

21 West Avenue, Spencerport, New York 14559 www.frontier.com

August 11, 2016 - VIA UPS DELIVERY

Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

RE: 2016 Annual Lifeline Data Request

Dear Ms. Stauffer;

Per request dated July 15, 2016, enclosed are the responses to the 2016 Annual Lifeline Data Request for Frontier Communications of the South, Inc. and Frontier Florida, LLC. We request these responses be placed in the undocketed file.

If you have any questions pertaining to the data, please contact me at 585-777-6719.

Sincerely,

Christine Burke

Manager, Regulatory Affairs

Misting Burke

cc: Angie McCall

ILEC LIFELINE DATA REQUEST 2016 Frontier Florida

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, staff requests that you provide responses to the following by August 15, 2016. Your response should include your company name, contact person, and email address.

For items 1 through 16, please provide the data for the fiscal year July 1, 2015, through June 30, 2016.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

July 2015	199,114
Aug 2015	196,098
Sept 2016	193,219
Oct 2016	190,057
Nov 2015	186,436
Dec 2015	183,993
Jan 2016	180,766
Feb 2016	176,664
Mar 2016	172,502
Apr 2016	174,863
May 2016	170,167
June 2016	165,913

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

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July 2015	4,692
Aug 2015	4,658
Sept 2015	4,631
Oct 2015	4,597
Nov 2015	4,065
Dec 2015	3,980
Jan 2016	3,985
Feb 2016	4,013
Mar 2016	4,035
Apr 2016	4,022
May 2016	3,933
June 2016	3,896

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

Lifeline measured rate credit = \$12.75 Lifeline flat rate credit = \$15.91 4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

	Not Customer	Already on LL	Invalid Acct	Disconnect	Other
Apr 2016	441	0	71	10	
May 2016	199	6	9	1	
June 2016	212	11	10	2	

Prior to Frontier's ownership of this legal entity, this data was not tracked.

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

Aug 2015 89 Sept 2015 77 Oct 2015 68 Nov 2015 67 Dec 2015 535 Jan 2016 53 Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102 June 2016 80	July 2015	102
Oct 2015 68 Nov 2015 67 Dec 2015 535 Jan 2016 53 Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102	Aug 2015	89
Nov 2015 67 Dec 2015 535 Jan 2016 53 Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102	Sept 2015	77
Dec 2015 535 Jan 2016 53 Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102	Oct 2015	68
Jan 2016 53 Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102	Nov 2015	67
Feb 2016 106 Mar 2016 99 Apr 2016 62 May 2016 102	Dec 2015	535
Mar 2016 99 Apr 2016 62 May 2016 102	Jan 2016	53
Apr 2016 62 May 2016 102	Feb 2016	106
May 2016 102	Mar 2016	99
,	Apr 2016	62
June 2016 80	May 2016	102
	June 2016	80

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines, or Lifeline customers moved to Transitional Lifeline.

July 2015	131
Aug 2015	123
Sept 2015	104
Oct 2015	102
Nov 2015	599
Dec 2015	620
Jan 2016	48
Feb 2016	78
Mar 2016	77
Apr 2016	75
May 2016	191
June 2016	117

7. The number of customers participating in Transitional Lifeline each month.

July 2015	2,205
Aug 2015	1,642
Sept 2015	1,556
Oct 2015	1,452
Nov 2015	1,210
Dec 2015	1,638
Jan 2016	963
Feb 2016	533
Mar 2016	469
Apr 2016	422
May 2016	353
June 2016	329

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Frontier's serving area in Florida does not included any Tribal Lands.

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

No Lifeline lines have been resold to other carriers.

- 10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:
 - a. Procedures used to process applications received from the Office of Public Counsel.

Each applicant received through the Office of Public Counsel via email is reviewed to verify that the applicant has a qualifying, active Frontier account and does not already have Lifeline on their account, then Frontier adds lifeline to the customer's account. If the applicant is not found to be a Frontier customer, the account is disconnected, the account is a business account, or the Customer already has lifeline, then Frontier does not process the addition of Lifeline and advises the Agency accordingly.

b. Procedures used to process applications received directly from customers.

Each application received directly from a customer is reviewed to verify that the applicant is a Frontier customer and does not already receive a lifeline discount on his or her Frontier account, that the application is fully completed and signed, that the customer's responses on the application do not disqualify the customer, and that required documentation is provided and supports the customer's eligibility. If requirements are met and needed documents are provided, Frontier adds lifeline to the customer's account. If one or more of these requirements is not met or needed documents are not provided, Frontier provides notice to the customer on the denial.

c. Procedures used to process applications received through the PSC on-line process.

