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June 28, 2011

**Via E-Mail**

Mr. John M. Leutza  
Director – Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue, Third Floor  
San Francisco, CA 94102

**Re: Opening Comments of the Small LECs and SureWest Telephone on Draft Resolution T-17321 Revising General Order 153 to reflect revisions to the California LifeLine Program as adopted in Decision 10-11-033**

Dear Mr. Leutza:

Pursuant to the Notice of Availability dated June 13, 2011, the Small LECs<sup>1</sup> and SureWest Telephone (U 1015 C) provide these Opening Comments on Draft Resolution T-17321 (the "Draft Resolution"). The Draft Resolution, if adopted, would implement changes to General Order 153 ("Procedures for Administration of the Moore Universal Telephone Service Act"), to implement the new Specific Support Amount ("SSA") method of carrier reimbursement requirements adopted in D. 10-11-033 as well as to make some other administrative changes to the program.

The Small LECs participated in workshops convened by the Communications Division and provided extensive comments on the various proposals considered by the Communications Division. The Small LECs support the Draft Resolution and sincerely appreciate the

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<sup>1</sup> The Small LECs are a group of small incumbent local exchange carriers serving rural and remote areas, as follows: Calaveras Telephone Company (U 1001 C), Cal-Ore Telephone Co. (U 1006 C), Ducor Telephone Company (U 1007 C), Foresthill Telephone Co. (U 1009 C), Global Valley Networks (U 1008 C), Happy Valley Telephone Company (U 1010 C), Hornitos Telephone Company (U 1011 C), Kerman Telephone Co. (U 1012 C), Pinnacles Telephone Co. (U 1013 C), The Ponderosa Telephone Co. (U 1014 C), Sierra Telephone Company, Inc. (U 1016 C), The Siskiyou Telephone Company (U 1017), Volcano Telephone Company (U 1019 C), and Winterhaven Telephone Company (U 1021 C).

Commission staff's efforts to implement the SSA mechanism in a smooth and thoughtful manner. However, the Small LECs believe that some specific additional changes should be made to the Draft Resolution, the revised General Order, and the Claim Form to better reflect the requirements of D. 10-11-033.

Specific changes to the revised General Order and the new Claim Form are set forth in the Attachments to this letter. Some of these are non-substantive typographical and formatting changes. Some of the comments recommend language changes to clarify the documents. For example, the Small LECs and SureWest propose some word replacements throughout to better reflect the purpose of the program and its operation. These word changes include replacement of the term "subsidy" with "reimbursement" in the revised General Order and new Claim Form, replacement of the term "Disabled" with "TTY" in the Claim Form, replacement of the words "end user," "subscriber" and "customer" to conform their use in the documents with the definitions in the revised General Order.

With respect to the definitions, the Draft Resolution, on page 3, states that the terms Informal Appeal and Formal Complaint were added. However, definitions for those terms were not included in the revised General Order. Proposed definitions for these terms are set forth on Attachment A. On page 4, the Draft Resolution states that the definition of Local Calls was eliminated; however, there is still a definition for Local Call in Section 2.35 of the Revised General Order. SureWest and the Small LECs believe the definition should be retained. Finally, SureWest and the Small LECs recommend that the definition of "Incumbent Local Exchange Carrier" be revised to cite Section 251(h) of the Telecommunications Act, which established the term. Proposed language is set forth in Attachment A.

Some of the recommendations seek to cure apparent inconsistencies. For example, Section 8.6 of the revised General Order appears to require carriers to show credits for surcharges. However, Public Utilities Code 876(c) and Section 8.1.9 of the revised General Order prohibit surcharges on the rates charged for LifeLine service. As it seems inconsistent to credit an amount that must not be charged in the first place, the Small LECs and SureWest have recommended modifications to Sections 8.1.9 and 8.6 of the revised General Order in Attachment A.

Similarly, Section 2.49 is clarified to reflect that LifeLine discounts, once a customer's application is approved, date back to the application date, which is not necessarily the date that the customer first received telephone service.

Section 4.6 of the revised General Order removed the reference in the current General Order to D.07-07-043, which established the "in language" rules. The Small LECs and SureWest recommend that the reference to D. 07-07-043 be retained for the sake of consistency. Recommended language is included in Section 4.6.2 of Attachment A.

SureWest and the Small LECs recommend that Section 8.1.2.1 of the revised General Order be modified to eliminate the first sentence and change the second sentence to provide that subscribers be offered the option of paying the California LifeLine Service Connection Charge in equal monthly installments with no interest for a period not to exceed 12 months, consistent with the federal Link-up program.

Section 9.3.2 should be modified to state more clearly that LifeLine providers will receive as much as is needed to compensate for the discounts provided, as long as the reimbursement doesn't exceed the SSA. Recommended language is contained in Attachment A.

