

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 19 1999

FCC MAIL ROOM

In the Matter of)
)
Applications for Consent)
to the Transfer of Control of Licenses and)
Section 214 Authorizations from)
)
AMERITECH CORPORATION, to)
Transferor)
)
SBC COMMUNICATIONS, INC.)
Transferee)

CC Docket No. 98-141

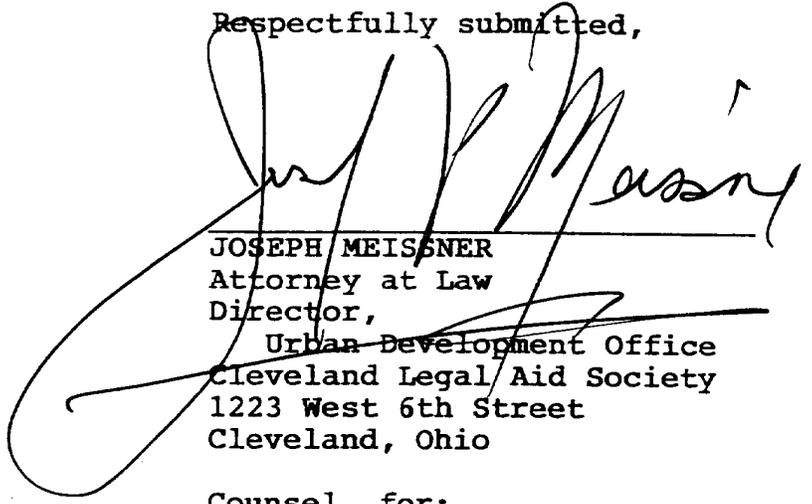
COMMENTS
OF
PARKVIEW AREAWIDE SENIORS, INC.
ON
PROPOSED CONDITIONS FOR MERGER

Now comes the Parkview Areawide Seniors, Inc., who through their counsel offer the following Comments, both General and Specific, on the conditions proposed for the merger of the SBC Communications, Inc., and the Ameritech Corporation. The Parkview Areawide Seniors, Inc., is composed of senior citizens who have worked on many areas of concern for seniors including food, clothing, utilities, and income maintenance. The organization is dedicated to

advocating on behalf of senior citizens forced to live on fixed and low incomes as well as also providing services to these seniors. The organization has been involved in the Ameritech Ohio USA Program to provide telephone lifeline services for low income families, including seniors. Currently, the President of the organization, Ms. Doran McKeever, is a member of the Ameritech USA Advisory Committee.

The Parkview Areawide Seniors urge the FCC both to consider and adopt the recommendations they have provided in the following comments.

Respectfully submitted,



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GENERAL COMMENTS

1. PLEASE DO THIS RIGHT! Low income families, the disabled and handicapped, and senior citizens living on fixed and low incomes--these are groups that must have access to telephone communications. Yet these are the very groups who often lack adequate telephone services. That is why the USA Program in Ohio is needed, not only in Ameritech Ohio's territory, but also throughout the entire areas and States to be served by the new merged entity of SBC and Ameritech.

2. No one should think that the USA Program which provides a monthly credit or discount of \$10.20 for a low-income family's telephone service happened all at once or was achieved without a long and bitter struggle in Ohio. For over twenty years senior citizens and low income families have advocated for a decent and substantial lifeline program. On four different occasions in those twenty-three years of struggle, we thought we had achieved success only to have victory snatched away from our clients.

3. Most recently, as a result of telephone deregulation, termed "alternative regulation" in Ohio, in 1994, we thought the battle was finally over when the USA Service was established and agreed to by Ameritech Ohio as part of the company's commitments in order to achieve the company's goal of deregulation. Yet three years later despite intense citizen efforts and the strong advocacy of an Advisory Committee

established in the Alternative Deregulation Stipulation, the USA Program had barely 40,000 families enrolled when Ameritech itself in its own PR releases had stated that 200,000 Ohio families would benefit from the USA program.

4. Citizen groups in 1997 and 1998 were forced to spend their precious legal and organizational resources to litigate against Ameritech on the basis that the Company had failed to meet its obligations to implement the USA Program. Finally, in December 1998, the PUCO found that the charges of the citizen groups were well-founded and Ameritech was provided with a series of orders to implement an adequate USA Lifeline Program. The Company was given six months to meet its obligations.

5. At this time, the summer of 1999, some progress has been achieved as the Company and its Advisory Committee have worked together in a partnership. (See the attached newspaper article from the Plain Dealer, Ohio's largest newspaper. Exhibit A)

6. When our clients request that the FCC "Please Do This Right," they are urging the FCC to learn from the Ohio and USA experience. Let this be the one and final battle to establish a decent and comprehensive lifeline program throughout the SBC-Ameritech territory. Do not condemn citizen groups to endless litigation and another twenty years in the wilderness.

