

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rulemaking on the Commission's Own Motion to Review
the Telecommunications Public Policy Programs.

Rulemaking No. 06-05-028

**OPENING COMMENTS OF AT&T ON DRAFT RESOLUTION T-17202'S
REVISION OF GENERAL ORDER 153 TO REFLECT
ADMINISTRATIVE REVISIONS TO THE
CALIFORNIA LIFELINE TELEPHONE PROGRAM**

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Pursuant to Draft Resolution T-17202, AT&T¹ submits these Opening Comments on the Resolution's revisions of General Order 153 to reflect administrative revisions to the California Lifeline Telephone Program ("Draft Resolution").

I. INTRODUCTION

On September 29, 2008, the Commission conducted a workshop to revise General Order ("GO") 153 in order to ensure that it accurately incorporated the new pre-qualification application system requirements approved in Decision 08-08-029. A draft workshop report outlining Commission Staff's proposed revisions to GO 153 was distributed on January 12, 2009. In accordance with the Telecommunications Division's instructions, interested parties had an opportunity to recommend non-substantive edits. Commission Staff issued a final workshop report on February 27, 2009, which forms the basis for the GO 153 revised at issue in the Draft Resolution.

AT&T California supports adoption of the Draft Resolution's proposed revisions to GO 153, with the exception of two items. Generally, the revisions to G.O. 153 will enable California to administer the new pre-qualification enrollment process efficiently. However, AT&T urges the Commission to reconsider Staff's recommendation on (a) handling enrollment processes during the "transition period," and (b) modifying Rule 4.2.1.1. AT&T's ordering system cannot operate two Lifeline enrollment processes during the transition period. The proposed rules for these items add new system requirements and may jeopardize the July 1, 2009 implementation deadline. Moreover, the proposed rules will increase implementation costs while offering no additional protections to Lifeline consumers. As is discussed in detail below, the Commission should modify these proposed revisions to ensure a cost effective and streamlined approach to these administrative issues.

II. COMMENTS ON ADMINISTRATIVE REVISIONS TO LIFELINE

A. Transition Period: The Pre-Qualification Process Should Not Be Implemented Before July 1, 2009.

D.08-08-029 orders all carriers and Solix to commence enrolling customers under the pre-qualification process as of July 1, 2009. Parties are working diligently to modify their ordering systems to administer the new enrollment process by this implementation date. As the Commission is aware, the IT work efforts involve a complex renovation and re-design of numerous operating systems. Carriers have been methodically developing and

¹ Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C); AT&T Communications of California, Inc. (U 5002 C); TCG San Francisco (U 5454 C); TCG Los Angeles, Inc. (U 5462 C); TCG San Diego (U 5389 C).

following intensive project schedules in order to meet the July 1, 2009 target date. Notwithstanding that fact, the Draft Resolution instructs carriers to begin enrolling customers under the pre-qualification process well before that date.² As discussed further below, this modification to pre-qualification's implementation date will create significant obstacles to carriers without any benefit to Lifeline applicants, and should be rejected on grounds that it does not comply with D.08-08-029.

The Draft Resolution requires carriers to enroll Lifeline applicants under the pre-qualification system before July 1, 2009 if the customer's service will be installed after the implementation date. Should the Commission approve what is, in essence, an earlier implementation date, carriers will be required to reorganize their timetables and expedite their work efforts.

1. AT&T's Ordering System Cannot Operate Two Lifeline Enrollment Processes Concurrently.

AT&T cannot enroll customers under both First Contact and Pre-Qualification concurrently. Its new ordering system that will go into effect on July 1, 2009 in accordance with D.08-08-029 is not capable of toggling between First Contact and Pre-qualification enrollment processes. AT&T cautioned Commission Staff of this system limitation during the September 29, 2008 workshop. As such, AT&T proposed that a customer who calls in during the "transition period" be processed as First Contact, regardless of the service start date. AT&T reiterated that its ordering system cannot operate two enrollment processes concurrently on February 18, 2009 in response to Commission Staff's draft workshop report.

