

Before the

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

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109

**COMMENTS OF CINCINNATI BELL INC.**

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## SUMMARY

Competition in local telecommunications service and the increasing prevalence of wireless-only service mandate an update of the Lifeline rules to ensure that assistance is available to those who truly need it, while controlling the cost of the program.

Cincinnati Bell supports codification of the one-per-residence requirement to control the cost of the Lifeline program and encourages the Commission to take cost effective steps to prevent duplicate Lifeline claims. Cincinnati Bell believes that requiring ETCs to inform consumers that services are Lifeline supported, requiring subscribers to annually certify that they do not have duplicate Lifeline service, and instituting minimum consumer charges would be cost effective measures to prevent duplicate claims. The resolution of duplicate claims should be administered by a neutral third-party that would protect consumer privacy and ensure that the process is handled in a competitively neutral manner. Retroactive recovery for duplicate claims and fines or sanctions should only be imposed when an investigation establishes that the provider and/or subscriber knowingly intended to defraud the program.

Any measures adopted to improve the process of eligibility verification must also be evaluated from a cost-benefit perspective. Consistent verification procedures would be a cost effective improvement, while the cost of a national or regional database may outweigh the benefits.

Because of the competitive market that now exists for Lifeline services, the Commission should not provide for coordinated enrollment with qualifying public assistance programs. However, it should combine Tier 1 and Tier 2 Lifeline support to simplify the system and place intermodal competitors on equal footing. Pro rata reporting requirements should not be imposed as the changes necessary to implement it exceed the benefit. Finally, although Cincinnati Bell supports community outreach programs, the Commission should not make them mandatory.

## COMMENTS OF CINCINNATI BELL INC.

Cincinnati Bell Inc., on behalf of its subsidiaries, Cincinnati Bell Telephone Company LLC (“CBT”) and Cincinnati Bell Wireless, LLC (“CBW”), offers these comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in the above referenced proceedings. CBT is a mid-sized incumbent local exchange carrier (“ILEC”) that provides Lifeline service in accordance with the rules of this Commission, the Public Utilities Commission of Ohio (“PUCO”), and the Public Service Commission of Kentucky (“PSCK”). CBW is a regional facilities-based wireless service provider that has been designated as an eligible telecommunications carrier (“ETC”) in Ohio for the limited purpose of offering prepaid wireless Lifeline service to qualifying Ohio consumers in southwestern Ohio.<sup>1</sup> In addition, CBW has applied for ETC designation to offer prepaid wireless Lifeline service in Kentucky.<sup>2</sup> CBW anticipates that it will begin offering Lifeline service in the second quarter of 2011.

### **I. INTRODUCTION**

Cincinnati Bell agrees with the Commission’s basic premise that the Lifeline program needs a holistic review to ensure that the program operates efficiently and cost effectively and meets its statutory purpose in light of the changing communications marketplace. As the Commission notes (¶ 17), the marketplace has changed dramatically in the last fifteen years. When the Lifeline program began, consumer wireless and broadband did not exist and the Lifeline rules were designed for a consumer market in which a single wireline voice connection at home was the norm. Now, the majority of Americans have wireless service and many households have dropped their landline service entirely. While the vast majority of American

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<sup>1</sup> Application of Cincinnati Bell Wireless LLC for Designation as a Eligible Telecommunications Carrier in the State of Ohio, Case No. 10-2449-TP-UNC, *Finding and Order*, Dec. 29, 2010.

<sup>2</sup> Petition of Cincinnati Bell Wireless LLC for Designation as a Nonrural Eligible Telecommunications Carrier for the Limited Purpose of Offering Lifeline Service to Qualified Households, Case No. 2011-00059, filed Feb. 18, 2011.

households that want voice service now have it, the same cannot be said for broadband service. Access to broadband is becoming increasingly important, but as the National Broadband Plan recognized, broadband adoption among low-income households significantly lags that of middle and upper income households.

