

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Lifeline and Link Up) WC Docket No. 03-109

**REPLY COMMENTS OF
QWEST COMMUNICATIONS INTERNATIONAL INC.**

Qwest Communications International Inc., on behalf of Qwest Corporation (Qwest), submits these comments in accord with the Federal State Joint Board on Universal Service's (Joint Board) request for comment on the questions referred to it by the Federal Communications Commission (Commission) regarding eligibility, verification, and outreach rules for the universal service low-income programs.¹ Qwest is an Eligible Telecommunications Carrier (ETC) offering Lifeline, enhanced Lifeline and Link-Up services in fourteen western states.² That experience forms the basis of Qwest's comments here.

The Joint Board should make the following recommendations to the Commission:

- The Commission should not require states to have the same eligibility criteria, but should require states to determine individual consumers' eligibility using the states' criteria.
- Generally, requiring uniformity across the states for the Lifeline program is not the right approach. The better approach is permitting states and providers the flexibility to offer Lifeline support to consumers as needed to address the telephone service needs of low-income consumers in each state.

¹ See *Public Notice, Federal-State Joint Board on Universal Service Seeks Comment on Lifeline and Link-Up Eligibility, Verification, and Outreach Issues Referred to Joint Board*, CC Docket No. 96-45, WC Docket No. 03-109, FCC 10J-2, (rel. June 15, 2010) (*Public Notice*) (seeking comment on issues referred to Joint Board in *In the Matter of Federal-State Joint Board on Universal Service, Lifeline and Link Up*, Order, CC Docket No. 96-45, WC Docket No. 03-109, FCC 10-72, 25 FCC Rcd 5079 (2010)).

² For ease of reference, in these comments references to "Lifeline" generally encompass the other services of the federal low-income program including enhanced Lifeline and Link-Up services.

- The Commission should further explore the creation of a national database to aid administration of the universal service low-income program.
- The Commission should require states to undertake at least a minimum amount of verification each year, but the form of that verification process does not need to be the same across the states.
- The Commission should encourage states to participate in outreach activities, but should not impose specific outreach requirements on the states or providers.
- The Commission should implement one or more pilot programs to provide discounted broadband service to low-income customers before establishing rules for a more permanent program to provide such support.

Consumer Eligibility

The Commission should not require states to have the same low-income program eligibility criteria, but should require states to make consumer-by-consumer eligibility determinations for the Lifeline program. It is not necessary to mandate that all states have the same eligibility criteria. States should maintain the authority to set eligibility requirements. But, as several commenters have advocated, states should be the ones implementing those criteria and determining which individuals are eligible to participate in the state and federal low-income programs.³ Additionally, the Commission should not continue to require telecommunications providers to evaluate individual consumers' satisfaction of income eligibility requirements. As the Benton Foundation and its joint commenters noted, private providers are not well-suited to this task.⁴ Further, as others have noted, requiring providers to make these determinations may be discouraging participation by those who are not comfortable sharing their income information with a prospective telephone service provider.⁵

³ See, e.g., AT&T Comments at 5-8; see also, United States Telecom Association Comments at 5, stating that (“[g]overnment, not providers, should be responsible for administering the eligibility process, including periodic verification”).

⁴ See Benton Comments at 9; see also AT&T Comments at 5.

⁵ AT&T Comments at 5.

The Commission should encourage states to streamline Lifeline enrollment. The Joint Board should recommend that the Commission encourage states to take all reasonable steps to streamline Lifeline enrollment. The Commission should encourage automatic enrollment to the extent it means that customers qualifying for an underlying program that have existing phone service would automatically be enrolled in the Lifeline program so that they could receive the discount on their existing phone service. This could be accomplished either by having states directly send each provider a list of customers to be added as Lifeline customers (add files) or by having states input that information into a national database that would pass that information to the appropriate service provider, along the lines of what AT&T and others have proposed.⁶ Qwest agrees with the Nebraska Public Service Commission and others that automatic enrollment should not be required for customers that do not have telephone service.⁷ But, a streamlined process where a customer's pre-established eligibility could be quickly checked by a potential service provider -- such as through a national database -- would make it easier for consumers and service providers to establish Lifeline service for a new telephone customer.

