

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of: Lifeline and Link-Up	CC Docket No. 96-45 WC Docket No. 03-109
---	---

**REPLY COMMENTS OF THE RURAL IOWA
INDEPENDENT TELEPHONE ASSOCIATION**

The Rural Iowa Independent Telephone Association (“RIITA”) is a nonprofit association of rural independent telephone companies, representing approximately 130 Iowa incumbent local exchange carriers. Approximately one-half of RIITA’s members serve fewer than 1,000 access lines. The vast majority of the remaining members serve fewer than ten thousand access lines. These companies are providing telephone service in extremely small communities where many of the residents know each other or are aware of information about the other residents.

The comments filed thus far in this proceeding do not appear to reflect the concerns of small telephone companies.

In Iowa, a system has been adopted to allow LIHEAP (Low Income Heating Assistance Program) applicants to apply for Lifeline on the LIHEAP application if approved. Applicants who qualify for LIHEAP assistance are eligible for Lifeline and Link-up and will have the appropriate information forwarded to their local phone company. This appears to be similar to the program adopted by Massachusetts. *In re: Federal-State Joint Board on Universal Service*, Recommended Decision adopted March 27, 2003, Appendix E, I.C.1. at page 37. In Iowa, this is

a new program. Without statistics at this point, the response to the program has been dramatic. Many RIITA members report a significant increase in customers taking advantage of the Lifeline and Link-up Programs. This sudden increase could be due to a number of factors. However, some members have observed that the increase in enrollment could be due to a reluctance on the part of customers to apply and self-certify at the local phone company offices in small towns. The embarrassment or reluctance of otherwise qualified customers, who may not wish to certify eligibility to neighbors and friends working at the phone company is alleviated by providing the information to the LIHEAP administrator.

RIITA's members are concerned that if requirements for certification—and particular re- or continuing verification—are too stringent on State agencies, Lifeline and Link-up enrollments could be reduced because participants may choose not to stay involved in a program that requires a person to provide income information to their local phone company. In addition, RIITA is concerned that new verification (or re-verification) requirements not be placed on the local phone companies. Unlike a large LEC, RIITA members deal with customers in small-town locations that provide little or no anonymity. Requiring a small company to “police” its own customers and report on potential loss of eligibility, and potentially depriving community members of phone service on this basis could severely damage the public relations of small companies, ultimately threatening their businesses which rely heavily on personal service and reputation.

RIITA requests that state public utility commissions be given as much flexibility as possible in determining how to manage Lifeline and Link-up Programs so that the state agencies can adapt to the unique situations facing that state. Iowa's success with providing information

through the LIHEAP program would not be duplicated in a state with few or no heating days per year. Iowa's uniquely small companies can be accommodated better by allowing the Iowa Utilities Board to determine the process used to evaluate eligibility or termination from programs within Iowa.

As a consequence, RIITA specifically asks the FCC not to adopt, or to clarify or modify the recommendations in paragraphs 31 through 46 of the Joint Federal-State Board's recommendations. These recommendations, requiring additional burdens for verifying and periodically re-verifying, should be rejected or changed to clarify that states need not impose the burden on local exchange carriers of evaluating, verifying or periodically verifying the qualifications of Lifeline/Link-Up enrollees or applicants. In the alternative, RIITA asks the FCC to prohibit states from imposing that burden on small local exchange carriers.

RIITA fully supports the goals of these programs, but believes that those goals will be better served if small local phone companies are not placed in the position of policing qualifications of enrollees in these small communities.

Respectfully Submitted,

WHITFIELD & EDDY, P.L.C.

By 
THOMAS G. FISHER JR.

317 Sixth Avenue, Suite 1200
Des Moines, Iowa 50309-4195

ATTORNEYS FOR RURAL IOWA
INDEPENDENT TELEPHONE ASSOCIATION

Copy filed with:

Qualex International, Portals II
445 12th Street S.W.
CY-B402
Washington, D.C. 20554