

## CenturyLink Comments – Lifeline Working Group Meeting

September 24, 2010

Embarq Florida, Inc. d/b/a CenturyLink (CenturyLink) provides the following written comments as requested in response to the questions discussed at the August 18, 2010 Lifeline Working Group Meeting. Of the four questions on the agenda, three of the questions were interrelated and so the comments responsive to those three questions are provided together.

1. How should an eligible subscriber's personal identifying information be shared?
2. Should an eligible subscriber's personal identifying information be used by an ETC for marketing purposes?
3. What should be the obligations of each party with respect to the use of an eligible subscriber's personal identifying information?

The first three questions all center on the issue of sharing eligible subscribers' personal identifying information. The answer to the first and third questions will depend on answers to the questions, what information, shared with whom and for what purpose. Clearly, the ETCs must abide by the CPNI rules regarding what information about their customers can be provided and in what context it can be provided. Likewise, the agencies which qualify individuals for the various social service programs must also abide by the statutes governing what information they can share and with whom. The current processes in use for sharing information seem to be working well and meet the requirements for confidentiality. Any new processes developed will need to be constructed in such a way as to ensure continued adherence to the statutory requirements governing all parties involved.

Regarding the second question, the statutes seem very clear regarding what information can be shared, with whom it can be shared and for what purposes. Florida Statutes 364.10(3)(h) states (emphasis added):

The departments, the commission, and the Office of Public Counsel may exchange sufficient information with the appropriate eligible telecommunications carriers and any commercial mobile radio service provider electing to provide Lifeline service under paragraph (a), such as a person's name, date of birth, service address, and telephone number, so that the carriers can identify and enroll an eligible person in the Lifeline and Link-Up programs. The information remains confidential pursuant to s. 364.107 and may only be used for purposes of determining eligibility and enrollment in the Lifeline and Link-Up programs.

Based on the reading of the statute, it appears that using the information for marketing purposes was not contemplated and would not be appropriate.

Beyond the statutory constraints, CenturyLink also believes that participants in government provided programs such as Food Stamps, TANF, etc., might be upset if their personal identifying information were given to other parties for purposes of marketing or even for informing them of the existence of another program, one implemented by private industry, in which they might have expressed no interest.

4. What procedures should be implemented to increase enrollment and verify eligibility in these programs?

As discussed at the Working Group Meeting on August 18<sup>th</sup>, many of the ETCs, the FPSC, the OPC and others have given much effort and consideration over the past years to the question of how to increase enrollment. It is a difficult issue to address for a number of reasons. CenturyLink believes that one of the most effective ways to increase enrollment is to have the social service agencies whose clients are Lifeline eligible provide information to those clients regarding the program. While we do recognize that these agencies already have many tasks to do and adding another one could be a burden, it has been our experience that Lifeline eligible persons will be more likely to believe in the legitimacy of the program if they hear about it from the agency which has assisted them in obtaining other types of relief.

Regarding verification of eligibility, the current process whereby CenturyLink downloads eligible clients from the FPSC's secure web site is working very well. While the company would be willing to consider other methods for determining eligibility, we would need to determine the cost effectiveness of implementing different processes.

CenturyLink currently performs the required annual recertification by choosing a random, statistically valid sample of customers and sending letters, requesting that the subscribers provide proof of their continued eligibility. Additionally, CenturyLink chooses a non-random sample of customers who either have not been audited previously or who have the oldest recertification dates and requests proof of continued eligibility. CenturyLink has chosen this method in order to address the questions about potential fraud associated with self certification and to keep the base as current as possible. The company would be interested in identifying a method of annual self-certification that would not require the customers to mail in proof and which would be less costly and time-consuming for the company. In that regard, CenturyLink believes the concept of the portal established by DCF is of interest. But, as noted during the working group meeting, in order to be used as a recertification tool, a permanent record of each verification would be mandatory for audit trail purposes.

In conclusion, CenturyLink currently has processes which are working well and implements various outreach efforts in order to get the word out about Lifeline. The company remains committed to improving the Lifeline experience for all involved, the eligible subscribers, the company, the agencies, the FPSC and the OPC and will continue to work towards any cost-effective improvements.