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April 6, 2009

By E-Mail and U.S. Mail

Mr. Jack Leutza
CPUC—Telecommunications Division
505 Van Ness Avenue
San Francisco, CA 94102

**Re: Reply Comments of SureWest Telephone on Draft Resolution T-17202
Proposing Revisions to General Order 153 to Reflect Administrative
Revisions to the California LifeLine Telephone Program**

Dear Mr. Leutza:

Pursuant to Public Utilities Code Section 311, and based on the instructions in the March 16, 2009 notice served on the parties to R.04-12-001, SureWest Telephone (U 1015 C) ("SureWest") offers this reply to the comments of other interested parties on Draft Resolution T-17202 ("Draft Resolution"). From a review of the Commission's website, it appears that seven parties filed opening comments, as follows: (1) AT&T; (2) Cox; (3) the Division of Ratepayers Advocates ("DRA"); (4) Frontier; (5) the Joint Consumer Groups ("Joint Consumers"); (6) the Small LECs; and (7) Verizon. SureWest has reviewed these comments, and has the following brief reply comments.

1. SureWest agrees with Verizon, AT&T, Cox, and the Small LECs that the proposal to require the collection of "prior service address" information should be removed from the proposed General Order ("G.O.") 153. *See Res. T-17202, Proposed 4.2.1.1.* This requirement would be unduly burdensome, and, for SureWest, it would almost certainly make implementation by July 1, 2009 impossible.

2. SureWest agrees with the Small LECs and Cox that the requirement that claims workpapers be provided to staff within five business days may not be reasonable in all circumstances. *See Cox Opening Comments, at p. 3; Small LECs Opening Comments, at p. 4.* SureWest supports both the Small LEC proposal that 10 business days be adopted as a reasonable response timeframe, and the Cox proposal that reasonable extensions will be permitted.

3. SureWest supports the Small LECs' comments that carriers should be permitted to charge conversion fees upon a customer's request to be shifted to the LifeLine class of service.

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The costs associated with the processing of such a request should be recovered, either from the customer, or from LifeLine fund. Particularly in light of the proposal in the pending Proposed Decision in R.06-05-028 to eliminate administrative recovery, the Commission should allow carriers to recover conversion fees from customers at the moment that they are generated. Customers who are not qualified for LifeLine should bear the costs of the conversion activities that they have set in motion. *See Small LECs Opening Comments*, at p. 3.

* * *

SureWest urges the Commission to consider the above comments in crafting the final version of Resolution T-17202. Should you have any questions regarding the foregoing, please contact the undersigned at (415) 765-0369.

Very truly yours,



Patrick M. Rosvall
Attorneys for SureWest Telephone

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cc: R.04-12-001 Service List

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