

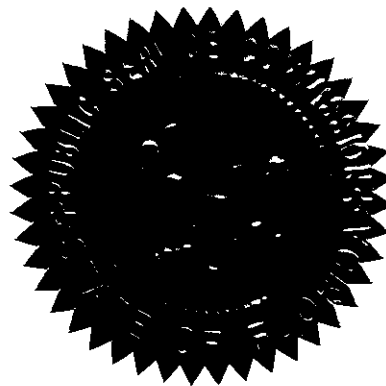
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. UNDOCKETED

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In the Matter of:

RULE DEVELOPMENT WORKSHOP;
LIFELINE SERVICE (RULE 25-4.0665).



PROCEEDINGS: WORKSHOP

DATE: Wednesday, November 5, 2008

TIME: Commenced at 9:30 a.m.

PLACE: Betty Easley Conference Center
 Room 148
 4075 Esplanade Way
 Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
 Official FPSC Reporter
 (850) 413-6732

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1 PARTICIPATING:

2 BETTYE WILLIS, representing Windstream
3 Communications.

4 DAVID CHRISTIAN and DEMETRIA CLARK, representing
5 Verizon.

6 TRACY HATCH, MARYROSE SIRIANNI and KATHY FORBES,
7 representing AT&T.

8 GENE ADAMS, representing TW Telecom.

9 DOUG NELSON, representing Sprint/Nextel.

10 KASSIE KINDER, representing Alltel.

11 SANDY KHAZRAEE and CHRISTI PONTIS, representing
12 Embarq.

13 CHARLIE BECK and LISA EVANS, representing the Office
14 of Public Counsel.

15 BOB CASEY, ROSANNE GERVASI, ADAM TEITZMAN, CURTIS
16 WILLIAMS, CATHERINE BEARD, DALE MAILHOT and JIM POLK,
17 representing the Florida Public Service Commission staff.

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P R O C E E D I N G S

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MR. CASEY: Good morning, everybody. I'd like to go ahead and get started. I just want to let everybody know that the meeting is being recorded on a digital recorder. And that's to enable us to make a transcript, and the transcript will be available November 24th, for those of you who would like one.

I'd like to introduce a few people. To my left is Rosanne Gervasi, she will be the attorney handling the rulemaking. To her left is Catherine Beard, who's in my section helping us. To my right, of course, is Curtis Williams. You all know him from Lifeline; he's been on it for years. And then to my right at the end of the table there is Jim Polk. He's going to be running the recorder for us. He's also in my section and works on Lifeline.

And with that, I'd like Ms. Gervasi to read the notice.

MS. GERVASI: Pursuant to notice, this time and place has been set for a rule development workshop in re: Proposed Amendment of Rule 25-4.0665, Lifeline Service.

MR. CASEY: Okay. And with that, I'd like to take appearances, please, so we can get you on the record. Let's start on my left. Charlie.

MR. BECK: Charlie Beck, Office of Public Counsel.

MS. EVANS: Lisa Evans, Office of Public Counsel.

1 MS. WILLIS: Bettye Willis, Windstream
2 Communications.

3 MR. TEITZMAN: Adam Teitzman, PSC staff.

4 MR. POLK: Jim Polk, PSC staff.

5 MS. CLARK: Demetria Clark, Verizon.

6 MS. SIRIANNI: MaryRose Sirianni, AT&T Florida.

7 MR. HATCH: Tracy Hatch, AT&T Florida.

8 MR. WILLIAMS: Curtis Williams, PSC staff.

9 MR. CASEY: Bob Casey with the PSC staff.

10 MR. CHRISTIAN: David Christian, Verizon.

11 MS. GERVASI: Rosanne Gervasi, PSC, Legal.

12 MS. BEARD: Catherine Beard, PSC staff.

13 MR. MAILHOT: Dale Mailhot, PSC staff.

14 MR. ADAMS: Gene Adams with the Pennington law firm,
15 representing TW Telecom.

16 MR. CASEY: All right. Okay. Let's get the people
17 on the telephone. So everybody doesn't jump on at once, I
18 could read the names of the people I already have.

19 De O'Roark.

20 Angie McCall.

21 Debbie Nobles.

22 Doug Nelson.

23 Donna Marrell.

24 And Linda Bennett.

25 Is there anyone else on the phone that joined?

1 MS. FORBES: Yes. Kathy Forbes with AT&T.

2 MR. CASEY: Kathy. Okay.

3 MS. KINDER: Kassie Kinder with Alltel.

4 MR. CASEY: I'm sorry.

5 MS. KINDER: Kassie Kinder with Alltel.

6 MR. CASEY: Okay. All right. Anyone else?

7 And we've just had a couple of more people join us
8 here in the room.

9 MS. KHAZRAEE: Sandy Khazraee with Embarq.

10 MS. PONTIS: Christi Pontis with Embarq.

11 MR. CASEY: Okay. Well, thank you very much.

12 I'd like to go around the room to see if there's any
13 opening comments, first of all. And then what I'm going to do
14 after that, if there is no opening comments, we'll go through
15 the proposed rulemaking, not line by line, but article by
16 article. Okay? Or section by section.

17 Charlie, do you have any comments?

18 MR. BECK: No, no opening comments.

19 MR. CASEY: No opening comments. Okay. Anyone else
20 have any opening comments? Nobody? How about on the
21 telephone, does anybody have any opening comments they would
22 like to make? Okay. We have no opening comments. We'll go
23 ahead and start.

24 One thing I would like to announce is that we have
25 removed the proposed rule language addressing Lifeline

1 discounts on bundled packages. As many of you know, we had
2 that in a recommendation to the Commission. It was protested.
3 It is going to hearing on February 24th, so that matter will be
4 handled at hearing.

5 For those of you that are involved in that docket,
6 the docket number is 080234. The direct testimony will be due
7 in about four weeks. It's due December 5th, with intervenor
8 and staff testimony January 5th. The prehearing will be
9 February 9th and the hearing will be February 24th.

10 And with that I will just go ahead and start going
11 down section by section. If anyone would like to comment on
12 anything in a section, please just feel free to speak up. This
13 is pretty informal.

14 Section Number 1.

15 MR. BECK: This is Charlie. On Number (1)(a)6.,
16 there is an "or" at the end. And I was wondering if that's an
17 extra one, because there is an "or" in 1(a)7., as well.

18 MS. GERVASI: You know, I looked at that, Charlie,
19 and I wondered the same thing at first, and then I came upon
20 the conclusion that both "ors" were needed, not that I can
21 remember exactly why at this very moment.

22 MR. BECK: I'm not advocating an "or" or not. It's
23 just an observation.

24 MR. CASEY: I will leave it to Rosanne, whether or
25 not to leave the "or" in there. Put a question mark there.

1 Anyone else have any comments or suggestions on
2 Section 1?

3 UNIDENTIFIED SPEAKER: The first "or" addresses just
4 the last --

5 MR. BECK: And the last "or" goes to the 8.

6 MS. SIRIANNI: Bob.

7 MR. CASEY: MaryRose.

8 MS. SIRIANNI: Just kind of generally, and I will
9 probably hand this over to Tracy, but if you incorporate the
10 federal rule into this proposed state rule, I was kind of
11 wondering, you know --

12 MR. CASEY: Is it duplication of effort?

13 MS. SIRIANNI: Well, that and the fact that, you
14 know, then if the federal rule changes --

15 MR. HATCH: That's a problem.

16 MS. SIRIANNI: You know, it's a problem because it
17 doesn't track back to the changes, so --

18 MR. HATCH: It's not that you can't cross-reference
19 it; the problem is once you do it, you've etched it in stone;
20 if the federal rule changes, then everybody is confused is what
21 really it is.

22 MR. BECK: It seemed to me, also, either if you are
23 going to do that, that you would say give the year or the date
24 of the federal rule.

25 MR. HATCH: That would make it even better for

1 reference purposes.

2 MR. BECK: Or get rid of it completely.

3 And if you would hold up, there are a number of
4 places.

5 MS. SIRIANNI: It just, you know, causes you guys to
6 have to constantly be going back and making changes to your
7 rule.

8 MR. HATCH: Yes. You'll have to make sure you have
9 the correct copy when you decide you want to deal with the rule
10 as compared to what may be published in the CFR.

11 MS. SIRIANNI: And that portion of the rule, when you
12 read it, it really just kind of defers to, you know, the
13 state's Lifeline plan. So, you know, I'm not sure you really
14 need it. I'm not sure it's necessary. And that's my layman's,
15 so I'll leave it to the attorneys.

16 MR. CASEY: I was just going to say that, I would
17 leave it up to Rosanne to decide whether or not that should be
18 in there.

