

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

December 27, 2012

Thomas J. Navin  
202.719.7487  
tnavin@wileyrein.com

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Puerto Rico Telephone Company's Emergency Petition for Temporary Waiver of the Lifeline Recertification Deadline; Lifeline and Link Up Reform and Modernization, WC Docket 11-42; Lifeline and Link-Up, WC Docket No. 03-109; Federal-State Joint Board on Universal Service, CC Docket No. 96-45*

Dear Ms. Dortch:

On December 24, 2012, the Puerto Rico Telephone Company ("PRT") filed an Emergency Petition for Temporary Waiver of the Lifeline Recertification Deadline ("Petition") in the above-referenced proceedings seeking additional time to implement the Commission's recent Lifeline reforms. As explained in the Petition, PRT faces unique circumstances specific to Puerto Rico in completing Lifeline eligibility re-certifications as the Wireline Competition Bureau itself explicitly recognized in its Order adopted and released on November 30, 2012 in the above-referenced proceedings. *See Lifeline and Link Up Reform and Modernization, WC Docket 11-42; Lifeline and Link-Up, WC Docket No. 03-109; Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order, DA -12-1927 (Wireline Comp. Bur. rel. Nov. 30, 2012).*

In response to questions from FCC Wireline Bureau Staff yesterday, December 26, 2012, PRT provides the following additional information. First, PRT clarifies that its Petition seeks only an additional twenty (20) days to complete the process of recertification and therefore asks the FCC to waive the time periods specified in sections 54.410(f) (December 31, 2012 deadline) and 54.405(e)(4) (requiring de-enrollment within five business days of a failure to respond to a request within 30 days of de-enrollment letter) of its rules for twenty days. The scope of relief requested here is less than that afforded PR Wireless in the November 30th WCB Order.

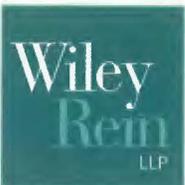
Second, PRT supplements its Petition with the following additional information. PRT took all of the following steps to contact its Lifeline customers for purposes of recertification: (1) November 6-8, 2012, PRT called customers to inform them of the upcoming recertification deadline; (2) from November 26-28, 2012, PRT

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informed Lifeline customers via letter of the need to recertify or face de-enrollment according to the FCC rules; (3) on November 28, 2012, PRT sent an SMS to its wireless Lifeline customers asking them to contact PRT's vendor about recertification; (4) on December 17, 2012, PRT sent an additional SMS asking the customers not yet re-certified to call PRT's vendor to complete the recertification. Significantly, as recent as two weeks ago, PRT's third party vendor, El Día Directo, Inc. ("EDD") had overestimated the response rate of Lifeline customers by double counting certain responses which precipitated PRT's delay in filing this waiver request.

Third, PRT updates the number of Lifeline customers that have responded as of December 26, 2012 to 84,594. In its Petition, PRT stated that it had received 73,944 responses from Lifeline customers. Therefore, within the span of three business days, PRT has received an additional 10,650 responses. As such, PRT has a reasonable expectation that if the Commission grants its Petition, thousands of additional Lifeline re-certifications will be received.

Fourth, similar to PR Wireless, through the duplicates process established by the Telecommunications Regulatory Board of Puerto Rico, PRT already de-enrolled more than 55,000 Lifeline customers from April to December 2012. Therefore, PRT believes that the vast majority of Lifeline customers enrolled in the Program as of June 1, 2012 (134,387) are still eligible to keep the benefit under the FCC's new rules. In addition, PRT certified 14,399 new customers already during the first five months of 2012 using an enrollment form similar to that used by PR Wireless. (*See Attached Lifeline Form*). To date, only 7,676 of those customers have completed the recertification. Accordingly, PRT requests the additional time to complete the recertification for the balance of these customers in consideration that in many cases they expected to certify their eligibility no more than once a year.



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Thank you for your attention to this request, and please let me know if there are any additional questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "T. Navin", written over a blue circular stamp.

Thomas J. Navin

cc: Kim Scardino  
Jonathan Lechter

## UNIVERSAL SERVICE

CLARO, leader in service and telecommunications technology, offers its customers orientation about the Universal Service Programs (Federal / Local). Both programs purpose is to guarantee access to modern telecommunication services at a reasonable cost to people with limited resources.

### FEDERAL UNIVERSAL SERVICE PROGRAM

**Lifeline** - Offers residential and cellular customers, who comply with the eligibility requirements, a maximum monthly subsidy of \$10.00 for the cost of Interstate Access and telephone basic rent.