Cincinnati Bell supports the Commission's efforts to reform the Lifeline program to more appropriately reflect the realities of today's marketplace, however, in doing so, it is important that the size of the low-income fund be closely monitored to limit the burden on consumers and businesses who must fund the program. Although Cincinnati Bell appreciates the Commission's desire to transition funding to broadband, Cincinnati Bell cautions that in doing so it is important that consumers who still use Lifeline to support basic voice telephony service not be excluded. Accordingly, Cincinnati Bell applauds the Commission's efforts to establish performance goals and measurements to preserve and advance the availability of voice service for low-income Americans, while simultaneously looking for ways to free up funds to begin transitioning to a broadband service fund. Reforms that improve administration of the program and eliminate waste, fraud and abuse should help to ensure that the limited funds available for low income support are stretched as far as possible to provide as many Americans as possible with affordable, essential telecommunications service.

Based upon its experience as a wireline Lifeline service provider since the inception of the program, a newly certified wireless Lifeline service provider, and a contributor to the Universal Service Fund ("USF"), Cincinnati Bell offers comments on several of the ideas raised in the NPRM. Specifically, Cincinnati Bell comments on the codification of the one per residence rule, proposed measures to assist in detecting duplicate claims, remedies to address duplicate claims, the merits of a minimum consumer charge, verification of consumer eligibility,

coordinated enrollment, modification of the discount structure, pro rata reporting requirements, and consumer outreach initiatives.

## **II. THE ONE-PER-RESIDENCE RULES SHOULD BE CODIFIED**

The prevalence of wireless service in today's telecommunications marketplace and the individual nature of wireless service are somewhat at odds with the concept of a one-per-residence rule, since the very nature of wireless service uncouples it from the residence. If there were no need to constrain the size of the fund, the best approach would be to provide support for one wireless service per eligible adult, rather than one per residential address. This approach would recognize that wireless service is the new norm for voice telephony and, therefore, support the principle that low-income consumers should have access to services that are reasonably comparable to services enjoyed in urban areas. However, the countervailing reality is that the size of the USF must be constrained.

Although providing support at the individual level would solve some of the issues the Commission has wrestled with, such as support for unrelated individuals living at a single address, Cincinnati Bell is concerned that the demands on the fund would significantly increase or, if the fund were capped, the available support per qualified individual would be too small to make a difference in their ability to afford the service.

The Commission's proposal to codify a one-per residential address rule represents a reasonable compromise that should provide meaningful support to ensure that the maximum number of Americans have access to voice telephony service while controlling the size of the low-income support fund.

## **II. THE COST OF MEASURES TO REDUCE, DETECT AND REMEDY DUPLICATE CLAIMS MUST BE BALANCED AGAINST THE BENEFITS**

Cincinnati Bell agrees that the process to detect and remedy duplicate claims could be strengthened, however, it is also important that the cost of any such measures be considered in the analysis. A national database, although attractive on the surface, would likely be costly to develop and maintain and may raise insurmountable hurdles relative to the protection of customer proprietary information. If duplicate claims can be identified, the process to address and remedy the duplicate claims must be administered in a cost effective manner by a neutral third-party.

### **A. Measures to Reduce Duplicate Claims**

#### *ETC Marketing Requirements*

One inexpensive step identified in the NPRM (§ 237) to reduce duplicate claims would be to require all ETCs to clearly inform subscribers that the service is a Lifeline supported service. Although ETCs should be able to market their Lifeline-supported services under a trade name, they should be required to expressly identify that service as a Lifeline-supported service in their advertising and outreach to consumers. This would not preclude providers from offering unique, competitive Lifeline-supported services, but it would help consumers to understand which competitive offerings are Lifeline-supported so that they do not inadvertently sign up for duplicate Lifeline service. The cost of such a requirement would be minimal for ETCs.

#### *Customer Certification*

Requiring subscribers to certify during the initial enrollment process that they do not receive any other Lifeline service and annually recertify that only one Lifeline benefit is in effect

at the household would further reinforce the prohibition against duplicate claims.<sup>3</sup> (¶ 167) The initial certification and subsequent audits provide good opportunities to educate customers regarding Lifeline eligibility restrictions and reduce instances where customers may unknowingly have duplicate Lifeline benefits.

#### *Minimum Consumer Charges*

Eliminating free Lifeline service offerings may be another cost effective way to reduce the number of duplicated claims (¶¶ 85 - 89). Lifeline, as originally constructed for ILECs, was not designed to provide free telephone service. Free Lifeline service is primarily the result of prepaid wireless entities' entry into the Lifeline market. Understandably, customers have migrated to the free services. Whether or not the free service has increased overall penetration rates or is appropriate public policy is debatable. What is not debatable is that free service creates economic aberrations that do not exist when customers must pay for service.