19 MS. GERVASI: Well, whether or not we need the
20 reference to the federal rule would be the first question. And
21 if we do, how to deal with it.

22 MR. HATCH: Yeah, that's the question.

23 MS. SIRIANNI: I just wanted to bring that up and --

24 MR. CASEY: Good point.

25 MR. HATCH: I'm not sure what you gain by the

1 reference by including it. Sometimes that's useful, and it's a
2 really good thing. You just sort of have to do it. But I'm
3 not sure here whether you need to do that.

4 MS. SIRIANNI: Thank you.

5 MR. CASEY: Sometimes it will add a lot of work to
6 us. Okay. Any other comments or suggestions on Section 1?

7 MS. WILLIS: Bob, this is Bettye Willis with
8 Windstream. On Item B, is the intent there to make that
9 applicable for all companies, including small ILECs where this
10 is currently not a requirement for our customers?

11 MR. CASEY: No. As you will see on that separate
12 sheet -- there is a single sheet that was passed out along with
13 the proposed rule. Do you have that single sheet?

14 UNIDENTIFIED SPEAKER: It's at the very bottom of
15 what I gave you.

16 MS. WILLIS: Okay.

17 MR. CASEY: On the single sheet there's four lines we
18 want to add to this rule somewhere in here. We're not sure
19 where we want to put it. And I'll read it for those of you who
20 are the phone. ETC is not required to enroll Lifeline
21 applicants through the income eligibility test of 135 percent
22 or less of the federal poverty guidelines as required by
23 Section 364.10(3)(a), Florida Statutes, and they do so
24 voluntarily, provided the certification and verification
25 requirements of C.F.R. 54.410 are met.

1 MS. WILLIS: Okay.

2 MR. CASEY: So, no, it's not a requirement. The only
3 ones that would be required are the ILECs who went through
4 rebalancing. Those three have to do the income.

5 MS. WILLIS: Okay. I just needed that clarification.

6 MR. CASEY: Okay.

7 MS. SIRIANNI: Bob, one other thing, and this is kind
8 of a nit, but all through the rules you talk about Lifeline
9 service. And I think we brought this up before, in that
10 Lifeline in and of itself is not a service. It's, you know,
11 the Lifeline program or a Lifeline credit. So I don't know,
12 maybe we want to consider just throughout the rules maybe
13 change it from service to -- I mean, program or if somebody
14 else has a suggestion.

15 MR. CASEY: I think we kept it service because that's
16 what the federal calls it, the Lifeline service.

17 MS. SIRIANNI: Do they?

18 MR. CASEY: I think so.

19 MS. SIRIANNI: I'm not sure.

20 MR. WILLIAMS: I think the statute, the Florida
21 Statute does reference --

22 MS. SIRIANNI: Do they call it service, also?

23 MR. WILLIAMS: In some places.

24 MR. HATCH: The problem with calling it a service is
25 it implies that it is a discreet entity. If you look in the

1 tariff for Lifeline service, you ain't going to find it. What
2 it is is a discount off your bill. If you want to call it a
3 service, it probably doesn't really matter, but it can be
4 confusing.

5 MS. SIRIANNI: Yes. I mean, I know, like I said, I
6 mean, it's kind of sort of a nit, but at the same time we don't
7 consider it a service. It's a program or a discount. Just --
8 I don't know, just think about it.

9 MR. CASEY: That's why we're here, to get your
10 suggestions.

11 Okay. Anybody else have any suggestions or comments
12 on Section 1?

13 Okay. Let's go ahead and go to Section 2. Anybody
14 have any suggestions? Comments?

15 Okay. Let's go on. No suggestions or comments,
16 let's go on to Section 3.

17 Now, there was something brought up by a new ETC, by
18 Tracfone on this one, and we may be adding some language there.
19 What Tracfone brought up is that they really don't have a
20 Link-up program because they don't charge a connection fee. So
21 in order to encompass them, what we would have to do is put
22 some language in there. I just jotted something down, and it
23 goes like this: As part of an eligible telecommunication
24 carrier's Lifeline assistance plan, ETCs who charge an initial
25 connection charge must offer a subscriber eligible for Lifeline

1 service pursuant to Sections 1 and 2 of this rule, Link-up
2 service.

3 Would anybody have any objection to that?

4 UNIDENTIFIED SPEAKER: At what line would we be
5 inserting that, Bob?

6 MR. CASEY: That would be on Line 23, Page 1, there.
7 And that's just to cover them because they don't charge a
8 connection fee, so they really can't offer Link-up.

9 MR. HATCH: Details.

10 MR. CASEY: Well, that's why we're here. We want to
11 make sure we --

12 MS. SIRIANNI: Should there be a -- on Line 24, where
13 it says of this rule, comma, should that be and Link-up service
14 in accordance or just, comma, Link-up service? It's how you
15 read it.

16 MR. CASEY: Whether the comma is necessary or not?

17 MS. GERVASI: Whether an and should be --

18 MS. SIRIANNI: Whether an and should be added.

19 Subscriber service pursuant to 1 and 2 of this rule, and --

20 MR. CASEY: No, that's not an and. .

21 MS. SIRIANNI: No?

22 MR. CASEY: No.

23 MS. SIRIANNI: Okay.

24 MR. CASEY: No. It's just saying that ETCs who offer
25 Lifeline service must also offer Link-up service. In other

1 words, that's what it's saying.

2 MS. SIRIANNI: Okay.

3 MR. CASEY: Any other comments on Section 3? We're
4 moving right along.

5 How about Section 4?

6 MR. BECK: Bob, when it says, on Line 3, ETC may use
7 the form. Do companies use the other forms if they are not
8 using the PSC form?

9 MR. CASEY: Some companies, I believe, have their own
10 form separate from that.

11 MR. BECK: And the only other thought, also, when
12 you -- when you refer to the website, the Commission's website,
13 you get very specific with that. It's like being Link-Up
14 Florida and then what -- if you ever change your web form,
15 you're going to have to change the rules.

16 MR. CASEY: Yes, right.

17 MS. SIRIANNI: We had that concern, too.

18 MR. BECK: Just a suggestion, you could just put a
19 period after the FloridaPSC.com. If you care to. I mean,
20 we're not -- strong feelings.

21 MR. CASEY: I think that was brought up by an
22 attorney a couple of years ago when we started this, that they
23 actually had to show where to go to get this. Well, I'll leave
24 that up to Legal.

25 MS. GERVASI: Where are you, Charlie?

1 MR. BECK: On 4, on Page 4 -- Section 4, Lines 6 and
2 7, basically. At the end of 5. You give the website and then
3 you start -- and then it gives very specific directions of
4 exactly what to do on the website.

5 MS. GERVASI: Right.

6 MR. BECK: And that's just a thought. I mean, we
7 have no stake in this, but it seems to me if you change the
8 website, the way you do it, then you have to change the rule.

9 MS. GERVASI: So just not making reference to the
10 website at all, is that what you are saying?

11 MR. BECK: I would refer to the website. I'd just
12 put a period.

13 MS. GERVASI: Oh. I happen to remember why it is
14 that we added the more specificity, and it was because of JAPC
15 wanting that.

16 MR. BECK: Okay.

17 MS. GERVASI: I don't know if they still are being
18 sticklers about that, but that's why we added it.

19 MR. BECK: I was just pointing it out.

20 MS. SIRIANNI: Just trying to keep you from having to
21 do extra work every time it changed.

22 (Simultaneous conversation.)

23 MS. GERVASI: Can we go back to 3 just for a second.
24 That's where I kind of lost you. We were talking about 4, and
25 I was still thinking about 3.

1 MR. CASEY: Okay.

2 MS. GERVASI: It seems like it is a little awkward
3 the way it's written in the sentence.

4 MR. BECK: You know, if we put in what Bob said,
5 which is right before -- on Line 24, before Link-up say must
6 also offer.

7 MS. GERVASI: Or maybe -- how about this, if we
8 put -- if we say on Line 23, ETCs must offer Link-up service to
9 subscribers eligible for Lifeline, pursuant to blah, blah,
10 blah.

11 MR. BECK: Sure.

12 MS. GERVASI: And in accordance with.

13 MS. SIRIANNI: It was just confusing, and that's why
14 I wasn't sure if the and was needed or not, but it was just --
15 it didn't read very smoothly. I mean, I knew what it meant,
16 but --

17 MR. CASEY: Okay. We would still have the language
18 in there about just for those who impose an initial connection
19 charge, right?