AT&T's Lifeline ordering system was designed in accordance with D.08-08-029 which ordered implementation of a pre-qualification enrollment system as of July 1, 2009. D.08-08-029 did not contemplate a dual ordering system as does the Draft Resolution. Accordingly, AT&T designed its new ordering system to replace the First Contact process on July 1, 2009. The first contact method will no longer be available as of that date. This approach was designed to ensure that no service representative inadvertently provisions Lifeline under the first contact process rather than pre-qualification. As such, service representatives will not have the capability of enrolling customers in Lifeline by two different processes.

2. AT&T's Project Timeline, As Currently Structured, Does Not Permit Enrolling Lifeline Applicants Under the Pre-Qualification System Prior to July 1, 2009.

² Draft Resolution, p. 3.

For AT&T, June 2009 will be a critical month to complete all testing of the system modifications and conduct final preparations for moving IT's work product into production. The new systems will not be ready to commence operations until July 1, 2009. Accordingly, as the IT project is currently structured, administering the pre-qualification system before July 1, 2009 would be unworkable. Although customer representatives will have been trained to administer pre-qualification by June 2009, they will be unable to access the new ordering systems before July 1, 2009.

However, if AT&T is required to enroll Lifeline applications under the pre-qualification approach before this date, it will have no choice but to expedite the IT project. Regardless, even if AT&T can implement pre-qualification earlier it cannot administer a dual enrollment process as anticipated in the Draft Resolution. This may result in unnecessarily shorter project intervals, which can lead to increased risk of programming errors, higher implementation costs, and greater potential for administrative problems.

3. Administering First Contact Enrollment Through June 30, 2009 Regardless of Service Start Date Does Not Prejudice or Negatively Affect Customers.

The Draft Resolution instructs carriers to begin enrolling customers under pre-qualification early in order to avoid the alleged problem of "pre-application."³ Specifically, Commission staff appears to believe that a "transition period" will exist when customers can avoid pre-qualifying for Lifeline benefits by ordering services unnecessarily early. The record does not indicate that this scenario will be widespread. Though a minority of consumers may fall within this transition period, administering those customers under the First Contact rule as ordered in D.08-08-029 would not create any unfairness.

Furthermore, consumers will begin receiving Commission mandated notices indicating that the Pre-Qualification system will begin on July 1, 2009. Requiring carriers to impose pre-qualification rules on some before this date will likely create confusion and lead to many inquiries.

4. Administering Pre-Qualification Rules before July 1, 2009 May Be Unfair to Consumers.

The transition period rule seems even more egregious in the instance a customer applying in late June is required to pre-qualify due to unforeseen delays in the carrier's ordering system, which is out of the control of the

³ Draft Resolution, p. 3.

customer. Requiring these customers to endure pre-qualification before the new enrollment process is officially implemented is not justified.

Considering that this proposed “transition period” rule offers no protection or benefit to consumers, requiring carriers to expend additional Fund resources to expedite implementation of the new enrollment process and operate two Lifeline programs (i.e. first contact enrollment and pre-qualification) concurrently during the month of June is unnecessary. AT&T recommends that the Draft Resolution be modified to instruct carriers as follows:

During the transition period, carriers will be required to process new Lifeline applicants under the First Contact enrollment process regardless of the service start date. All new customers who apply for Lifeline in June 2009 must be enrolled using the First Contact system. Carriers will not be required to expedite their implementation of the Pre-qualification system or operate two Lifeline programs concurrently during the month of June 2009.

B. Rule 4.2.1.1: The Draft Resolution’s Proposed Modifications Are an Inefficient Approach to Improving Enrollment Processes.

