

Response of Frontier Communications – In RED below:

Development of Rules Regulating Sales Practices and Regulatory Compliance Standards for Lifeline Services

In summary, Commission staff seeks comments from stakeholders and interested parties on at least the following preliminary issues:

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? **Frontier has no comment and doesn't use agents to enroll subscribers for Lifeline.**
2. Rather than prohibiting agents, should the Commission set minimum standards for training and background checks for agents? **Frontier has no comment and doesn't use agents to enroll subscribers for Lifeline.**
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? **Frontier has no comment and doesn't use agents to enroll subscribers for Lifeline.**

Temporary Structures/Marketing Events

4. Should the Commission prohibit Lifeline enrollment from temporary structures, such as tents, vans, and booths, at temporary locations? **Frontier has no comment.**
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? **Frontier has no comment.**

Process for Checking Accurate Subscriber Addresses

6. Do all or most wireless ETCs use MelissaData to determine if prospective Lifeline subscribers' addresses are valid? **Frontier has no comment.**
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? **Frontier has not comment.**

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)?¹ For example, does your company use recorded conversations, electronic checklists and signatures, paper application forms, or another form of documentation? **Frontier uses a paper application form to sign subscribers up for Lifeline.** How are these certifications verified and retained? **The applications are reviewed for completeness and to ensure they are signed by the subscriber or the subscriber's legally authorized representative. Complete and valid forms are then scanned into an electronic file. Both the paper and electronic copy of the forms are retained for three years beyond the date of disconnection from Lifeline of that subscriber.**
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? **Frontier uses paper Lifeline Household Worksheet forms.**
10. Does your company use the FCC's Lifeline Household Worksheet (see attached)? **Yes.** If not, what does your company use? **Not applicable.**
11. What prompts your company to require a prospective or existing Lifeline customer to complete a LHW? **If a subscriber's number or name show up as duplicate in the National Lifeline Accountability Database (NLAD) or Frontier is notified by NLAD of a duplicate household mailing, a Lifeline Household Worksheet will be mailed to the subscriber.**

Other

12. Are there any other considerations the Commission should address regarding the Lifeline program and its implementation in Indiana? **Keeping state rules consistent with federal rules is preferred in order to streamline processes across all of Frontier's service territory. Frontier has experienced issues when a customer signs up for Wireless Lifeline service when they already subscribe to landline Lifeline and lose their landline Lifeline service credits. Frontier recommends a standard disclosure for Wireless Lifeline providers so**

¹ ETCs must provide prospective subscribers Lifeline certification forms that make certain disclosures in clear, easily understood language, such as, the statement that Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment, or being barred from the program; and that only one Lifeline benefit is available per household. Prospective Lifeline subscribers are required to provide certain identifying information to ETCs, such as full name, address, and the last four digits of the applicant's Social Security number, among other information.

that the customer is aware that they can't subscribe to two Lifeline products simultaneously.