The Commission should further explore creating a national database for the Lifeline program. The Joint Board should recommend that the Commission continue to explore creation of a national database to aid administration of the universal service low-income program. As several commenters have noted, a well-designed national database could serve to streamline customer enrollment, reduce or even eliminate the need for periodic verification of customer

⁶ See *id.* at 9-11.

⁷ Nebraska Public Service Commission Comments at 4; see also AT&T Comments at 8. It could make sense to require automatic enrollment if the service were to be provided for free, but Qwest does not believe this is or should be the intent of the program.

eligibility, minimize infractions of the “one-per household” rule, and provide an alternative process for determining Lifeline reimbursement.⁸

Any national database for administering the low-income programs must include an ability to cross reference the address of an eligible customer to ensure that no other eligible customer is already receiving low-income program support at the same address. Additionally, in designing a national database thought should be given as to how to use the database to help ensure that Link-Up support is only provided once per address per eligible participant.

Providers must be able to rely on customers’ self-certifications of eligibility. To the extent that the Commission continues to require customer self-certifications regarding eligibility for Lifeline support, such as self-certifications of tribal land residency or compliance with the one-per-household rule, providers should be permitted to rely on those certifications. Providers currently have no mechanisms for policing those certifications. Nor are they, or should they, be required to do so.⁹ Further, to the extent a national database could be designed to enforce the one-connection-per-household rule and other limitations on customer eligibility, self-certifications could become superfluous.

Uniform document retention requirements across the states are not necessary.

Although national uniformity in document retention requirements for Lifeline providers is appealing, especially for a provider serving in multiple states, it actually may be impractical. Currently Lifeline providers offering Lifeline service in federal default states are required to

⁸ See, e.g., AT&T Comments at 9-15; Nexus Communications, Inc. Comments at 3-4; Verizon Comments at 5-6.

⁹ As Qwest has previously argued, it relies on customers’ self-certification that they reside on tribal lands in providing enhanced Lifeline support, and it has no systems in place or any known obligation to police that certification. Request for Review by Qwest Communications International Inc. of Decision of the Universal Service Administrator, WC Docket No. 03-109 at 6-10, filed Apr. 25, 2008; see also AT&T Comments at 12-13.

obtain certain certifications from customers regarding their eligibility for Lifeline service and retain customers' self-certifications of eligibility for as long as the customer receives Lifeline service from the provider and three years thereafter. But, some states with their own Lifeline programs do not require that such certifications be obtained or retained by service providers. This is usually because there is a state agency responsible for determining the customer's eligibility, and thus the service provider is not responsible for demonstrating the customer's program eligibility.¹⁰ In turn, imposing the federal default state document retention requirements across all states would potentially impose additional, unnecessary document retention obligations in many states. The Joint Board should not recommend, and the Commission should not impose, uniform document retention obligations that would result in superfluous obligations in several states.

Similar if not identical consumer eligibility criteria likely should apply to a program offering discounts on broadband services for low-income individuals. Eligibility criteria probably should be the same for broadband or voice services. Primarily eligibility criteria should not depend on the services offered but on the economic status of the individual. But that should be examined more closely after there is some experience with offering discounted broadband services through a pilot program.

At this time, none of the states in which Qwest is an ETC discounts broadband services through their low-income programs.

Verification

Verification processes must effectively balance protecting against waste, fraud, and abuse of the program with minimizing unenrolling legitimately eligible customers.

¹⁰ For instance, this is the case in Arizona, Idaho, Montana, and Washington.

Verification is an important piece of protecting the integrity of the Lifeline program. It needs to be implemented effectively to protect against waste, fraud and abuse, but also to minimize removing legitimately eligible customers who fail to respond to verification requests. In a program where state agencies determine consumer eligibility, those same agencies should also be in a position to monitor or do periodic reviews to determine if a consumer is no longer eligible. When the state agency determines a consumer is not eligible because he no longer qualifies for the underlying programs, it can notify the appropriate service provider, or if there is a national database, provide that information to the database to notify the appropriate provider. If state agencies perform these types of reviews, it could eliminate or minimize the need in those states to have providers perform sample verifications, and potentially reduce the number of Lifeline customers who are legitimately eligible, but are removed from the program because they do not respond to the verification requests.

