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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Resolution of Certain Issues) DOCKET NO. 10-2528-01
Related to the Designation of a Common)
Carrier as an Eligible Telecommunications Carrier) COMMENTS OF URТА

The following are the Utah Rural Telecom Association’s Comments/Summary of Issues to the Lifeline Program Reform that fall within the purview of the Public Service Commission of Utah. Each issue has been prioritized, and applicable deadlines are included.

Issue Summary	Priority	Deadline
<p>Update Lifeline rules. To prevent inadvertent ETC non-compliance, all rules (including policy manuals) published by the PSC or other relevant agencies should be reviewed to ensure that the state rules are consistent with the federal rules. For example, page 3 of the UTAH TELEPHONE ASSISTANCE (LIFELINE) PROGRAM POLICY & PROCEDURES MANUAL indicates that UTAP applications will be shredded after two years; however, since 2005, ETCs have been required to maintain Lifeline applications for as long as the customer receives Lifeline plus three years (see 47 C.F.R. § 54.417(a)).</p>	High	June 1, 2012
<p>Timely transfer of eligible Lifeline subscribers to ETC. Beginning in October, carriers must submit their FCC Forms 497 by the 8th to be reimbursed by USAC within a timely manner. In order to meet the deadline, ETCs will need the list/certifications of eligible Lifeline subscribers within the first few days of the following month (e.g., the September subscribers in the beginning of October). Carriers who cannot submit their FCC Forms 497 by the 8th may not receive a</p>	High	October 8, 2012

<p>disbursement from USAC for two months (e.g., September claims submitted on October 10th may not be reimbursed until December 30th depending on filing method).</p>		
<p>National Lifeline Accountability Database (NLAD). Utah PSC must notify the FCC if it intends to opt out of the NLAD.</p> <p>If the Utah PSC does not opt out, it must determine whether the Lifeline administrator or ETCs will be responsible for checking for duplicate subscribers in the NLAD. If it is the latter, how will the administrator and ETCs coordinate the efforts to minimize enrollment delays?</p> <p>If the state administrator will manage the NLAD transfer, the Utah PSC must determine how it will collect the information required for transmittal to the NLAD (e.g., permission to transfer information to USAC, D.O.B, last four digits of the SSN) from existing customers. Will it occur during the recertification process? Will ETCs collect this information separately?</p>	<p>High</p>	<p>November 1, 2012</p>
<p>Certification Forms. Determine processes to transfer Lifeline certification forms to ETCs prior to enrollment.</p>	<p>High</p>	<p>December 1, 2012</p>
<p>Recertification. If the state continues to manage the recertification process, it must recertify the subscribers as of June 1st no later than December 30, 2012, and provide the results to the ETCs in time for the January 31, 2013 filing deadline.</p>	<p>Medium</p>	<p>December 31, 2012</p>
<p>Update Lifeline websites and materials. To prevent consumer confusion all Lifeline materials maintained by the state PSC or other agencies should be updated to reflect the current eligibility criteria, enrollment procedures, restrictions, etc. There are errors on at least one state-managed website.</p>	<p>Medium</p>	

Respectfully submitted this 25th date of July, 2012.

BLACKBURN & STOLL, LC

/s/ Stanley K. Stoll

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