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Via eFiling and Hand Delivery

Julie P. Orchard
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Re: Docket No. 10-2528-01

Dear Julie:

In its May 2, 2011, Interim Scheduling Order in Docket No. 10-2528-01, the Public Service Commission (PSC) stated that “a party may respond to any issues raised in the previous technical conference or in previous filings.” This letter is not intended to restate Qwest/CenturyLink’s (“CTL”) position on all of the issues in this docket, but instead this letter sets forth CTL’s recommendation on how this docket should proceed, particularly focusing on the issue of certification. Enclosed for filing, please find the original and five copies of CTL’s response in addition to an attached Certificate of Service.

CTL believes it will be productive for the parties to continue to meet with the Division of Public Utilities (DPU) in informal meetings and attempt to reach agreement on the various issues and solutions. In order to get the most benefit from the informal meetings, CTL believes it is imperative to prioritize the issues. From CTL’s perspective, the highest priority is to establish a permanent upfront certification process which will be applicable to all Lifeline providers and to also improve the ongoing (annual) eligibility verification process. Once the certification and verification process is in place, the parties can then focus upon outreach and other Lifeline issues that have been addressed in this docket.

During the June 1 technical conference, Administrative Law Judge Ruben H. Arredondo informed the parties that the current PSC Lifeline rules allows for Lifeline customers to self-certify upfront. Even though self-certification may satisfy the immediate concern of enabling the wireless Lifeline providers to begin providing Lifeline service, CTL and other parties have stated that this is not a suitable long term solution.

After the conclusion of the most recent technical conference the parties met informally to further discuss how this docket should proceed. The parties recognized that upfront certification and continued verification was a fundamental issue that needs to be addressed in this docket, yet, the state agencies that are at the center of these issues have not been participating. In order to have the most productive meeting possible, CTL believes it is important for the relevant state agencies that have been involved, or may be involved with upfront certification and verification be invited to participate in this process. The parties discussed the idea of having the DPU schedule a meeting with the appropriate state agencies to find out what they are capable of doing and what they were willing to do in regards to upfront certification and continued eligibility verification of Lifeline customers. The DPU agreed to set up a meeting and all parties in this proceeding will be invited to participate.

Before scheduling additional process in this proceeding, CTL believes the parties should be encouraged to participate in informal meetings with the DPU and work towards viable solutions to the various issues. Status reports can be provided by DPU to the PSC to ensure that progress is being made to resolve the various Lifeline issues.

Sincerely,

Attached Certificate of Service