Verification should occur in all states each year, but it need not be the same process across the states. As with other aspects of the Lifeline program, it is not critical that verification requirements be uniform across the states. What is critical is that some minimum amount of verification is taking place to protect the integrity of the program. The Joint Board should consider whether there are certain minimum verification efforts that should be undertaken each year, preferably by the states, but leave the states room as to how to implement those minimum requirements and permit additional efforts. For example, the Joint Board could recommend that the states must verify the eligibility of 10% of Lifeline customers in the state each year, but that the state could accomplish this through any means it determined was appropriate including through monthly or real time review and notification to service providers of no longer eligible customers, an annual file review, or some other method.

Some of the commenters suggested specific verification processes for customers receiving Lifeline support from pre-paid wireless providers.¹¹ While Qwest has no significant experience with these types of Lifeline offerings, based on the opening comments it would seem prudent to consider whether additional or different verification processes are warranted given the significant increase in these pre-paid wireless Lifeline service offerings.

The same verification processes used for voice services likely should apply to a program offering discounts on broadband services for low-income individuals. Qwest's views on verification probably would not change if the Lifeline program were expanded to include broadband, since the focus of verification is the consumer's eligibility to participate in the program, irrespective of the services discounted. Again, that could change depending on how the Lifeline program is ultimately expanded to include discounts for broadband services.

Outreach

The Commission should encourage states to undertake outreach efforts. Qwest continues to believe that outreach through state agencies administering the underlying programs is an efficient and cost-effective way to inform those who will be eligible for the Lifeline service about the program and refers the Joint Board to some of Qwest's prior comments on this issue.¹² As Qwest has stated before, effective outreach requires at least two components: (1) making eligible consumers aware of the programs and their eligibility for the programs; and (2) having eligible consumers enroll in the programs.

¹¹ See, e.g., Florida Public Service Commission (Florida PSC) Comments at 9-10; Public Utilities Commission of Ohio (Ohio PUC) Comments at 13-14; AT&T Comments at 15-16.

¹² See Comments of Qwest Communications International Inc., In the Matter of Lifeline and Link-Up, WC Docket No. 03-109 (filed Aug. 24, 2007); Comments of Qwest Corporation, DA 06-41 (filed Mar. 1, 2006), attached hereto.

For the first component, maintaining flexibility to design outreach approaches that will reach target audiences in a cost-effective manner is critical. In Qwest's experience, advertising Lifeline services to the general population through traditional advertising media such as advertisements on buses or radio spots has not been particularly effective in generating customer enrollment for Qwest's Lifeline services. Much more effective has been where state agencies provide information about the services at the time a consumer has qualified for an underlying qualifying program.¹³ The Joint Board and Commission should examine the practices of states that have already implemented outreach programs and identify best practices for other states to adopt.¹⁴

The Commission's rules on outreach should provide states and providers flexibility to implement cost-effective outreach efforts. At the same time, the states should be given the flexibility to design outreach efforts that are suited to each state's low-income population. States should be encouraged to work with providers to develop cost-effective outreach approaches. Qwest agrees with other commenters that the Commission should not adopt specific rules for outreach.¹⁵ Instead, the Commission should modify the existing requirement to ensure that providers and states have the necessary flexibility to learn from past outreach efforts and work together to design and implement more cost-effective outreach solutions.

¹³ *Id.*

¹⁴ For example, the Ohio PUC notes that its new telecommunications law establishes a state-wide advisory group to coordinate Lifeline outreach, marketing and education. Ohio PUC Comments at 14. *And see* Verizon Comments at 12 (discussing California's Lifeline outreach).

¹⁵ *See* YourTel Comments at 6 (cautioning against any actions that would make the Commission's outreach guidelines more stringent, more financially burdensome for providers and possibly less effective); Florida PSC Comments at 11 (advocating against mandatory outreach requirements for ETCs' compliance).

For the second component, streamlining the enrollment process while guarding for enrollment of legitimately eligible customers is key. It should also be kept in mind that some individuals, even if eligible and aware of the program, will choose not to enroll for various reasons. Also, some individuals may be eligible for the program but not able to receive Lifeline service due to the one-connection-per-household restriction. Thus, for some percentage of “eligible” consumers, no amount of outreach will result in their participation in the program.