Section 9.4.10 should be modified to provide for recovery of "any additional administrative costs that do not fall into the categories listed in Section 9.3.13" to ensure that the actual administrative expenses of providing LifeLine services can be claimed. Recommended language is contained in Attachment A.

Finally, the Small LECs seek clarification with respect to those companies who have grandfathered multi-party flat rate LifeLine service customers. For example, Happy Valley Telephone Company has twelve multi-party flat rate LifeLine subscribers grandfathered from its 1997 general rate case order (Res. T-16001, April 23, 1997) at a tariffed rate of \$3.16 per month. Sierra Telephone Company, Inc., has twenty-eight multi-party flat rate LifeLine subscribers grandfathered from its 1997 general rate case order (D. 97-04-032, April 9, 1997) at a tariffed rate of \$3.23 per month. D. 10-11-033 establishes a price floor for flat rate LifeLine service of \$5.00 per month. Accordingly, the Small LECs request that the Draft Resolution expressly authorize companies with grandfathered multi-party flat rate LifeLine service at rates below the price floor to submit compliance advice letter tariff filings to implement rate changes to conform to the price floor established in D. 10-11-033.

Again, the Small LECs and SureWest Telephone appreciate the diligent work of the Commission staff to implement the requirements of D. 10-11-033. Any questions concerning these comments may be directed to the undersigned.

Very truly yours,

*/s/ Mark P. Schreiber*

Mark P. Schreiber

Attachments

cc: Benjamin Schein  
Cherrie Conner  
Service List

## Attachment A

### Specific Proposed Changes to Revised G.O. 153

Deletes are shown as ~~strikeouts~~.

Additions are shown in **color**.

- 2.1 “Anniversary Date” –The Anniversary Date falls on the one-year anniversary of the LifeLine subscriber’s Application Date **and annually thereafter**.
- 2.12 “California LifeLine Service Provider. [A paragraph break is missing between this definition and the definition in Section 2.13 for "Carrier."]
- 2.17** “Customer” [The section number is incorrect.]
- 2.18** “Deadline Date” [The section number is incorrect.]
- 2.XX** “Formal Complaint” – **If an applicant’s informal appeal with the Commission’s Consumer Affairs Branch is denied and he/she wishes to pursue the matter further, he/she may file a Formal Complaint. For more information about the Consumer Affairs Branch and how to file a formal complaint , please see this link:**  
<http://www.cpuc.ca.gov/PUC/aboutus/Divisions/CSID/Consumer+Affairs/>.
- 2.32 “Incumbent Local Exchange Carrier (ILEC)” – ~~The former monopoly provider of local exchange service in a given service area.~~ **The definition of ILEC is set forth in Section 251(h) of the Telecommunications Act of 1996.** ILECs are each required to serve as a COLRs, pursuant to D. 96-10-066, Appendix B, Rule 6.D.1.
- 2.XX** “Informal Appeal” - **When a California LifeLine applicant believes that he or she has been disqualified improperly, the applicant may file a California LifeLine Appeal with the Commission’s Consumer Affairs Branch (CAB). For more information about the Consumer Affairs Branch, , please see this link:**  
<http://www.cpuc.ca.gov/PUC/aboutus/Divisions/CSID/Consumer+Affairs/>.
- 2.49 “Service Start Date” – The date a new customer begins receiving phone service. ~~The customer is billed by the California LifeLine Service Provider from this date.~~ **Once the LifeLine Administrator approves the customer’s application, The the subscriber receives California LifeLine discounts back to the Service Start Application Date.**
- 2.50 “Specific Support Amount” (SSA) – A maximum ~~subsidy~~ **set reimbursement** paid to California LifeLine Service Providers for the monthly recurring charge of California LifeLine service to **subscribers. The SSA may be adjusted by the CPUC annually.**
- 2.52 “Surcharge” – The percentage increment, as determined by the Commission, which is

assessed on ~~an end-user's~~ a customer's Intrastate Telecommunications Services by the California LifeLine Service Provider for the purpose of funding California LifeLine.

