

July 30, 2012

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 11-42 Lifeline and Link Up Reform and Modernization  
EX PARTE PRESENTATION**

Dear Ms. Dortch:

On May 21, 2012, the Telecommunications Regulatory Board of Puerto Rico filed with the Commission an ex parte letter in which it summarized a series of meetings held on May 17, 2012 with Commissioners and various staff members. According to that letter, the Board's efforts regarding the Lifeline (low-income) program were discussed. The letter provides little detail as to what aspects of Lifeline were discussed beyond mentioning the Board's efforts to identify possible duplication of eligibility, its one-per-household policy, and its establishment of a Puerto Rico database which includes, *inter alia*, both last names of applicants and full 9 digit Social Security numbers.

Disagreements between the Board and this firm's client, TracFone Wireless, Inc. ("TracFone"), have been before the Commission for more than five months commencing with the filing of TracFone's Emergency Petition for Declaratory Ruling and Interim Relief filed February 22, 2012 in the above-captioned docket as well as in WC Docket No. 03-109 and CC Docket No. 96-45, and its more recently-filed Request for Clarification and Declaratory Relief, filed April 10, 2012. The Board's May 21, 2012 ex parte letter does not indicate whether any matters responsive to those filings or supplemental to the Board's written responses were mentioned or discussed.

TracFone deems it necessary to respond and to provide updated information on the issues regarding Lifeline in Puerto Rico -- issues which remain largely unresolved and which have been the subject to filings made with the Board by several other Lifeline service providers, including T-Mobile and Claro. At the outset, we note that the Board's ex parte letter indicates that two Board members as well as the Board's legal counsel, its technical advisor, and its outside legal counsel and outside economic advisor attended the meetings. Not attending the meetings was the third member of the Board -- Associate Member Nixyvette Santini Hernandez. We do not know why Board Member Santini was absent from the meeting. We do know, however, that Board Member Santini has dissented from the Board's two member majority on an important matter regarding the Lifeline program, specifically regarding the Board's 2-1 vote to establish an Online Control Code System. Attached to this letter is Board Member Santini's April 23, 2012 Dissent and an English translation of that dissenting opinion. As noted by Board Member

Santini, the Board's order approving the Online Control Code system was adopted despite the fact that several participating Lifeline providers raised concerns with the Board and its consultant prior to its adoption, and explained why the system would not be workable. TracFone is one of those participating providers who raised such concerns with the Board and with its consultant. The Dissenting Opinion then identifies several specific problems:

1). The Board's Online Control Code system requires Lifeline providers to assign telephone numbers to Lifeline applicants **before** the provider has determined that the applicant is eligible to receive Lifeline-supported service. No Lifeline provider can responsibly assign an applicant for Lifeline service a new telephone number until the applicant's eligibility has been determined. The only way that any Eligible Telecommunications Carrier ("ETC") can provide a telephone number prior to completion of the Lifeline enrollment process is if the carrier already has assigned a working telephone number to the customer. That would only happen if the customer already was receiving service from that provider. Only the incumbent wireline local exchange carrier would be likely to have provided a telephone number to a potential Lifeline customer (and existing telephone service customer) before verifying the customer's eligibility for Lifeline.

In addition, requiring assignment of phone numbers prior to enrollment of customers in Lifeline would render Lifeline service virtually unavailable to those households which do not currently have telephone service and therefore have no assigned telephone number. Unserved low-income consumers are among those consumers who most need Lifeline assistance. Enrollment of such unserved households should be encouraged -- not subject to unnecessary and artificial Board-created roadblocks.

2). The Online Control Code system does not validate addresses of public housing locations, certain condominiums and certain rural addresses. Many Lifeline-eligible low-income households reside at such addresses.

3). The system does not accommodate number porting, notwithstanding the fact that number porting is required by federal law.

4). The Online Control Code system during testing enrolled consumers who were already receiving Lifeline benefits from other providers (*i.e.*, "duplicates") thereby failing to achieve one of the Board's stated primary objectives -- detection and prevention of duplicate enrollment.