Without a more concrete proposal for Lifeline support for broadband services, possible outreach requirements are too speculative. Appropriate outreach obligations with respect to Lifeline support for broadband services will depend at least in part upon the nature of the broadband services supported and the extent of a service provider’s obligation to offer those services. And providers will need the flexibility to target any outreach regarding their offering of discounts on their broadband service to low-income customers to the manner and extent in which they are participating in such a discount program.

Respectfully submitted,

QWEST COMMUNICATIONS
INTERNATIONAL INC.

By: /s/ Tiffany West Smink
Craig J. Brown
Tiffany West Smink
607 14th Street, N.W.
Suite 950
Washington, D.C. 20005
craig.brown@qwest.com
tiffany.smink@qwest.com
303-383-6619

Its Attorneys

July 30, 2010

ATTACHMENT

COMMENTS OF QWEST CORPORATION

Qwest Corporation (“Qwest”) provides these comments in response to the request for information on effective outreach to low-income consumers issued by the Working Group on Lifeline and Link-Up Telephone Services on January 10, 2006.¹

I. INTRODUCTION AND SUMMARY OF COMMENTS

Qwest is an eligible telecommunications carrier (“ETC”) throughout its 14-state territory. At the end of 2005, Qwest was providing Lifeline benefits directly to retail customers and indirectly to customers of resellers of Qwest’s services to 342,379 individuals across our region. During 2005, Qwest also directly and indirectly provided Link-Up benefits to 87,697 consumers.

In April 2004, the Federal Communications Commission (“Commission”) issued an order on Lifeline and Link-Up services which includes adopting the following outreach guidelines:

“(1) states and carriers should utilize outreach materials and methods designed to reach households that do not currently have telephone service; (2) states and carriers should develop outreach advertising that can be read or accessed by any sizeable non-English speaking populations within a carrier’s service area; and (3) states and carriers should coordinate their outreach efforts with governmental agencies/tribes that administer any of the relevant government assistance programs.”² Additionally, in November 2004, Qwest entered into a Consent Decree with the Commission’s Enforcement Bureau, in which Qwest agreed to extend specific outreach efforts to low-income residents of tribal lands in Qwest’s in-region territory regarding Lifeline and Link-Up services available to them.³

¹ See *Public Notice*, Working Group on Lifeline and Link-Up Telephone Services Seeks Information on Effective Outreach to Low-Income Consumers, DA 06-41, rel. Jan. 10, 2006.

² FCC 04-87 at ¶ 45.

³ *In the Matter of Qwest Corporation; Compliance with the Commission’s Rules and Regulations Governing Advertising the Availability of Lifeline and Link-Up*, 19 FCC Rcd 22533 (2004).

Qwest's Lifeline and Link-Up outreach efforts include advertising the availability of the services in bill inserts, DEX Call Guide Pages, new customer welcome packages, brochures, on the Qwest web site, and occasionally through press releases. Qwest has also initiated a multi-media (radio and bus sign) awareness campaign for Lifeline and is tracking the number of calls to the toll-free number provided for that campaign to assess the impact of those outreach efforts. Qwest's outreach efforts also include distribution of Tribal Lifeline applications by Network Technicians working on reservations, Tribal Lifeline information booths at four regional pow wows as well as several Native American conferences, print ads in Native American publications, radio ads on stations which reach reservations served by Qwest, posters distributed to each reservation served by Qwest, and the establishment of a Tribal Liaison within each reservation who agreed to work with Qwest to identify local activities to help promote the availability of Tribal Lifeline.

For the most part, Qwest has engaged in its outreach efforts without the involvement of state agencies or other carriers. Yet, where Qwest has seen the greatest increases in Lifeline enrollment is where outreach has been conducted in conjunction with a state, local or tribal agency which enrolls low-income consumers in qualifying government assistance programs, such as the Low Income Home Energy Assistance Program ("LIHEAP"), Food Stamps, or Temporary Assistance for Needy Families ("TANF"). Consequently, Qwest believes that the Commission should continue to encourage state commissions to work with other state, local and tribal agencies and carriers to implement cost-effective state-wide outreach regarding Lifeline and Link-Up services. Qwest believes that if state agencies would incorporate Lifeline and Link-Up outreach and applications into their current enrollment processes for qualifying programs, individual states would be able to maximize the effectiveness of each outreach dollar spent and

significantly increase the enrollment of their qualified citizens. One way to encourage such cooperative efforts would be for the Commission to provide a funding mechanism to support cooperative outreach and/or Lifeline enrollment assistance at the government agency level.

