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Jeremy Comeau
Assistant General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St., Ste. 1500 East
Indianapolis, IN 46204

Re: RM# 15-03 Development of Rules Regulating Sales Practices and Compliance Standards for Lifeline Services

On May 13, 2015, you circulated documentation indicating that the Indiana Utility Regulatory Commission (Commission) is considering developing rules for Lifeline-Only Eligible Telecommunications Carriers (ETCs) and asked ETCs to review and provide written comments on the Preliminary Draft Issues List it had compiled. On June 12, 2015, AT&T provided such comments.

On July 15, 2015, the Commission held a workshop where the rulemaking was informally discussed and Draft Rules were distributed. In follow-up to the discussion at the workshop, the Commission asked ETCs to submit written comments regarding these Draft Rules no later than August 17, 2015.

AT&T has reviewed the Draft Rules and offers the following comments:

Consistent with its comments on the Preliminary Draft Issues List, AT&T reiterates that it strongly believes that significant reforms are needed to the Lifeline program itself as well as to the administration of the Lifeline program *on a national basis*. The FCC has initiated a proceeding to consider modernizing the Lifeline program and reforming its rules and processes, and much attention is being given to these issues. In fact, on June 22, 2015, as anticipated, the FCC released an order and further notice of proposed rulemaking on Lifeline. Several of the Lifeline administrative reforms the FCC is proposing address the issues that give rise to the Indiana Draft Rules.

For example, in its Second Further Notice of Proposed Rulemaking, the FCC proposes eliminating providers' role in administering eligibility determinations. That is something that we have long advocated; in our view, it is inappropriate that private sector service providers and not government, should be administering eligibility and enrollment for this government benefit program, particularly because those providers stand to benefit financially from a positive eligibility determination. Because we believe this inappropriate provider role is the source of many of the problems that exist in the Lifeline program, a change of this nature would eliminate the need for rules such as the Commission is proposing.

With the attention being given this important issue at this time, and with the types of changes being considered at the federal level, AT&T asserts that it would be more rational and efficient for individual states to hold off making changes of this nature at this time and to reconvene after the FCC takes action. Instituting state-specific changes at this time may ultimately require participating ETCs in the state to make changes now only to have to make further changes required by the FCC again later. Moreover, state-specific rules adopted now may ultimately be inconsistent with or unnecessary as a consequence of the FCC's new rules.

In summary, AT&T encourages the Commission delay making changes of this nature at this time and reconvene after the FCC takes action.

Very truly yours,

A handwritten signature in black ink that reads "Brian D. Robinson". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping underline.

Brian D. Robinson