

Commission Secretary
FCC
445 12th Street SW room TWA-325
Washington, DC 20554

Re: Petition and Certification of the Public Utility Commission of Oregon to opt-out of the National Lifeline Database. WC Docket Nos. 11-42, 03-109, 12-23; CC Docket No. 96-45

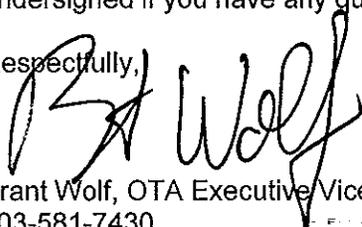
The Oregon Telecommunications Association ("OTA") represents all incumbent local exchange carriers and several small competitive local exchange carriers operating in Oregon. See Exhibit A. A majority of Eligible Telecommunications Carriers ("ETC") in Oregon are members of the OTA. The OTA supports the opt-out petition filed by the Public Utility Commission of Oregon ("OPUC") in the above dockets. In its filing, the OPUC provides specific detail that it meets the requirements for opting out of the National Lifeline Accountability Database set forth in the *Public Notice*, DA 12-1624, and the *Lifeline Reform Order*¹. The OPUC has in place a comprehensive system to ensure against duplicative Lifeline support.

Since the inception of Lifeline in Oregon in 1989, the OPUC has verified applicants' eligibility and performed checks to prevent duplicate benefits for all wireline and wireless ETCs. The OTA believes that the OPUC's administrative role or approach as facilitated by its system already fulfills the FCC's goal of minimizing waste, fraud, and abuse. If the FCC does not authorize the OPUC to opt-out of the National Accountability Lifeline Database, it will result in the need for additional resources and costs (e.g. personnel, etc.) to the OTA members that will have to comply with the requirements of the National Accountability Lifeline Database.

The OPUC system includes Lifeline customer information for all ETCs and eliminates the potential for duplicate benefits. In addition, the OPUC has real-time access to the Oregon Department of Human Services for initial and ongoing verification of eligibility. The OPUC's comprehensive role in the administration of Lifeline conserves resources for the OTA members and ensures an optimal result that is in the public interest. The OPUC furthers the FCC's goals in ensuring that duplicate benefits do not occur and for the reasons described herein, the OTA respectfully urges the FCC to approve the OPUC's petition.

Thank you for the opportunity to provide these supporting comments. Please contact the undersigned if you have any questions or concerns.

Respectfully,



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¹ See *Lifeline and Link Up Reform and Modernization et al.*, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012).

Exhibit A

Oregon Telecommunications Association Members

Asotin Telephone Company d/b/a TDS Telecom
Beaver Creek Cooperative Telephone Company
Canby Telephone Association d/b/a Canby Telecom
Cascade Utilities, Inc., d/b/a Reliance Connects
Century Tel of Oregon, Inc., d/b/a Century Link
CenturyTel of Eastern Oregon, Inc., d/b/a CenturyLink
Clear Creek Telephone & Television
Colton Telephone Company, d/b/a ColtonTel
Eagle Telephone System, Inc.
Frontier Communications Northwest, Inc.
Gervais Telephone Company
Helix Telephone Company
Home Telephone Company d/b/a TDS Telecom
Midvale Telephone Exchange
Molalla Communications, Inc. d/b/a Molalla Communications
Monitor Cooperative Telephone Company
Monroe Telephone Company
Mt. Angel Telephone Company
Nehalem Telecommunications, Inc., d/b/a RTI Nehalem Telecom
North-State Telephone Co.
Oregon-Idaho Utilities, Inc.
Oregon Telephone Corporation
People's Telephone Co.
Pine Telephone System, Inc.
Pioneer Telephone Cooperative
Qwest d/b/a Century Link
Roome Telecommunications Inc.
St. Paul Cooperative Telephone Association
Scio Mutual Telephone Association
Stayton Cooperative Telephone Company
Trans-Cascades Telephone Company, d/b/a Reliance Connects
United Telephone Company of the Northwest d/b/a CenturyLink