7. There are some guidelines the Parkview Areawide Seniors would urge the FCC to follow:

a. Understand the importance of the USA Lifeline Program. The main reason for allowing this merger is that it will better serve the public in providing telephone communications. An adequate USA lifeline program will insure that a very vulnerable part of the public will be able to participate in these telephone communications.

b. An adequate USA Lifeline program will help the FCC in meeting its long-time goal of universal service.

c. Insuring that low-income families can obtain and maintain their telephone service will help these families to navigate on the information superhighway. It will help them, for example, to obtain and use computers which have become a necessity in today's society. It will help the children and youth in these families so they are not condemned to an information and communications ghetto.

d. The FCC cannot leave the conditions for a USA Program in general and vague language. One of the main Ameritech Ohio executives who also has been one of the main negotiators for the SBC-Ameritech merger very early in the implementation of the USA Program in Ohio (the 1995 to 1997 period) took the approach that if something was not stated explicitly in the various documents and stipulation for the USA Program, then Ameritech Ohio had no obligation to do anything. In other words, we cannot expect nor can the FCC expect "good will" and a cooperative approach to fill in

the details and missing gaps if the language in the conditions for a USA-type lifeline program are left to vague and general commitments. This is especially true in today's unregulated environment when the bottom line of corporate profits is the only report card of corporate executives and their staff.

e. The attitude of at least some Ameritech Ohio executives toward low income customers was best revealed by a reported comment from the executive referred to in 7.d. above. When it was pointed out to him that not many were enrolled in the USA Program, he replied, "Well, them dogs just don't like that dog food." That comment fits in with other comments made about the deregulated competitive arena that "under deregulation, Big dogs Eat First." That is why an FCC is more important than ever before to insure that vulnerable customers, such as the poor, the disabled, and seniors living on low incomes, are not left behind and excluded from the new information superhighway of telephone communications.

f. On behalf of our clients, we therefore urge the FCC to adopt specific and comprehensive guidelines for the USA lifeline program. We urge that SBC-Ameritech be required to designate the company personnel who will have the necessary authority and power to implement the program. We also urge that a citizens advisory committee be established to oversee

the implementation of the program.

8. On behalf of our clients we have provided more detailed recommendations below.

SPECIFIC COMMENTS

1. There are a number of specific areas that must be addressed in the conditions for the merger in order to insure that an adequate and comprehensive USA Lifeline Program is implemented.

2. Eligibility for the Program: The goal is to help low income families, the disabled, and seniors living on low incomes. Normally, the telephone company will not want to determine eligibility because of the administrative costs. So USA eligibility is based upon enrollment in other programs. We would urge these same programs be used for Ameritech-SBC. We have included as Exhibit B a simple Application form for the USA Program which lists the programs. We would also urge that those who receive the Earned Income Credit on their Income Tax Forms be added as eligible for the SBC-Ameritech USA Lifeline Program.

3. Enrollment Goals: One of the Ohio lessons is that goals need to be established at the beginning so that progress can be measured. These goals would include numbers of customers who will be enrolled and target dates. A rough calculation is that some 5 million families at a minimum should be enrolled in the new program.

4. Ease of Enrollment: In the beginning, it seemed as though Ameritech had a complicated maze of forms and offices which made enrollment very difficult. While we acknowledge that verification is needed to insure that only those truly eligible are able to enroll, this concern should not lead to the erection of a series of bureaucratic hurdles which make it almost impossible for families to enroll.

5. Significant and Substantial Monthly Credit: The monthly credit or discount should be significant enough so that those eligible obtain real help which will insure they can maintain their telephone service. We would recommend a monthly credit of at least Ten Dollars or One-half of the ordinary local telephone bill, whichever of these two would be higher. Given the great profits made by companies such as Ameritech and SBC, this level of monthly credit is hardly exorbitant.

6. Use of Automatic Enrollment: This means using all of our modern computer advances so that those eligible can be easily enrolled. For example, many of the benefit programs such as Medicaid use the client's Social Security Number. The telephone company also uses these numbers to identify its customers. Why not therefore "marry up" the list of telephone customers with the list of people enrolled in the benefit program? Wherever there is a match, the individual would receive the USA monthly credit. (Of course, customers would be allowed to opt out of the USA Program

if they did not want to participate.)

7. Arrearage Plans: In Ohio we found that many low income families had serious arrearage problems for telephone service, including past terminations of service because of arrearages. Attempts have been made to implement various payment options so that low income families could participate in telephone service. The root of the arrearage problem lies in the fact that other utilities have had various programs and arrearage options for some sixteen years in Ohio to help with low income families while the telephone company has lagged behind in developing and providing realistic and appropriate repayment options. SBC-Ameritech should be required to establish and implement such options that will help families with arrearage problems and past due debt.