II. SPECIFIC COMMENTS

1. **Success of outreach:** *What are successful examples of Lifeline/Link-Up outreach within the last two years? Why was this outreach successful? What form or type of media did this outreach activity take (e.g., advertisements, brochures)? How was the outreach developed? How were the costs covered? To the extent that past outreach on Lifeline/Link Up has been less than successful, please explain why you think this was so.*

Qwest has seen that outreach is the most successful when it is done in conjunction with an individual enrolling in a “qualifying program.” In New Mexico, customers enrolling in LIHEAP are given the opportunity to have the New Mexico Human Services Department share their eligibility with their phone company. An electronic file of these customer accounts is then sent to the appropriate ETC so that these customers can be automatically enrolled to receive Lifeline services. Although there are only two qualifying programs for Lifeline in New Mexico, at the end of 2005 approximately 8% of our customers were receiving Lifeline benefits in that state. As a percentage of Qwest’s per-state customer base, Qwest’s highest penetration of Lifeline enrollment is in New Mexico. Qwest believes that this is a direct result of the Lifeline outreach provided by the New Mexico Human Services Department at the time of LIHEAP enrollment.

Similarly, in Iowa, customers are provided an opportunity to enroll for Lifeline benefits at the time they are enrolling in the LIHEAP program. At the end of 2005, just under 5% of Qwest’s Iowa customers, are receiving Lifeline benefits in Iowa.

In North Dakota, the Department of Human Services sends individuals who have recently enrolled in a qualifying program a certificate of eligibility, which they are instructed to forward

to their telephone company in order to be enrolled in Lifeline. At the end of 2005, slightly over 6% of Qwest's North Dakota customers were receiving Lifeline benefits in North Dakota.

Similarly, in Washington, the Department of Social and Health Services automatically sends a multi-lingual pamphlet explaining how to enroll in the Washington Telephone Assistance Program to individuals who have recently enrolled in one of the qualifying programs. As of year end 2005, over 5% of our Washington customers were receiving Lifeline benefits in the state.⁴

This trend is apparent in Tribal Lifeline outreach efforts as well. Qwest's Tribal Lifeline outreach efforts have been most successful when individuals are made aware of the program at the time they qualify for a related program. Qwest's Tribal Liaison on the Fort Hall Reservation, in Idaho, is associated with LIHEAP on that reservation. Because of this involvement, the Liaison encourages tribal members to sign up for Tribal Lifeline as they are being approved for LIHEAP. As a result of his efforts, participation in the Tribal Lifeline program doubled on the Fort Hall Reservation during 2005, growing from 80 to 159 participants. The increase in this one reservation accounts for nearly one-third of the overall growth in Qwest's Tribal Lifeline during 2005.

On June 21, 2005, the Arizona Corporation Commission ("ACC") ordered all Arizona ETCs to meet with the Arizona Department of Economic Security ("AZ DES") and within six months provide a report and recommendations to the ACC regarding: (1) whether the

⁴ Qwest has not performed a rigorous statistical analysis of its Lifeline enrollment data, and there are likely other factors in play that impact Qwest's numbers such as different median income levels across the states, different numbers of households at or below 135% of the federal poverty level across the states, and different competitors among the states offering Lifeline benefits. This speaks to Qwest's concern addressed in the next section as to the limits of an ETC-by-ETC measure of success for outreach. Nevertheless, these higher penetration rates support Qwest's experience that there is greater enrollment where there is a state agency that already has a relationship with the individual providing Lifeline outreach.

development of an electronic interface for Lifeline verification and certification would be beneficial to Arizona; (2) how other states' on-line electronic interfaces operate; (3) whether such interfaces have had an impact on subscribership rates in these other states; (4) cost recovery options to cover the costs of an on-line interface of this nature; (5) whether centralized administration by AZ DES of all Arizona ETC end-user assistance programs would be beneficial; and (6) outreach programs that should be implemented to increase subscribership in Arizona. A representative from each ETC, along with representatives from AZ DES, the AZ Community Action Organization, and ACC staff met at least monthly to discuss individual company experiences, explore programs used in other states and develop a workable solution for Arizona. In December, 2005, the Arizona ETCs filed a report with the ACC recommending that funding be secured to enable the AZ DES -- Family Assistance Administration to provide automatic enrollment in Lifeline at the time it enrolls individuals in Food Stamps, TANF, and Medicaid.⁵ The report estimated that there is an unduplicated caseload of 432,559 Arizona households enrolled in these three programs, which represents approximately 77% of the Arizonans who qualify for Arizona Lifeline. Providing an opportunity for automatic enrollment at the time these individuals enroll in the qualifying program would increase current enrollment in the state from approximately 60,000 to over 400,000 in a single year. The ACC has not yet issued a formal response to this recommendation, which was submitted in late December.

