

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on
Telecommunications Public Policy
Programs

R. 06-05-028

**COMMENTS OF CITIZENS TELECOMMUNICATIONS COMPANY OF
CALIFORNIA INC., ON DRAFT RESOLUTION T-17202**

I. Introduction.

Citizens Telecommunications Company of California Inc, d/b/a Frontier Communications of California (“Frontier”) provides these comments on draft resolution T-17202. Frontier appreciates the staff’s attempt to address the concern of the number of lifeline customers who have been unable to transfer their lifeline status when transferring to a new carrier and are forced to re-apply as a new lifeline customer.

II. Section 4, Notices, Enrollment and Forms

Frontier believes the modification to Section 4.2.1.1 requiring the carrier to request the customer’s name as it appeared on their prior bill, the exact service address and prior telephone number is unduly burdensome. This new requirement will impose additional burdens of collecting, storing and transmitting the customer’s prior service address, phone number and name as it appears on their former carriers bill. In some cases the customer may not have a copy of the former bill and may not be able to provide the requested information the carrier during the initial

contact and cause additional customer frustrations. It may also be the case that the information provided by the customer may not be captured correctly due to human error. In the case of Frontier, this new requirement will trigger additional enhancements and modifications to its customer operating and billing systems to accommodate this additional requirement. Frontier estimates that it would not be able to implement the additional requirement until third quarter 2010.

III. Frontier Proposed Modification to Section 4.2.1.1

Frontier recommends that the draft resolution be modified to impose this additional requirement on the Commission's CertA. By having the CertA request this information directly from the Customer the possibility of potential input errors between the Carrier and the Cert A would be minimized. In addition, carriers such as Frontier would not have to make additional system enhancements and modifications to collect, store and transmit this information to CertA.

- **Proposed Section 4.2.1.1 Language**

If yes, the carrier will advise the customer to provide the Commission's CertA at the time they complete their application, with their name as it appeared on their prior bill, the exact address where they received prior service and the prior phone number if it is not being ported. The carrier shall inform the customer that the CertA will notify the customer and the customer's carrier once it determines whether or not the customer is currently or within the past 30 days has been enrolled in Lifeline. If the CertA cannot confirm the customer's continued eligibility (using the prior account information), the customer will be treated as a new Lifeline applicant and be subject to the certification process.

VI. Recommendations on Section 9, Reports and Claims for Reimbursement of Lifeline-Related Costs

Under Section 9.11.3 of the General Order, “Utilities are required to provide to the Commission or TD, upon request, documents, workpapers, records (to the extent that records exist) and other information regarding costs and lost revenues claimed by the utility. Failure to provide information requested by the Commission or TD constitutes reasonable grounds to deny costs and lost revenues claimed by the utility”. The draft resolution proposes that carriers must provide the requested information within 5 business days. Frontier believes the time frame should be extended to at least 15 business days to allow carries enough time to research and retrieve the requested information.

VI. Conclusion.

Frontier supports the direction of the draft resolution with the changes recommended above for sections 4.2 and 9. These proposed changes will help the program be more efficient for the companies, Commission and the customer.

Respectively Submitted,

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