In addition to the problems identified by Board Member Santini, the Board has still not articulated any reasoned explanation as to why Puerto Rico -- unlike any of the other 51 states which administer Lifeline programs (the District of Columbia and Puerto Rico are States under the Communications Act) deems it necessary to require that Lifeline applicants provide second last names and 9-digit Social Security numbers. The Commission's rules and those of other states only require last 4 digits of Social Security numbers. While it is not unusual for Hispanic persons to have two last names, Puerto Rico is not the only jurisdiction with a significant Hispanic population. Requiring Lifeline applicants to provide second last names does nothing to prevent fraudulent enrollment and nothing in any filing by the Board or in any Board order

indicates otherwise. Requiring ETCs to obtain full 9-digit Social Security numbers does nothing to prevent fraudulent enrollment but it does compromise legitimate security rights and expectations of consumers by requiring consumers to divulge to private corporations and to government departments their entire Social Security numbers when the last four digits are sufficient to validate consumer identities.

The Board's Online Control Code system deviates from Commission requirements, including requirements promulgated in the Commission's recent Lifeline Reform Order (Lifeline and Link Up Reform and Modernization, FCC 12-11, released February 6, 2012) in other ways. For example, the Puerto Rico system does not allow for consumers to enroll in Lifeline if their addresses are deemed "commercial," even though commercial addresses may be used in appropriate circumstances. Because of this flaw, persons residing in temporary locations including, for example, nursing homes and shelters, are unable to enroll in Lifeline programs. In addition, this system, developed by the Board's retained consultant, requires that each Lifeline applicant be assigned a unique identifier called a "Codigo de Control." If the Online Control Code indicates that the address is not a valid residential address, the Lifeline provider must send a screen shot of the error notice returned by the system. It then becomes the responsibility of the consumer to take the screen shot to the Board's offices in San Juan. Many applicants for Lifeline service in Puerto Rico, including persons who are rejected by the Online Control Code based on invalid addresses, reside in rural communities great distances from the Board's offices in San Juan and have no means of delivering those screen shots to the Board. The impact of the Online Control Code system is to deny Lifeline-supported service to many eligible low income households who are entitled to such support under the Commission's rules governing Lifeline.

TracFone also deems it appropriate to provide updated information on certain Board communications with Puerto Rico Lifeline consumers. On April 10, 2012, TracFone filed in this proceeding a Request for Clarification and Declaratory Relief. That request was deemed necessary to bring to the Commission's attention certain events which had transpired subsequent to its Emergency Petition for Declaratory Ruling and responsive comments to that petition. Among those subsequent events was a notice dated March 26, 2012 signed by the Board President and Secretary notifying certain de-enrolled Lifeline customers (*i.e.*, those whom the Board had ordered be de-enrolled as of March 1, 2012 based on a check of Social Security numbers) informing those customers that they may immediately request re-enrollment with the provider of their choice (not with the provider who served the customer first as directed in a March 7, 2012 Board order). In its April 17, 2012 response to the Request for Clarification, the Board stated that the signed March 26, 2012 notice had not been issued, that it had been sent to the State Electoral Commission for approval, and accused TracFone of improperly obtaining that notice prior to its public dissemination.<sup>1</sup>

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<sup>1</sup> The assertion that TracFone had improperly obtained and disseminated a non-public document is a serious allegation. As explained in TracFone's April 24, 2012 reply, the March 26, 2012 notice was provided to an attorney representing TracFone by a reporter in Puerto Rico who had received a leaked copy of the notice from the Board's public relations officer.

Accusations about how TracFone obtained the March 26, 2012 notice and questions about to whom the Board and its staff may have provided copies have now been mooted by the fact that the Board has sent such a notice dated April 10, 2012 to Lifeline customers who were de-enrolled on March 1, 2012.<sup>2</sup> Copies of that April 10, 2012 notice and an English translation of that notice are attached hereto. In most respects, that notice is similar to the earlier version that was attached to TracFone's Request for Clarification. It notifies those de-enrolled customers that they may immediately request a subsidy for a single wireline or wireless service. Nothing in that April 10, 2012 notice limits consumers to re-enrolling with the provider who served them first. The notice does reference a lack of information provided to consumers regarding Lifeline benefits and states that the lack of information is "apparently caused by the telecommunications companies." The Board offers no explanation for that accusatory and defamatory statement. Lifeline providers were directed by the Board to send de-enrollment notices to consumers identified by the Board as receiving duplicate benefits. The Board instructed those providers what information to provide to those consumers. In the absence of any evidence that TracFone or any other telecommunications provider failed to communicate to de-enrolled Lifeline customers the information required by the Board, blaming providers for a lack of information is unexplained and unexplainable.