Theoretically, in a market without free service, an individual who needs Lifeline to afford telephone service will purchase the most economical service that fits his/her needs, and the likelihood of the person purchasing a second Lifeline service is relatively small because income is limited. However, with free service, an individual can readily have additional service with little or no added cost, and this can easily be achieved by obtaining free service from multiple providers. Furthermore, the customer needs to do nothing more than use the phone to retain service.

Requiring the customer to make a payment every month to retain service would dissuade some customers from trying to obtain Lifeline service from multiple providers. Setting a minimum threshold payment amount is the most practical approach because of the wide variety

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<sup>3</sup> CBT is already implementing customer certification that the household has no other Lifeline service as part of its enrollment and audit processes. CBW will require this certification once it begins offering service.

of services available to Lifeline customers. At a minimum, this threshold needs to cover the costs to establish the billing. Given that free service is largely a prepaid wireless issue, an appropriate minimum payment would be the cost the provider incurs to activate a pre-paid card.

In addition to helping to reduce duplicate claims, eliminating free service resolves most of the issues regarding how long a provider can claim reimbursement for a customer. (¶¶ 80, 82) Either a customer is paying for working service and reimbursement is appropriate, or service is disconnected and the provider is not reimbursed. There is no need to debate whether or not service is active or being used.

### **B. Detecting Duplicate Claims**

The NPRM at paragraph 57 suggests the development of a database containing subscriber names, addresses, social security numbers, birthdates, or other unique household-identifying information. The information would be submitted to the Universal Service Administrative Company (“USAC”) by ETCs when filing their Forms 497. The criteria for matching in such a database should be limited to numerical fields such as social security number or birthdate where a consistent format is easier to employ. Attempting to detect duplicate claims by matching names and addresses would be far more challenging because names and addresses can be provided, displayed or abbreviated many different ways. For example, street names may be abbreviated differently or, a subscriber may include a middle name or initial when applying with one provider, but leave out the middle name or initial with the other provider. In general, data consistency becomes increasingly more difficult as non-numerical fields are included in the database. However, if attempting to enforce a one Lifeline benefit per residential address requirement, it seems that some type of check of address fields would be necessary. Cincinnati Bell is concerned that, if used for that purpose, the database may either miss many duplicate claims because the addresses are not an exact match or alternatively, if the system matches on

fields that are close, but not exact, it may reject many valid claims and/or cause the ETCs to spend money investigating suspected duplicate claims unnecessarily.

### **C. Remedies To Address Duplicate Claims**

Cincinnati Bell supports the process recommended by the ETCs and trade associations for resolving duplicated benefits (§59). Neutral third-party administration of this process by USAC or another administrator is imperative for several reasons. First, customer privacy and competitive neutrality dictate that information regarding one provider's customers must not be shared with other providers. A neutral third-party allows the privacy of the customer to be maintained. Second, providers are motivated to keep the customer, and thus should not be relied upon to objectively administer contacts with the customer. Third, one provider would have no way to know or verify a person's response to another provider. Finally, the customer could affirmatively respond to all providers and attempt to keep the duplicate benefits.

Under the recommended process, the neutral third-party would contact the customer, explain the situation, and notify the affected ETCs. When the subscriber selects a provider, the third-party would notify the ETCs not selected to remove the Lifeline benefits from the account. If the customer does not affirmatively select a provider within a reasonable time, for example thirty days, the third-party would instruct all providers to remove Lifeline benefits from the account. Cincinnati Bell recommends that the third-party should also inform the subscriber of the need to contact the provider(s) not selected if they wish to discontinue service with the provider, otherwise the subscriber will continue to be billed by the provider at the non-Lifeline rate. This would prevent the subscriber from receiving unanticipated bills and enable the provider to explain any final billing to the customer.

Providers should receive reimbursement for the Lifeline benefits until the time they are instructed to remove the benefits. As the Commission observes at paragraph 50, neither the

customer nor the provider may have reasonably been aware that the customer was receiving duplicate Lifeline benefits. Retroactive recovery of funds for duplicate enrollments as proposed in the NPRM (§ 62) appears to be punitive and intended as a deterrent to duplicate enrollments. However, retroactive recovery, fines or sanctions are inappropriate without a finding of wrongdoing and should not be based on data regarding a customer's actions over which the provider has no control.

