



April 6, 2009

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

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

Dear Mr. Schein:

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

1. ORDERS TAKEN BEFORE JULY 1, 2009 SHOULD CONTINUE TO HAVE FIRST CONTACT

Verizon supports AT&T's position that customers who contact their carriers for service prior to July 1, 2009 should receive the California Lifeline discounts regardless of when their service begins. AT&T is correct that the Workshop report creates an earlier implementation for any customer who cannot have service provisioned prior to July 1, 2009. The transition period proposed in the Workshop report will cause customer confusion, create an unnecessary complication for carriers and result in no customer benefit.

For these reasons, Verizon urges the Commission to allow customers who contact their carriers for service prior to July 1, 2009, to continue to be enrolled in LL under "first contact" rules. Since carriers are now intently working on implementation, Verizon requests that the Commission reject the transition period as it would cause increased costs, and unnecessary additional programming and testing.

2. COLLECTING EXACT NAME AND ADDRESS INFORMATION SHOULD BE DEFERRED

For a multitude of reasons, implementation of Section 4.2.1.1. was also opposed by AT&T, Cox, Citizens and the Small Carriers. Of all the solutions proposed, AT&T's suggestion of modifying the Cert A form and sending it only to customers with transfer problems probably has the most merit. But given the wide range of suggestions, and that input from Solix is needed, it may still be best to defer to this problem to the LL Working Group for complete resolution.

3. OTHER MODIFICATIONS SUGGESTED BY PARTIES

Verizon supports the following clarifications proposed by other carriers for the same reasons stated in their opening comments:

1. Section 9.11.3: Cox, Citizens and Small Carriers to provide more time to respond to a Commission request for work papers to support claims.
2. Section 4.2.5 and 5.4.6: Cox's clarification of **net** balance on bills for customers that request a refund check.

4. CLAIMS FORM CLARIFICATION

The proposed claims form adds columns for customer counts from the prior month, labeled "Previous months (true-up)." Verizon recommends that this number include only the changes to the customer counts provided in the prior month's report.

Very truly yours,

VERIZON CALIFORNIA, INC.



Lorraine A. Kocen
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