Each applicant received through the PSC on-line process is reviewed to verify that the applicant has a qualifying, active Frontier account and does not already have Lifeline on their account, then Frontier adds lifeline to the customer's account. If the applicant is not

found to be a Frontier customer, the account is disconnected, the account is a business account, or the Customer already has lifeline, then Frontier does not process the addition of Lifeline and advises the Commission accordingly.

d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.

Frontier did not receive coordinated enrollment files from the Department of Children and Families during the period covered in this data request.

e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Frontier usually processes lifeline applications within 10 business days of receipt, when Customer is found to be eligible and Lifeline discount is applied, the lifeline credit appears on the customer's next bill. Depending on the customer's bill cycle, the credit may not appear until the second bill following processing, but will apply retroactively.

- 11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:
 - a. Time period between initial certification and annual recertification.

Verification of continued eligibility for lifeline can occur up to twelve months following initial certification, but may occur sooner depending on the date of the customer's initial certification.

b. Method(s) used to verify customer eligibility.

Frontier utilizes USAC to perform the annual recertification of eligibility.

- 12. Description of your company's procedures for Lifeline. Include the following in your response:
 - a. Internal procedures for promoting Lifeline.

On-Line Reference manuals contain information on Lifeline qualifications and procedures for applying. Call Center Representatives advise customers of the availability of Lifeline to qualifying individuals.

Outreach and educational efforts involving participation in community events.

No outreach involving community events took place during the request period.

 Outreach and educational efforts involving mass media (newspaper, radio, television).

Frontier maintains a Lifeline page on its website, it sends an annual Lifeline bill message and publishes an annual newspaper notice.

d. Copies of Lifeline outreach materials of your company.

See attached separate sheet

e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Frontier has partnered with The Florida Department of Human Resources and the OPC.

13. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

Frontier customer service representatives receive extensive training in all areas of customer service and Frontier product service offerings as part of their new employee training and periodic refresher training is provided. The Lifeline procedures are spelled out in detail in our intranet reference manuals. The following is the scripting reference for the initial discussion on Lifeline:

Step	Action			
1	"We want to make you aware of a government assistance program called Lifeline that is available to eligible Frontier customers and provides discounted monthly rates to qualified customers based on income qualification. If you reside on Federally recognized Tribal land , we also offer enhanced monthly discounts and discounts toward installation fees with our Tribal Link-Up program. Lifeline benefits are non-transferable and are limited to one per household." NOTE: Explain Lifeline and Link-Up programs to customer.			
2	Then continue "I'd be happy to provide specific information on the discounts for your state. Are you interested in hearing more?"			
	IF customer response is THEN			
3	Yes	follow Lifeline and Link-Up Individual State eligibility requirements processes and procedures. • Important to review the individual state requirements as Frontier does not provide the actual application in all states, some states or a state designated vendor administers the program.		
	No	continue call accordingly.		

14. Please provide any link on your Web site that provides Lifeline information.

http://frontier.com/discountprograms/lifelineprogram/Florida

15. Do you anticipate offering and seeking reimbursement for Basic Internet Access Services (BIAS) in Florida as part of the Lifeline Program? If yes, please project when you will offer BIAS and when you will seek reimbursement for it.

Yes, Frontier intends to offer BIAS service starting on the later of December 1, 2016 or 60 days after OMB approval.

16. Do you see any impediments in the implementation to the FCC's new Lifeline Order (FCC 16-38)?

Frontier offers service in multiple states and where the state offers differing eligibility to what the new FCC eligibility requirements will be on 12/1/16 and does not change them to mirror the federal requirements, it will create a bifurcated process for Lifeline in each of those states. The move to rolling recertification before all states have been transitioned to the National Verifier will cause a burden to carriers.

17. To the extent you have experienced a decline in Lifeline customers, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting the Lifeline participation in Florida are welcome.

Frontier has seen a decline in Lifeline customers due to the annual recertification process and due to its decline in access lines.

Outreach Samples:

Bill message language:

VERIZON FLORIDA LLC LIFELINE SERVICE IN FLORIDA

Lifeline is a government assistance program that is supported by the Florida Public Service Commission and the Federal Communications Commission. The Lifeline program provides assistance to reduce the basic monthly telephone rate by \$15.91 for eligible residential consumers. As an Eligible Telecommunications Carrier, Verizon Florida LLC (Verizon) offers the Lifeline discount on Lifeline supported services, which include basic local telecommunications service and a number of residential bundled packages.

