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August 30, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

**Re: Notice of *Ex Parte* Communication
WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization
CC Docket No. 96-45, Federal-State Joint Board on Universal Service
WC Docket No. 03-109, Lifeline and Link Up**

Dear Ms. Dortch:

On August 29, 2011, at the request of Commission Staff, the undersigned representative of Cincinnati Bell Telephone Company LLC (“CBT”) spoke via telephone with Jonathan Lechter, Attorney Advisor with the Wireline Competition Bureau, regarding automatic enrollment of Lifeline eligible customers in Ohio.

During the conversation, I described the following:

The Current Automatic Enrollment Process

Twice per year, the Ohio Department of Development (“ODOD”) provides a computerized list of HEAP recipients’ names and addresses to ILECs across the state. Each ILEC receives a different list based on the zip codes within its service area. CBT compares the list it receives from ODOD to its customer records to determine customers who are eligible to receive Lifeline but do not currently receive a Lifeline discount. CBT adds the Lifeline discount to the eligible accounts beginning with the customer’s next bill. Customers do not receive a notice that the discount is being added to their accounts.

Issues with the Current Process

The automatic enrollment process was established when only ILECs provided Lifeline service. Over the past two years, however, the Public Utilities Commission of Ohio (“PUCO”) has approved several prepaid wireless Lifeline providers, but these wireless providers are not included in the automatic enrollment process and do not receive data from ODOD. The automatic enrollment process requires the ILEC to automatically add Lifeline benefits to qualifying customer accounts based on the ODOD data and does not

give customers the opportunity to choose a competitive Lifeline service provider. Moreover, this process can result in customers receiving multiple Lifeline benefits without their knowledge. A customer may have consciously chosen not to have the ILEC Lifeline service because the customer already has a wireless Lifeline service. However, automatic enrollment adds the Lifeline discount to the customer's account without the customer's knowledge and without the ILEC knowing that the customer has other Lifeline service.

The PUCO currently has a case open (Case No. 10-2377-TP-COI) to investigate the provision of prepaid Lifeline service by competitive ETCs. Cincinnati Bell filed comments in the Ohio proceeding recommending that automatic enrollment be suspended to reduce the possibility of subscribers receiving multiple Lifeline benefits or that it be amended to eliminate the inherent bias for wireline service that the current automatic enrollment creates. This case is on the PUCO meeting agenda for August 31, 2011.

Data Availability and Confidentiality

When automatic Lifeline enrollment began in Ohio ten to twelve years ago, the Ohio Department of Human Services (subsequently renamed the Ohio Department of Jobs and Family Services - "ODJFS") and ODOD both provided lists of Lifeline eligible customers to the large ILECs. (ODJFS administers all of the state programs that are Lifeline qualifiers except HEAP.) Originally, these lists included social security numbers, but both agencies stopped providing social security numbers because of privacy issues.

In 2002, ODJFS stopped providing data altogether citing additional privacy concerns. Since that time, the industry and the PUCO Staff have tried, on at least two occasions, to work with ODJFS to create a confidentiality agreement that would allow provision of the Lifeline eligibility data, but without success. Thus, automatic enrollment has been limited to HEAP recipients since 2002. One of Cincinnati Bell's primary concerns with a national database is the ability to have the ODJFS data included in the database.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any question, you may contact me directly at 513-397-6858 or bob.wilhelm@cinbell.com.

Sincerely,

/s/ Robert W. Wilhelm, Jr.

Robert W. Wilhelm, Jr.
Regulatory Pricing Manager

cc: Jonathan Lechter