8. Advisory Committee: A citizens advisory committee, similar to Ameritech's, should be established to help the company implement the program. This committee would include low income family, disabled, and senior citizen representation.

9. Adequate Budget for Advisory Committee: An adequate budget must be provided for the advisory committee and its activities, such as publicity and community education.

10. Cooperation with Community-Based Organizations: The merged company should be required to cooperate with community-based organizations for implementing the USA

lifeline program. This would include using these organizations to carry out some of the needed publicity and community education about the program.

11. Necessary Company Personnel with the Authority to Implement the program: This is one of the most important lessons of the Ohio experience. Unless the proper company personnel possessing the requisite authority are placed in charge, the program will never be implemented properly. The USA Lifeline Program should not be the graveyard for incompetent company personnel who are a step away from being "restructured."

12. Use of Outside Enrollment Agency: This is not absolutely essential. Internal Company personnel could be in charge of enrollment. However, the Ohio experience was that an outside agency whose whole mission in life was to enroll USA applicants greatly improved the operations of the program.

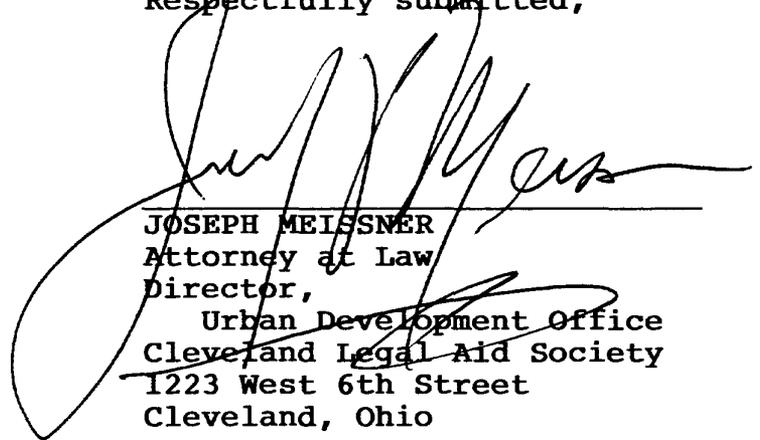
CONCLUSION

On behalf of our clients, the Parkview Areawide Seniors, we urge the FCC to adopt the Twelve Recommendations we have provided above. These are the minimum that are needed in order to insure that THIS IS DONE RIGHT. There may be other specific recommendations that are needed as well. We

are also certain that others will offer worthwhile comments and suggestions to the FCC on how best to establish and implement a USA Lifeline program similar to Ohio's throughout the territory of the new merged SBC-Ameritech.

We urge the FCC to consider both our comments and those of other consumer groups who are committed to the goal of universal access in telephone communications.

Respectfully submitted,



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Ameritech finally gets serious on low-income discount plan

By ZACH SCHILLER
PLAIN DEALER REPORTER

Six months after regulators ordered Ameritech Corp. to shape up, the telephone giant is making serious efforts to market half-price telephone service to low-income Ohioans.

The Chicago-based company said it signed up nearly 11,000 new customers in the first five months of the year, more than the 7,700 it added during all of 1998. A total of 65,000 customers — roughly 20 percent of those eligible — now participate in the program.

Ameritech promised to start the Universal Service Assistance (USA) program five years ago in exchange for state regulators' approval of a plan that deregulated most of Ameritech's rates and lifted caps on the phone company's profits.

But the company dragged its feet for years, prompting frustrated consumer advocates to formally complain to the Public Utilities Commission of Ohio in 1997.

Last December, the PUCO ruled that the company's actions "demonstrate a failure to meet the spirit of the commitment it made." It ordered Ameritech to make improvements within six months.

As the commission ordered, Ameritech has put one person with decision-making authority in charge of the program and upgraded its marketing. It also started allowing customers who

receive optional services such as call waiting to participate in the program.

Advocates for low-income consumers who long had complained of Ameritech's administration of the program said they are encouraged by the recent progress.

"Things are better now," said Joseph Meissner, an attorney at the Legal Aid Society of Cleveland who chairs the committee established to advise the company on the program. "Of course, they had a lot of room to go up."

The USA program gives discounts of up to \$10.20 a month on basic phone service for Ohioans with low incomes.

Since the December order, the company has stepped up its outreach for the program, sending out messages in bills and mailings in cooperation with the Ohio Department of Human Services.

"In our mind, that's what's driving the numbers," said company spokesman Dave Pacholczyk. Following the commission's direction, Ameritech also installed direct telephones at ODHS offices in 15 counties.

PUCO spokesman Dick Kimmins said the commission staff is studying a filing Ameritech made on the program June 30 but "considers the company to be in compliance" with the December order.

Meissner said the program had benefited from newly committed leadership, expanded eligibility criteria and Ameritech's hiring of

an outside contractor to handle enrollment.