Only eligible consumers may enroll in the program. You may qualify for Lifeline service if you can show proof that you participate in certain government assistance programs or your annual income is 150% or below the Federal Poverty Guideline, If you qualify based on income, you will be required to provide income verification. In addition, the Lifeline program is limited to one discount per household consisting of either wireline or wireless. Therefore, you are required to certify and agree that no other member of the household is receiving Lifeline service from Verizon or another communications provider. Verizon also provides Lifeline Service to residents of federally recognized lands who meet Native American Lifeline criteria. Lifeline service is a

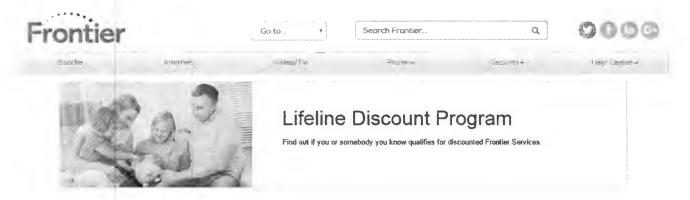
non-transferable benefit. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment, or may be barred from the program.

You must meet certain eligibility requirements in Florida in order to qualify for Lifeline Service. An Application for Verizon Lifeline Service can be obtained by contacting Verizon at verizon.com/lifeline or by phone at 1.800.VERIZON.

To find out more information, you may also call the Universal Service Administration Company (USAC), which administers Lifeline for the FCC by calling 1.888.641.8722 or by accessing their website at LifelineSupport.org.

All rates, terms and conditions included in this notice are subject to change and are current at the time of printing.

Website:



You have selected: Florida

To receive Lifeline Telephone Service discounts in Florida, you must certify that you or someone in your household currently receives benefits from one of these programs:

- Medicald
- Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- · Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)/Temporary Cash Assistance
- National School Lunch Program's Free Lunch Program (NSL)

You may also qualify if your annual income is at or below 150% of the Federal Poverty Guidelines. Please download the application and return to Frontier Communications along with proof of eligibility, we will establish the effective date for your discounts to begin and issue the appropriate credits.

You must notify Frontier when you are no longer eligible for Lifeline service is a non-transferable government assistance program that provides a discount on the cost of monthly telephone service. Lifeline is limited to one discount per household and only eligible customers may enroll. You must also verify your continued eligibility annually (or as requested) with Frontier. If there is someone else at the address who is receiving a Lifeline discount and you want to be considered a separate economic unit, the Lifeline Application and proof of eligibility must be submitted along with the Lifeline Household Provided by the Change your Lifeline benefit from another carrier to Frontier, you must submit a benefit transfer letter with your application to

Dawnload the Lifeline application for the state of Florida,

For further information, please contact Customer Service. We're here to help. A Frontier representative will be happy to answer your questions and assure you receive the appropriate application. Call us. We're here to help.

ILEC LIFELINE DATA REQUEST 2016

Frontier Communications of the South, Inc.

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For items 1 through 16, please provide the data for the fiscal year July 1, 2015, through June 30, 2016.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

1779
1761
1746
1739
1719
1704
1694
1677
1658
1639
1626
1618

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

45
41
41
36
33
34
31
30
31
31
30
28

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

Lifeline credit = \$9.25

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

	Not Customer	Already on LL	Invalid Acct	Disconnect	Other
July 2015	3	1		1	1
Aug 2015	1				1
Sept 2015	3	1			
Oct 2015					2
Nov 2015		1			4
Dec 2015				3	2
Jan 2016	1		1		
Feb 2016	3				2
Mar 2016	0				
Apr 2016	8				
May 2016	1				
June 2016					7

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

July 2015	0
Aug 2015	3
Sept 2015	5
Oct 2015	0
Nov 2015	0
Dec 2015	4
Jan 2016	1
Feb 2016	0
Mar 2016	1
Apr 2016	0
May 2016	1
June 2016	1

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines, or Lifeline customers moved to Transitional Lifeline.

July 2015	1
Aug 2015	7
Sept 2015	5
Oct 2015	5
Nov 2015	3
Dec 2015	3
Jan 2016	4
Feb 2016	1
Mar 2016	0
Apr 2016	0
May 2016	2
June 2016	3

7. The number of customers participating in Transitional Lifeline each month.

July 2015	0
Aug 2015	0
Sept 2015	0
Oct 2015	0
Nov 2015	0
Dec 2015	0
Jan 2016	0
Feb 2016	0
Mar 2016	0
Apr 2016	0
May 2016	0
June 2016	0

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Frontier's serving area in Florida does not included any Tribal Lands.

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d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.

Frontier did not receive coordinated enrollment files from the Department of Children and Families during the period covered in this data request.

e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Frontier usually processes lifeline applications within 10 business days of receipt, when Customer is found to be eligible and Lifeline discount is applied, the lifeline credit appears on the customer's next bill. Depending on the customer's bill cycle, the credit may not appear until the second bill following processing, but will apply retroactively.

