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Division of Public Utilities

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--==-- MEMORANDUM ==--

TO: PUBLIC SERVICE COMMISSION OF UTAH

FROM: DIVISION OF PUBLIC UTILITIES
Chris Parker, Division Director
Bill Duncan, Manager, Telecom & Water Section
Shauna Benvegna-Springer, Utility Analyst

DATE: October 24, 2012

SUBJECT: In the Matter of the Resolution of Certain Issues Related to the Designation of a Common Carrier as an Eligible Telecommunications Carrier

RE: Docket No. 10-2528-01

In response to the Public Service Commission of Utah's (Commission) Amended Order Circulating Edited Lifeline (UTAP) Program Draft Business Proposal for Final Comment issued on October 18, 2012, the Division submits comments on two areas. They are 1) the Resolution Process for Lifeline Participants and 2) DWS Lifeline Database.

Resolution Process for Lifeline Participants

On Exhibit A, page 5, line 182, the term "state" was changed to "federal". The Division believes that based on FCC code 54.405 (e) (1) it states "A carrier providing Lifeline service in a state that has dispute resolution procedures applicable to Lifeline termination must comply with the applicable state requirements". If it is the desire of the Commission to adopt the federal de-enrollment process then the term "state" should be replaced with "federal". The federal requirement shortens the amount of time that a participant has to prove eligibility from 60 days to 30 days, and it eliminates the appeal process currently in the Commission rule. The Division believes "state" should be retained instead of replaced by "federal".

DWS Lifeline Database

On Exhibit A, page 11, starting with line 420 through lines 429, the section identifies the minimum amount of information that will be retained in the DWS Lifeline Database. At a

minimum, the billing address of the participant must be added to the list. This will be used when the annual recertification is completed and/or the resolution process is evoked for a participant.

It would be most desirable to retain all the information fields of the application and whether they have a Lifeline Household Worksheet on file in the database, in addition to the telephone phone for the discount, telephone carrier, Lifeline effective date, Lifeline termination date, dollar amount sought for discount, and means through which the applicant qualified for Lifeline.

The Division recommends that the Commission utilize the business proposal report to make a formal request to DWS to implement the objectives of the business proposal report and modify the current Memorandum of Understanding with DWS.

cc: Service List