"At this point, we're feeling pretty positive about the way things are moving in that program," said Susan Merryman, a spokeswoman for the Ohio Consumers' Counsel, which represents residential customers in utility cases.

"If everybody continues to work at it, by the end of this year we should be well over 100,000," Meissner said.

That would still be well short of the 200,000 Meissner thinks should be enrolled based on eligibility. Other advisory committee members have estimated the number of eligible Ohioans at 300,000 to 500,000.

For all its flaws, the program has become a model for other states. As part of its proposed merger with Ameritech, SBC Communications Inc. is offering to extend a similar plan to all 13 states in the two companies' combined territory.

Meissner still would like to see Ameritech adopt automatic enrollment for customers who qualify because they receive food stamps, energy assistance or other types of aid. The company has tried that in the Columbus area, and some 2,411 enrolled that way in early June.

Pacholczyk said the company was analyzing the results of that test before deciding whether to expand it.

Phone: (216) 999-4138
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Exhibit A

YOU MAY BE ENTITLED TO A MONTHLY CREDIT ON YOUR TELEPHONE BILL ! !

IF YOU RECEIVE FOOD STAMPS; or HEAP; or E-HEAP: or
FEDERAL PUBLIC HOUSE/SECTION 8; or MEDICAID: OR
OHIO ENERGY CREDIT PROGRAM: or OHIO WORKS FIRST (Welfare);
or SSI/DISABILITY ASSISTANCE,

YOU CAN APPLY FOR A MONTHLY TELEPHONE CREDIT

FILL OUT THIS APPLICATION AND RETURN IT TO THE RECEPTIONIST.

Application for Universal Service Assistance - Ohio

PICK THE BOX THAT
APPLIES TO YOU

Sign Me up for Plan 1 for \$10.20 monthly credit on my telephone bill.
I have no optional features like Call Waiting or Caller ID.

Sign Me up for Plan 2 for \$5.25 monthly credit on my telephone bill.
I do have optional features like Call Waiting and Caller ID.

Eligibility for Universal Service Assistance (USA 1 & USA 2) is dependent on Applicant's participation in one or more of the following programs:

1. I hereby certify that I participate in the following programs (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Home Energy Assistance Program (HEAP) | <input type="checkbox"/> Food Stamps |
| <input type="checkbox"/> Emergency Home Energy Assistance Program (E-HEAP) | <input type="checkbox"/> Medicaid |
| <input type="checkbox"/> Federal Public Housing or Section 8 | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Ohio Works First (was AFDC & TANF)...USA 1 ONLY | <input type="checkbox"/> Ohio Energy Credit Program (OECF) |
| <input type="checkbox"/> Disability Assistance (State or County)...USA 1 ONLY | |

(Attention: Social Security, PIP and Medicare DO NOT qualify)

2. I also hereby certify that:

- My telephone service is listed in my name
- I am not listed as a dependent on another person's tax return
- The address listed is my primary residence; not a second home or business; and

3. If, in the future, I no longer participate in at least one of the programs listed in item 1 above or conditions in item 2 above change, I will promptly notify Ameritech - Ohio that I am no longer eligible for the Universal Service Assistance Program.

4. I authorize Ameritech - Ohio or its duly appointed representative to access any records required to verify these statements to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to Ameritech - Ohio, if requested by the company, to verify my participation in the above programs, and my eligibility for Universal Service Assistance.

5. I affix, under penalty of perjury, that the foregoing representations are true.

Applicant's Name: _____

County: _____

Address Street: _____

State: _____

City: _____

Zip Code: _____

Telephone Number: _____ Or Can Be Reached at: _____

Social Security Number: _____

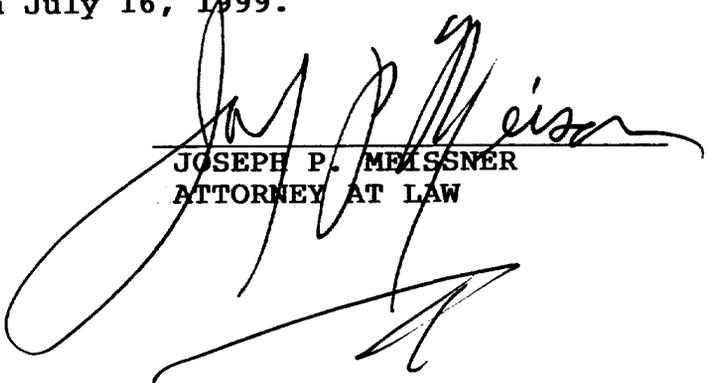
Signed: _____

Date: _____

Exhibit B

CERTIFICATE OF SERVICE

I hereby certify that copies of this pleading have been served on all parties in this proceeding by First Class Mail, postage prepaid, as appears on the attached service list, on July 16, 1999.



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