

Questions presented to Florida ETC working group:

- A. How should an eligible subscriber's personal identifying information be shared?
- B. Should an eligible subscriber's personal identifying information be used by an ETC for marketing purposes?
- C. What should be the obligations of each party with respect to the use of an eligible subscriber's personal identifying information?
- D. What procedures should be implemented to increase enrollment and verify eligibility in these programs?

Comments from Budget PrePay

- A) Budget PrePay assumes the question was meant to probe the way that a state agency should share personal information of a subscriber to a wireless service provider. In this case, Budget feels that state agencies should honor any privacy policies that the agency has published to the public. If the policy impedes the sharing of critical lifeline eligibility information, the agency should reconsider their privacy policy and allow select information to be openly shared with service providers with customer's approval.
- B) Budget PrePay feels that a customer has the right to determine if their information is to be used for marketing purposes. The "do not call" list has been successful in managing the activities of marketers. We think Florida should consider this approach. If customer denies participation in a "do not market" list, then share the customer's information. Keep in mind that a customer that wishes to keep their information private and secret to a service provider could still end up on a direct mail list purchased by the same service provider. The name on the list would be completely legitimate and be within the company's right to market via direct mail.
- C) Budget Prepay feels that it is the right of the customer to opt in or out of marketing activities that exceed the purpose of the original reason for collecting data. Although, rules or obligations designed to protect customer information would be very difficult to monitor.
- D) Budget PrePay feels that the primary reason for historic low participation rates is related to the collections and deposit policies of the ILEC's and RBOCs. I don't think the ILEC's and RBOC's will ever embrace the low income customer. On the other hand, Budget Prepays business model is perfect for the low income customer and is made for the participation of eligible customers. We desire a low income customer as our operations and policies have been create around the cost and maintenance of this type of customer. The business model of prepaid service providers allows us to continue to service a customer even though payment histories are spotty at best. Once a customer owes an ILEC or RBOC a past balance, the customer is typically required to settle their debt before signing back up with a post pay service provider. This is not likely considering the fact that this same customer can go to a prepaid provider and get prepaid service without the need to settle any past due debts. Prepaid service providers have no customer account receivable and no collection process. We never require a customer to make a deposit.