

EXHIBIT A

**SPRINT NEXTEL'S COMMENTS & PROPOSED REVISIONS
TO IURC STAFF STRAWMAN PROPOSED RULES FOR ILAP**

Sprint Concern	Rule Cite & Existing Language	Proposed Corrective Language
<p><i>Eligibility Requirements</i></p> <p>Eligibility requirements are not tied to the customer, so the customer could qualify simply because roommates or children of roommates qualify. This is difficult to police, and is inconsistent with the purpose & spirit of the rule, which is to tie benefits to the <i>customer</i>.</p>	<p>170 IAC 7-8-3(a)(2):</p> <p>“A customer is eligible for the program if: ... (2) any person in the customer’s household receives or has a child who receives any of the following: ...”</p>	<p>Revise language:</p> <p>“A customer is eligible for the program if: ... (2) the customer receives or has a child residing in the customer’s household who receives any of the following: ...”</p>
<p><i>Creditworthiness & Deposits</i></p> <p>Creditworthiness & deposit rules create entirely new processes that conflict with Sprint’s established operating procedures and that would require new and costly Indiana-specific practices.</p>	<p>170 IAC 7-8-4</p>	<p>Revise applicability so that rule is consistent with federal practice, which allows carriers to avoid creditworthiness and deposit regulations so long as customer opts toll blocking or toll limitation.</p> <p>Revise 170 IAC 7-8-4(a) by adding the following sentence at the end of the existing language:</p> <p>“Provided, however, that no part of this section shall apply where a customer or applicant elects toll blocking or toll limitation.”</p>

<p><i>Certification Forms</i></p> <p>Certification forms cannot be company-generated. Sprint has spent considerable time & money developing its own form (presently used throughout Sprint's system) that complies with federal regulations.</p>	<p>170 IAC 7-8-5(b):</p> <p>"The certification form shall: (1) be created by the administrator..."</p>	<p>Revise language as follows:</p> <p>"The ETC must use a certification form that:</p> <p>(1) is created by the administrator or the ETC; (2) is approved by the commission; and (3) includes a self-certification statement by the customer regarding the customer's eligibility under subsection 3(1) of this rule."</p>

<p><i>Continued Eligibility Verifications</i></p> <p>Verifications are tied to the customer's anniversary date, which is very time consuming to monitor.</p>	<p>170 IAC 7-8-6(a)(1), (2), (3):</p> <p>“On an annual basis, a participant’s eligibility to remain in the program shall be verified by the following process: (1) the ETC shall mail a verification form to the participant no later than 60 days prior to the participant’s anniversary date. (2) The participant shall complete and sign the verification form and return it to the ETC with supporting documentation by the participant’s anniversary date. (3) If the ETC does not receive the verification form and supporting documentation by the participant’s anniversary date, the ETC shall notify the customer that the customer will be withdrawn from the program if the signed verification form and supporting documentation are not returned to the ETC within 60 days of the notice.</p>	<p>Revise the rule to allow the ETC to prove compliance with or mirror the federal requirement, which is an annual verification not necessarily tied to the customer’s anniversary date:</p> <p>“On an annual basis, a participant’s eligibility to remain in the program shall be verified when an ETC provides the commission with a copy of the participant’s eligibility verification provided by the ETC the same calendar year to the FCC or by the following process: (1) the ETC shall mail a verification form to the participant annually. (2) The participant shall complete and sign the verification form and return it to the ETC with supporting documentation within 60 days of the date postmarked on the verification form. (3) If the ETC does not receive the verification form and supporting documentation within 70 days of the date postmarked on the verification form, the ETC shall notify the customer that the customer will be withdrawn from the program if the signed verification form and supporting documentation are not returned to the ETC within 60 days of the notice.</p>
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<p><i>Disconnection</i></p> <p>Wireless carriers like Sprint do not provision or bill their service in a way that allows stand alone basic service to be separated (either as service or on the bill). Thus, the provision of the disconnection rules that prohibits disconnection of basic service due to nonpayment of charges for other services billed by the ETC is impossible for wireless carriers to implement. For example, a Sprint customer may receive as part of one bundle or package: local & long distance, ring tone charges, internet charges, etc. Unlike a wire-line LEC, Sprint does not provision telephone service in a way that allows the basic telephone service component to be separated from, for example, the long distance component. Also, Sprint's systems are unable to treat telecom service on the invoice differently from third party vendor charges, like music or movies.</p>	<p>170 IAC 7-8-9:</p> <p>“An ETC shall not discontinue a participant’s basic telecommunications service because of nonpayment by the participant of charges for other services billed by the ETC, including interexchange service.”</p>	<p>Revise the rule to allow for exemption when compliance is technically infeasible or unduly burdensome:</p> <p>Add the following sentence to the rule:</p> <p>“Upon request of an ETC, the commission may exempt an ETC from this requirement where the ETC shows that its service is provisioned in a way that makes compliance technically infeasible or unduly burdensome.”</p> <p>ALTERNATIVELY, amend the language to read:</p> <p>“An ETC shall not discontinue a participant’s basic telecommunications service because of nonpayment by the participant of charges for other services billed by the ETC, including interexchange service. Provided, however, that except for 911 service, a wireless ETC may discontinue all aspects of a participant’s service because of nonpayment by the participant of charges for any services billed by the ETC, including interexchange service or services rendered by third party vendors.”</p>
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<p><i>Dispute Resolution Procedure</i></p> <p>The dispute resolution rule creates an entirely new process that conflict with Sprint’s established operating procedures and that would require new, Indiana-specific practices. (As a wireless carrier, Sprint is not bound by the commission’s existing customer dispute resolution rules). Additionally, in many cases, Sprint and the customer have a contract that establishes a different dispute resolution process.</p>	<p>170 IAC 7-8-10</p>	<p>Revise the rule to allow for exemption by adding a new section (a) on applicability:</p> <p>(a) “Upon request of an ETC, the commission may exempt an ETC from the requirements of this section where the ETC shows that: 1) its service is provisioned in a way that makes compliance technically infeasible or unduly burdensome; and 2) the participant and ETC have previously agreed upon another dispute resolution processes.”</p>
<p><i>Mandatory Customer Outreach</i></p> <p>The customer outreach requirements are significantly more detailed than requirements Sprint experiences in any other jurisdiction and will be extremely burdensome and costly to implement. Additionally, the requirement that a customer service representative discussing payment arrangements must advise a consumer of their Indiana Lifeline/Linkup dispute resolution rights creates difficulties when, for example, one of Sprint’s nationwide customers from another state discusses payment arrangements in an Indiana Sprint store.</p>	<p>170 IAC 7-8-11</p>	<p>Revise the rule to narrow the number and type of mandatory outreach initiatives:</p> <p>Revise 170 IAC 7-8-11(a) as follows:</p> <p>“An ETC shall make available at least one of the following consumer outreach materials in order to advertise the availability of the program to consumers in the following manner:”</p> <p>-Additionally, add another option for outreach:</p> <p>“(3) ETCs shall provide program eligibility information through the USAC website at www.usac.org/lifeline-income/lifelinesupport/browser/Default.aspx.”</p>

<p><i>Applicability of Discount</i></p> <p>In the wireless context, benefits to participants should be applied to the lowest priced service plan. The FCC is currently considering whether the lifeline discount can be limited to the lowest priced service plan.</p>	<p>170 IAC 7-8-14</p>	<p>Add the following sentence at the end of 170 IAC 7-8-14(a):</p> <p>“Participants whose primary exchange line is provided by a wireless ETC shall receive reduced monthly rates applied to the wireless ETC’s lowest priced service plan.”</p>

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