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Public Utility Commission of Texas

February 8, 2013

VIA ECFS

EX PARTE

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

Re: Lifeline and Link up Reform and Modernization, WC Docket No. 11-42; Lifeline and Linkup, WC Docket No. 03-109; Federal-State Joint Board on Universal Fund, WC Docket No. 96-45; Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23

Dear Ms. Dortch:

On Thursday, February 7 and Friday, February 8, 2013, Jay Stone of the Public Utility Commission of Texas (PUCT) had telephone conversations with Jonathan Lechter of the Wireline Competition Bureau to clarify information submitted in the PUCT's January 31, 2013 ex parte filed in the above-referenced dockets. The conversation addressed the process changes implemented by the PUCT in January 2013 to further strengthen the duplicative screening procedures employed by the Texas Low Income Discount Administrator (LIDA) and to address duplicates identified by the Universal Service Administrative Company (USAC) in its initial Track 1 duplicate analysis.

Prior to January 2013, the LIDA generated monthly lists of all customers eligible for a Lifeline discount, including prepaid wireless customers, and then conducted its matching process to identify duplicates. Texas customers at addresses with identified potential duplicate credits were sent a letter requiring the customer to choose a single telephone number for which the Lifeline discount would be applied. The customer was given thirty (30) days to respond to the letter. If the customer did not respond, the first telephone number on the randomly sorted list included in the letter was selected as the Lifeline number. All other telephone numbers at that address were de-enrolled and affected eligible telecommunications carriers (ETCs) were notified accordingly. While this process was effective at identifying duplicate discounts, it resulted in a short time lag before such duplicates were de-enrolled.

In order to achieve more real-time de-enrollment of duplicate discounts, the LIDA modified the service provider update process in January 2013. Rather than allowing a duplicate credit to continue while awaiting a confirmation from the customer, the LIDA now updates the customer's record to identify the most recent service provider selection as the single telephone number to receive the discount, and immediately de-enrolls any other telephone numbers associated with that customer. This immediate transfer process ensures that the customer will continue to receive a Lifeline discount, for only one telephone number, while eliminating the time lag that existed under the prior method.

As a consumer protection measure, the LIDA continues to send confirmation letters to customers who have had their Lifeline discount transferred to a new telephone number or service provider. If the customer authorized the transfer then no further action is required. If the customer returns the appropriate forms and indicates that the transfer was not what they intended, the Lifeline discount will be transferred to the telephone number or service provider indicated by the customer and any duplicate discounts will be de-enrolled.

The net effect of the process enhancements was that the number of identified duplicates declined from 21,000 in December 2012 to only 18 in January 2013. The process revisions worked as anticipated and will continue to be utilized going forward.

Respectfully submitted,
/s/
Jay Stone
Program Administrator

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