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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of CenturyLink
For a Waiver to the Utah Lifeline Eligibility
Requirements

DOCKET NO. 16-049-16

In the Matter of the Miscellaneous
Correspondence and Reports Regarding
Telecommunications Utility Services; 2016

DOCKET NO. 16-999-03

CENTURYLINK'S COMMENTS

Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) respectfully provides the following comments¹ to the petition that CenturyLink filed on October 26, 2016.

On October 27, 2016, the Public Service Commission (PSC) issued its NOTICES OF FILING AND COMMENT PERIOD, asking interested parties to respond to specific questions. Attachment A provides CenturyLink’s response to the questions.

Additionally, CenturyLink seeks clarification from the PSC in regards to the meaning of the following underlined language in rule R746-341-6A:

¹ Normally a party would not file comments to its own petition. However, in the October 27, 2016 Notice of Filing and Comment Period, the PSC stated that any interested party may submit comments regarding specific questions.

R746-341-6. State Lifeline Telephone Service Features.

A. Discounts -- Lifeline telephone service provided by state ETCs shall consist of dial tone line, usage charges or their equivalent, and authorized Extended Area Service (EAS) charges, less a discount of \$3.50 and all other matching funds established by the Federal Communication Commission.

CenturyLink seeks clarification from the PSC that the above rule language does not mandate a specific type of federal match in order for a qualified low-income customer to also receive the state Lifeline credit for voice service. For example, if a low-income customer receives the federal Lifeline credit for subscribing to a high speed internet service, CenturyLink seeks clarification that this does not preclude this customer from also receiving the \$3.50 Utah Lifeline credit for voice service.² If the PSC believes its language does preclude the receipt of the Utah Lifeline credit for voice service in this circumstance, CenturyLink respectfully amends its Petition For Approval Of A Waiver To The Utah Lifeline Rules³ to allow a low-income customer receiving the federal Lifeline credit for high speed internet service to also be permitted to receive the \$3.50 Utah Lifeline credit for voice service.

RESPECTFULLY SUBMITTED this 8th day of November 2016

² This could apply to low-income customers that have a bundled high speed internet service from CenturyLink along with voice service.

³ As filed on 10/26/16: <http://www.psc.utah.gov/utilities/telecom/telecomindx/2016/1604916indx.html>



By: _____

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