20 MS. GERVASI: Yes. I wasn't suggesting removing that
21 language.

22 MR. CASEY: Okay.

23 MS. SIRIANNI: Can you read that again?

24 MS. GERVASI: As part of an eligible
25 telecommunication carriers, ETC, Lifeline assistance plan, ETCs

1 must offer Link-up service to subscribers eligible for Lifeline
2 service pursuant to Subsections 1 and 2 of this rule, in
3 accordance with, and then the rest of the sentence.

4 MS. SIRIANNI: But you would add the part that --

5 MS. GERVASI: And then add --

6 MR. CASEY: Yes. Right. ETCs who charge an initial
7 connection charge must. It would be right there on Line 23.

8 MS. GERVASI: Okay.

9 MR. CASEY: ETCs who charge an initial connection
10 charge.

11 MS. GERVASI: Okay.

12 MR. CASEY: Okay.

13 MS. GERVASI: Maybe that's a little clearer, I don't
14 know.

15 MR. CASEY: We'll polish it up a little bit before we
16 go in the recommendation, of course.

17 And there's also some language on Page 2 that we are
18 going to be cleaning up, too. If you notice there it says
19 self-certification forms.

20 MS. GERVASI: Uh-huh.

21 MR. CASEY: Technically it's not self-certification
22 forms; it's simplified certification, because that's what the
23 Commission order approved. So we will be changing that to
24 simplified certification. And then make sure there's a
25 distinction between simplified certification and automated

1 enrollment. Okay. We'll make that in the final version.

2 Any other comments or suggestions on Section 4?

3 Okay. How about Section 5?

4 MR. BECK: It's just a suggestion. On (b), where it
5 says ETCs shall maintain the name. You know, when I first read
6 that, I wasn't -- it was little unclear to me. I thought if
7 you said ETCs shall designate a primary or secondary
8 representative, and so forth, and then the ETCs will provide
9 the name, e-mail, and address. But, you know, this is not a
10 big deal.

11 MR. CASEY: Okay. All right.

12 MS. GERVASI: Did you get that?

13 MR. CASEY: You want to read -- could you read --

14 MR. BECK: Well, ETCs shall designate one primary and
15 one secondary company representative, and so forth.

16 MR. CASEY: Okay.

17 MR. BECK: To the end of that sentence.

18 And then you could say ETCs shall provide the name,
19 e-mail address, and telephone number of these representatives
20 to the Commission upon request. That's just offered, if you
21 like it. If you don't like it, that's fine, too.

22 MR. CASEY: Well, we always like what you have, you
23 know that.

24 MR. BECK: I know better.

25 MR. CASEY: Okay. Any other comments on 5?

1 Okay. Let's go to Section 6. We did have something
2 come up on Section 6 that may be in conflict with 5(a) up
3 above. Okay. Where it says ETCs shall accept the Lifeline and
4 Link-up Florida online self-certification form as proof, and
5 then down below it says they must accept the federal letters.
6 Okay. Do you think people would get confused with that, that
7 they have to provide federal letters up front instead of
8 self-certification? We may need to clarify that a little bit.

9 MR. CHAMITO: I'm Jorge Chamito on behalf of
10 Tracfone. We are the ones that raised that concern. You know,
11 our understanding, and correct me if I'm wrong, but our
12 understanding is that the obligation to sign with the customer
13 is triggered upon them signing the self-certification or
14 simplified certification. No, we were not allowed to go back
15 and ask for verification for purposes of eligibility.

16 MR. CASEY: That's correct. Once they sign a
17 self-certification, that's correct.

18 MR. CHAMITO: So the only thing we could do, then, is
19 on an annual basis -- it doesn't say whether you can do it at
20 the end or -- anytime within that year period, you can ask for
21 verification, but you can't do it as a gatekeeper function on
22 the front end.

23 MR. CASEY: Right. Basically, what these federal
24 forms were talking about, consumers who would go directly to
25 the telephone company instead of going through the automated

1 process or self-certification process.

2 MR. CHAMITO: Correct. Which is the case for us,
3 primarily. We register most of our clients on the web.

4 MR. CASEY: Right.

5 MR. CHAMITO: As you are aware.

6 MS. SIRIANNI: Bob, just a comment. I mean, you
7 could accept the federal letter in lieu of the signed
8 simplified certification. So maybe you need to work that into
9 where -- I mean, it's an option.

10 MR. CASEY: Right.

11 MS. SIRIANNI: I mean, if somebody had their letter
12 and wanted to give that to you, instead of, you know, signing
13 the self-certification, they can do that, too. So maybe it
14 needs to be worked in as another option, but it's not like
15 an and/or.

16 MR. BECK: There's two ways and you must accept
17 either of them.

18 MS. SIRIANNI: I mean, right. I read it like that,
19 too. But if you think it's unclear, then maybe just, you know,
20 some verbiage to --

21 MR. CASEY: And we are going to polish that up a
22 little bit, just to make sure that they don't have to have
23 those forms. Self-certification is fine. And then at
24 verification time, annual verification, then the forms come
25 into play.

1 MS. SIRIANNI: Right.

2 MR. CASEY: Okay. Anything else on 6?

3 Okay. Let's go to Number 7, Section 7.

4 MS. KHAZRAEE: I have an issue with the
5 electronically.

6 MR. CASEY: Okay.

7 MS. KHAZRAEE: I don't understand -- I'm not sure I
8 understand what you are trying to get at there. If by
9 electronically we're talking about we have to be able to
10 retrieve them from the Commission's website, which we are
11 currently doing, I'm fine with that. But I would like it to be
12 clear that that's what it means. Because at one point I think
13 there had been some discussion about us establishing an e-mail
14 address that customers could directly just e-mail us things,
15 and we don't have that and probably wouldn't develop it. So I
16 guess I'm just unclear as to what we're trying to say here.

17 MR. CASEY: Did OPC originally bring this up? Is
18 this something that you brought up?

19 MR. BECK: Not that I recall.

20 MR. CASEY: That they can be accepted by mail, fax,
21 or electronically?

22 MS. SIRIANNI: I agree. This is AT&T. I agree with
23 Sandy. You know, if you mean the Commission's, then maybe you
24 could just say via the PSC website. But I'm not sure that
25 that's what you were referring to, because we, also, would not

1 be setting up e-mail accounts for them to be able to e-mail it
2 in. It would take a fax or mail.

3 MS. CLARK: The same applies for Verizon.

4 MS. WILLIS: It would be consistent --

5 MR. CASEY: It would be the same for Windstream?

6 MS. WILLIS: Yes.

7 UNIDENTIFIED SPEAKER: Bob, I think you may be able
8 to take care of the problem by putting in may. Because like in
9 our case, our applications are online. And you e-sign, and you
10 submit it directly to the company and we sign you up. So if
11 you take it out, then we wouldn't be allowed to do that,
12 presumably. I mean, if you put may allow, that might take care
13 of the problem for those that decide they want to set up an
14 electronic interface, and for those that don't and want to do
15 it via mail, you know, that would allow for both.

16 MR. CASEY: What do you think, may or must? This was
17 put in here a couple of years ago, and I really don't
18 remember --

19 UNIDENTIFIED SPEAKER: Yes. It's going to be a
20 problem for me if you let --

21 MS. SIRIANNI: I know a couple of years ago when I
22 looked back at the comments, we also had a concern about the
23 electronically. I mean, if you want to change it to, you know,
24 ETCs may allow customers the option, then it leaves it open to
25 each company can do it whatever way they like.

1 MR. CASEY: Either put may in there or take
2 electronically out. Leave must in there.

3 MS. SIRIANNI: Well, I don't want to preclude them
4 from being able to do it electronically.

5 UNIDENTIFIED SPEAKER: You won't be able to do it.

6 MS. SIRIANNI: So, I mean, I would think the better
7 way would be to put may, that way companies can do it whichever
8 way -- you know, while we say today we're not doing that, and
9 we have no plans to do that, you never know down the road, you
10 know. So I think may might be the thing that works the best.

11 MR. CASEY: Okay.

12 UNIDENTIFIED SPEAKER: What was your original
13 argument about why you didn't want to do it electronically?

14 MS. SIRIANNI: We currently don't accept the
15 applications in e-mail. And to do that we would have to set
16 that up, and then you have to have, you know, the resources.

17 UNIDENTIFIED SPEAKER: (Inaudible.)

18 UNIDENTIFIED SPEAKER: On our end, I mean, it was --
19 setting up the website was probably the most time-consuming
20 part. Once you set it up --

21 UNIDENTIFIED SPEAKER: Yes.

22 (Simultaneous conversation.)

23 MS. SIRIANNI: I think it's just a business
24 preference. I mean, you know --

25 UNIDENTIFIED SPEAKER: And the cost incurred in doing

1 it.