Although Qwest has conducted several Lifeline outreach efforts independent of a government agency, they have had limited success in improving enrollment in Lifeline and Link-Up. For instance, in December 2005, Qwest initiated a Lifeline outreach campaign targeted at

⁵ Report and Recommendation of the Arizona Eligible Telecommunications Carriers on Lifeline and Link-Up Issues, Docket No. T-00000A-05-0380 (Dec. 21, 2005) attached hereto as Attachment 1.

reaching low-income individuals in our federal default states of Iowa, Minnesota, North Dakota and South Dakota. During December, Qwest ran 854 sixty-second radio spots in fourteen markets describing the Lifeline and Link-Up programs. These radio ads also included a special toll-free telephone number which customers could call for more information. During this same time period, Qwest also used interior bus signs to advertise the availability of Lifeline and Link-Up services in five of the more urban markets in these four states. These signs also included the special toll-free number. Qwest invested over \$45,000 in this targeted, multi-media outreach effort. To date, this campaign has only realized 277 calls to the advertised toll-free number, out of a potential 200,000 households at or below 135% of the federal poverty level in these states. With a response rate of less than 1% and a per applicant outreach cost of approximately \$162, we believe this program demonstrates the difficulty of conducting cost-effective outreach apart from state agency involvement where better targeting is possible.

Qwest has also tried a variety of outreach approaches for its Tribal Lifeline and Tribal Link-Up programs. These outreach efforts have included, but are not limited to, sponsorship and informational booths at four major pow wows and eight seminars, print ads in monthly periodicals targeted to Native Americans, four weeks of radio ads, posters, a "tell-a-friend" campaign, participation at local tribal events, and brochures distributed by local network technicians who work on reservations. Qwest spent approximately \$100,000 on these efforts in 2005 and realized a 23% growth in the number of customers enrolled in Tribal Lifeline in that same year. This significant percentage in growth, however, reflects the addition of only 250 new families to the programs -- 79 of which were on the Fort Hall Reservation discussed above. Based on these numbers, the cost of Qwest's Tribal Outreach efforts in 2005 was approximately \$400 per new applicant. While these outreach efforts have had success in increasing enrollment

in Tribal Lifeline services, this high cost of outreach per applicant makes these efforts unsustainable in the long run. More cost-effective outreach efforts need to be used.

Perhaps the Lifeline program is difficult to understand in today's competitive telecommunications market, perhaps people are suspicious of it because the application process is more often not handled by a familiar government agency, or perhaps low-income individuals are unable to take advantage of the program because of their previous payment history with the telephone company. Whatever the reason, outreach done in conjunction with state or local agencies enrolling individuals in qualifying programs has proven much more effective in increasing consumer enrollment in the Qwest Lifeline program.

2. Measuring the success of outreach: How should the success of outreach efforts on Lifeline/Link-Up be measured?

Qwest believes that the effectiveness of Lifeline and Link-Up outreach may be measured best on a state-by-state basis, rather than on an ETC-by-ETC basis, since the breadth of eligibility criteria varies by state and the number of qualified households crosses individual ETC boundaries -- particularly in today's competitive marketplace. Thus, one measure of success of outreach may be a periodic examination of the number of individuals receiving Lifeline services within a state compared to the qualified population within the state.

Success of outreach is not well measured by the number of individuals enrolled in the Lifeline program compared to the qualified population within each ETC. Variables such as each state's eligibility criteria, the percentage of low-income individuals within a particular ETC's customer base, and the individual applicant's previous credit history with the ETC (which could prevent them from re-establishing service with the Lifeline benefit) all serve to distort such a measurement.

