

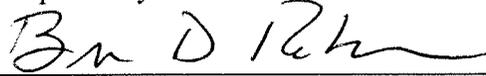
STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

SUBMISSION OF AT&T INDIANA

Indiana Bell Telephone Company, Incorporated d/b/a AT&T Indiana (AT&T Indiana), by counsel, respectfully submits the following *AT&T Indiana's Reply Comments On Staff's Revised "Strawman" Draft Of Proposed Administrative Rules For Indiana Lifeline Assistance Program.*

Dated January 17, 2008

Respectfully submitted,



Brian D. Robinson (#22825-49)
AT&T INDIANA
240 North Meridian Street, Room 1830
Indianapolis, IN 46204
Telephone: (317) 265-2136
Facsimile: (317) 265-3343
br5328@att.com

**AT&T INDIANA’S REPLY COMMENTS ON STAFF’S REVISED
“STRAWMAN” DRAFT OF PROPOSED
ADMINISTRATIVE RULES FOR INDIANA LIFELINE ASSISTANCE
PROGRAM
170 IAC 7-8-1 et. seq.**

Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana (“AT&T Indiana”) hereby submits these brief comments in response to the comments filed by Sprint Nextel (“Sprint”) on January 4, 2008 in the referenced rulemaking. Sprint takes issue with additional language proposed for draft rule 170 IAC 7-8-5(c) which would require Eligible Telecommunications Carriers (ETCs) “migrate” their current federal Lifeline customers to the new Indiana Lifeline Assistance Program (ILAP). Sprint Comments, pps 4-5. Sprint argues that the ILAP is a supplement to the federal Lifeline program. *Id.* AT&T Indiana’s suggested language was proposed in order to make it clear that all ETCs and their Lifeline-eligible customers must transition to the ILAP rules established by the Commission.

AT&T Indiana acknowledges that there are two distinct sources of funding for Indiana Lifeline discounts and that the additional state dollars that come from the ILAP may be fairly characterized as a supplement to federal Lifeline support. However, once a state adopts its own Lifeline program, it is the state program rules that govern the ETCs administration of the program and the eligibility of customers. Indiana is proposing to establish its own state Lifeline program. As such, Sprint and other ETCs must adhere to Indiana’s rules governing, for example, eligibility criteria or outreach efforts. *See e.g.*, In the Matter of Lifeline and Link-Up, FCC 04-87, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, released April 29, 2004, para 23 (stating “in a state that has instituted its own Lifeline/Link-Up program, an individual

must follow that state's certification and verification procedures, if any, in order to enroll and continue to participate in that state's Lifeline/Link-Up program.""). AT&T Indiana's language was suggested to make clear that current Lifeline customers would not have to take any affirmative action to re-enroll in ILAP, i.e., it would be the provider's responsibility to begin providing the enhanced benefits resulting from ILAP to existing Lifeline customers.