2 UNIDENTIFIED SPEAKER: We also have a link to the
3 PSC's website from our website so that it can go electronically
4 from our website. So it's, you know --

5 UNIDENTIFIED SPEAKER: Does everybody have that down?
6 I mean, if you want to -- if they want to come to our web and
7 do it.

8 UNIDENTIFIED SPEAKER: Yes, we accept them from you.

9 UNIDENTIFIED SPEAKER: Probably not.

10 (Simultaneous conversation.)

11 UNIDENTIFIED SPEAKER: I don't know, but I'll find
12 out.

13 UNIDENTIFIED SPEAKER: I don't know, either.

14 MS. SIRIANNI: I'm not sure if we actually have a
15 link to your website, but that's what we usually, if they call
16 or they ask, we --

17 UNIDENTIFIED SPEAKER: We refer them.

18 UNIDENTIFIED SPEAKER: -- we refer them to your
19 website, and we prefer to just take them from that one source,
20 because we have a system in place to take those out to process
21 them and get them back to you guys on the secure website
22 telling you the outcome.

23 MR. CASEY: Do you have a comment?

24 UNIDENTIFIED SPEAKER: Yes. If you say may allow,
25 then it would be possible for a company to say they will only

1 accept them by fax. And then you are driving people to have to
2 find access to a facsimile machine. I just think that could be
3 problematic if you --

4 UNIDENTIFIED SPEAKER: We could always make it two
5 sentences: You must either mail or fax.

6 MR. CASEY: You may do it electronically.

7 MS. SIRIANNI: We usually say via mail, facsimile, or
8 may -- or may.

9 UNIDENTIFIED SPEAKER: Or may.

10 UNIDENTIFIED SPEAKER: Or may allow --

11 MR. CASEY: Thank you. That's good. That's a good
12 point.

13 UNIDENTIFIED SPEAKER: There are some companies that
14 do allow electronic submission, correct? Are there any
15 companies that -- other than Tracfone, are there any of the
16 incumbent local exchange companies that may be on the line?
17 None of the companies.

18 UNIDENTIFIED SPEAKER: We were referring to your
19 website.

20 UNIDENTIFIED SPEAKER: They link to your website.

21 MR. CASEY: Okay. Any other comments on 7?

22 Let's go ahead to Number 8, talking about the
23 consumer only having to provide the last four digits of the
24 Social Security Number. Any comments?

25 MS. KHAZRAEE: I'm just going to throw out one that's

1 not from Embargo, because Mr. McCabe can't help. I don't think
2 Tom is on right now.

3 MS. SIRIANNI: No, he didn't join. He had a conflict
4 en route.

5 MS. KHAZRAEE: We talked about this via the FGI
6 regulatory committee, which is why I have his input. And he
7 said that's fine as long as you guys understand that when he --
8 to do his annual verification, he batches (phonetic) against
9 DCF's files, and he's afraid that by not having the whole
10 Social Security Number it may cause a large number of those
11 people to fall out. They can't find them in DCF's files, so
12 that was his only concern. He just wanted you to be aware of
13 that. It might mess up the annual verification.

14 MR. CASEY: But if they had the address and the last
15 four digits, there shouldn't be a problem, right?

16 UNIDENTIFIED SPEAKER: Unless they update their
17 address.

18 MS. SIRIANNI: I think he was wanting you to be aware
19 that it could. I mean, it may or may not, but it could.

20 UNIDENTIFIED SPEAKER: It could.

21 MR. CASEY: Even if they are kicked off, they're sent
22 a letter giving them 60 days to correct the problem.

23 MS. KHAZRAEE: Right. To which they then have to
24 respond to which, as we know some people throw mail from the
25 phone company in the trash without looking at it.

1 MS. SIRIANNI: And, Bob, I know we were one of the
2 companies that had a problem with that part of the rule
3 previously, but we don't have a problem anymore.

4 MR. CASEY: No problems?

5 (Simultaneous conversation.)

6 MR. CASEY: Tom was the one with the problem, and
7 he's not here.

8 MS. SIRIANNI: Tom, didn't have a problem with it.
9 He just really wanted you to be aware that it may cause more to
10 drop out because you don't have the full number. But you would
11 still follow the same process in giving them 60 days.

12 UNIDENTIFIED SPEAKER: Right.

13 MR. CASEY: Okay. Any other comments on 8?

14 UNIDENTIFIED SPEAKER: I was just going to add one
15 last thing just for clarification.

16 MR. CASEY: Sure.

17 UNIDENTIFIED SPEAKER: At the end of the sentence,
18 where it says, (inaudible) program that we just put, as part of
19 the annual verification process, just to clarify we're talking
20 about -- that you're doing this just as part of your annual
21 verification.

22 MR. CASEY: Okay. Anybody have any problems with
23 that? Concerns?

24 UNIDENTIFIED SPEAKER: For a customer -- I have a
25 question. For a customer account, you're still not getting the

1 full -- I mean, if you are setting up your account, you still
2 have the full Social Security Number, right?

3 MS. SIRIANNI: Are you talking to me?

4 UNIDENTIFIED SPEAKER: Yes.

5 MS. SIRIANNI: We do request the full Social Security
6 Number. However, if they, you know, refuse to give it, we're
7 not going to deny service. In the past when (inaudible) for
8 Lifeline customers was to be able to batch it. But, as you
9 know, there's been a lot of controversy about using full Social
10 Security Numbers, so we have backed off of that.

11 MR. CASEY: Okay. We can now move over to Page 4,
12 the bottom of Page 4, since 9 is already in the rule.

13 MS. SIRIANNI: Can we back up for a second?

14 MR. CASEY: Sure can.

15 MS. SIRIANNI: On 9(e), I know this is already a
16 rule, but we have made some changes to this since we put this
17 in place. This is within 20 days of receiving notifications,
18 e-mail notification, we give you back the list of -- now we
19 have the secure website that we post them. And I apologize,
20 because I was going to try to draft some language to
21 incorporate in there, and I didn't have time. But I think this
22 needs to be updated to reflect that you now have a secure
23 website that we post it on. We don't just file it confidential
24 or --

25 MR. CASEY: You have the option of putting it on this

1 website.

2 MS. SIRIANNI: Right. Right. So I just think you
3 may want to incorporate that into the current rule that we have
4 the option of doing the secure website.

5 MS. KHAZRAEE: And, in fact, I thought that was you
6 guys' preferred request, because I think you guys specifically
7 asked us to switch from filing them with the clerk to using the
8 secure website, which we did.

9 MR. CASEY: Right. We feel it is much more secure
10 than just faxing it.

11 MS. SIRIANNI: It's much more efficient, too.

12 MR. CASEY: For you guys, too.

13 UNIDENTIFIED SPEAKER: Yes.

14 MR. CASEY: Okay. We can update that. That's no
15 problem.

16 MS. SIRIANNI: I mean, if you need me to draft
17 something, I will.

18 MR. CASEY: Are you volunteering?

19 MR. HATCH: No, she's volunteering me.

20 MS. SIRIANNI: That's why I brought my attorney
21 along.

22 MR. CHAMITO: Bob, we have a comment in regard to
23 that.

24 MR. CASEY: Sure. Go ahead, Jorge.

25 MR. CHAMITO: As you know, we do it electronically.

1 And so we will send you -- we hit the click, and you submit.
2 We give you a confirmation number. And that's e-mailed to you
3 if you've registered an e-mail. You know, again, you know, we
4 are trying to go paperless to the extent that we can. You
5 know, first the ability to recognize that language. The
6 receipt seems to, I think, conjure up an idea of a paper
7 document.

8 MR. CASEY: Okay. Now, we are not on -- now, you are
9 on 10, right?

10 MR. CHAMITO: I'm sorry, yes.

11 MR. CASEY: Okay. We are just getting to 10.

12 MR. CHAMITO: Okay.

13 MS. SIRIANNI: I went back on 9(e).

14 MR. CASEY: Yes. She was back on 9.

15 Any other questions or comments on 9 before we go to
16 10?

17 MR. NELSON: Bob, can you hear me?

18 MR. CASEY: I sure can.

19 MR. NELSON: Sorry. I was on mute. This is Doug
20 Nelson.

21 MR. CASEY: Hey, Doug.

22 MR. NELSON: I came back on, because I had trouble
23 speaking before. Could we really briefly go back to 8 for a
24 moment?