The Draft Resolution identifies a legitimate concern with the number of existing Lifeline customers who are unable to retain their Lifeline status when transferring service to a new carrier. Although carriers obtain the customer’s name and the prior telephone number in order to confirm program participation, Solix, in many instances, cannot identify the customer in its database. This typically occurs because the participant’s name on the prior Lifeline account is spelled differently or the prior telephone number was recorded incorrectly. These are manual inadvertent errors recorded by the customer representatives of either the former or new carrier.

The Draft Resolution suggests that customer representatives capture additional identifying information during the enrollment process that can be streamed to Solix. This proposal does not work for two reasons. First, inadvertent errors are unavoidable when collecting data verbally over the telephone. Asking for the customer’s name as it appeared on their prior bill or the address where they received prior service will likely result in the same rate of mismatches that arise today. Second, Solix’ current rules for confirming status is to match the customer’s name to their (a) current telephone number, (b) current address, or (c) previous telephone. If Solix can match the customer name to at least one of these criteria, it can successfully transfer the Lifeline status. The customer’s prior address seems unnecessary. Adding a fourth criterion seems costly when balancing the value of this additional data.

Should the Commission approve the proposed rule, IT system changes will be required for both carriers and Solix in order to create additional fields that can capture the new information anticipated in proposed Rule 4.2.1.1. It will also require changes to the existing record layout between Solix and carriers. This will result in higher

implementation costs and greater administrative burdens to carriers. Moreover, implementing these changes to be effective July 1, 2009 will jeopardize the overall pre-qualification release date. The Commission should be mindful of imposing greater costs on providers of Lifeline at a time when it is considering the elimination of cost recovery.

Rather than expanding the information captured by customer representatives under Rule 4.2.1.1, the Commission should take a more streamlined approach that will decrease the risk of manual errors that seem to plague this enrollment process without overburdening carriers. Instead of changing Rule 4.2.1.1, AT&T recommends that the Certification Form be modified to capture the additional information directly from the customer. This will significantly reduce the rate of errors that occur when recording information relayed to customer representatives verbally. AT&T proposes the following new process for customers who have had Lifeline service within the last 30 days:

1. Modify the Certification Form to contain a new section for applicants who had Lifeline service within the last 30 days. This section will ask for the following information (a) the customer's name as it appeared on their prior bill, (b) the exact address where they received prior service, and (c) the prior phone number.
2. Carrier contacts the CertA to validate the customer's certification status as is currently done under Rule 4.2.1.1.
3. If the CertA cannot confirm the customer's continued eligibility, the customer will be forwarded a Certification Form that contains the new section described above.
4. The customer will have the option of completing the new section or the certification portion of the section should the customer determine that he/she may not be eligible under the 30-day rule. The customer returns the form to Solix for confirmation of program status.

C. Additional Modifications to General Order 153.

AT&T urges the Commission to make the minor modifications to GO 153 in order to ensure clarity and consistency throughout the rules as set forth in redlining in Attachment A.

III. CONCLUSION

AT&T California respectfully submits the foregoing comments and urges the Commission to reject the Draft Resolution's (a) instructions to administer pre-qualification enrollment before July 1, 2009, and (b) modification to Rule 4.2.1.1.

Dated: April 1, 2009

Respectfully submitted,

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APPENDIX A – AT&T’s Proposed Revisions to Attachment A to Draft Resolution T-17202

4.4⁴ Customer Certification Forms.

4.4.1 ~~A~~ Certification Forms ~~are~~is used when customers are applying to enroll in LifeLine.

4.4.1.1 A copy of the Certification forms and associated instructions are attached to this General Order as Appendix B.

4.4.1.1.1 The instructions must inform LifeLine customers that the Commission or the Commission’s agent may audit the customer’s eligibility to participate in the LifeLine program. If the audit establishes that the customer is ineligible, the customer will be removed from the LifeLine program and billed for previous LifeLine discounts that the customer should not have received plus interest equal to the 3-month commercial paper rate.

4.4.1.1.2 The instructions must inform LifeLine customers that submitted income and/or supporting documentation will not be returned to the customers.

