INECA Comments on ILAP
"Stawman" Draft – Version 2
For Pre-Rulemaking Workshop

Sec. 6. (a) (1), (2) and (3) refer to "the ETC". In reality, a number of ETCs have contracted with an agent to administer the ILAP process and verification. Does the reference to "the ETC" contemplate that an agent may perform the task on behalf of "the ETC" or should the reference be changed to "the ETC or its agent"?

Sec. 10. (b) in the last line the proper phrase needs to be determined, "is has been received"

Sec. 11. (a) (4) would appear to require an ILAP eligibility discussion with every new customer, regardless of their apparent eligibility. A suggested revision might read "When and ETC provides a new customer with information regarding new telephone service and the credit information indicates the customer may be eligible for ILAP, the ETC shall also…..

Sec. 11. (c) states the materials shall be available in the Spanish language. Would the availability on the OUCC website meet this requirement or would an ETC be required to make them available in the same manner as the English materials are available, not knowing if there will even be any demand for the materials in the Spanish language?

Sec. 12. (d) (12) correct typo to be "thorough"