Neither the providers nor the customer should be punished in situations where a person unintentionally and unknowingly received multiple benefits. Instead of penalizing the providers, the process for removing duplicate benefits should be improved to minimize the time allotted for de-enrolling subscribers. Cincinnati Bell believes that the current 60-day period to de-enroll a customer is too long and delays the time until ineligible customers can be removed from Lifeline. Cincinnati Bell recommends reducing this time to no more than thirty days.

If a provider appears to have an unusually high number of duplicate enrollments or otherwise appears to be in violation of the enrollment standards, the Commission should address the provider's actions on an individual case basis and assess any fines or sanctions as part of that investigation. Retroactive recovery of funds as described in the NPRM appears to assume intent, is thus unfair, and should be rejected. Similarly, if a customer appears to have obtained service fraudulently, legal action could be taken against the customer. Prohibiting a customer from enrolling in Lifeline, as discussed in paragraph 61, is not practical without a national Lifeline database. Otherwise, the customer could subscribe to Lifeline from yet another provider, and that provider would have no way to know that the customer was no longer eligible for, or "banned from," Lifeline.

#### **IV. VERIFICATION OF ELIGIBILITY**

The NPRM proposes several changes to improve the process by which consumer eligibility for the Lifeline program is verified. Cincinnati Bell believes that introducing greater consistency across the country would result in significant improvement and reduce administrative costs for providers. However, Cincinnati Bell has concerns about the value of a national database and the annual audits.

##### *Consistent Verification Procedures Are Necessary*

Consistent verification procedures across states would improve the program by ensuring that all Lifeline recipients have gone through the same eligibility verification screening and, accordingly, would make it easier to detect duplicate and/or fraudulent claims if USAC is reviewing a consistent set of data from all providers in all states. Moreover, consistent procedures would reduce costs for providers by enabling providers that operate in multiple states to have consistent application forms, processes and systems.

##### *The Cost of a National or Regional Database May Outweigh the Benefits*

Although Cincinnati Bell believes that a consistent set of requirements will help to reduce fraud and abuse, it is not convinced that a national database will significantly improve the program. Cincinnati Bell is concerned that developing a database of Lifeline subscribers to verify eligibility will be expensive, more difficult to compile, and less effective than anticipated. The basis for these concerns is CBT's experience with automatic enrollment in Ohio where customer privacy, data consistency, and the frequency of data updates have limited the ability to enroll customers in Lifeline. These same limitations must be addressed when determining the viability of any Lifeline customer database.

When CBT began automatically enrolling customers in Lifeline in 1999 the Ohio Department of Jobs and Family Services (“ODJFS”)<sup>4</sup> and the Ohio Department of Development (“ODOD”) provided names, addresses, and social security numbers identifying participants in various Lifeline qualifying programs. However, ODJFS stopped providing this data to CBT (and other Ohio ILECs) in 2002 because of privacy issues. Despite repeated attempts to address these issues with ODJFS, the agency has not provided data since 2002. ODOD continues to provide data, but the data no longer includes social security numbers due to privacy issues. Without social security numbers it is difficult to ensure that the qualifying individual and the Lifeline applicant are one and the same.

If the Commission does move forward to establish a database, it must have adequate safeguards to protect customers’ personal information, especially if the database can be accessed by providers. Any access by service providers to a Lifeline database must be limited only to identifying whether or not a particular person or household already has Lifeline service. In addition to protecting private information, procedures must ensure that providers cannot collect information from the database for marketing purposes, especially if this list would enable a competitor to identify another competitor’s customers.

As mentioned above relative to detecting duplicate claims, obtaining standardized data for the database may prove difficult or costly. Providers undoubtedly have their own conventions for abbreviating names and addresses and any attempt to require them to standardize this information for Lifeline reporting purposes may necessitate costly system changes for the providers or, at a minimum, considerable manual data entry to conform to the standardized format.

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<sup>4</sup> Formerly, the Ohio Department of Human Services.

