

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 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

**REPLY COMMENTS OF CINCINNATI BELL INC.
TO FURTHER INQUIRY OF AUGUST 5, 2011**

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SUMMARY

Cincinnati Bell supports the comments filed in this *Further Inquiry* into Lifeline issues by AT&T¹ and GCI,² both of whom advocate the adoption of a one-per-qualifying-adult rule instead of a one-per-residence or one-per household limitation. Furthermore, Cincinnati Bell agrees with AT&T and GCI that the Commission should not require an annual census of Lifeline subscribers because of the burdensome costs that a census would place on Lifeline providers.

COMMENTS OF CINCINNATI BELL INC.

A. The Commission Should Adopt a One-per-Qualifying-Adult Standard

As Cincinnati Bell noted in its April 22, 2011 Comments, Cincinnati Bell is concerned with increasing the size of the fund, but the Lifeline program should also reflect the realities of today's marketplace and, in particular, the increasing prevalence of wireless-only service. Moving to a one-per-qualifying adult standard for Lifeline eligibility is a step towards this goal. As GCI notes, a one-per qualifying adult standard would promote public safety, be administratively simple and be consistent with the statute.³

The mobility and individual, not household, nature of wireless service requires looking at the most basic tenet of Lifeline – access to a telephone – differently. As GCI correctly notes, a household that has one wireless Lifeline and no other telephone services, may or may not have access to a telephone in an emergency situation, depending on where the phone may be.⁴ Furthermore, wireless phones provide emergency access in many locations where wireline

¹ Comments of AT&T to *Further Inquiry*, filed August 26, 2011 (“AT&T Comments”).

² Comments of General Communication, Inc. in Response to the Public Notice of August 5, 2011 *Further Inquiring Into Four Issues*, filed August 26, 2011 (“GCI Comments”).

³ GCI Comments at 12 – 15.

⁴ GCI Comments at 13.

phones are not readily available. In either case, public safety is promoted by focusing on the individual, not the household or residence.

Second, the one-per-qualifying-adult standard would simplify administration because it would eliminate the debate regarding what constitutes a household and how to differentiate between people with the same address. To paraphrase AT&T,⁵ if Jane Doe can produce a Lifeline qualifying document with her name on it, she can receive Lifeline without any further qualification checks except whether or not she already has Lifeline service. This process would benefit both consumers and providers because it would limit the need for consumers to gather and share personal information and it would limit the information that providers must review and protect.

The result would be that low-income consumers would have access to telecommunications services – both wireline and wireless – comparable to non-Lifeline urban consumers, consistent with the intent of the statute.

B. The Commission Should Not Require an Annual Census of Lifeline Subscribers

Cincinnati Bell agrees with AT&T that verifying the eligibility of Lifeline subscribers every year would result in significant costs.⁶ Furthermore, if the Commission establishes a national database to verify Lifeline eligibility, that may preclude the need for an audit. Rather, a customer's continued eligibility could be verified through the database. While Cincinnati Bell remains concerned with the cost and feasibility of a national database, requiring a census of Lifeline customers seems premature without a more thorough investigation of the eligibility database. Once the database options are better understood, the costs and benefits of the database

⁵ AT&T Comments at 5.

⁶ AT&T Comments at 11.

can be compared to a census to determine which, if either, of these approaches would best reduce waste, fraud, and abuse.

C. Conclusion

Cincinnati Bell appreciates the opportunity to present these additional comments and urges the Commission to take them into consideration as it addresses changes to the Lifeline program.

Respectfully submitted,

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