- 4.1.1 California LifeLine Service Providers shall inform new residential customers calling to establish Basic Service or non-regulated residential service, as applicable, about the availability of California LifeLine, a discount program for customers with a household member currently enrolled in certain public assistance programs or customers with low household income. If customers indicate that they are interested in subscribing to California LifeLine, California LifeLine Service Providers shall contact the California LifeLine Administrator to begin the California LifeLine Application Process for the customer in accordance with Section 4.2 of this General Order and the Timeline for Processing California LifeLine Qualifications (found at [http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/FormNotices\\_Public+Program.htm](http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/FormNotices_Public+Program.htm) )..
- 4.1.3 In accordance with the Timeline for Processing California LifeLine Qualifications (found at: [http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/FormNotices\\_Public+Program.htm](http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/FormNotices_Public+Program.htm) ), California LifeLine Service Providers shall send a confirmation notice to all ~~new customers who desire to enroll in~~ California LifeLine applicants informing them of the arrival of Application Forms from the California LifeLine Administrator and the requirement to return the completed forms with all required documentation. The notice shall also inform California LifeLine applicants that failure to return the forms and eligibility documentation by the Deadline Date will result in the denial of the application for discounted California LifeLine telephone service.
- 4.2.1.2.2 If no, ask the customer about his/her household size and read the corresponding California LifeLine income limits information outlined in section 5.1.4 of this General Order that the applicant must meet in order to qualify for California LifeLine.
- 4.6.2 With the exception of those sales where the applicant, subscriber or California LifeLine Service Provider requested the use of an outside translation service and consistent with D. 07-07-043, any California LifeLine Service Provider that sells California LifeLine in a language other than English shall provide those subscribers to whom it sold California LifeLine in a language other than English with the following:
- 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 listed in 5.1.4 of this General Order and complete the section of the Application Form entitled “Method 2 Income-Based”.
- 5.4.3 [A paragraph break is missing between this section and Section 5.4.4.]
- 5.5.1.2 If the subscriber 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 subscriber *must* continue his/her California LifeLine enrollment under the Income-Based Criterion **listed in 5.1.4 of this General Order** and complete the section of the Renewal Form entitled “Method 2 Income-Based”.

- 5.5.4 Any subscriber who fails to qualify for continued eligibility in California LifeLine shall be removed from the California LifeLine Program. Upon notification from the California LifeLine Administrator, the California LifeLine Service Provider shall convert the subscriber to ~~Basic Residential~~ **a non-LifeLine Service** and ~~shall convert the subscriber to a non-California LifeLine service starting effective on~~ **with** the Denial Date provided by the California LifeLine Administrator. No Service Conversion Charges shall be billed to the customer for this change in service.
- 5.6 California LifeLine subscribers must notify their California LifeLine Service Provider of any change that causes the California LifeLine subscriber to no longer qualify for (i) California LifeLine, or (ii) a second California LifeLine line. Upon receipt of notification, the California LifeLine Service Provider ~~will change the subscriber's California LifeLine service to Basic Residential Telephone~~ **shall convert the subscriber to a non-LifeLine Service**. No Service Conversion Charges shall be billed to the customer for this change in service.
- 6.2 All California LifeLine Service Providers must notify the California LifeLine Administrator before their initial offering of California LifeLine and arrange the 2-way exchange of its California LifeLine ~~subscriber~~ **customer** data.
- 6.3 California LifeLine Service Providers shall provide California LifeLine ~~subscriber~~ **customer** data to the California LifeLine Administrator notwithstanding any tariff, contractual, or legal restrictions on limiting the disclosure of non-published customer information.
- 6.3.1 All California LifeLine Service Providers must provide the California LifeLine Administrator with their California LifeLine subscriber/**applicant** activities ~~before~~ **by** the end of the next business day after the ~~in-service~~ **service order completion date**. ~~of the applicant's or subscriber's service order.~~
- 6.3.2 All California LifeLine Service Providers must provide the California LifeLine Administrator with all California LifeLine subscriber/**applicant** activities initiated by the California LifeLine Service Providers ~~before~~ **by** the end of the next business day ~~from~~ **after** the ~~time such actions were taken.~~ **service order completion date**.
- 6.3.3.1 Newly enrolled ~~subscribers~~ **customers** who are found eligible to participate in California LifeLine during the Application Process.
- 8.1.1.5 [The font size of the words "at regular rates" should be adjusted.]