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b. Outreach and educational efforts involving participation in community events.

No outreach involving community events took place during the request period.

c. Outreach and educational efforts involving mass media (newspaper, radio, television).

Frontier maintains a Lifeline page on its website, it sends an annual Lifeline bill message and publishes an annual newspaper notice.

d. Copies of Lifeline outreach materials of your company.

See attached separate sheet

e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Frontier has partnered with The Florida Department of Human Resources and the Escambia County Department of Health, Molino Clinic.

13. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

Frontier customer service representatives receive extensive training in all areas of customer service and Frontier product service offerings as part of their new employee training and periodic refresher training is provided. The Lifeline procedures are spelled out in detail in our intranet reference manuals. The following is the scripting reference for the initial discussion on Lifeline:

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2	Then continue "I'd be happy to provide specific information on the discounts for your state. Are you interested in hearing more?"						
	IF customer response is	THEN					
3	Yes	follow Lifeline and Link-Up Individual State eligibility requirements processes and procedures. • Important to review the individual state requirements as Frontier does not provide the actual application in all states, some states or a state designated vendor administers the program.					
	No	continue call accordingly.					

14. Please provide any link on your Web site that provides Lifeline information.

http://frontier.com/discountprograms/lifelineprogram/Florida

15. Do you anticipate offering and seeking reimbursement for Basic Internet Access Services (BIAS) in Florida as part of the Lifeline Program? If yes, please project when you will offer BIAS and when you will seek reimbursement for it.

Yes, Frontier intends to offer BIAS service starting on the later of December 1, 2016 or 60 days after OMB approval.

16. Do you see any impediments in the implementation to the FCC's new Lifeline Order (FCC 16-38)?

Frontier offers service in multiple states and where the state offers differing eligibility to what the new FCC eligibility requirements will be on 12/1/16 and does not change them to mirror the federal requirements, it will create a bifurcated process for Lifeline in each of those states. The move to rolling recertification before all states have been transitioned to the National Verifier will cause a burden to carriers.

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Frontier has seen a decline in Lifeline customers due to the annual recertification process and due to its decline in access lines.

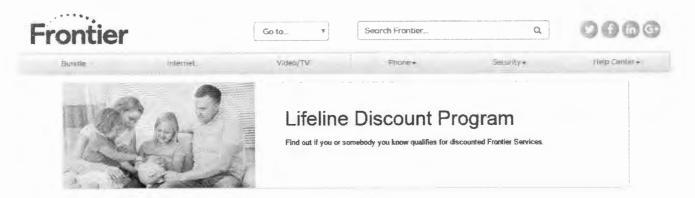
Outreach Samples:

Bill message language:

*** IMPORTANT INFORMATION FOR OUR FLORIDA CUSTOMERS ***

Do you or anyone you know need help paying for phone service? You may be eligible for Florida Lifeline if you, or someone in your household, participates in any of these programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps, Medicaid, Federal Public Housing Assistance (Section 8), Temporary Assistance for Needy Families (TANF), Low-Income Home Energy Assistance Program (LIHEAP) or National School Lunch Free Lunch Program. You may also qualify if your household is at or below 135% of the Federal Poverty Guidelines. Florida Lifeline is a non-transferable government assistance program that provides a \$9.25 discount on the cost of monthly telephone service and is limited to one discount per household and only eligible customers may enroll. For more information please call Customer Service.

Website:



You have selected: Florida

To receive Lifeline Telephone Service discounts in Florida, you must certify that you or someone in your household currently receives benefits from one of these programs:

- Medicaid
- · Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)/Temporary Cash Assistance
- National School Lunch Program's Free Lunch Program (NSL)

You may also qualify if your annual income is at or below 150% of the Federal Poverty Guidelines. Please download the application and return to Frontier Communications along with proof of eligibility. After Frontier receives your completed application and the required proof of eligibility, we will establish the effective date for your discounts to begin and issue the appropriate credits.

You must notify Frontier when you are no longer eligible for Lifeline. Lifeline service is a non-transferable government assistance program that provides a discount on the cost of monthly telephone service. Lifeline is limited to one discount per household and only eligible customers may enroll. You must also verify your continued eligibility annually (or as requested) with Frontier. If there is someone else at the address who is receiving a Lifeline discount and you wish to be considered a separate economic unit, the Lifeline Application and proof of eligibility must be submitted along with the Lifeline Household Worksheet. If you wish to change your Lifeline benefit from another carrier to Frontier, you must submit a benefit transfer letter with your application to Frontier.

Downtoad the Lifeline application for the state of Florida.

For further Information, please contact Customer Service. We're here to help. A Frontier representative will be happy to answer your questions and assure you receive the appropriate application. Call us. We're here to help.

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