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21 West Avenue, Spencerport, NY 14559 www.frontier.com

July 25, 2017 - VIA UPS DELIVERY

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

RE: 2017 Annual Lifeline Data Request

Dear Ms. Stauffer;

Per request dated July 18, 2017, enclosed are the responses to the 2017 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,

Misting Bucke

Christine Burke Manager, Regulatory Affairs

cc: Angie McCall

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<u>LIFELINE DATA REQUEST 2017</u> <u>Frontier Florida Inc.</u> <u>Christine Burke</u> Christine.burke@ftr.com

To assist the Florida Public Service Commission (FPSC) in the development of our Annual Lifeline Report, **staff requests that you provide responses to the following data request by July 31, 2017.** This report is prepared for 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. **Your response should include your company name, contact person, and email address.**

For items 1 through 8, please provide the data for the fiscal year July 1, 2016, through June 30, 2017.

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 TDM voice residential access lines in service each month.

July 2016 153.980 151,366 Aug 2016 148.201 Sept 2016 145.650 Oct 2016 141,883 Nov 2016 Dec 2016 138,108 133,311 Jan 2017 129,654 Feb 2017 126,534 Mar 2017 123,176 Apr 2017 119,814 May 2017 June 2017 116,599

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

July 2016	3,911
Aug 2016	3,882
Sept 2016	3,731
Oct 2016	3,776
Nov 2016	2,978
Dec 2016	3,146
Jan 2017	3,236
Feb 2017	3,249
Mar 2017	3,206
Apr 2017	3,232
May 2017	3,144
June 2017	3,116

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 Frontier	Already	Invalid	Account	
Customer	on LL	Product	Disconnected	Other
5501	201	1127	126	115

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

July 2016	76
Aug 2016	56
Sept 2016	59
Oct 2016	78
Nov 2016	95
Dec 2016	196
Jan 2017	160
Feb 2017	85
Mar 2017	56
Apr 2017	90
May 2017	61
June 2017	46

6.

The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

July 2016	61
Aug 2016	105
Sept 2016	207
Oct 2016	33
Nov 2016	893
Dec 2016	28
Jan 2017	46
Feb 2017	72
Mar 2017	99
Apr 2017	64
May 2017	149
June 2017	74

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

July 2016	314
Aug 2016	303
Sept 2016	273
Oct 2016	234
Nov 2016	18
Dec 2016	0
Jan 2017	11
Feb 2017	3
Mar 2017	1
Apr 2017	1
May 2017	0
June 2017	0

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

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

- 9. 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 non-qualifying 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 has a qualifying, active Frontier account 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 nonqualifying 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.

- 10. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the method(s) used to verify customer eligibility.
 - a. Time period between initial certification and annual recertification.

Annual recerification has taken place in the fourth quarter at approximately the same time, so is done one year from the last recertification, but can be more than 12 months since their initial application.

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

Frontier utilizes USAC to perform the annual recertification of eligibility.

- 11. Description of your company's procedures for Lifeline. If your response has not changed from last year's response, you may indicate this below. Please 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.

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 publishes an annual newspaper notice.

d. Copies of Lifeline outreach materials of your company.

See attached separate sheet for newspaper ad, annual bill message and website info.

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.

12. 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	Frontier customers to maint customers by providing a n	are of Lifeline, a government assistance program, to encour tain their service. Lifeline is a plan that assists qualified low-inco nonthly discount on their bill." Link-Up programs to customer.	27.00	
2	Then continue "I'd be happy to provide spe in hearing more?"	ecific information on the discounts for your state. Are you intere	ested	
	IF customer response 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. Review the bullets shown above, inform the customer that they can only have one Lifeline discount per household and cannot already be receiving a Lifeline with any other carrier. 		
	No	continue call accordingly.		

- 13. Please provide any link on your website that provides Lifeline information. https://frontier.com/resources/discountprograms/lifelineprogram/florida
- 14. Have you experienced any problems implementing the FCC's 2016 Lifeline Modernization Order (FCC 16-38)? If yes, please elaborate.
- 15. Does your company offer and seek reimbursement for Basic Internet Access Services in Florida as part of the Lifeline Program? If no, please provide the FCC forbearance order that waives this requirement for your company.

Yes, Frontier offers BIAS as part of the Lifeline Program in Florida

16. 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. 2

Florida Eligible Telecommunications Newspaper Advertisement Jan 2017

Frontier provides basic residential services for rates in Florida for 13.80 - \$23.48 for flat rate service. Frontier also provides basic business services in Florida for \$29.49-\$41.00. Other taxes, fees, and surcharges may apply. Frontier offers single party service, touch tone, toll blocking, access to long distance, emergency services, operator assistance, and directory assistance. Use of these services may result in additional charges. Budget or economy services may also be available. Frontier offers Lifeline service which is a nontransferable government assistance program that provides a \$9.25 discount on the cost of monthly telephone service or eligible broadband products (where available) and is limited to one discount per household. In addition to Basic Lifeline, individuals living on federally recognized Tribal Lands who meet the eligibility criteria may also qualify for additional monthly discounts through Enhanced Lifeline and up to \$100.00 toward installation fees through the Tribal Link-Up program. You may also gualify for an additional state discount where available.