Finally, any database used for verifying eligibility or detecting duplicate claims must be updated in a timely manner, ideally in real time. With automatic enrollment in Ohio, CBT received updates from ODJFS every month and from ODOD twice per year. Obviously, these time frames are not frequent enough to verify Lifeline eligibility, particularly for a population that may be more transient than average. If the database is out of date, a person could appear to have duplicate benefits when in fact the person simply switched service providers at the same address and the old provider had not yet updated the database. Conversely, a person could obtain Lifeline service from multiple providers at the same time, but it could take months to identify the situation if the database is not updated immediately. However, real time updates also create significant expenses and administrative burdens that must be balanced against the potential benefits.

*Improvements in the Annual Audit Process Are Needed*

The Commission's concerns about the adequacy of the annual verification audits to protect the program from waste, fraud and abuse are well founded. Cincinnati Bell's primary concern with the audit process is that the respondents to the audit do not represent the population as a whole. Customers who want to retain their Lifeline benefits are highly motivated to respond to the audit. However, customers who are no longer eligible for Lifeline have no financial incentive to respond. Depending on how the provider treats non-respondents, the customer will either have their Lifeline benefits removed some time later than if they had responded to the audit or the benefits will not be removed at all. Either way, the customer receives more benefits by not replying to the audit. Thus, understanding and treating non-respondents is the most significant statistical issue that must be considered when evaluating alternative proposals to the current audit requirements. In its present form, the audit results are inherently biased towards

those who remain eligible for Lifeline. Collecting more data through larger sample sizes or requiring a specific number of responses does not change the inherent bias.

One of the alternatives proposed in the NPRM is a sample-and-census approach. This alternative is subject to the same inherent bias due to non-respondents as the current approach. CBT has very few respondents - approximately 1% over the last two years - who respond to the annual audit and state that they are no longer eligible for Lifeline.<sup>5</sup> Relying upon a small segment of apparently highly-conscientious customers who respond to the audit that they are no longer eligible for Lifeline is not a statistically sound method to determine if a census is required. More appropriately, consistent data reporting is needed to better understand the response rate and the characteristics of those who respond to the audit as recommended by the Joint Board. Requiring all states to submit verification sampling data to USAC will assist in this effort. Furthermore, Cincinnati Bell supports the Commission's proposal to require ETCs to remove Lifeline benefits from those who do not respond to the annual audit.<sup>6</sup>

## **V. COORDINATED ENROLLMENT IS INAPPROPRIATE IN TODAY'S COMPETITIVE MARKET**

As explained in the NPRM (¶ 199), coordinated enrollment is a mechanism that allows consumers to enroll in Lifeline and Link-Up at the same time they enroll in a qualifying public assistance program. Coordinated enrollment is inappropriate in today's competitive market because it assumes that a customer can be enrolled in a service without contacting the service provider. While Cincinnati Bell supports program-provider agencies and social service organizations informing eligible consumers about Lifeline, there are a variety of reasons why

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<sup>5</sup> CBT specifically instructs customers to return the audit form stating that they are no longer eligible for Lifeline, but few do. Similarly, CBT has for years required customers to acknowledge that they will notify CBT if their Lifeline eligibility status changes. However, virtually no one has pro-actively contacted CBT to remove Lifeline benefits. While the proposal in ¶ 172 to require that customers notify providers if they are no longer eligible for Lifeline is appealing, the practical answer is that the proposal will yield no benefits based on CBT's experience.

<sup>6</sup> Cincinnati Bell already follows this process as part of its audits. Those who do not respond to the initial audit are sent a second mailing giving the customers 60 days to respond with verification or lose benefits.

customers should only be enrolled through the service providers or their authorized representatives.

