	√	√							
Multilingual Instruction on How to File a Complaint	√		√							

EXHIBIT 6

Source: ILEC Survey Response, Questions 19-25

3.4.1 AT&T

AT&T has an LEP customer service program with a customer service manager responsible for oversight. Customer service is offered in Spanish and Creole. The program features a choice between English, Spanish, and Creole for inbound calls, multilingual representatives, and welcome materials. The company also offers multilingual customer service information on its website. New customers are able to choose a language preference when establishing service and can receive billing statements in that language. AT&T also provides multilingual instructions on how a customer can file a complaint.

3.4.2 Embarq

Embarq has a customer service program designed specifically for LEP consumers, but does not have a customer service manager dedicated to LEP. The Embarq LEP customer service program is offered in Spanish. It allows a customer to choose between English and Spanish when calling the company, and provides Spanish speaking representatives. Spanish customer service information appears on the company website. New customers are also able to choose either language when establishing service and can receive billing statements in the preferred language.

3.4.3 Verizon

Verizon has an LEP customer service program and a customer service manager assigned with oversight responsibility. The program is offered in Spanish and Vietnamese. The hub of Verizon's LEP customer service program is a centralized Multilingual Sales and Service Center (MSSC) located in California. Specialists are assigned to the MSSC to assist non-English speaking customers in the caller's native language. Verizon allows a customer a choice of language when calling the company for assistance and the call is routed to a representative in the MSSC.

In addition to services available from the MSSC, LEP customers can receive welcome materials in either Spanish or Vietnamese. New customers are also able to choose a language preference when establishing service, and can receive billing statements in Spanish. Verizon provides multilingual instructions on how a customer can file a complaint, and general customer service information is available on the company website in languages other than English.

3.4.4 Other ILECs

Frontier, ITS, Smart City, and Windstream state that they have customer service programs designed for Spanish-speaking customers. Two of the ILECs, Frontier and Windstream, offer an automated language choice when a customer calls. The others state they are capable of providing Spanish speaking representatives upon request.

Fairpoint, NEFCOM, and TDS do not have LEP customer service programs. However, Fairpoint and TDS each stated that they have Spanish-speaking representatives who are able to handle customer service issues on an as-needed basis. TDS states that the company subscribes to Language Line, a subscriber service offering translation assistance.

4.0 Conclusions

4.1 Overall

The 2005 U. S. Census Bureau’s American Community Survey data estimates Florida’s population at 17.38 million. More than 4 million Floridians speak a language other than English at home, and close to 2 million of these residents report that they speak English less than “very well.” With a population of this magnitude, some ILECs have found it necessary and beneficial to customize education, outreach, sales and marketing, and customer service for these residents.

“ ILECs which do not have a proactive LEP program may consider forming a consumer advisory committee . . . ”

Several factors impact whether an ILEC chooses to provide LEP services. When making decisions regarding LEP initiatives, ILECs typically consider the varied circumstances such as size, geographic characteristics, demographics, cost effectiveness, and services offered. Three ILECs (AT&T, Embarq, and Verizon) have significantly larger LEP customer bases than other Florida ILECs. They each have a very strong presence in one or more of Florida’s metropolitan areas that contain large non-English speaking populations. For these ILECs, a need to establish comprehensive LEP programs exists.

Florida ILEC initiatives aimed at the LEP demographic, fall into two discernable groups based on ILEC size. The larger carriers have comprehensive LEP programs that address and accommodate consumer needs. Larger carriers typically offer education, outreach, customer service, and marketing in a variety of languages. Smaller carriers are more likely to have limited or no multilingual LEP capabilities. The majority of smaller ILECs, however, appear to possess capabilities to accommodate specific LEP needs when identified.

All ILECs had difficulty specifically identifying the number of LEP customers in their service territories. While each company believes it has a handle on LEP customer numbers, all currently rely on estimates of their LEP populations. When staff compared the total number of LEP customers estimated by the ILECs to the number identified by the U.S. Census for Florida, there appears to be a substantial gap. Staff believes that the ILECs may be underestimating their LEP consumers. ILECs may want to consider steps to more clearly identify the size of the LEP population and strive to facilitate better communication with these groups.

Staff’s survey asked whether each ILEC would support a voluntary and collaborative process for resolving challenges faced by LEP consumers through cooperation between companies and community-based organizations. Eight of the ten companies indicated they would be interested. ILECs which do not have a proactive LEP program may want to consider forming a consumer advisory committee to conduct roundtable discussions that would identify the challenges and needs of the LEP telecommunications customers in their communities. Participants might include community-based organizations and consumer groups that assist the limited English proficiency community.

“ . . . larger ILECs have robust, formal programs . . . ”

The advisory committee could facilitate improved communication between the carriers and the community-based organizations to ensure the problems facing the limited English proficiency communities are being heard and resolved expeditiously. Additionally, the consumer advisory committee may help the ILECs better estimate the size of their LEP populations.

Staff is encouraged to learn from conducting this review that larger ILECs have robust, formal programs, and that the smaller ILECs report being capable of responding to LEP needs when requested.