Likewise, the success of outreach cannot be measured by the amount of money spent on it. As cited in the examples above, a significant amount of money can be spent on outreach without achieving a corresponding significant increase in enrollment.

Another possibility might be to measure the success of outreach based on the overall consumer "awareness" created by a company's outreach efforts. If this were the case, traditional advertising awareness research could be conducted in conjunction with each ETC's outreach efforts. The risk here, however, is that additional resources would continually be spent by ETCs in order to prove the effectiveness of their campaigns, which may or may not be cost effective in actually generating Lifeline enrollment.

3. ***Currently available information:*** *If someone contacts your organization asking for information regarding the type of assistance available through Lifeline or Link-Up, what do they receive? What resources do you currently have available to promote the availability of Lifeline and Link-Up to your constituency? What resources would you like to have available? Is there anything on your website about assistance for low-income consumers? Is it specific to Lifeline and Link-Up? Do you produce a hard copy publication to promote Lifeline and Link Up?*

Lifeline eligibility criteria and the enrollment process are different in each state. A customer in Iowa, New Mexico, North Dakota, South Dakota, Minnesota, or who lives on tribal lands who calls Qwest for information on Lifeline would be sent the Lifeline/Link-Up enrollment application appropriate for his state. A customer calling from any of Qwest's other in-region states would be provided the telephone number of the agency responsible for determining Lifeline eligibility in his state.

In addition to the various outreach efforts discussed in response to question 1, Qwest customers and non-customers alike can find information on Telephone Assistance Plans (or "TAP") in the Call Guide Pages of the DEX directory and at www.qwest.com/TAP. Information on Telephone Assistance Plans is contained in a brochure entitled "Qwest Disability Solutions:

Convenience, Flexibility, Freedom,” which is available at Qwest kiosks located in various retail malls.⁶ In Arizona, a bi-lingual brochure describing Telephone Assistance Plans was distributed at the Arizona State Fair, which Qwest sponsored, and was recently made available at Qwest kiosks located in Hispanic grocery stores in Arizona.⁷ This brochure contains a telephone number to Qwest’s El Centro call center which is dedicated to providing service to Spanish-speaking customers. Qwest customers receive information on Telephone Assistance Plans as part of their initial welcome packets.⁸ Additionally, annual bill inserts include information on TAP in several Qwest states. Qwest is rolling out a 14-state Lifeline outreach campaign, which includes bus signs⁹ and radio spots that run periodically. Posters have also been developed and will be made available to various agencies within each state.

4. ***Joint outreach:*** *Are you aware of any joint partnerships or outreach activities that have taken place or are planned in your region? If so, what has been your experience?*

Prior to 2005, Utah customers enrolling in Lifeline were sent an ETC-specific application which they completed and returned to their respective phone company. In June, 2005, the Utah Public Service Commission modified its Lifeline rules to give the Utah Department of Community and Culture (“UDCC”) the responsibility for qualifying individuals for Lifeline. Concurrent with this change, Qwest and other ETCs in Utah worked with the UDCC to develop an informational brochure and Lifeline application which could be used throughout the state to inform and enroll individuals in the Lifeline program. Qwest now uses the brochure and application for its Lifeline services in Utah. Qwest believes that the Utah approach of having a

⁶ Brochure is attached hereto as Attachment 2.

⁷ Brochure is attached hereto as Attachment 3.

⁸ Sample bill inserts are attached hereto as Attachment 4.

⁹ Sample bus sign is attached hereto as Attachment 5.

consistent brochure and application for Lifeline across the state is a good one. An important next step is for the UDCC to provide these materials directly to qualifying individuals. Also, efforts have just begun in Utah to have Lifeline enrollment offered concurrent with LIHEAP qualification, and as a result of this new process Qwest is seeing a noticeable increase in Lifeline enrollment for existing Qwest customers.

In Arizona, Qwest co-chaired the Lifeline Task Force charged by the Arizona Corporation Commission with developing a recommendation to increase enrollment in the Arizona Lifeline program. The task force calculated that its recommendation that the AZ DES be enabled to enroll individuals for Lifeline services at the time they enroll in certain qualifying programs (discussed in response to Question 1) has the potential to increase Lifeline enrollment in the state from 60,000 to over 400,000 in a single year.