25 MR. CASEY: Sure.

1 MR. NELSON: Sorry about that.

2 MR. CASEY: No problem.

3 MR. NELSON: I just want to go sort of on the record
4 as saying from our perspective we -- I think we've discussed
5 this before. The Social Security Number we think would really
6 help us sort of validate the identity of some of the
7 applications we get from you all through the automatic
8 enrollment process. You know, we have trouble with people who
9 fill out the form at DCF and may give a telephone number that
10 may be an ILEC line or something. Their address may be a
11 little off, their names a little off, and we can't verify that
12 they are our customer or not.

13 And, unfortunately, the ways to do that that are most
14 precise are the account number or the telephone number that is
15 our, you know, that they are subscribed to with us or the
16 Social Security Number. And I understand the reasons why
17 that's hard to ask people for, no doubt, but I just wanted to
18 say that, you know, we think that would really help us
19 determine who is an existing customer and sort of get people
20 signed up.

21 MR. CASEY: If you had the full Social Security
22 Number instead of just the last four?

23 MR. NELSON: Yes. You know, the argument in our
24 favor, I think, is that even though it's a sensitive piece of
25 information, people, it's my understanding, would be asked for

1 that information by DCF, you know, in applying for the
2 programs. And so, you know, the question is whether it would
3 really deter them from giving it in order to get Lifeline.

4 You know, there are processes in place that, you
5 know, can sort of secure the information. A lot of companies,
6 I think, deal with Social Security Numbers, probably not all.
7 But, you know, it's something that I don't think should be a
8 huge deterrent necessarily.

9 MR. CASEY: Right. It's my understanding that DCF
10 does have the full Social Security Number. Whether or not we
11 should get it from them is the question then. It's been
12 decided so far that we should just use the last four digits.

13 MR. NELSON: I understand that. I just wanted to
14 reiterate the point.

15 MR. CASEY: And we've got your comments down.

16 MR. NELSON: Okay.

17 MR. CASEY: Thank you.

18 UNIDENTIFIED SPEAKER: I think we would have to
19 coordinate with DCF, because I believe that anytime a
20 government agency requires Social Security Numbers, they have
21 to disclose the full scope and purpose for which it is used,
22 and then that's monitored by either the Legislature or the
23 Governor's Office. And I think that that disclosure would have
24 to come out of DCF, and they would have to agree to it before
25 we could ever start down that road.

1 MR. CASEY: Okay.

2 MR. BECK: Let me just state our -- you know, I
3 understand Doug Nelson's concerns, but we support the way it is
4 written here. There is just a suspicion by people of the
5 Lifeline program. And people are, I think, much more
6 comfortable just giving the last four numbers.

7 MR. CASEY: And they would be reluctant to sign up.

8 MR. BECK: Yes. That's the other side of the coin.

9 MR. CASEY: Okay. Any other comments before we go on
10 to 10? Okay. Let's go on to Section 10. This deals with the
11 receipt for an application, Lifeline application. Any
12 comments, suggestions?

13 UNIDENTIFIED SPEAKER: We have a comment.

14 (Simultaneous conversation.)

15 MR. CASEY: I'll start with Charlie.

16 MR. BECK: Yes. I know we pushed this one
17 previously, but we've reconsidered and do not see this as
18 necessary from our side. That will make --

19 UNIDENTIFIED SPEAKER: Great.

20 UNIDENTIFIED SPEAKER: Nevermind. Charlie, you're
21 our new hero.

22 MR. CASEY: Okay.

23 MS. WILLIS: We can just strike that.

24 MR. CASEY: Section 10 will be stricken.

25 UNIDENTIFIED SPEAKER: Thank you.

1 UNIDENTIFIED SPEAKER: Thank you, Charlie, for that.

2 MR. CASEY: Okay. Number 11, Section 11.

3 MS. KHAZRAEE: We don't have a problem with this. I
4 think the only comment I wanted to make, which I think we made
5 the last time this came up was my understanding is you're just
6 saying we can't require them to show us any other proof that
7 they are qualified if they signed up for the self-cert, which
8 we're fine with. We just want to make it clear that if they
9 don't currently have service with us, and they fill out your
10 form online, we do have to get additional information from
11 them. Not for the purpose of approving Lifeline, but for the
12 purpose of establishing the account.

13 MR. CASEY: That's a whole separate thing.

14 MS. KHAZRAEE: That's what you meant. Okay.

15 MR. CASEY: Establishing an account and signing up
16 for Lifeline are two different things.

17 MS. KHAZRAEE: Then we're fine.

18 MR. CASEY: And we also have the 47, the cite there.
19 And I was asking to check to see if we need it.

20 Any other questions or comments on 11? Okay.

21 Shall we go over to 12? Any comments?

22 Now, this may be a point where we enter that new
23 language about voluntary 135 percent. I'll read that once
24 more: ETCs not required to enroll Lifeline applicants through
25 the income eligibility test of 135 percent or less by the

1 federal poverty guidelines as required by Section 364.10(3)(a),
2 Florida Statutes, may do so voluntarily provided the
3 certification and verification requirements of C.F.R. 54.10 are
4 met. That may be a good place to put it in. I'll leave that
5 up to the attorneys.

6 MS. SIRIANNI: Bob, let me just ask, if you put that
7 there, then back on 1 would you take (b) out?

8 MR. CASEY: Right. 1(b) is the other place where we
9 could put it.

10 MS. SIRIANNI: You would take it out and just put it
11 in the other, or would you just want to put it with (b) there
12 so that all the eligibility criteria is in the same place?

13 MR. CASEY: Right. That's why I'm going to leave it
14 for Rosanne.

15 MS. SIRIANNI: Okay.

16 MR. CASEY: She's got the esquire after her name, and
17 I don't. I stay away from that.

18 MS. SIRIANNI: I just wasn't sure if you were going
19 to leave that there and have it in a second place.

20 MS. CLARK: And, Bob, this is Demetria with Verizon.

21 MR. CASEY: Sure.

22 MS. CLARK: I just want to make sure this language is
23 not precluding, for example, when I get e-mails from Lisa with
24 our income certified subscribers, sometimes it will say, for
25 example, currently with -- like with Verizon, they have a

1 package. And we put on the spreadsheet that, of course, that
2 disqualifies them from Lifeline. That's not interfering with
3 our saying, okay, but they haven't met this particular Verizon
4 requirement right now. I'm saying it's not a -- we want to
5 make sure there's not a conflict with our current process.

6 MR. CASEY: Now, you've brought something up that we
7 haven't even thought of. That's something we're going to have
8 to think about.

9 MS. CLARK: Okay.

10 MR. CASEY: And, of course, it will probably be
11 settled by the time -- the hearing will be come and gone by the
12 time --

13 MS. CLARK: Maybe some clarifying language would
14 help, you know.

15 MR. CASEY: Okay. It's something we're going to have
16 to look at.

17 Okay. Any other comments on 12?

18 Okay. Let's move on down to 16, about advertising.

19 A question was brought up about where we got this language. It
20 is in an order, a '97 order of the Commission. The order
21 number is PSC-97-1262, if anybody wants to reference it.

22 Any questions, comments?

23 UNIDENTIFIED SPEAKER: Bob, I have a question.

24 MR. CASEY: Sure.

25 UNIDENTIFIED SPEAKER: We are a prepaid, so we don't

1 have a billing service. So how would you address it for the
2 carriers that don't generate a bill?

3 MR. CASEY: We don't have a directory, either.

4 UNIDENTIFIED SPEAKER: Yes. But I don't -- for those
5 that have seen our billboards or commercials --

6 MR. CASEY: You have billboards?

7 UNIDENTIFIED SPEAKER: I'm looking for your picture
8 on there.

9 UNIDENTIFIED SPEAKER: I'm working on it.

10 I mean, do you want to have a different standard for
11 the folks that don't generate a bill? I mean, in case of a
12 prepaid?

13 MR. CASEY: Well, we have an if in there. At a
14 minimum, if, if the ETC publishes a directory --

15 UNIDENTIFIED SPEAKER: Well, but you could also say
16 must also place an insert in the subscriber's bill, or match it
17 to the subscriber's bill at least once a year.

18 UNIDENTIFIED SPEAKER: Say the same thing. If an ETC
19 generates, and then use your bill.

20 MR. CASEY: We can do that. Anybody have a problem
21 with that?

22 UNIDENTIFIED SPEAKER: And this doesn't preclude the
23 federal standard that's published in newspapers or whatever.

24 MR. CASEY: General distribution, general
25 circulation. No.

1 UNIDENTIFIED SPEAKER: So you're seeking -- just so
2 that I'm clear, are you seeking to define the minimum for
3 purposes of -- the standard, the federal standard is
4 (inaudible) the availability of Link-up, and at least -- strike
5 the Link-up, there is similar language for Lifeline. In a
6 manner reasonably designed to reach those likely to be
7 qualified for the program. Are you seeking to define that for
8 purpose of the Florida community you can satisfy that
9 requirement by at least --

10 MR. CASEY: This has already been defined in an
11 order, so that's the language right out of the order. So what
12 we did is we went above and beyond, which we are allowed to do
13 with the FCC, above and beyond as long as we don't contradict
14 their rule.