By its terms, the Board's April 10, 2012 notice to customers (like its March 7, 2012 Order) is only applicable to those Lifeline customers who were de-enrolled on March 1, 2012 per Board edict based on Social Security number. To date, the Board has provided no rulings, orders, notices or anything else which establish any re-enrollment rights for those thousands of Puerto Rico Lifeline customers who were de-enrolled on April 1, 2012 per Board directive based on residential address, for those consumers who were de-enrolled as required by the Board on May 1, 2012 based on allegedly incomplete information (second last names and 9 digit Social Security numbers), or for any consumers who the Board may require to be de-enrolled in the future for any reason.

Moreover, even for those March 1, 2012 de-enrollees who were later allowed to re-enroll, first only with the provider who served them first (per the March 7, 2012 Order), then with the provider of their choice (per the April 10, 2012 notice), the violation of Section 54.405(e) of the Commission's rules remains uncured. That rule states, in relevant part, that ". . . upon notification by the Administrator to any ETC in any state that a subscriber is receiving Lifeline service from another eligible telecommunications carrier and should be de-enrolled from participation in that ETC's Lifeline program, the ETC shall de-enroll the subscriber from participation **in that ETC's Lifeline program** within 5 business days" (emphasis added). By its terms, Section 54.405(e) allows qualified consumers to receive one -- and only one -- Lifeline-supported service. Section 54.405(e) neither requires nor permits states to deprive qualified persons of all Lifeline service. Those customers who were de-enrolled from their Lifeline programs on March 1, 2012 were not allowed to re-enroll with their preferred provider until after receiving the April 10, 2012 notice -- a period of six weeks. Therefore, for those six weeks, the Board prevented qualified low-income Puerto Rico households from receiving any Lifeline

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<sup>2</sup> TracFone knows that the Board's April 10, 2012 notice has been sent since it was provided with a copy by one of TracFone's de-enrolled customers.

service, in violation of Section 54.405(e). To date, the Board has provided no explanation or justification for this most egregious violation of federal law. In addition, the Board's violations of Section 54.405(e) with respect to those Puerto Rico households who were de-enrolled on April 1, 2012, May 1, 2012, and on subsequent occasions are continuing. It is not known when, if ever, the Board will allow the consumers who have been deprived of Lifeline service for up to 4 months -- and counting -- to obtain Lifeline benefits from their provider of choice or from any provider.

As described herein and as has been explained in prior filings, the Board's rules and policies governing Lifeline enrollment and de-enrollment are ever-shifting. While various changes to those requirements and policies have been announced from time to time, none of those announcements change the critical and undisputable fact that the Board's actions have had the unfortunate effect of depriving thousands of low-income households of Lifeline support to which they are entitled. In addition, by threatening to fine ETCs up to \$10,000 per violation, notwithstanding those ETCs' good faith efforts to comply with unworkable requirements and procedures which seem to change almost on a weekly basis, the Board is removing any incentive for any ETC to provide Lifeline service in Puerto Rico. This is especially unfortunate in the case of TracFone which has never sought nor received a single dime of support from the Puerto Rico Universal Service Fund -- the fund whose resources the Board is ostensibly protecting by those requirements and procedures.

Accordingly, TracFone reiterates its request that the Commission declare that all state policies, practices and procedures governing duplicate enrollment in Lifeline programs supported by the federal Universal Service Fund ensure that all consumers receive notification that 1) they may only receive one Lifeline-supported service per household; 2) that they will be de-enrolled from all except one service; and that 3) they must be afforded a choice of which Lifeline-supported service in which to enroll. Furthermore, the conduct of the Board deems it necessary for TracFone to request that the Commission declare that states may not impose Lifeline enrollment requirements beyond those set forth in the Commission's rules for those ETCs who receive no support from state universal service funds.