First, the choice the eligible consumer must make is not as simple as choosing between provider A and provider B. Most wireless Lifeline providers offer multiple Lifeline plans while many ILECs have optional services or bundles available to Lifeline customers. Customers must understand the plans and options to choose the service that is best for them. Explaining the options is a task for the service provider, not a social service organization or government agency. Second, customers may want or need to pick service elements, such as wireless handsets or long distance plans. Social service agencies cannot be expected to know this information, much less take time to explain it to clients. Again, this task belongs to the service providers. Third, previous customer records may be needed to establish service. For example, a customer may have a past due charge that must be paid before service can be re-established. Again, the service provider is best positioned to serve the customer. Finally, coordinated enrollment requires participation by agencies and organizations over which the Commission has no jurisdiction and may be unworkable in many instances - like CBT's experience with automatic enrollment via ODJFS in Ohio.<sup>7</sup>

## **VI. TIER 1 AND TIER 2 LIFELINE SUPPORT SHOULD BE COMBINED**

In light of the significant marketplace changes that have occurred since the Lifeline support tiers were adopted, Cincinnati Bell believes that combining Tier 1 and Tier 2 support into one fixed amount would be more meaningful. Basing the discount on the subscriber line charge ("SLC") no longer reflects the current Lifeline market. First, the SLC often varies across

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<sup>7</sup> While not included in the NPRM discussion, Cincinnati Bell has similar concerns with automatic enrollment of Lifeline customers. All providers must be given equal opportunities to enroll customers and consumers should be able to choose their service and service provider. Automatic enrollment precludes both tenets.

ILECs. This variation was less common when Lifeline began and the cap on the residential SLC was significantly less than the current cap. A fixed Lifeline discount would treat all Lifeline subscribers the same and be simpler for customers to understand by providing the same savings to everyone. Second, the amount to impute for the SLC is an issue with any non-ILEC Lifeline service, especially if the provider serves multiple ILEC areas with different SLCs. Providing different discounts in different areas is administratively burdensome for the provider and confusing for customers.

Providing a Lifeline discount based on a weighted average of the ILECs' SLCs would simplify administration for the providers and be less confusing to subscribers. Thus, Cincinnati Bell recommends replacing the current Tier 1 and Tier 2 discounts with a fixed discount equal to the average ILEC SLC plus \$1.75. This discount would have the advantage of treating all providers equally regardless of service technology and would better support competitive markets than the current discount structure which is based on charges that are only relevant to ILECs.

## **VII. PRO RATA REPORTING REQUIREMENTS SHOULD NOT BE CODIFIED**

Pro rata reporting on the FCC Form 497 for partial month Lifeline subscribers should not be codified. The NPRM's assumption that enforcement of such a requirement would minimize waste of Lifeline funds is unfounded. Many carriers, including Cincinnati Bell, track access lines using a customer database that is updated at the end of each month - consistent with most accounting and reporting systems and requirements. While CBT's billing system includes partial month billing, this is a unique function of the billing system that does not carry over to CBT's customer records database. Pro rata reporting would require a fundamental change to CBT's systems that would entail programming updates, additional storage, and potentially the creation of a new database.

Moreover, use of the month end snapshot to calculate reimbursement seems to be misunderstood. Although some customers with partial month service will be included in the end of month counts, some would not. For example, a customer who had service from March 10 through April 25 would have service for one and one-half months but would only be counted as one month for Lifeline reimbursement at the end of March. On the other hand, a customer who had service from March 20 to May 5 - again one and one-half months - would be counted twice for Lifeline reporting. CBT believes these two situations when averaged together would result in Lifeline reimbursements that are essentially the same as what pro rata reporting would yield. Providers would incur significant costs to implement pro rata reporting with little or no change in the overall Lifeline reimbursement.

## **VIII. OUTREACH**

Cincinnati Bell agrees with the Joint Board that community-based outreach can be an effective means to reach low-income households. Cincinnati Bell's experience has demonstrated that the most effective method to promote the Lifeline program is via state and local social service organizations. Cincinnati Bell codes its application forms to identify the various community organizations that support and promote the Lifeline program so that Cincinnati Bell can readily identify enrollments resulting from these outreach efforts. Because of their success in generating Lifeline enrollments relative to various forms of print advertising and other outreach, these organizations are Cincinnati Bell's primary means of reaching eligible consumers. Although Cincinnati Bell has found community-based outreach to be very effective, it believes that the Commission should refrain from mandating that all providers utilize this or any other specific means of reaching out to eligible consumers. In today's competitive marketplace, each competitor needs the freedom to determine how best to market its services to potential customers in the markets it serves.

**IX. CONCLUSION**

Cincinnati Bell appreciates the opportunity to comment on the NPRM. It urges the Commission to take its comments into consideration in fashioning changes to the Lifeline rules.

Respectfully submitted,

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