

Qwest/CenturyLink
Comments
Docket No. 10-2528-01
May 25, 2011

The Commission providing outreach regarding the availability of Lifeline services, as opposed to particular ETC's providing that outreach and communication. (Similar to what occurs in the Relay Utah Program):

Response: Qwest/CTL believes that it will be much more effective and efficient for the PSC to manage the promotional and outreach activities of the Lifeline program. Promotional or outreach activities should provide generic Lifeline program information such as; how customers qualify, how to enroll in the program, and how to select a Lifeline provider. The funds to pay for the generic promotion and outreach should come from the USF.

If the PSC requires providers to implement specific promotional activities and outreach materials for their Lifeline service, Lifeline providers should be able to obtain reimbursement for the reasonable expenses incurred.

Qwest/CTL believes that targeted outreach will prove to be more effective and efficient in getting customers to sign up. It is more difficult to measure the success of mass marketing promotional efforts, such as newspaper, radio and TV ads. Examples of effective targeted outreach would be conducting outreach activities at senior citizen centers, or sponsoring a booth at special event that would likely be attended by those who qualify for Lifeline. The success of targeted outreach activities can be more easily measured.

What interim procedures or actions could be implemented quickly to allow newly approved ETCs to commence service in the short-term while preserving more long-term issues for later resolution in this docket or future proceeding:

Response: Amend the contract with the current agency so they can use contract employees as a way to handle any surge in demand. This would enable the current agency to do the qualification and verification for all Lifeline providers. If the current state agency will not do this, find another state agency that will do the certification and verification for the new Lifeline providers and have the existing state agency continue to do the certification and verification for the existing Lifeline providers. As a last resort – continue with the existing process for current Lifeline providers and allow self-certification for new Lifeline providers until a contract can be put in place to handle the new providers.

Which issues published in the Notice of Agency Action and Supplement to Notice of Agency Action are no longer relevant—either in whole or in part:

Response: Qwest/CTL does not know if any of the issues have been resolved at this time. However, significant progress will happen if the existing process can be expanded to include the new Lifeline providers initially, followed later by improvements that can make the process more effective and efficient.

Identify issues to be discussed at the June 1, 2011 technical conference:

Response:

Items for the agenda for the June 1 technical conference:

- Status of getting an appropriate state agency to do all of the certification and verification work. Invite DCC and DWS to come prepared to discuss issues/concerns with taking on the additional work load. What can be done, such as hiring contract employees, to enable the state agency to do the certification and verification for the new Lifeline providers?
- How to move forward implementing improvements to the existing process.