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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) Docket No. 10-2528-01
Common Carrier)

**Comments of Salt Lake Community Action Program on the Proposal of the
Division of Public Utilities for the Lifeline Program**

Salt Lake Community Action Program appreciates the opportunity to comment on the proposal of the Division of Public Utilities for the Lifeline Program. There are a few sections of the draft where the language could be clarified to be less confusing and so we have attempted to provide comments and questions to that effect.

Program Vision: The last two sentences of the first paragraph need to be clarified to indicate that this is current practice. This is in contrast to the objectives that follow which are proposals for future practice.

Requirements of the Proposal: The sentence “Consumers are only able to receive one federal and/or state discount per household and from only one telecommunications company” is confusing. It could be footnoted to reflect that all eligible customers can receive one Lifeline discount which is composed of a federal and state discount for wireline customers and a federal discount only for wireless customers.

Transition of Current Lifeline Participants:

Participants with Complete Information: This section states that a file will be provided by DWS to the telecommunications carrier, DPU and UTAP denoting which participants are eligible or ineligible. Is it possible to clarify who precisely is UTAP or where it is located? Is it the PSC or a part of DWS or the DPU? Prior to the emergence of wireless providers as Eligible Telecommunications Carriers, UTAP was administered through the Department of Community and Culture. We are just curious as to where the program will be housed in the future.

Ineligible Participants: It appears that a participant would be deemed ineligible if they do not participate in a public assistance program. SLCAP would appreciate it if the information sent to the “ineligible participant” lets them know clearly that they may be eligible for the Lifeline discount on an income basis even if they are not participating in a program. This makes it appear that they must appeal the decision.

De-enrollment and Resolution Process for Lifeline Participants: While SLCAP agrees that the list of reasons for de-enrollment is legitimate, we are nevertheless confused by some aspects of the process of de-enrollment. While the Resolution Process for Lifeline Participants provides a clear process for some of the reasons outlined, others appear to us to be less clear. For instance, isn't a wireless carrier required to suspend service if the service hasn't been utilized for a certain amount of time? Would this require a Resolution Process during which time the carrier would still be collecting Universal Service Funds? In the case of multiple users in a household, how will it be determined which person in the household is allowed to keep the Lifeline benefit? If a single person is determined to hold duplicative Lifeline benefits (which could be a result of misinformation from a provider or an overlap in service), are both Lifeline benefits cancelled?

As an organization that works with low-income populations, SLCAP believes that it is important to let participants know that they can have more than one telephone service so long as only one of them is a Lifeline service. Cutting off wireline service to a customer could result in an expensive reinstallation of service for a customer who would like to continue that service by paying for it. On the other hand, keeping the service intact but removing the Lifeline credit could be a problem for the carrier if the customer is unable to pay the bill.

Conclusions and Recommendations

Finally, SLCAP appreciates the time and effort the Division of Public Utilities has put into this proposal and its responsiveness to previous comments made by parties. We suggest that parties have another chance to review the final product if there are substantial further changes made in the course of scoping the work with the Department of Workforce Services.

We understand that changes have been made to the Lifeline Application form and hope to be able to review that at a later date to ensure that it is as consumer friendly as possible as well as complying with the FCC's Lifeline requirements.