- 8.1.2.1 ~~California LifeLine Service Providers shall offer California LifeLine customers the option of paying the LifeLine Service Connection Charge in three equal monthly installments with no interest.~~ California LifeLine Service Providers ~~may also~~ shall offer California LifeLine subscribers the option of paying the California LifeLine Service Connection Charge in equal monthly installments with no interest for a period not to exceed 12 months.
- 8.1.9 There shall be no charge ~~or related credits~~ (to California LifeLine subscribers' LifeLine billings) ~~service~~ for surcharges including the following:  
California High Cost Fund (CHCF-A) A surcharge,  
California High Cost Fund (CHCF-B) ~~CHCF-B~~ surcharge,  
California Teleconnect Fund surcharge (CTF),  
California Relay Service and Communications Device Fund surcharge (DDTP),  
LifeLine surcharge (ULTS),  
California Advanced Services Fund surcharge (CASF),  
9-1-1 Tax,  
CPUC User fee.  
~~These surcharges will apply to any other intrastate telecommunications services purchased by LifeLine subscribers as required by law.~~
- 8.4 Except as specifically modified by this General Order, all rules, regulations, rates and ~~charges~~ ~~charges~~ in conjunction with the California LifeLine Service Provider's tariffs or terms and conditions applicable to non-California LifeLine services are also applicable to the service provided under California LifeLine.
- 8.6 No later than January 1, 2012, California LifeLine Service Providers shall specifically show ~~all~~ California LifeLine reductions, or ~~its~~ ~~their~~ equivalent, on the California LifeLine subscriber's bill.
- 8.6.1 If reductions are not shown as separate line items, California LifeLine Service Providers shall provide a revised sample bill format to the Public Advisor that includes a section showing the discounts being provided to the customer by ~~July 2011~~ September 30, 2011.
- 8.6.2 California LifeLine Service Providers must, at a minimum, ~~delineate the LifeLine reductions~~ show the regular non-LifeLine rate, any Federal Support Credits and any California LifeLine Support Credits on subscriber's bills in a manner discernible by the public.
- 9.2.2 From the effective date of D. 10-11-033 until December 31, 2012, California LifeLine Providers may claim additional ~~subsidy~~ reimbursement to cover higher rates in Extended Area Service territories.

9.3.2 Each California LifeLine Service Provider with reported and eligible California LifeLine subscribers will be paid ~~up to~~ the SSA, **or the portion of the SSA necessary to reimburse the carrier for discounts provided to LifeLine subscribers, whichever is lower. The SSA will be** adjusted on its subscribers' on a per-subscriber basis based on the daily weighted-average customer counts as supplied on a monthly basis by the California LifeLine Administrator. on a monthly basis by the California LifeLine Administrator.

9.3.2.1 [A paragraph break is missing between this section and Section 9.3.2.2.]

9.4.10 Administrative costs over and above those allowed under Section 9.3.12 and 9.3.13. California LifeLine Service Providers operating under rate-of-return regulation may seek recovery in their general rate cases any additional administrative costs **that do not fall into categories listed in Section 9.3.13** that are not reimbursed through the process outlined in the sections referenced above.

10.1 All California LifeLine Service Providers shall assess, collect, and remit the California LifeLine surcharge on revenues from ~~end-user~~ **customers** Intrastate Telecommunications Services. For carriers required to file tariffs, they must include the requirement to collect the state surcharges in their tariffs.

10.5.1 All ~~end-user~~ **customer** intrastate telecommunications services, whether tariffed or not, are subject to the California LifeLine surcharge, except for the following services:

## **G.O. 153 Appendix A**

8. Access to foreign Numbering Plan Areas **unless subscriber has requested Toll Blocking**



## Attachment B

### Specific Proposed Changes to the Claim Form

**Page 2:**

#### BASIC SERVICE RECOVERY

33. 1. Allowable SSA for Flat Rate Service \_\_\_\_\_  
1.5 Allowable SSA for Flat Rate Service (~~Disabled~~ TTY) \_\_\_\_\_
34. 2. Allowable SSA for Measured Rate Service \_\_\_\_\_  
2.5 Allowable SSA for Measured Rate Service (~~Disabled~~ TTY) \_\_\_\_\_
35. 3. Connection Charges \_\_\_\_\_  
3.5 Connection Charges (~~Disabled~~ TTY) \_\_\_\_\_
36. 4. Conversion Charges \_\_\_\_\_  
4.5 Conversion Charges (~~Disabled~~ TTY) \_\_\_\_\_
37. 5. Allowable Recovery – Untimed Calls \_\_\_\_\_  
5.5 Allowable Recovery – Untimed Calls (~~Disabled~~ TTY) \_\_\_\_\_
38. 6. FCC End User Surcharges (EUCL) \_\_\_\_\_  
6.5 FCC End User Surcharge (EUCL) (~~Disabled~~ TTY) \_\_\_\_\_

\*Claimed amounts should be net of the ~~subsidies~~ reimbursement, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline and Link-up programs.

Send Completed California LifeLine Claim Form to:  
~~California LifeLine Team~~, Communications Division

**Page 8:**

In table 3, Column I:  
Amount Billed to LifeLine Subscribers (~~\$10~~ x col G)

In table 4, under the “Service Description” heading:  
(~~Disabled~~ TTY 2nd)

# Attachment C

## Table of Authorities

Decision 97-04-032.....	3
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# **Attachment D**

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CALIFORNIA LIFELINE ADMINISTRATOR.....	Section 6
CALIFORNIA LIFELINE RATES AND CHARGES.....	Section 8
REPORTS AND CLAIMS FOR REIMBURSEMENT OF CALIFORNIA LIFELINE-RELATED COSTS.....	Section 9
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CLAIM FORM .....	APPENDIX D

# Attachment E

## Service List

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## Attachment E

### Page 2

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