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Sent: Wednesday, March 07, 2012 4:12 PM
To: Filings@psc.state.fl.us
Cc: Khazraee, Sandy A
Subject: CenturyLink Post-Workshop Comments
Attachments: CenturyLink Post Workshop Comments 3-7-12.pdf

Filed on Behalf of: Sandy Khazraee

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FPSC-COMMISSION CLERK

Sandra A. Khazraee
Director - Regulatory Affairs
Southern Region



315 S. Calhoun Street, Suite 500
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March 7, 2012

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Proposed Lifeline Rule Development – Undocketed

Dear Ms. Cole:

At the conclusion of the January 18, 2012 workshop on the proposed Lifeline rule changes, staff requested post workshop comments be filed thirty days after the FCC issued its Lifeline Reform Order, which makes the comment due date March 7, 2012. In that regard, attached are the post-workshop comments of Embarq – Florida, Inc d/b/a CenturyLink (CenturyLink).

If you have any questions regarding CenturyLink's comments, please do not hesitate to call me at 850-847-0173.

Sincerely,

A handwritten signature in cursive script that reads "Sandra A. Khazraee".

Sandra A. Khazraee

Enclosure

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FPSC-COMMISSION CLERK

FLORIDA PUBLIC SERVICE COMMISSION

Proposed Amendment of Rule 25-4.0665) Undocketed
F.A.C., Lifeline Service and Proposed)
Elimination of Rule 25-4.113 Refusal or)
Discontinuance of Service by Company)

Embarq – Florida, Inc. (CenturyLink) Post-Workshop Comments

Embarq – Florida, Inc. (CenturyLink) hereby submits the following comments on Staff's Proposed Amendment of Lifeline Rule 25-4.0665. CenturyLink is generally supportive of the Commission Staff's proposed revisions to the existing Lifeline Rules and understands that further changes to the rules will likely be made as a result of the FCC's recent Lifeline / Link-Up Reform Order.

On January 18, 2012, a rulemaking workshop was held by Commission staff to discuss proposed changes to Rule 25-4.0665 – Lifeline Service and the proposed elimination of Rule 25-4.113 Refusal or Discontinuance of Service by Company. CenturyLink participated in the workshop and offers the following written comments.

Rule 25-4.0665 (20):

CenturyLink supports elimination of the quarterly reporting requirement currently found in paragraph 20 of Rule 25-4.0665. We agree that this information is available from USAC and thus it is not necessary to require the ETCs to compile and file these reports. With regard to the language moved from existing rule 25-4.113 Paragraph 1 (f) into paragraph 20 of Rule 25-4.066, CenturyLink would like the qualifying phrase "for nonpayment" added into the proposed rule language as that is the intent of language being moved from existing rule 25-4.113. We have provided that suggested change here and we agree with Verizon's comments at the workshop that there may be other acceptable reasons for discontinuing a customer's Lifeline local service.

(20) A company may not discontinue a customer's Lifeline local service **for nonpayment** if the charges, taxes, and fees applicable to dial tone, local usage, dual tone multifrequency dialing, emergency services such as "911," and relay service are paid.

Rule 25-4.0665 (22):

CenturyLink's Interconnection Agreements entered into by both facilities based and reseller CLECs, require the CLECs to comply with all applicable laws and regulations. The non-ETC CLECs who are reselling Lifeline and/or Link-Up should be responsible to provide directly to the FPSC their own annual certification stating they are complying with all FPSC and FCC requirements. At the workshop, staff raised the concern that they would not know which CLECs

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were reselling Lifeline without the ETCs providing that information. CenturyLink acknowledges that valid concern and suggests that FPSC staff can obtain that information through the annual data request to collect the information for the annual Lifeline report to the Governor, President of the Senate and Speaker of the House required in Florida Statute 364.10 (2) (h). CenturyLink provides the name of each CLEC currently reselling Lifeline service within our territory in response to Question 15 in that annual Lifeline data request. We offer the following suggested rule language change to capture our concerns.

(22) Eligible telecommunications carriers that resell Lifeline and/or Link-Up services to non-eligible telecommunications carriers are required to obtain a certification from each reseller that it is complying with all of the Commission and Federal Communications Commission Lifeline/Link-Up requirements. That certification may be in the form of language within the Interconnection Agreement which requires the CLEC to comply with all applicable laws and regulations. ~~The eligible telecommunications carriers shall file a copy of this certification with the Division of the Commission Clerk by October 1 of each year.~~

Rule 25-4.0665 (23):

CenturyLink currently maintains customer records for a period of at least three years. However, with the automated enrollment process in Florida, the only documentation CenturyLink has for many of our Lifeline customers is the data received from the FPSC's automated enrollment web site or the spreadsheet provided by the Office of Public Counsel (OPC) with the customer's name, telephone number, address and request to provide the Lifeline and/or Link-Up discount. Because the FCC's Lifeline Reform Order is adopting changes to increase consistency in certification practices, CenturyLink would suggest that proposed rule paragraph (23) be dropped from this rulemaking and taken up in a future rulemaking when the changes associated with the FCC's order are addressed. In the alternative, we would ask to modify the language in paragraph (23) to clarify that the documentation might be only the spreadsheet from the OPC or the downloaded spreadsheet from the FPSC's automated enrollment process.

~~(23) Each eligible telecommunications carrier shall retain its eligibility documentation as a designated eligible telecommunications carrier, as well as for its customers receiving Lifeline discounts, for a period of three years.~~

Or

(23) Each eligible telecommunications carrier shall retain its eligibility documentation as a designated eligible telecommunications carrier, as well as for its customers receiving Lifeline discounts, for a period of three years. Documentation of a customer's eligibility may consist of an email from the Office of Public Counsel or a spreadsheet from the FPSC's automated enrollment process.

CenturyLink appreciates the opportunity to comment on these draft rule amendments and respectfully requests the modifications suggested above.

Respectfully submitted this 7th day of March, 2012.

/s/ Sandra A. Khazraee
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