Customers subscribed to this subsidy, may select (optional) Long Distance Call Restriction at no additional cost. This selection offers an Initial Deposit Credit.

**Link-Up America** - Grant an eligible customer requesting residential and cellular service, the benefit of a subsidy that covers half of the installation or activation cost of the main residential line, up to a maximum of \$30.00 (whichever is less) for the installation charge. This applies only to all new connections.

### LOCAL UNIVERSAL SERVICE PROGRAM

The Local Program includes a monthly subsidy of \$3.50, applicable to the Basic Rent of the main line.

Both programs combined, (Federal / Local) offer a maximum credit of \$13.50 on the monthly telephone invoice.

These services apply exclusively to one telephone line. The subsidy (Federal and Local) apply only to one wireline or wireless phone line, not both of them.

Once the documents are processed by CLARO, the applicant will begin to enjoy the benefits of the subsidy.

## IMPORTANT

The customer may receive the telephone subsidy, if he is a beneficiary of one of the following social assistance program :

- Nutritional Assistance Program (PAN), Family Department
  - Local Energy Assistance Program for Low Income Homes, Family Department
  - Plan Section 8, Housing Department
  - Medicaid Program, Health Department
  - Temporary Assistance for Needy Families Program (TANF), Family Department
  - National School Lunch Program, Education Department
  - Income Eligibility (present evidence of family gross income)
- The telephone number must be registered under the participant's name of the benefit program
  - The subsidy is not transferable to another customer
  - It is necessary to present Certification from the participating government agency. Also, Universal Service request properly completed and signed. PAN customers need only submit the request.
  - All member of the household to qualify by income should presented evidence for all income receive.
  - If your certification is not considered eligible, you will receive a written notification. The request may be reconsidered, according to the applicable laws.
  - Any person, who knowingly presents false or fraudulent information on this document, may be penalized under the applicable laws. In addition, the subsidy will be suspended immediately.
  - Call and notify if you discontinue to participate in any of the applicable beneficial programs, if there is any change to your income
  - The Local Energy subsidy program is not related to any Power Authority Program

## PROGRAM INFORMATION CENTER

**(787) 774-3000**

**SERVICIO UNIVERSAL**

**P.O. BOX 70234 / SAN JUAN, PR 00939 - 7234**

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| UNIVERSAL SERVICE REQUEST |                  |      |                        | ENTER THE NUMBER THAT YOU WISH THE SUBSIDY |                     |
|---------------------------|------------------|------|------------------------|--|---------------------|
| First Name                | Second Last Name | Name | Social Security Number | Telephone Number ( )                       | Cellular Number ( ) |

Residential Address (Complex or Condominium Name, Street Name or Number, City, Postal Zip Code) Please enter the address in the suggested order

|  |  |   |
|--|--|---|
| Program Requested:<br><input type="checkbox"/> "Link-up America" (only new application)<br><input type="checkbox"/> "Lifeline" (New or existing customers) | If a telephone application was submitted, enter the order number | Do you wish to restrict Long Distance Calls without an additional cost?<br><input type="checkbox"/> Yes <input type="checkbox"/> No |
|--|--|---|

|   |  |   |
|---|--|---|
| If you have another telephone number under your name enter the number | How many persons live in your home?<br>Family Unit _____ | (Income Eligibility) Annual Gross Family Income : |
|---|--|---|

### PAN PROGRAM - CUSTOMER BENEFICIARY CERTIFICATION (Family Department)

- I request registration in the Universal Service Program
- I request exclusion from the automatic enrollment process for the Universal Service Program
- I certify that neither I, nor any member of my family unit possess an additional telephone line or a cellular phone or a PCS that is subscribed to the Lifeline subsidy. In addition, I agree to submit annually, evidence of my participation in the Program and notify CLARO when I cease to be a beneficiary.

### CUSTOMER BENEFICIARY CERTIFICATION OF OTHER PROGRAMS

I certify, under penalty of perjury, that neither I, nor any member of my family unit possess an additional telephone line or a cellular phone or a PCS that is subscribed to the Lifeline subsidy. In the same manner, I certify that the documents presented are a true and exact representation of my family's unit annual income. In addition, I agree to submit annually, evidence of my participation in the Program and notify CLARO when I cease to be a beneficiary.

|           |      |
|-----------|------|
| Signature | Date |
|-----------|------|

**WARNING : Providing false or fraudulent information on this document, may be penalized according to the effective laws. Only applications that are duly completed and signed will be processed.**