FLORIDA PUBLIC SERVICE COMMISSION

Proposed Amendment of Rule 25-4.0665	)	Undocketed
F.A.C., Lifeline Service	)	

TDS TELECOM/Quincy Telephone Company Post Workshop Comments

TDS TELECOM/Quincy Telephone Company ("TDS") hereby files its post workshop comments on the Florida Public Service Commission's ("FPSC") Proposed Amendment of Lifeline Rule 25-4.0665. TDS supports the FPSC's intent to develop a comprehensive set of rules for all certified Eligible Telecommunications Carriers. TDS supports the vast majority of the proposed rules, however we believe that some of the rules are overly burdensome and provide little if any benefit to increasing the level of Lifeline participation. TDS appreciates the opportunity to file these post-workshop comments and offers the following suggested changes.

TDS TELECOM's Proposed Changes to Rule 25-4.0665

Rule 25-4.0665(4):

TDS recommends that the language in this rule be clarified that subsection (1)b only applies to those ETC's that have been authorized to rebalance access and local rates as set forth in section 364.164, Florida Statutes. TDS recommends the following language.

> (4) As part of an eligible telecommunications carrier's (ETC) Lifeline Assistance Plan, an ETC must offer a subscriber eligible for Lifeline service, pursuant to subsection (1) and (2) of this rule, Link Up service in accordance with 47 C.F.R. s.54.411, which is incorporated herein by reference. *ETCs not operating under the provision of Section 364.164, F.S. are exempt from subsection (1)b.*

Rule 25-4.0665(7):

TDS suggested change in this rule is simply clerical. It is our understanding that all ETCs are required to use the simplified Lifeline application form. Therefore, ETCs do not verify eligibility on the front-end of the application process. Verification of eligibility is only done on an annual basis; therefore TDS believes that "*enrollment*" can be stricken from the third line. TDS believes the rule can read as follows:

> *"…, as proof of the subscriber's eligibility for Link-up and Lifeline verification."*

Rule 25-4.0665(9):

TDS recommends that this proposed rule be eliminated. In most situations, TDS enrolls customers within one day of receipt of a completed Lifeline application form, and there is no evidence to suggest that TDS is not processing applications in a timely manner. If for some reason a customer does not return a Lifeline application to the appropriate company or location, it is highly unlikely that there will be any expectation from the customer that they should have received a receipt. TDS believes that the proposed rule does not provide any substantive benefit to Lifeline applicants, and will merely increase company cost and workload.

Rule 25-4.0665(10):

TDS recommends that the proposed rule be eliminated at this time. This is not to suggest that companies should not provide Lifeline service if a customer refuses to provide their social security number. In most situations, TDS has not had any significant issues with customers refusing to provide their social security numbers. TDS does not suggest that companies refuse to provide Lifeline service if a Lifeline applicant refuses to provide their social security number. However, TDS is concern that adoption of this rule will become the norm rather than the exception. Today, the Department of Children and Family Services (DCF) performs that annual verification for TDS. This process requires TDS to provide the customer social security number in order to match the DCF data base. Unless DCF can verify based on the last four digits of the social security number, TDS believes this will create a greater burden on Lifeline subscribers since they would ultimately be required to provide the ETC with proof of verification. Under the current process, Lifeline subscribers that match to the DCF data base are not burdened with any further verification process.

Rule 25-4.0665(16):

TDS recommends that the language requiring an application receipt be removed from this rule for the reason set forth above in response to rule 25-4.0665(9).

Rule 25-4.0665(18):

TDS supports the comments at the February 6, 2007 workshop that this rule not be implemented at this time. The FCC current rules limit Lifeline service to one line per household.

Rule 25-4.0665(25):

TDS supports the FPSC's interest to analyze data in order to evaluate the status of the Lifeline program. However, TDS believes that the proposed rule to submit quarterly reports to the Commission and certain information requested is overly burdensome, costly, and provides marginal benefits. TDS recommends that all ETC's continue to submit data on an annual basis, and that the data is limited to information that is generally available in the normal course of business. However, if a change is made, TDS recommends the following:

1. ETCs must submit semi-annual reports to the FPSC no later than 30 days following the end of the six month period. The proposed two week filing is not sufficient time to gather the information following the last month of the reporting period. The 30 day following the end of the reporting period is consistent with the FPSC rules regarding the filing of service quality reports.

2. The reports should be limited to the following information as set forth in the proposed rule, they are: 25(a), (c), (d), (e), (i), (j), and (k). With regard to items 25(b), (f), (g), and (h), TDS does not believe the information provides any significant benefits in which to evaluate or advance the Lifeline program, yet would require companies to implement procedures to track information that is not readily available and run special reports. Although TDS has provided some of this information in the past it is a time consuming and manual process.

Rule 25-4.0665(3):

TDS believes that this rule should be eliminated. Although today TDS allows Lifeline subscribers to bundle the Lifeline discount with other offerings, TDS believes that this decision should be left to the individual ETCs business and marketing decisions. In the future, do to competitive pressures; TDS believes it should have the flexibility to determine whether or not to offer the Lifeline discount on bundled services of both regulated and non-regulated services.

Public policy has been established that basic local exchange service is a necessity, and as such the Lifeline program was established to provide discounted basic service to individuals and families that can not afford phone service. As Windstream appropriately pointed out at the workshop, the Lifeline discount allows those that can least afford phone service to receive basic service in the range of $4-7 dollars per month plus taxes, not for making non-essential services like long distance, cable, and high-speed internet affordable. If the staff believes that bundled services should be available to Lifeline subscribers, those bundled offerings should be limited to regulated non-basic services.

Conclusion

TDS appreciates the opportunity to provide post-workshop comments in support of implementing Lifeline rules for all ETCs. TDS believes that the proposed changes to the rules offered by TDS will not diminish the availability of Lifeline, impede the growth of the Lifeline program, or limit the FPSC's ability to evaluate the effectiveness of the Lifeline program. However, we believe that the proposed changes will assist in ensuring that the program is administered in a cost effective manner, and consistent among all ETCs. TDS is committed to continuing to work with the FPSC staff, the Office of Public Counsel, and the AARP on the adoption of these rules.