15 UNIDENTIFIED SPEAKER: Okay.

16 UNIDENTIFIED SPEAKER: So you have got the federal
17 model and --

18 MR. CASEY: Right. Any other questions or comments?

19 Okay. Number 17.

20 MS. KHAZRAEE: We have an issue.

21 MR. CASEY: Oh. A concern and an issue, okay.

22 UNIDENTIFIED SPEAKER: Well --

23 UNIDENTIFIED SPEAKER: Sandy's is further along.

24 MR. CASEY: We need a buzzer.

25 UNIDENTIFIED SPEAKER: Go right ahead.

1 MS. KHAZRAGEE: You know, so far, as far as I know,
2 the FCC has not -- has not approved this, right? So if for
3 purposes of reimbursement from USAC, we're only allowed to get
4 reimbursement for one line per household. So this is requiring
5 us to put in a line we would get zero reimbursement for? Is
6 that --

7 MR. CASEY: That's something we're going to have to
8 look at.

9 MS. SIRIANNI: Yes, that's my understanding, Sandy,
10 that, you know, we would get the 10.50 for the first line, but
11 the second line, the whole entire 13.50 would be out of our
12 pocket. And so that is a concern.

13 MR. HATCH: We're not sure you really want to do
14 that.

15 MS. SIRIANNI: Right.

16 MR. CASEY: Well, I brought it up with the FCC.

17 MS. SIRIANNI: And what did they say?

18 MR. CASEY: What do you think they would say? We'll
19 look at it.

20 MS. SIRIANNI: I mean, unless you, you know --

21 (Simultaneous conversation.)

22 MR. CASEY: This was brought up at a relay
23 conference, the Florida Relay Conference.

24 (Inaudible, electronic noise.)

25 MR. CASEY: Are you petitioning the Legislature or

1 something?

2 MS. SIRIANNI: No, I'm just bringing it up.

3 MR. HATCH: No, she's not.

4 MS. SIRIANNI: No, I'm not.

5 MR. CASEY: Okay.

6 MS. SIRIANNI: I'm just throwing it out there, you
7 know. Food for thought.

8 MR. CASEY: Okay. I was just wondering.

9 MS. SIRIANNI: No, I'm not.

10 MR. CASEY: Okay. One other thing that I was
11 wondering about, should we define that a little better in Line
12 3, to say and Lifeline service for one residential access line?
13 Do you think that's needed? That was brought up, and I was
14 just wondering if anybody else had a comment on that.

15 MS. SIRIANNI: Do the FCC rules talk about whether
16 Lifeline is residential or -- I mean, we all know that --

17 MR. CASEY: They do in a couple different places.
18 Under Link-Up they talk about it.

19 MS. SIRIANNI: That it is only available for
20 residential.

21 MR. CASEY: And then in the definition of Lifeline
22 they talk about one household, I believe. Let me get my book
23 here. Yes, under the definition of Lifeline, it says it means
24 a retail local service offering that is available only to
25 qualifying low-income consumers. So a business wouldn't be a

1 consumer.

2 MR. HATCH: That begs the question -- I wouldn't say
3 that's necessarily ironclad, but I think in the context of what
4 we're dealing with --

5 MR. CASEY: Well, would you suggest putting in
6 residential?

7 MR. HATCH: It wouldn't hurt.

8 MS. SIRIANNI: I mean, I don't think we would have a
9 problem putting in residential.

10 MR. CASEY: Any objections to --

11 UNIDENTIFIED SPEAKER: Actually, we have a question,
12 but it doesn't go to that specific issue, but it's related.
13 And it's -- and somebody maybe could answer this for me. Does
14 anyone know if there is a definition of what a household is?
15 And the problem that we're having, we're offering free phones
16 for any folks calling from shelters. And those are not
17 households, per se, but that is where they live. So I don't
18 know if there is any definition of household to include the
19 folks that are transient, and, you know, do they move from
20 shelter to shelter? We've had folks that are applying from
21 Shelter A and then the following week they are in Shelter B.

22 MR. HATCH: I guess by definition if they are in a
23 shelter that are not a household.

24 UNIDENTIFIED SPEAKER: Well, that's my question.

25 MR. HATCH: It does bet the question, yes.

1 MR. CASEY: And those are the people who probably
2 need it the most at some level.

3 UNIDENTIFIED SPEAKER: But, you know, we can shift --
4 we're only going to be able to shift one, because we're only
5 going to get, you know, the subsidy for one. We may get 50
6 requests. So, you know, if the definition is that is not
7 residential, and we would think that's probably the correct
8 one --

9 MR. CASEY: And I did bring that up with USAC, the
10 head of the low income program for USAC. And, of course, she
11 suggests going to the FCC and getting a clarification. And by
12 the time I retire, we may get it. If we even put one in.

13 UNIDENTIFIED SPEAKER: You're not that lucky, Bob.

14 MR. CASEY: Yes.

15 UNIDENTIFIED SPEAKER: So if a Tracfone customer
16 signs up for Lifeline, do they have to put an address down?

17 MR. CASEY: Yes.

18 UNIDENTIFIED SPEAKER: Okay. And we'll ship it out
19 to that address. The problem is if Joe Smith is the first one
20 to do it, we'll ship it. Then Jane --

21 MR. HATCH: It would be ten people from the same
22 address.

23 UNIDENTIFIED SPEAKER: Right.

24 UNIDENTIFIED SPEAKER: It will kick it out. It will
25 flag it and say, you know, we're using it, it's (inaudible) it

1 will flag it and say we can't ship it. So we just want to make
2 sure we're doing what we need to be doing. And we think we
3 are. I mean, we think that that's not a household.

4 MS. GERVASI: So only the first person living in that
5 shelter would get a phone and the others wouldn't.

6 MR. HATCH: The first person that applied from that
7 address would get --

8 UNIDENTIFIED SPEAKER: Because you track them by
9 address.

10 MR. HATCH: Yes.

11 UNIDENTIFIED SPEAKER: And it's really the same issue
12 that we just raised about doing two lines, it's because USAC is
13 not going to write for more than one at that address. Which is
14 the same problem we're having with having two at the same
15 address.

16 UNIDENTIFIED SPEAKER: Right.

17 UNIDENTIFIED SPEAKER: We shipped eight phones to one
18 address and we found that was a shelter. You know, those are
19 the set of phones (inaudible).

20 MR. BECK: It's just an odd result. You know, it
21 doesn't mean -- you know, I understand the household issue, but
22 it was never intended to produce that result, it doesn't seem
23 to me.

24 UNIDENTIFIED SPEAKER: Right.

25 UNIDENTIFIED SPEAKER: Until they get audited by

1 USAC.

2 UNIDENTIFIED SPEAKER: Right.

3 UNIDENTIFIED SPEAKER: That's a USAC normally that --

4 MR. BECK: Only when that clarification comes. It's
5 the wrong result. I mean --

6 UNIDENTIFIED SPEAKER: We've dealt with that one like
7 in a, you know, kind of a multi-unit type, but then they have a
8 number, you know. But at the shelter you don't have, you know,
9 like --

10 UNIDENTIFIED SPEAKER: Bed 1.

11 UNIDENTIFIED SPEAKER: Yes.

12 UNIDENTIFIED SPEAKER: Right. We don't have -- I
13 mean, we've dealt -- we've gone through that because of a house
14 like, you know, Unit 1 or Unit 2, you know, so the address is
15 just enough different that they really are in a separate. But
16 in your case, that's a --

17 UNIDENTIFIED SPEAKER: I have another issue. Also,
18 with the Tracfone, if an elderly parent lives with a child, but
19 their funds are not commingled, you know, we have to make that
20 decision as to, you know, are they part and parcel of that same
21 household. And it gets very difficult at times to approve or
22 disapprove based on that. And then if you have an
23 over-21-year-old child who comes back into the parents' house,
24 but, you know, just to live there, do we qualify them or not?

25 MS. SIRIANNI: Yes. We have had those issues, too,

1 where you have multiple families living together in one
2 household at one address, and we'll only qualify the first one
3 for Lifeline. They may have a second line, but we don't do it.