Finally, TracFone respectfully requests that the Commission prohibit states from imposing Lifeline enrollment requirements which are not necessary to achieve the purposes and goals of the Lifeline program and which impede the ability of qualified consumers to receive federal benefits to which they are entitled. With particular respect to the Board, TracFone asks that the Commission prohibit the Board from requiring that telephone numbers be assigned to customers before completion of the enrollment process, and that the Board be prohibited from requiring ETCs to obtain second last name and full 9 digit Social Security number data in the absence of a showing by the Board that such information is necessary to prevent fraudulent enrollment by persons not qualified for Lifeline benefits or to prevent duplicate enrollment.

Ms. Marlene H. Dortch  
July 30, 2012  
Page 6

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please direct any questions to undersigned counsel for TracFone.

Respectfully submitted,



Mitchell F. Brecher

Attachments

cc: Hon. Sandra Torres  
Hon. Gloria Escudero  
Hon. Nixyvette Santini Hernandez  
Ms. Alexandra Fernandez  
Mr. Michael Steffen  
Ms. Angela Kronenberg  
Ms. Christine Kurth  
Ms. Priscilla Delgado Argeris  
Mr. Nicholas Degani  
Mr. Trent Harkrader  
Ms. Kimberly Scardino

# **Attachment**

**(Board Member Santini's April 23, 2012 Dissent)**

RECEIVED  
4/24/2012

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OPINIÓN DISIDENTE DE LA ORDEN ADMINISTRATIVA DEL 19 DE ABRIL DE 2012

JRT-2001 -SU-0003  
Nixyvette Santini Hernández  
23 de abril 2012

La orden administrativa (OA) que hoy nos ocupa, establece que el 1 de mayo de 2012, el sistema de *Código de Control en Línea* (CCL), será la herramienta que las compañías utilizarán para verificar la elegibilidad de consumidores al programa de subsidio a través del Fondo de Servicio Universal (FSU). El FSU, fue creado con el propósito de ayudar a los ciudadanos más necesitados en el pago de su factura de servicio de telefonía ya sea alámbrico o inalámbrico. Véase Ley Núm. 213 del 12 de septiembre de 1996, según enmendada, 27 L.P.R.A § 265, et seq. El sistema de CCL ha sido comisionado por esta Junta con el propósito de evitar la existencia de duplicados en la asignación de los subsidios. Consiste en un sistema central que servirá de control para verificar la elegibilidad de cada ciudadano que desee adquirir un servicio de telefonía subsidiado mediante el FSU. Con esta intención de la Junta, no poseo objeción alguna, sino por el contrario apoyo el esfuerzo para alcanzar una mejor operación en la asignación de los subsidios.

Previo a este sistema en línea ser adoptado por la Junta, se acordó la realización de unas pruebas por parte de las compañías de telecomunicaciones durante los días del 2 al 4 de abril de 2012, esto para conocer sobre la efectividad de la aplicación en línea y si había una necesidad de hacer modificaciones o mejoras para el beneficio de todos. Las compañías tenían hasta el 11 de abril de 2012, para enviar sus comentarios y preocupaciones, si alguna, con el sistema. Los comentarios fueron enviados a la Junta en la fecha acordada y radicados por el Director de Sistemas de Información de la agencia para evaluación de la Junta el 13 de abril de 2012 a las 4:08 PM. También los comentarios fueron enviados individualmente por las compañías a cada uno de los Miembros Asociados mediante carta.

A pesar de la Junta haber impulsado este fuerza de prueba, la orden administrativa aprobada por la mayoría pasa por alto todas las preocupaciones presentadas por las compañías, y la misma adolece de directrices claras para atender dichos señalamientos técnicos. Entendemos, que antes de emitirse la presente orden administrativa, se deben atender los problemas encontrados por las compañías durante las pruebas para que la implantación a nivel de toda la isla no sea un acto que ocasionen la pérdida de la confianza en el mismo por parte de los ciudadanos, que serán los que se



sistema resulta aun más preocupante ya que la razón primordial por la que se comisionó la creación de esta aplicación fue para evitar precisamente el que consumidores recibieran el subsidio duplicado.