4.4.1.2 The Certification forms mailed to customers for completion will be partially completed by the CertA based on information provided by utilities.

5.4⁵ Each customer enrolling in the LifeLine program is subject to the certification process described below:

5.4.1 At Certification, the customer has the option of enrolling in LifeLine under either: (i) the program-based criterion, or (ii) the income-based criterion.

5.4.1.1 If the customer has a household member currently enrolled in any of the means-tested programs listed in Section 5.1.5 of this General Order, the customer should enroll under the program-based criterion and complete the ~~section of the~~ certification form entitled “~~Method 1 LifeLine-Program-Based Certification Form~~.”

5.4.1.2 If the customer does not have a household member currently enrolled in any of the means-tested programs listed in Section 5.1.5 of this General Order, the customer *must* enroll under the income-based criterion and complete the ~~section of the~~ certification form entitled “~~LifeLineMethod 2 Income-Based Certification Form~~”.

5.4.2 The Certification form ~~that a customer chooses to file~~ shall be signed by the customer whose name appears on the utility’s account, the customer’s legal guardian or a person operating pursuant to a power of attorney for such customer.

5.4.2.1 By signing the form, the customer is self-certifying, under penalty of perjury, that the information contained in the completed form and submitted documents, if any, are true and correct.

⁴ The modifications to Rules 4.4, 5.4.2, and 5.5.2 clarify that there exists only one certification form and one verification form.

⁵ The modifications to Rule 5.4 and 5.5 clarify that there exists only one certification or verification form. The customer completes one of two sections (Method 1 or Method 2) in order confirm eligibility.

- 5.5 To remain in LifeLine, each LifeLine customer is subject to the annual verification process described below:
- 5.5.1 At verification, the customer has the option of qualifying his or her continued eligibility under either: (i) the program-based criterion, or (ii) the income-based criterion.
- 5.5.1.1 If the customer has a household member currently enrolled in any of the means-tested programs listed in Section 5.1.5 of this General Order, the customer should continue his/her LifeLine enrollment under the program-based criterion and complete the [section of the](#) verification form entitled “~~Method 1 LifeLine Program-Based Verification Form~~.”
- 5.5.1.2 If the customer does not have a household member currently enrolled in any of the means-tested programs listed in Section 5.1.5 of this General Order, the customer *must* continue his/her LifeLine enrollment under the income-based criterion and complete the [section of the](#) verification form entitled “~~LifeLine Method 2 Income-Based Verification Form~~”.
- 5.5.2 The Verification form ~~that a customer chooses to file~~ shall be signed by the customer whose name appears on the utility’s account, the customer’s legal guardian or a person operating pursuant to a power of attorney for such customer.
- 5.5.2.1 By signing the form, the customer is self-certifying, under penalty of perjury, that the information contained in the completed form and all submitted documents, if any, are true and correct.
- 6.2⁶ All utilities must notify the CertA before their initial offering of LifeLine services and arrange the 2-way exchange of LifeLine customer data information. [Direct link to the CertA is available at: http://www.epuc.ca.gov/PUC/teleo.](#)
- 6.4⁷ CertA shall notify customers in writing of the final [settlement decision](#) of their LifeLine qualification including the right to challenge the CertA’s findings.
- 6.4.1 Customers may dispute CertA’s finding of ineligibility by submitting a formal or informal complaint to the Commission.

⁶ There is no direct link to the CertA’s system from the Commission’s website.

⁷ Solix notifies customers of its final decision.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **COMMENTS OF AT&T ON DRAFT RESOLUTION T-17202 REVISING GENERAL ORDER 153 TO REFLECT ADMINISTRATIVE REVISIONS TO THE CALIFORNIA LIFELINE TELEPHONE PROGRAM** on all persons listed in the Service List for **R.04-12-001**, as well as all Commissioners, Chief Administrative Law Judge Clopton, and the Commission's General Counsel, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 1st day of April 2009 at San Francisco, California.

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