If you have any questions regarding Frontier's rates or services, please call us at 1-800-921-8101 for further information or visit us at <u>www.Frontier.com</u>.

Florida Annual Lifeline Bill Message 3rd Quarter 2016

Do you or anyone you know need help paying for phone service? You may qualify for a government assistance program called Lifeline, which provides a discount toward your monthly phone bill. You may be eligible 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 contact Customer Service.

frontier.com/resources/discourtprograms/lif	elineprogram/fionda	.Q + C 🖬 Lifeline Di	iscount Program					-
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	Frontie	r	Shop	My Account	Support	Search Frontier_	Q.	

Florida Lifeline Discount Program

Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services. Lifeline service is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of monthly telephone or qualified internet access service. Lifeline is limited to one discount per household and only eligible customers may enroll. To receive the Lifeline discount of \$9.25 per month, you must certify that you or someone in your household currently receives benefits from one of these programs.

Medicaid (also known as ACCESS Florida) Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps Supplemental Security Income (SSI) Federal Public Housing Assistance (Section 8) VA Veterans Pension (Supplemental Income for Wartime Veterans) VA Survivors Pension



An eligible resident living on federally recognized Tribal Lands who participates in one of above programs or one of the following federal assistance programs shall also qualify for an additional monthly credit of up to \$25.00 with Enhanced Tribal Lifeline and up to \$100.00 toward installation fees with Tribal Link-Up Assistance.

Bureau of Indian Affairs General Assistance Tribaily Administered Temporary Assistance for Needy Families (Tribal TANF) Head Start (Income-Based) Food Distribution Program on Indian Reservations (FDPIR)

You may also qualify if your annual income is at or below 135% of the Federal Poverty Guidelines. Please <u>download the application</u> (también disponible <u>en españo</u>) 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.

In Florida, there may be an additional state Lifeline discount available to eligible customers (varies by service area).

You must notify Frontier when you are no longer eligible for Lifeline. 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 (también disponible <u>on españo</u>).

Customers who subscribe to Seasonal. Stay Connected, or Vacation Service are not eligible for the Lifeline discount. Existing Lifeline customers must remove Lifeline in order to enroll in Seasonal, Stay Connected, or Vacation Service, and reapply for Lifeline upon restoring service.

For further information, please contact Customer Service. A Frontier representative will be happy to answer your questions and assure you receive the appropriate application.

Return to Frontier Lifeline Program page.



<u>LIFELINE DATA REQUEST 2017</u> <u>Frontier Communications of the South, Inc.</u> <u>Christine Burke</u> <u>Christine.burke@ftr.com</u>

To assist the Florida Public Service Commission (FPSC) in the development of our Annual Lifeline Report, staff requests that you provide responses to the following data request by July 31, 2017. This report is prepared for 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. Your response should include your company name, contact person, and email address.

For items 1 through 8, please provide the data for the fiscal year July 1, 2016, through June 30, 2017.

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 TDM voice residential access lines in service each month.

July 2016	1,542
Aug 2016	1,522
Sept 2016	1,526
Oct 2016	1,513
Nov 2016	1,481
Dec 2016	1,454
Jan 2017	1,446
Feb 2017	1,429
Mar 2017	1,407
Apr 2017	1,396
May 2017	1,373
June 2017	1,347

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

July 2016	29
Aug 2016	29
Sept 2016	30
Oct 2016	31
Nov 2016	28
Dec 2016	28
Jan 2017	32
Feb 2017	32
Mar 2017	31
Apr 2017	30
May 2017	27
June 2017	26

- 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 Frontier	Already	Invalid	Account	Other
Customer	on LL	Product	Disconnected	
2	2			

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

July 2016	0
Aug 2016	0
Sept 2016	1
Oct 2016	1
Nov 2016	0
Dec 2016	0
Jan 2017	3
Feb 2017	0
Mar 2017	0
Apr 2017	1
May 2017	0
June 2017	0

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

July 2016	0
Aug 2016	0
Sept 2016	0
Oct 2016	0
Nov 2016	3
Dec 2016	0
Jan 2017	0
Feb 2017	0
Mar 2017	1
Apr 2017	2
May 2017	3
June 2017	1

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

July 2016	0
Aug 2016	0
Sept 2016	0
Oct 2016	0
Nov 2016	0
Dec 2016	0
Jan 2017	0
Feb 2017	0
Mar 2017	0
Apr 2017	0
May 2017	0
June 2017	0

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

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

- 9. 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 non-qualifying account, or the Customer already has lifeline, then Frontier does not process the addition of Lifeline and advises the Agency accordingly.