La aprobación de esta OA, que busca una mejor administración de los fondos del FSU, un interés loable con el cual concuerdo totalmente, tiene el efecto de agilizar la implantación del sistema CCL que ha demostrado no estar listo todavía. No podemos entender porque la insistencia de la mayoría en forzar la implantación de la aplicación sometiendo a los ciudadanos al uso de ésta, sin antes asegurarse de haber atendido y corregido los problemas que han sido identificados por las compañías durante el periodo de prueba. El forzar la implantación del sistema creará unos procesos adicionales, tal vez onerosos para los ciudadanos, por lo que el esfuerzo de esta Junta debería estar dirigido a corregir estas fallas para entonces comenzar su uso en vivo.

Esta aprobación para comenzar el uso del sistema a nivel de toda la isla, pudiera afectar el acceso de los ciudadanos más necesitados de nuestra población a los beneficios que se han creado para ayudarles a obtener servicios de telecomunicaciones a precios accesibles. Nos preocupa que ante el hecho de que se realizó una cantidad muy limitada de pruebas, las compañías hayan identificado muchos problemas con el sistema. Por tal razón, y buscando el mayor interés público, entiendo que la aplicación debe ser probada nuevamente luego de corregirse las deficiencias ya señaladas, y antes de su implantación formal en toda la isla. El que se retrase la implantación por un periodo de prueba de 30 a 60 días y con un muestreo mayor de solicitudes, no debería crear mayor incomodidad ni preocupación. En esta forma se podrán corregir los defectos adicionales que se encuentren sin un impacto mayor en la comunidad de ciudadanos que tiene derecho a beneficiarse del fondo de servicio universal, y salvaguardando de igual manera la confianza y la integridad de los procesos de esta Junta.

El propósito de esta aplicación es evitar la duplicidad del beneficio y asegurar que cada ciudadano elegible a recibir el beneficio lo reciba conforme la ley. El sistema CCL de la Junta no puede derrotar el fin para el cual el FSU local y federal han sido creados. En la medida en que el sistema entorpezca el acceso de los consumidores elegibles al subsidio, el mismo se estará prestando para derrotar la razón del subsidio. Es por estas preocupaciones que no puedo estar de acuerdo en estos momentos con la mayoría, ya que están forzando la implantación de esta aplicación a la misma estar lista para ello. Más aún, sin estar seguros de que no se perjudica el acceso de los consumidores a



DISSIDENT OPINION OF THE APRIL 19, 2012 ADMINISTRATIVE ORDER

JRT-2001-SU-0003  
Nixyvette Santini Hernández  
April 23, 2012

The Administrative Order (AO) that occupies us today establishes that on May 1, 2012, the Online Control Code system (OCC) shall be the tool used by companies for verifying consumer eligibility to the subsidy program provided by the Universal Service Fund (USF). The USF was created with the purpose of assisting needy consumers with the payment of their wireline or wireless telephone service bill. See Act No. 213 of September 12, 1996, as amended, 27 L.P.R.A. § 265, *et seq.* The OCC system was commissioned by this Board with the purpose of avoiding duplicity when assigning the subsidies. Said system consists of a centralized system which will work as a checkpoint for verifying the eligibility of every citizen who desires to receive a telephone service subsidized by the USF. With regards to this purpose, I do not hold any objections; on the contrary, I support the effort of achieving a better operation of the subsidy assignment process.

Prior to the adoption, by the Board, of this online system, we agreed on conducting a series of tests with the telecommunications companies during April 2 through 4, 2012, in order to learn about the effectiveness of the online application and if there was a need to make any modifications or improvements that would benefit everyone. The companies had until April 11, 2012, to send their commentaries and preoccupations, if any, regarding the system. The commentaries were sent to the Board for evaluation on the agreed date and were properly filed by this agency's Information Systems Director on April 13, 2012 at 4:08 PM. Further, each company sent their commentaries by letter to each of the Board's Associate Members.

