

CENTURYLINK REPLY COMMENTS
Docket No. 10-2528-01
June 10, 2013

In its comments filed on June 3, 2013, CenturyLink stated “*state government is in the best position to efficiently administer the Utah Lifeline Program, and that the state—not carriers—should retain primary responsibility. The ongoing certification and verification of Lifeline eligibility should be performed by state agencies, whether the DWS continues to administer the program, or a third party administrator is retained to administer the program (as proposed by the Office of Consumer Services (“Office”)). In order for a third party administrator to be successful, they will need access to the systems used by DWS and the state.*”

On Tuesday, June 4, 2013, the Commission provided the parties in this proceeding, with a copy of the letter from the Department of Workforce Services (DWS) to the Commission, providing written Notice of Termination to be effective August 31, 2013. The DWS decision to terminate the contract effective August 31, 2013 creates significant issues for the Commission and Lifeline carriers, and could negatively impact Lifeline customers. CenturyLink believes that it is in the best interest of all parties to delay the termination of DWS’ Lifeline involvement at least until after the conclusion of the next legislative session when the role of DWS in the Utah Lifeline program can be properly considered by the Utah Legislature.

If DWS proceeds with termination effective August 31, 2013, significant changes in the Utah Lifeline program will have to take place in a short period of time. First, the initial application process will need to be revised since applicants currently initiate a request for lifeline benefits directly to DWS. Moving the process from DWS to carriers will require carriers to create application forms and develop new processes to distribute and process these forms—all by August 31, 2013—or customers will not have a way to apply for benefits. Also, as the Utah Rural Telecom Association suggests in its comments, carriers may not be staffed to handle the additional responsibilities.

If DWS terminates its involvement effective August 31, 2013, the public will need to be informed of this change so they will know how to go about applying for benefits. At this point, there are less than 90 days to develop and implement the new application processes and get the word out to potential subscribers as to the changes in the program. Marketing materials for the program will all have to be revised to refer applicants to the carriers rather than to DWS. It is likely that special advertising campaigns will need to be initiated both by carriers and the Commission in order to notify subscribers of the changes taking place in the program. Even then, the question has to be, is there sufficient time before DWS terminates its involvement in the program to communicate these changes to the people who would qualify?

If DWS terminates its involvement effective August 31, 2013, this change will occur in the middle of the annual recertification of wireline Lifeline customers. The Commission will be put in the difficult position of either having to quickly establish a backup interim process or find a way to quickly migrate the responsibilities to carriers.

If Lifeline carriers are given the responsibility with such short notice, it will be difficult and costly¹ to complete the annual recertification and ensure that the transition happens in a way that does not negatively impact Lifeline customers. Lifeline carriers need adequate time to make changes to their existing processes, and implement new processes and train personnel to successfully take over the Lifeline responsibilities from DWS.

For these reasons CenturyLink believes that DWS should retain Lifeline responsibilities until at least next year as indicated above. In its previous comments CenturyLink stated *“that the Commission should consider utilizing a third party, working with DWS, to accomplish the 2013 recertification for the Lifeline customers of landline carriers. With additional third party resources, DWS should be able to complete the 2013 recertification well in advance of the December 31, 2011, deadline. Additionally the 2013 recertification should not be as difficult as the recertification in 2012 since 11,880 landline customers (about 48% of the total) were de-*

¹ Consistent with the Commission Lifeline Rule R746-341-8.A, CenturyLink will seek reimbursement for the expenses.

*enrolled during the first quarter of 2013.*² ” Having a third party assisting DWS this year utilizing the existing process is the best solution to ensure an effective and efficient completion of the annual recertification during 2013.

As stated previously, CenturyLink believes that the ongoing certification and verification of Lifeline eligibility should be performed by state agencies, either DWS or a third-party administrator. However, if DWS discontinues its role in the Lifeline process, and absent a third party administrator, it would be much more beneficial for a reasonable transition period to be established. This would allow carriers and the Commission to have time to work through the issues caused by such a shift in responsibilities. As described above, forcing a quick migration to carriers, who would not have enough time to make the necessary changes, will negatively impact both the carriers and existing and potential Lifeline subscribers. Retaining DWS for a longer period of time will provide for discussions to be scheduled between DWS, DPU, and the carriers so that we can work together to determine how the program can work to meet the needs of Lifeline customers.

² FCC Notice, page 4.