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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.

- 10. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the method(s) used to verify customer eligibility.
 - a. Time period between initial certification and annual recertification.

Annual recerification has taken place in the fourth quarter at approximately the same time, so is done one year from the last recertification, but can be more than 12 months since their initial application.

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

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

Frontier publishes an annual newspaper notice.

d. Copies of Lifeline outreach materials of your company.

See attached separate sheet for newspaper ad, annual bill message and website info.

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.

12. 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 Lifeline, a government assistance program, to encourage Frontier customers to maintain their service. Lifeline is a plan that assists qualified low-income customers by providing a monthly discount on their bill." NOTE: Explain Lifeline and Link-Up programs to customer. Then continue "I'd be happy to provide specific information on the discounts for your state. Are you interested in hearing more?" 							
2								
	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. Review the bullets shown above, inform the customer that they can only have one Lifeline discount per household and cannot already be receiving a Lifeline with any other carrier. 						
	No	continue call accordingly.						

- 13. Please provide any link on your website that provides Lifeline information. https://frontier.com/resources/discountprograms/lifelineprogram/florida
- 14. Have you experienced any problems implementing the FCC's 2016 Lifeline Modernization Order (FCC 16-38)? If yes, please elaborate.
- 15. Does your company offer and seek reimbursement for Basic Internet Access Services in Florida as part of the Lifeline Program? If no, please provide the FCC forbearance order that waives this requirement for your company.

Yes, Frontier offers BIAS as part of the Lifeline Program in Florida

16. 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.

Florida Eligible Telecommunications Newspaper Advertisement Jan 2017

Frontier provides basic residential services for rates in Florida for 13.80 - \$23.48 for flat rate service. Frontier also provides basic business services in Florida for \$29.49-\$41.00. Other taxes, fees, and surcharges may apply. Frontier offers single party service, touch tone, toll blocking, access to long distance, emergency services, operator assistance, and directory assistance. Use of these services may result in additional charges. Budget or economy services may also be available. Frontier offers Lifeline service which is a nontransferable government assistance program that provides a \$9.25 discount on the cost of monthly telephone service or eligible broadband products (where available) and is limited to one discount per household. In addition to Basic Lifeline, individuals living on federally recognized Tribal Lands who meet the eligibility criteria may also qualify for additional monthly discounts through Enhanced Lifeline and up to \$100.00 toward installation fees through the Tribal Link-Up program. You may also qualify for an additional state discount where available.

If you have any questions regarding Frontier's rates or services, please call us at 1-800-921-8101 for further information or visit us at <u>www.Frontier.com</u>.

Florida Annual Lifeline Bill Message 3rd Quarter 2016

Do you or anyone you know need help paying for phone service? You may qualify for a government assistance program called Lifeline, which provides a discount toward your monthly phone bill. You may be eligible 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 contact Customer Service.

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Florida Lifeline Discount Program

Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services. Lifeline service is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of monthly telephone or qualified internet access service. Lifeline is limited to one discount per household and only eligible customers may enroll. To receive the Lifeline discount of \$9.25 per month, you must certify that you or someone in your household currently receives benefits from one of these programs:

Medicaid (also known as ACCESS Florida) Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps Supplemental Security Income (SSI) Federal Public Housing Assistance (Section 8) VA Veterans Pension (Supplemental Income for Wartime Veterans) VA Survivors Pension



An eligible resident living on federally recognized Tribal Lands who participates in one of above programs or one of the following federal assistance programs shall also qualify for an additional monthly credit of up to \$25.00 with Enhanced Tribal Lifeline and up to \$100.00 toward installation fees with Tribal Link-Up Assistance:

Bureau of Indian Affairs General Assistance Tribaily Administered Temporary Assistance for Needy Families (Tribai TANF) Head Start (Income-Based) Food Distribution Program on Indian Reservations (FDPIR)

You may also qualify if your annual income is at an below 135% of the Federal Poverty Guidelines. Please <u>download the application</u> (también disponible <u>en españo</u>) 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.

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Customers who subscribe to Seasonal. Stay Connected, or Vacation Service are **not** eligible for the Lifeline discount. Existing Lifeline customers must remove Lifeline in order to enroll in Seasonal. Stay Connected, or Vacation Service, and reapply for Lifeline upon restoring service.

For further information, please contact Customer Service: A Frontier representative will be happy to answer your questions and assure you receive the appropriate application.

Return to Frontier Lifeline Program page.

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