Even though the Board promoted conducting such tests, the administrative order approved by the majority ignores all of the concerns brought forth by the companies, and the same lacks clear guidelines for addressing said technical issues. It is our belief that, before issuing said administrative order, the issues confronted by the companies during the tests runs must be addressed so that the island-level implementation of the system is not affected by any

defects which could cause the general public to lose faith in the system. After all, it is the general public whom will be benefiting from the system since their eligibility to participate in the program will be assessed through said system. It is because that I dissent from the determination made in the administrative order.

Nonetheless, the administrative order issued seems to suggest that the OCC system operated without any major difficulties and, as such, ignores the operational difficulties brought forth by the companies. This is reflected in footnote number five of the AO where it mentions that the tests showed that there were no major problems in the use of the application. This footnote greatly contrasts with the remarks presented by the companies in their communications. Some of the difficulties which raise the most concern are summarized below, along with my opinion regarding the same:

1. The system requires the assigned telephone number to be provided prior to validating the customer's eligibility. This requirement is incompatible with the business model used by several companies in our industry which do not assign a telephone number until the person has signed a service contract with the company.
2. Some of the companies faced problems in the process of validating the eligibility of citizens whose addresses were from public housing, condominiums and rural areas. The system never provided the control code validating their eligibility for the subsidy.
3. Some of the companies confronted problems when they tried to transfer numbers from a client who already received Lifeline benefits since the system does not provide the option for those cases where a customer wishes to switch providers while keeping the same telephone number. This has a negative impact on customers benefiting from the program who confront issues when requesting that their number be transferred to another service provider. The ability to retain their telephone number is a right granted to every telephone service customer, pursuant to federal law, see section 251 of the Federal Communications Act, 47 U.S.C. §251(b)(2).

4. Some companies informed that the system validated certain customers who should have been denied access to the program due to duplicity. This fault in the system is of great concern since the main purpose for the creation of the program was to precisely avoid duplicate consumers from gaining additional benefits.

The approval of this AO, which seeks a better administration of the USF funds, a worthy interest with which I concur in its entirety, has the effect of speeding up the implementation of the OCC system, which has been proved to be not yet ready for its implementation. We are unable to understand why the majority insists on imposing the implementation of this application, forcing consumers to use the same, without previously making sure of addressing and correcting the issues that have been identified by the companies during the testing period. Forcing the implementation of the system will create additional processes, which will most likely be burdensome for consumers; therefore the efforts of this Board should be directed to correcting these defects, and then being its online use.

This approval to begin using the system on an island wide level could negatively affect the accessibility to affordable telecommunications services by denying benefits to consumers who need it the most within our population. It worries us that, even though the number of tests conducted were limited, the companies have identified many problems with the system. For this reason, and keeping the best public interest in mind, it is our belief that the system should undergo further testing, after the deficiencies notified by the companies have been corrected and before it is implemented island wide. Delaying its implementation for a period of 30 to 60 days and with a larger sampling of possible customers would not create any major preoccupations or problems. This way, it would be able to correct any additional issues that may arise during this further testing period without affecting the consumers who have the right to receive benefits from the universal service fund, thus equally safeguarding the trust in the system and the integrity of the Board's process.

The purpose of this application is to avoid duplicate benefits and to make sure that every consumer eligible to receive such benefits does so in compliance with the law. The Board's OCC system cannot defeat the purpose for which the local and federal USF were created. To the

extent that the system hampers an eligible consumer's access to the subsidy, the system would be acting against the very purpose for creating the subsidy. It is because of these concerns that I cannot agree with the majority at this moment, since they are forcing the implementation of this application without it being ready for it and without ensuring that consumers who are entitled, by local and federal law, to receive such benefits are not left unjustly excluded from participating in the program and that the OCC system truly fulfills its purpose. If new tests are made and it is found that no major problems arise, such as the ones identified by the companies in their communications, I would be in the position of concurring with the majority opinion of commencing the implementation of the OCC system throughout all of Puerto Rico.

