



112 Lakeview Canyon Rd.
MC CA501LS
Thousand Oaks, CA 91362-3811
CA501LS

April 1, 2009

Mr. Benjamin Schein
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Comments of Verizon California Inc. on Draft Resolution T-17202

Dear Mr. Schein:

Verizon California Inc. ("Verizon") respectfully submits its comments on Draft Resolution T-17202 revising General Order 153 to Reflect Administrative Revisions to the California LifeLine Telephone Program.

THE CARRIER SCRIPT CHANGES PROPOSED IN SECTION 4.2.1.1 SHOULD BE NOT BE IMPLEMENTED AT THIS TIME.

When a customer wishes to transfer their LifeLine status to a new carrier, Section 4.2.1.1 proposes that carriers collect the following customer information:

- Name exactly as it appears on their former telephone carrier's bill,
- Exact billing address as it appears on their former telephone carrier's bill,
- If the customer is not porting their telephone number, their former telephone number.

Verizon has found that it does collect the customer's former telephone number and provides this information to Solix.

However, collecting the customers' *exact* name and address is problematic for a number of reasons. Customers would need to have their prior bill in front of them when placing their order. Many carrier systems have one large field for names and address and even an extra space may cause a mismatch.

Implementation would not be simple as Verizon would have to modify its systems and the file it sends to Solix, in addition to modifying its scripts to support this change. Also, since this change was not included in D.08-08-029, including this change now may delay the implementation of the other changes required for pre-qualification.

Verizon recommends that this issue be referred to the LifeLine Working Group for further investigation and resolution.

Very truly yours,

VERIZON CALIFORNIA, INC.

A handwritten signature in cursive script that reads "Lorraine A. Kocen".

Lorraine A. Kocen
Senior Staff Consultant - Regulatory