4 MR. CASEY: Any other comments? Okay. Let's move on
5 to 18. Comments, suggestions?

6 MR. CHAMITO: We do.

7 MR. CASEY: Jorge.

8 MR. CHAMITO: Our plan includes nationwide long
9 distance. We have no way of -- that's what the plan is. We
10 have no way of blocking toll calls.

11 UNIDENTIFIED SPEAKER: Technically feasible.

12 (Simultaneous conversations.)

13 UNIDENTIFIED SPEAKER: That's a good suggestion,
14 David. Could you put it up front?

15 MR. CASEY: I need to go back and look at the
16 statute, because I believe that's in the statute. We'll check
17 it.

18 MS. GERVASI: One of the reasons why they don't want
19 to copy statutes into rules.

20 MR. CASEY: She's always on me about that. No,
21 that's in the statute. You can't do that.

22 MR. BECK: That's a different discussion.

23 MS. SIRIANNI: Yes, that was a different discussion
24 we were actually going to think about having today. Maybe
25 Tracy and Rosanne could have that discussion.

1 MR. CASEY: We'll fix 18. We'll reword that as long
2 as the statute allows it.

3 19, any comments or suggestions?

4 Okay. 20?

5 UNIDENTIFIED SPEAKER: I'm just curious. Does
6 anybody still have a monthly number portability charge?

7 UNIDENTIFIED SPEAKER: Haven't we already paid for
8 all that?

9 UNIDENTIFIED SPEAKER: I think there are.

10 MR. CASEY: The ILECs have. There are some CLECs
11 that charge.

12 UNIDENTIFIED SPEAKER: Okay.

13 MR. CASEY: As a matter of fact, I'm auditing one
14 that was charging it, a local number portability fee.

15 UNIDENTIFIED SPEAKER: Okay.

16 UNIDENTIFIED SPEAKER: I did not know that.

17 UNIDENTIFIED SPEAKER: For what?

18 UNIDENTIFIED SPEAKER: That's why he's auditing it.

19 MR. CASEY: We'll find out. I'll guarantee you that.

20 Okay. Let's see. How about 21?

21 MS. SIRIANNI: I think we need a buzzer again.

22 MR. CASEY: Come on now, folks. Okay. 21 is about
23 the quarterly reports.

24 UNIDENTIFIED SPEAKER: Yes. I guess why do we need
25 quarterly reports?

1 MR. CASEY: Okay.

2 UNIDENTIFIED SPEAKER: Isn't it working find once a
3 year for you?

4 MR. CASEY: Because when this started out, I was
5 going with monthly reports and we conceded and went to
6 quarterly reports.

7 UNIDENTIFIED SPEAKER: So now don't you want to go to
8 annual?

9 MR. CASEY: Seriously, I feel like going back to
10 monthly so that we can monitor the ETCs a little better. So I
11 would not be in favor of going to semi-annual.

12 UNIDENTIFIED SPEAKER: So you are saying there is a
13 problem that needs to be --

14 MR. WILLIAMS: Well, we do get requests throughout
15 the year from different -- other agencies and organizations,
16 you know, requesting updated numbers. So it's a little awkward
17 to say that we were waiting for an annual submission for
18 updated numbers.

19 MS. WILLIS: What kind of information do they ask
20 for? I mean, is it specific, like the number of Lifeline
21 customers you have, or is it all of this? Because you are
22 asking for quite a bit on a quarterly basis. And, honestly, we
23 just don't track it. We don't keep it like that, and you're --
24 and it would be something we would really have to put processes
25 and people in place to do, which gets to be fairly expensive.

1 MS. CLARK: And as you know from Verizon's responses
2 to the annual, like my data request, some of this information,
3 at least half of it, our systems don't even track.

4 MS. WILLIS: That's right. Same here. You know, our
5 systems don't even have the capability. So you're talking
6 about building in -- you're talking about serious technical
7 changes that we would have to build into our current systems to
8 even track it.

9 MS. CLARK: And there's a few items that we can
10 probably provide, but there will be issues with the time line
11 two weeks following the end of the quarter. Sometimes, you
12 know, it takes at least 30 to 60 days, depending on what
13 information you're asking for to even retrieve that
14 information. But they're not set up to do this on a regular
15 basis.

16 MS. SIRIANNI: And, I guess, you know, as far as --
17 and you say quarterly, but some of this information it doesn't
18 change that much from quarter to quarter. So, I mean, I would
19 think at least -- I mean if you were going to keep some of
20 this, which I have a concern with, and I'll tell you about
21 that, but at least twice a year I would think would be plenty
22 because it doesn't change that much from quarter to
23 quarter at this level of detail. I mean, it really doesn't.

24 UNIDENTIFIED SPEAKER: Well, what about a suggestion
25 that, you know, the information you guys get back on the

1 website, so we send it back.

2 UNIDENTIFIED SPEAKER: There you go.

3 UNIDENTIFIED SPEAKER: I mean, is there a way for you
4 to track that information internally, because you've got the
5 raw data. Is there a way to sort those spreadsheets so you can
6 get at a total number of Lifeline applications that have been
7 processed, which is probably the key number that you need. And
8 I'm just trying to think of a solution here without increasing
9 our costs or our burdens here, that there might be something we
10 can do with the current system we have set up. And that might
11 be the way to go, rather than the level of detail here.
12 Because some of this information, like Demetria said, we don't
13 even capture.

14 MS. SIRIANNI: Like adding onto data like J, where it
15 asks for -- well, first of all, it says name of entity, which
16 I'm not sure what entity means. I would think that that needs
17 to say agency, because the only ones we would be able to tell
18 you is who we had got -- let's see, who we received from DCF,
19 OPC, and the PSC's website. Those would be really the only
20 three. The rest would come from individual customers, and I
21 don't think you're wanting us to list each individual customer
22 out.

23 So as far as where we get them, those are the three,
24 and two of those three are on the report that we post on the
25 secure website. And like when I do the annual report to get

1 you some of that information, I actually just went to those
2 reports that I gave you, tallied that stuff up and gave it to
3 you, you know, in maybe a different format. So some of that
4 you could get right there from that report that I send to you,
5 hopefully, once every couple of weeks.

6 MR. CASEY: What you put on the web, though, is only
7 the automatic enrollment process.

8 MS. SIRIANNI: Right. That's DCF and PSC.

9 MR. CASEY: What about customers that go directly to
10 AT&T?

11 MS. SIRIANNI: Right. But a large majority of them,
12 over 4,000 a month are from DCF and PSC. I mean, so that's a
13 large amount. I mean, I could -- in addition to that, you
14 know, if you wanted to look at maybe just A, the number of
15 Lifeline subscribers, you know, but when you start getting
16 into, you know, the more specific ones, that's difficult. I
17 mean, so if you could do part of it on your own by getting the
18 DCF and PSC, and actually OPC sends us a spreadsheet and then
19 we send it back. And, I mean, we could work out a way that if
20 you wanted we could post those on the secure website and you
21 could have those to do any analysis you wanted. I mean, as
22 long as my attorney is okay with that.

23 MR. CASEY: He's okay with anything.

24 MS. SIRIANNI: But, I mean, yes, that's an option
25 because she sends -- you know, Lisa sends me, and I think she

1 does to the other ILECs once a week, a list of -- once a week,
2 or something like that.

3 MS. EVANS: Yes, every Friday.

4 MS. SIRIANNI: A list to us, and then we go through
5 that list, and we send it back to her and say -- you know, and
6 basically what it does is it shows another column, who was put
7 on, who already had Lifeline, who is not our customer. So that
8 would be the other agency that we get them from, the third
9 agency. And then, of course, all the other apps that we get
10 from just individuals we don't track how many of those we put
11 on or reject. So really the only thing I would be able to get
12 you from that is how many we received outside of those other
13 three agencies.

14 MR. CASEY: Received or put on Lifeline?

15 MS. SIRIANNI: Well, I'm sorry, that we put on
16 Lifeline, that we actually signed up for Lifeline. And we
17 don't track here is how many we received, here is how many we
18 put on here, here is how many we rejected. We don't track
19 that, the ones we get from individual customers.

20 MR. CASEY: Okay. Let me make a suggestion. I'm
21 going to ask for post-workshop comments, okay. And if you
22 would go through A, B, C, go through each one and say our
23 system can't do this, or I suggest doing it this way, something
24 like that. Would that be acceptable to everybody?

25 MS. SIRIANNI: Sure.

1 UNIDENTIFIED SPEAKER: Thank you, Bob.

2 UNIDENTIFIED SPEAKER: Great.

3 UNIDENTIFIED SPEAKER: MaryRose.

4 MS. SIRIANNI: Yes.

5 UNIDENTIFIED SPEAKER: You mentioned that you get
6 4,000 from the automatic enrollment process. How many are you
7 getting from individual customers?

