

CENTURYLINK COMMENTS
Docket No. 10-2528-01
September 20, 2013

On August 26, 2013, the Utah Public Service Commission (“Commission”) issued a *Notice of Action and Invitation to Comment*. In the notice the Commission stated the following:

With respect to future administration of the program the Commission notes that the method of processing new applications and performing the annual certification must be determined. The Commission invites any interested party to comment by Monday, September 23, 2013, on the advisability and associated cost of the following options for program administration:

- 1. Rely on self-certification administered by the ETC for all participants who cannot be program matched.*
- 2. Continue with the present system of requiring participants to fill out full applications and approve people for initial participation only if they can document eligibility, and continue with the process described above for annual recertification.*

CenturyLink’s comments:

As stated in its previous comments, CenturyLink believes that state government is in the best position to efficiently and effectively administer the Utah Lifeline Program, and that the state—not carriers—should retain primary responsibility. The upfront certification and the annual verification of Lifeline eligibility should be performed by the appropriate state agency or a contracted 3rd party administrator.

CenturyLink also believes that if the process is changed next year to have the ETCs rely on self-certification for all participants who cannot be program matched, this is a step backwards. The ETCs will be able to process the applications and determine if they are filled out correctly but will not have access to the information necessary to verify eligibility. If the Commission is inclined to make this change it should first schedule a technical conference so this option can be discussed in greater detail. CenturyLink’s rough estimate of the cost to mail out and process the self-certification applications to Lifeline participants is in the \$3 - \$5 range per Lifeline applicant. Consistent with the provisions of the Commission’s Lifeline rule¹ ETCs would be able to seek recovery.

¹ R746-341-8. *Funding of Lifeline. A. Cost Recovery – The total cost of providing Lifeline telephone service, including the administrative costs of the ETCs and the costs incurred by the responsible agency, shall be recovered and funded as provided in 54-8b-15.*