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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Resolution of Certain Issues Related to the Designation of a Common Carrier as an Eligible Telecommunications Carrier	Docket No. 10-2528-01 SALT LAKE COMMUNITY ACTION PROGRAM'S RESPONSIVE COMMENTS
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In accordance with the Amended Interim Scheduling Order issued by the Public Service Commission (PSC or Commission) May 2, 2011, Salt Lake Community Action Program (SLCAP) submits responsive comments. The comments are based on concerns and questions raised by the comments of other interveners filed on May 25, 2011.

Qwest / CenturyLink

Outreach

- SLCAP questions Qwest / Century Link's recommendation that ETCs be reimbursed if they are required to do any outreach. Minimal requirements to let the public know that the ETC provides a Lifeline service, details about that service and how a customer may apply should not necessitate reimbursement. Rather it should be a requirement for receiving reimbursement for Lifeline service.

- SLCAP agrees with the general concept of targeted outreach where efforts are made to target specific and underserved communities. However, it disagrees with the recommendation that targeted outreach be limited to personal outreach such as booths at events and senior centers rather than outreach utilizing media outlets such as newspapers, radio and television. As the Division of Public Utilities noted in its comments, Relay Utah has utilized varied media to provide significant exposure to the program, resulting in increased participation. While it is necessary to do analysis regarding the costs and benefits of similar extensive media coverage for the Lifeline program, at a minimum, Public Service Announcements (PSAs) in all appropriate media outlets should be utilized.

Interim Procedures

It may be difficult or impossible for DCC to utilize contract employees to handle the increase in demand regarding initial certification and verification. This may require a longer term solution that incorporates recommendations from several parties for a coordinated system.

TracFone

Outreach

SLCAP questions TracFone's assertion that it should not have at least basic mandatory outreach requirements.

Interim Procedures

In regard to tracking duplicate enrollment, TracFone advises the FCC is working on an interim procedure proposed by a coalition of ETCs that will ultimately be rolled out on a state by state basis. Both the procedure and timeline should be further explored to

determine if this will be the best solution for Utah. There are several issues that concern consumer advocates with the proposed process. One is that consumers be educated in advance of implementing the process. Otherwise, it would be very confusing for a customer to be switched to another ETC by lottery if they fail to “choose” an ETC – a function of whether the notice was adequate and the education about the change occurred.

Others, such as the OCS, have suggested development of a simple database that could track Lifeline recipients and check for duplicate enrollment. Currently, ETCs do not report to DCC on who actually enrolls in Lifeline. Thus it could be more appropriate for ETCs to report to the Commission and/or DPU and for the DPU to develop and manage the database, utilizing consumer protections suggested by various parties.

Relevant Issues

SLCAP questions the deletion of the issue “The method of calculation and recovery of costs for verifying continuing eligibility of Lifeline customers, particularly for ETCs not paying to the state USF fund.” While TracFone has filed a “Statement regarding its State Universal Service Fund Contribution Methodology” on June 2, 2011 in Docket No. 09-2511-01, no schedule has been set for review and so it is premature to remove the issue from this docket.

Division of Public Utilities (DPU)

Interim Short Term Procedures

- Identify current participants: SLCAP suggests that it might be more efficient and cost effective if the procedure DPU outlines in its first suggestion is actually completed by the DPU. Because DCC currently has no information on Lifeline participation from ETCs, it makes more sense for DPU both to gather the

information and to develop the database rather than collecting the information and passing it on to DCC which is currently not equipped to handle that function.

- Initial Certification of Eligibility: While SLCAP is not opposed to an expanded contract with DCC, SLCAP suggests that it be further investigated as to which agency or company will be best suited to do this task in the short run.

Long-term Procedures

- While SLCAP supports the concept of an online application, we do not believe it should be the only accepted method of application for Lifeline service. Many low income households do not have the ability and/or time to access services via the internet and this would create an unduly burdensome barrier to participation. Paper applications and coordinated applications through other service providers also constitute appropriate methods to reach the intended customer base.

SLCAP regrets that it has not had sufficient time to respond to the Comments filed on May 31, 2011. We trust that best practices from other states will be incorporated into future discussions on the appropriate topics. We appreciate the opportunity to provide comments.

Dated this 8th day of June, 2011,

Betsy Wolf

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2011, a true and correct copy of the foregoing Responsive Comments was served on the following by electronic mail:

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