

Don C. Eachus  
Director  
State Public Affairs, Policy and Communications



2535 W. Hillcrest Dr., CAM21LB  
Newbury Park, CA 91320  
Direct: (805) 480-0702  
Fax: (805) 498-4659  
Email: don.eachus@verizon.com

**BY ELECTRONIC MAIL**

July 5, 2011

Mr. John M. Leutza, Director  
Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 3210  
San Francisco, CA 94102

**Re: Reply Comments 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 cover letter accompanying Draft Resolution T-17321 ("Draft Resolution"), issued June 13, 2011, Verizon submits these reply comments to address arguments by parties in opening comments that General Order 153 ("GO153") should include issues beyond changes made by D.10-11-033, or that the Draft Resolution should incorporate more specifics regarding issues to be addressed for non-traditional Lifeline providers lack merit and must be disregarded. Verizon reply comments focus on two recommendations advanced in opening comments for revisions to the Draft Resolution:

1. Arguments to add consumer protection language into GO153 lack merit.
2. Recommended in-language notice modifications to GO153 are not needed.

The preceding two points constitute Verizon's subject index. As required by the Notice of Availability, a table of authorities is attached hereto.

**1. Arguments to Add Consumer Protection Language into GO153 Lack Merit**

The Commission should disregard the arguments advanced by Greenlining and Disability Rights Advocates (GreenL/DisabRA) and The Utility Reform Network and National

Consumer Law Center (Joint Consumers) regarding modifications to GO153 to guard against the degradation of basic consumer protections. (GreenL/DisabRA at 2-4 /Joint Consumers at 3) First, D.10-11-033 mandates specific tasks in regards to GO 153 modifications, and these consumer group's requests would have Staff exceed the authority delegated by that mandate. Second, the requested additions are unnecessary for several reasons. There exist numerous protections in other General Orders, prior Commission Orders and in P.U. Code Sections. Also, non-traditional Lifeline providers can only offer Lifeline after a lengthy review process. It is apparent from the recent non-traditional carriers' ETC resolutions that the Commission conducts an in-depth review of the proposed service offerings, and has rejected those plans which are deemed to not be suitable. Thus it is highly unlikely they would be unaware of existing consumer protections by the time they are authorized to offer Lifeline to California consumers. Also, D.10-11-033 changed nothing with respect to disconnection policies. And Lifeline subscribers' ability to purchase bundles has not changed in years. Thus, GreenL/DisabRA and Joint Consumers' basis for arguing for these modifications are misplaced and, therefore, GO153 need not be modified as they request.

## **2. Recommended in-language Notice Modifications to GO153 Are Not Needed**

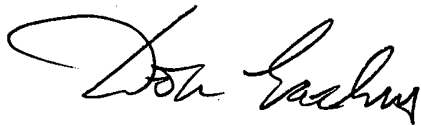
GreenL/DisabRA suggested modification to GO153 to require that all notices regarding the LifeLine program should be in accessible formats—including Braille—should be rejected. Although GreenL/DisabRA argued that the draft GO153 falls short in accessibility for subscribers with disabilities, they fail to cite where D.10-11-033 adopted this change (GreenL/DisabRA at 2). Such a specific requirement would entail a policy shift, one which

Mr. John Leutza  
July 5, 2011  
Page 3

must first be based on a thorough understanding of its ramifications and a cost/benefit analysis.<sup>1</sup> This has not been taken up in this rulemaking. Indeed, the purpose of the Draft Resolution is to modify GO 153 to implement the specific revisions adopted after a lengthy proceeding that did not involve accessibility policy, but did focus on subsidy methodology and claim system revisions that are necessary to expanding Lifeline to non-traditional carriers, as adopted in the Lifeline Decision, D.10-11-033. GreenL/DisabRA's recommended changes to GO 153 must therefore be rejected.

Please feel free to contact me with any questions.

Very truly yours,



Don Eachus

Attachment

cc: Cherrie Conner – CPUC Communications Division  
Benjamin Schein – CPUC Communications Division

---

<sup>1</sup> For example, in an unrelated proceeding, Verizon provided evidence that the cost of providing notices in Braille outweigh the benefits because a “minute” number of Verizon customers with visual impairments choose Braille-printed bills. See Verizon Opening Comments on the Draft Workshop Report regarding Telecommunications Emergency Backup Power at the Customer Premises: Customer Education, Accessibility and Implications, R.07-04-015, filed August 14, 2009 at 6.

**TABLE OF AUTHORITIES**

California Public Utilities Commission Authorities

D.10-11-033 .....	1,2,3
R.07-04-015 .....	3
Draft Resolution T-17321 .....	1
General Order 153 .....	1