(signed)

Att. Nixyvette Santini Hernández, PE  
Associate Member

# **Attachment**

**(April 10, 2012 Notice)**

# AVISO

## INFORMACIÓN IMPORTANTE SOBRE BENEFICIO LIFELINE

10 de abril de 2012

JUNTA REGLAMENTADORA DE  
TELECOMUNICACIONES DE PUERTO RICO  
500 AVE. ROBERTO H. TODD  
SAN JUAN, PR 00907-3941

MARIA FEBUS RAMOS  
HC 02 BOX 4128  
COAMO PR 007690000

Estimado ciudadano:

En semanas pasadas, recibiste una notificación de tu compañía de servicios telefónicos informándote que perderías tu subsidio de *Lifeline* a partir del 1<sup>o</sup> de marzo de 2012, por haberse identificado una duplicidad de subsidio, según la información suministrada por las propias compañías. También se te notificó que podías acudir a la Junta Reglamentadora de Telecomunicaciones de Puerto Rico para someter tu reclamación.

Hemos examinado las reclamaciones de muchos ciudadanos como tú, las cuales revelan que ha imperado una falta de información en cuanto al subsidio *Lifeline*, aparentemente proveniente de las compañías de telecomunicaciones. Esto ha llevado a que miles de puertorriqueños reciban más de un beneficio, contrario a lo establecido en los reglamentos aplicables.

Por este y otros motivos, no atribuibles a los consumidores, el 7 de marzo de 2012, la Junta Reglamentadora de Telecomunicaciones de Puerto Rico emitió una *Resolución y Orden*, mediante la cual deja en suspenso la regla aplicable<sup>1</sup> a las personas identificadas con subsidios duplicados por razón de su seguro social. En consecuencia, puedes volver a solicitar inmediatamente un solo subsidio para servicio alámbrico o inalámbrico por persona, siempre y cuando cumplas con los criterios de elegibilidad.

De tener alguna duda o de entender que la compañía proveedora de servicios no te orienta adecuadamente, acude a esta tu Junta Reglamentadora de Telecomunicaciones de Puerto Rico, mediante visita personal o carta dirigida a nuestra dirección: 500 Ave. Roberto H. Todd, San Juan, PR 00907-3941; a través de nuestro portal electrónico: [www.jrtpr.pr.gov](http://www.jrtpr.pr.gov); o llamando al 787-722-8606 o 787-756-0804 ext. 3012.

<sup>1</sup> Reglamento Número 8093, *Enmiendas Provisionales al Reglamento sobre Servicio Universal*

## NOTICE

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### IMPORTANT INFORMATION REGARDING LIFELINE BENEFIT

April 10, 2012

TELECOMMUNICATIONS REGULATORY  
BOARD OF PUERTO RICO  
500 AVE. ROBERTO H. TODD  
SAN JUAN, PR 00907-3941

MARÍA FEBUS RAMOS  
HC 02 BOX 4128  
COAMO PR 007690000

Dear Citizen:

In the past weeks, you received a notification from your telephone service providers informing you that you would lose your *Lifeline* subsidy beginning on March 1st, 2012, due to the identification of duplicate systems, according to the information provided by service providers. You were also informed that you could file a claim at the Telecommunications Regulatory Board of Puerto Rico.

We have reviewed the claims filed by many citizens just like you, which reveal that there has been a lack of information regarding the *Lifeline* benefits, apparently caused by the telecommunication companies. This has resulted in thousands of Puerto Ricans receiving more than one benefit, contrary to the provisions of the applicable regulations.

Due to the above, and to other reasons, **not attributable to the consumers**, on March 7, 2012, the Telecommunications Regulatory Board of Puerto Rico issued a *Resolution and Order*, through which it suspended the rule applicable<sup>1</sup> to customers identified by social security as receiving duplicate subsidies. Consequently, **you may immediately request a subsidy for a single wireline or wireless service per person**, as long as you are eligible for such services.

Should you have any questions or should you understand that your service providers has not provided you with adequate guidance, contact the Telecommunications Regulatory Board of Puerto Rico located at 500 Ave. Roberto H. Todd, San Juan, PR 00907-3941; through our website: [www.jrtpr.gov](http://www.jrtpr.gov); or call us at 787-722-8606 or 787-756-0804 ext. 3012.

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<sup>1</sup> Regulation Number 8093, *Provisional Amendments to the Universal Service Regulation*