5. *Effects of 2005 Hurricanes: Have you seen or do you anticipate an increase in the number of consumers that apply for Lifeline and/or Link-Up as a result of the hurricanes? Has your region made changes recently in Lifeline/Link-Up eligibility as a result of the hurricanes? What additional outreach measures would you propose for Lifeline/Link-Up as a result of the hurricanes? Other emergency situations?*

In December 2005, Qwest implemented the Katrina Link Up program. Customer service representatives received information on the new program, and the Qwest Katrina Link Up application was added to www.qwest.com/TAP. As of January 31, 2006, Qwest has only received six applications for the special Katrina Link Up, and four of those did not include the FEMA documentation required to validate eligibility.

Since eligibility for this special Link Up program requires the individual to have been approved for FEMA disaster housing assistance relating to Hurricane Katrina, outreach would be most effective if provided at the time the individual is notified that they are qualified for FEMA disaster housing assistance.

6. *Challenges and obstacles: What are some of the challenges/obstacles to implementing a successful outreach program on Lifeline and Link-Up?*
 - a. Targeting low-income individuals: Cost effective outreach requires very specific targeting -- not a mass market approach. The most effective way to reach the qualified individual is in conjunction with a qualifying program. While Lifeline outreach by the state agency in conjunction with enrollment for a qualifying program presents the greatest opportunity for increasing Lifeline enrollment, another possibility for effective targeting would be to have a Lifeline mailer/application sent to each person on a qualified program such as Food Stamps. Such a mailing, however, would have to come from the qualifying agency -- not any one ETC -- for obvious privacy reasons. It would also need to include a Lifeline application which all ETCs in the state had agreed to accept.
 - b. Customer confusion resulting from multiple messages: When each ETC in a serving area conducts its own mass media outreach campaign, both customers and social service agencies are exposed to overlapping and slightly different messages in regards to Lifeline and Link-Up services. A cooperative approach between ETCs and qualifying agencies would help ensure that a consistent message is delivered to the consumer.
 - c. Developing a message which can clearly communicate to the target audience: The complexity of the recently added income-level criteria and the documentation required to prove eligibility is not easy to communicate to an audience whose education level may be lower than that of the average customer. Outreach provided at the time the individual is registering for a qualifying program provides a unique opportunity for a case worker or similarly-trained individual to easily assist the individual in the application process.

- d. Funding an outreach campaign: In most states, there is no mechanism to reimburse ETCs for their outreach efforts and no incentive for ETCs and qualifying agencies to work together on such an endeavor. While the recent ACC order requiring all ETCs in the state to develop a joint recommendation for increasing Lifeline enrollment was successful in getting everyone to the planning table, currently there is no funding mechanism which could support the group's recommendation.
7. **Overall recommendations**: *What recommendations would you make in terms of outreach on Lifeline and Link-Up? Does an increase in the number of consumers eligible for or applying to the programs impact how outreach should be done?*

Qwest's experience has been that outreach for Lifeline and Link-Up services is most effective when done with the involvement of a qualifying agency. That outreach could be through an automated process in conjunction with enrollment in a qualifying program, or it could be through a letter and generic Lifeline application which can be sent to all participants in a particular qualifying program. Whatever the form, Qwest recommends that such outreach efforts be developed at a state level in conjunction with the qualifying agencies, and that a funding mechanism be created to support such outreach efforts. Generally, each state's public utilities commission is in the best position to facilitate the ETCs coming together to help develop such a program. How to engage and fund the individual agency involvement, however, is probably beyond the scope of a state commission and would probably require assistance at the federal level. Qwest believes that it is appropriate to consider using federal universal service support to fund outreach for Lifeline and Link-Up services.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY** **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be: 1) filed with the Office of the Secretary of the FCC via ECFS in WC Docket No. 03-109; 2) served via e-mail on Ms. Kay Marinos, Utility Program, Oregon Public Utility Commission at kay.marinos@state.or.us; 3) served via e-mail on Ms. Elizabeth Valinoti McCarthy, Telecommunications Access Policy Division, Wireline Competition Bureau at elizabeth.mccarthy@fcc.gov; 4) served via e-mail on Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau at charles.tyler@fcc.gov; and 5) served via e-mail on the FCC's duplicating contractor, Best Copy and Printing, Inc. at www.bcpiweb.com.

/s/Richard Grozier

July 30, 2010