



June 12, 2015

Indiana Utility Regulatory Commission
Office of the General Counsel
Attn: Mr. Jeremy Comeau
Assistant General Counsel
101 West Washington - Suite 1500 East
Indianapolis, Indiana 46204-3407

**Re: IURC Rulemaking RM#15-03 – CenturyLink Responses to the Preliminary Issues List
Applicable to Lifeline-Only Eligible Telecommunications Carriers**

Dear Assistant General Counsel Comeau:

CenturyTel of Central Indiana, Inc., d/b/a CenturyLink, CenturyTel of Odon, Inc., d/b/a CenturyLink, and United Telephone Company of Indiana, Inc., d/b/a CenturyLink (collectively “CenturyLink”) by counsel, respectfully submits their responses to the Rulemaking (“RM”) 15-03 Preliminary Issues List Applicable to Lifeline-Only Eligible Telecommunications Carriers.

Please direct any questions or comments regarding CenturyLink’s responses to Alan Matsumoto on (317) 531-0710 or alan.i.matsumoto@centurylink.com.

Respectfully submitted,

/s/ Charles R. Mercer, Jr.

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The Use of Agents to Enroll Lifeline Subscribers

1. Should the Commission prohibit or limit ETCs' use of third-party agents to enroll subscribers in Lifeline service? If so, how should third-party agents and employees of the company be defined? How would a prohibition of agents be enforced?
 - A. **No; CenturyLink does not believe the Commission should prohibit ETCs from employing third-party agents to enroll subscribers in Lifeline service.**
2. Rather than prohibiting agents, should the Commission set minimum standards for training and background checks for agents?
 - A. **Yes; given the importance of correctly enrolling customers in the Lifeline program and the sensitive nature of the personal information provided by prospective Lifeline subscribers, CenturyLink believes the Commission should adopt standards for training and background checks for agents. At a minimum, agents should be trained in state and federal lifeline rules as well as the proper handling of sensitive personal information and be familiar with rules for enrolling Lifeline subscribers.**
3. If the use of agents should not be prohibited, should the Commission prohibit agents from using their own laptops and interconnected devices to enroll subscribers in order to protect prospective Lifeline subscribers' sensitive information? If so, how should a prohibition be enforced?
 - A. **Yes; given the sensitive nature of the personal information provided by prospective Lifeline subscribers and the potential for loss or misuse of this data, CenturyLink believes the Commission should prohibit third-party agents from using their personal laptops and interconnected devices to enroll Lifeline subscribers.**

Temporary Structures/Marketing Events

4. Should the Commission prohibit Lifeline enrollment from temporary structures, such as tents, vans, and booths, at temporary locations?
 - A. **No; CenturyLink does not believe the Commission should prohibit ETCs from enrolling Lifeline subscribers from temporary structures, such as tents, vans, and booths, at temporary locations as long as certain standards for use of those structures are required and enforced.**
5. As an alternative to prohibition of Lifeline enrollment from temporary locations, should the Commission set standards for identification of the temporary structures and the representatives that staff them? For example, should the Commission consider rules similar to the Oklahoma Corporation Commission?

- A. Yes; CenturyLink believes the Commission should adopt standards for the clear identification of the ETC that is enrolling Lifeline subscribers and responsible for the temporary structures and the representatives that staff them. In addition, the Lifeline service offerings of the ETC must be clear and understandable. CenturyLink believes the Commission should consider rules similar to the rules adopted by the Oklahoma Corporation Commission.**

Process for Checking Accurate Subscriber Addresses

6. Do all or most wireless ETCs use MelissaData to determine if prospective Lifeline subscribers' addresses are valid?
- A. Regardless of whether all or most wireless ETCs use MelissaData to verify prospective Lifeline subscriber addresses, CenturyLink does not believe the use of MelissaData alone is sufficient. CenturyLink supports the use of usps.com and the National Lifeline Accountability Database (NLAD) for address validation.**
7. TerraCom has agreed that when a prospective Lifeline subscriber's address is indicated as AS16 by MelissaData, it will take the additional step of seeking a recent utility bill or letter from a government agency to verify the subscriber's current address. Should this procedure be required of all wireless ETCs? Is there another way to verify the subscriber's address is valid?
- A. As discussed in the response to issue 6 above, CenturyLink supports the use of usps.com and the National Lifeline Accountability Database (NLAD) for address validation. The use of a recent utility bill or letter from a government agency are also appropriate means to verify the Lifeline subscriber's current address.**

Form of Household Worksheet and Other Certification Documents

8. How does your company obtain and document Lifeline certification forms from customers pursuant to 47 C.F.R. 54.410(d)? For example, does your company use recorded conversations, electronic checklists and signatures, paper application forms, or another form of documentation? How are these certifications verified and retained?
- A. CenturyLink uses paper Lifeline application forms with a subscriber signature that certifies the subscriber's understanding of the Lifeline service and benefits and attesting to the veracity of the information provided and eligibility for Lifeline service. At this point, CenturyLink retains the Lifeline application forms indefinitely.**

9. How does your company obtain LHWs from customers to determine if more than one household resides at one address? For example, does your company use recorded conversations, electronic checklists and signatures, paper application forms, or another form of documentation? How are these LHWs verified and retained?
- A. CenturyLink uses paper LHW forms with a subscriber signature that certifies that the subscriber resides at an address occupied by more than one household and is eligible for Lifeline service. CenturyLink includes a LHW form with every initial application or recertification sent. We also send LHW forms to customers who have their applications returned from NLAD as duplicate addresses. At this point, CenturyLink retains the LHW forms indefinitely.**
10. Does your company use the FCC's Lifeline Household Worksheet (see attached)? If not, what does your company use?
- A. No, CenturyLink does not use the FCC's Lifeline Household Worksheet form. CenturyLink uses a form that is a slightly modified version of the FCC's LHW form. A copy of our Household Worksheet is attached for the Commission's review and consideration for future use.**
11. What prompts your company to require a prospective or existing Lifeline customer to complete a LHW?
- A. If a duplicate address is detected in the NLAD, CenturyLink will require a Lifeline customer to complete the LHW form.**

Other

12. Are there any other considerations the Commission should address regarding the Lifeline program and its implementation in Indiana?
- A. CenturyLink believes the Commission should clearly spell out penalties for non-compliance and violations of the Lifeline program rules and requirements in Indiana. In addition, should the FCC adopt requirements for third-party agents to enroll subscribers in Lifeline service and for administering the Lifeline program, CenturyLink respectfully requests the Commission support the FCC's efforts.**