8 MS. SIRIANNI: I don't know about that. I would have
9 to go back and kind of look. I mean, I say over 4,000. We're
10 not putting all 4,000 on. A lot of those either --

11 UNIDENTIFIED SPEAKER: I just wondered how many --

12 MS. SIRIANNI: I'd say that --

13 UNIDENTIFIED SPEAKER: -- individual customers are
14 still --

15 MS. SIRIANNI: I don't know. I'll look at that, but
16 it is not very many. I mean, we're getting most of them
17 through DCF and the PSC.

18 UNIDENTIFIED SPEAKER: Could you all give us a feel
19 for how much data we're missing?

20 MS. SIRIANNI: Sure.

21 UNIDENTIFIED SPEAKER: I mean, we do look at the
22 internal data.

23 MS. SIRIANNI: Sure, I know.

24 UNIDENTIFIED SPEAKER: We don't know -- I mean,
25 without a feel for much we are missing.

1 MR. CASEY: Is it 5 percent, 10 percent.

2 MS. SIRIANNI: Sure. I mean, and I could do that by
3 looking at just, you know, over the past, looking at the report
4 we gave you for the monthly that we put on and looking at those
5 reports to show how many we're trying to do in that time frame,
6 I can get a rough estimate of, you know, the difference and
7 then kind of tell you what percentage were actually submitted
8 by individual customers, post it that way. So I'll look at
9 that and try to give you a rough estimate.

10 MR. CASEY: That would be great.

11 MS. SIRIANNI: That will give you an idea.

12 MS. GERVASI: And to the extent that you could give
13 us specific rule language for the changes that you would like
14 to see, that would be most appreciated, in your post-workshop
15 comments.

16 UNIDENTIFIED SPEAKER: (Inaudible.) Do you want cost
17 information on changes that would have to go on with that, too?

18 UNIDENTIFIED SPEAKER: I'm guessing that there will
19 be a SERC sent out. Is there going to be one?

20 UNIDENTIFIED SPEAKER: It will be based on the rule
21 language that you come up with based on post-workshop comments,
22 right? Because right now we have commented on the current rule
23 for reporting, I think the cost for us to set up those IT
24 systems would be a lot higher than if we had comments on the
25 rule and then had a SERC based on a different rule that might

1 reduce those requirements.

2 UNIDENTIFIED SPEAKER: Do you already have an
3 estimate of how much it will be?

4 UNIDENTIFIED SPEAKER: I'm waiting for one.

5 UNIDENTIFIED SPEAKER: If you have it, sure.

6 UNIDENTIFIED SPEAKER: Okay.

7 UNIDENTIFIED SPEAKER: Based on the current rule.

8 UNIDENTIFIED SPEAKER: Yes.

9 UNIDENTIFIED SPEAKER: I assume that would be part of
10 your argument in your comments, though, of why you don't want
11 it.

12 UNIDENTIFIED SPEAKER: Yes.

13 UNIDENTIFIED SPEAKER: Got it. Great.

14 UNIDENTIFIED SPEAKER: Okay. Thanks.

15 UNIDENTIFIED SPEAKER: We did an original SERC a
16 couple of years ago, I believe.

17 MR. WILLIAMS: We did an original, and I mean, as you
18 know, that is handled by another division, so they actually
19 make the recommendation and provide that analysis to us to
20 finalize the rule. So it might be helpful to have it, but we
21 wouldn't be able to use it from a procedural standpoint.

22 UNIDENTIFIED SPEAKER: That's definitely something we
23 want to look at.

24 UNIDENTIFIED SPEAKER: Okay.

25 MS. SIRIANNI: Bob, just from where we -- you know,

1 are you going to get our post-workshop comments and then maybe
2 put out another draft, or do you intend to get the
3 post-workshop comments and then go straight to recommendation?

4 MR. CASEY: Let me ask my attorney.

5 MS. GERVASI: No, we haven't --

6 MR. CASEY: We are going to have to talk to the
7 management and decide what to do next.

8 MS. SIRIANNI: Because I didn't know if we were at a
9 point where we would get a SERC yet or not, or if you would go
10 through one more iteration of, you know, comments and proposals
11 before.

12 MR. CASEY: We can let you know.

13 MS. SIRIANNI: Sure.

14 MR. CASEY: Okay. As soon as I find out.

15 UNIDENTIFIED SPEAKER: Figure it out before you send
16 it out for a SERC.

17 MS. SIRIANNI: Yes, I think so.

18 MR. BECK: Bob, one other thought.

19 MR. CASEY: Sure.

20 MR. BECK: You have the reports being given to the
21 Commission's Director of Regulatory Compliance. If you
22 reorganize, you have to change the rule. You could cure that
23 by just saying you have to report --

24 MS. GERVASI: Where are you, Charlie?

25 MR. BECK: Line 15, Page 6.

1 UNIDENTIFIED SPEAKER: I'm not sure they have a
2 director of compliance.

3 (Simultaneous conversation.)

4 UNIDENTIFIED SPEAKER: Yes. She's sitting in the
5 back.

6 (Simultaneous conversation. Laughter.)

7 MR. CASEY: And her cell number is -- okay.

8 Any other comments?

9 MS. GERVASI: Should we mention the change to the
10 forms that we are making, the perjury thing?

11 MR. CASEY: Oh, yes. Go ahead.

12 MS. GERVASI: You know, there's two forms that are
13 referenced in the rule, and we are going to make a change to
14 the paragraph that talks about how you're filling this form out
15 under penalty of perjury, and I thought I had the new language
16 right here. Yes.

17 Well, anyway, it says I certify under penalty of
18 perjury on both of these forms just above the signature line,
19 you know, that they are reporting everything correctly. And
20 what we want to do is delete the under penalty of perjury,
21 since we don't have specific statutory authority to perjurize.
22 So it's saying things incorrectly --

23 MR. CASEY: We can shoot them, but we can't --

24 MS. GERVASI: -- on this form, and then we'll just
25 add a sentence to say that it is a misdemeanor of the whatever

1 it is degree that the statute says for falsely reporting,
2 knowingly falsely reporting something to a public official.
3 Just to let you know.

4 MS. SIRIANNI: I think that goes back to Charles. I
5 think Charles came up with that.

6 UNIDENTIFIED SPEAKER: He did.

7 MS. GERVASI: JAPC has been getting on us for that
8 sort of thing in other cases, so we thought we would --

9 MR. CASEY: And also, the little button that's on our
10 website that says self-certification, we are going to change
11 that.

12 Okay. Any other comments about anything?

13 How about post-workshop comments? Can we get them
14 tomorrow?

15 (Simultaneous conversation.)

16 MS. SIRIANNI: You said the transcript would be
17 November --

18 MR. CASEY: November 24th.

19 MS. SIRIANNI: So could we have some time --

20 MR. CASEY: How about December 5th, would that be
21 okay, or do you want --

22 UNIDENTIFIED SPEAKER: What day of the week is that?

23 MR. CASEY: That's a Friday. That will give you two
24 weeks, but there's Thanksgiving in there.

25 UNIDENTIFIED SPEAKER: There is Thanksgiving in

1 there. And, you know, FTI wants to file joint comments and --
2 if we can all agree, in which case the board has to approve it.
3 Could we get like maybe one more week?

4 MR. CASEY: How about December 12th?

5 UNIDENTIFIED SPEAKER: Okay.

6 MR. CASEY: All right.

7 UNIDENTIFIED SPEAKER: Thank you. I appreciate that.

8 Thank you.

9 MR. CASEY: Okay. Anything else?

10 If not, thank you for coming. Appreciate it. Thank
11 everybody on the phone for joining us. Take care.

12 * * * * *

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1 STATE OF FLORIDA)

2 : CERTIFICATE OF REPORTER

3 COUNTY OF LEON)

4

I, JANE FAUROT, RPR, Chief, Hearing Reporter
5 Services Section, FPSC Division of Commission Clerk, do hereby
6 certify that the foregoing proceeding was heard at the time and
place herein stated.

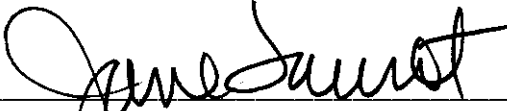
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IT IS FURTHER CERTIFIED that I transcribed said
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to the best of my ability.

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I FURTHER CERTIFY that I am not a relative,
11 employee, attorney or counsel of any of the parties, nor am I a
12 relative or employee of any of the parties' attorney or counsel
13 connected with the action, nor am I financially interested in
the action.

14 DATED THIS 24th DAY OF NOVEMBER, 2008.

15 

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