

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Uniform Cover and Calendar Sheet

1. REPORT DATE: December 16, 1997	2. BUREAU AGENDA NO. DEC-97-FUS-609*
3. BUREAU: Bureau of Fixed Utility Services	KJA
4. SECTION(S): Telecommunications	5. PUBLIC MEETING DATE:
6. APPROVED BY: Director: Muth 3-5242 <i>DM</i> Supervisor: <i>SP</i> Pilalis 7-5155 Marinko 3-3930 <i>MM</i> Legal Review: J.K. Witmer <i>JW</i>	December 18, 1997 DOCKETED JAN - 5 1998
7. PERSONS IN CHARGE: <i>GW</i> Wickwire 7-2101	
8. DOCKET NO.: XXXXXXXXXX R-00974236	

9. (a) CAPTION (abbreviate if more than 4 lines)
 (b) Short summary of history & facts, documents & briefs
 (c) Recommendation

(a) Commonwealth Telephone Company
 Home Office - Dallas, PA)
 Establishing Lifeline Service

(b) On December 15, 1997, Commonwealth Telephone Company filed Supplement No. 54 to Tariff-Telephone Pa. P.U.C. No. 23, to become effective January 1, 1998, for the purpose of establishing Lifeline Service in accordance with the directives contained in the Commission's July 31, 1997 Order On Reconsideration at Docket No. I-00940035.

(c) The Bureau of Fixed Utility Services recommends that the Commission adopt the proposed draft Opinion and Order which grants Commonwealth Telephone Company's Lifeline Service and permits the proposed tariff supplements to become effective as filed, and requires Commonwealth Telephone Company to comply with the directives contained in the body of the draft Opinion and Order.

10. MOTION BY: Commissioner Chm. Quain Commissioner Hanger - Yes
 Commissioner Rolka - Yes
 SECONDED: Commissioner Bloom Commissioner Brownell - Yes

CONTENTS OF MOTION: Staff recommendation adopted.

**DOCUMENT
FOLDER**



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

REFER TO OUR FILE

DECEMBER 22, 1997

R-00974236
I-00940035

NORMAN J KENNARD ESQUIRE
MALATESTA HAWKE & MCKEON
PO BOX 1778
HARRISBURG PA 17105-1778

In re: Formal Investigation to Examine and Establish Updated
Universal Service Principals and Policies for Telecommunications
Services in the Commonwealth

PENNSYLVANIA PUBLIC UTILITY COMMISSION
v.
COMMONWEALTH TELEPHONE COMPANY

BTL

To Whom It May Concern:

This is to advise you that an Opinion and Order has been adopted
by the Commission in Public Meeting on December 18, 1997, in the
above entitled proceeding.

An Opinion and Order has been enclosed for your records.

Very truly yours,

James J. McNulty,
Secretary

DOCKETED
MAR 27 1998

smk
Encls.
Cert.Mail

DOCUMENT
FOLDER

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17105-3265**

Public Meeting held December 18, 1997

Commissioners Present:

John M. Quain, Chairman
Robert K. Bloom, Vice Chairman
John Hanger
David W. Rolka
Nora Mead Brownell

In re: Formal Investigation to Examine and
Establish Updated Universal Service Principles
and Policies for Telecommunications Services
in the Commonwealth

I-00940035

Pennsylvania Public Utility Commission

v.

Commonwealth Telephone Company

R-00974236

OPINION AND ORDER

BY THE COMMISSION:

On December 15, 1997, Commonwealth Telephone Company
(Commonwealth or Company) filed Supplement No. 54 to Tariff-Telephone Pa. P.U.C.
No. 23, to become effective January 1, 1998, for the purpose of establishing Lifeline
Service in accordance with the directives contained in the Commission's July 31, 1997
Order On Reconsideration at Docket No. I-00940035.

DOCKETED
MAR 27 1998

**DOCUMENT
FOLDER**

Background

The federal Lifeline program operates by reducing end-user charges that low-income customers pay for basic local telephone service. The FCC, in its order re Federal-State Joint Board on Universal Service, (FCC May 8, 1997) CC Docket No. 96-45, FCC 97-157 (hereinafter referred to as the FCC Universal Service Order), extended the Lifeline program by designating that Lifeline Service should be provided to low-income consumers in every state, irrespective of whether the state provides matching funds, and that all eligible telecommunications carriers should be required to provide Lifeline service. In addition, the FCC ruled to increase the federal Lifeline support amount, but conditioned such an increase on the state permitting its carriers to reduce intrastate charges paid by the end user.¹

In the FCC Universal Service Order, the FCC directed that Lifeline Service should include the following services:

1. single-party service
2. voice grade access to the public switched telephone network (PSTN)
3. DTMF or its functional digital equivalent (touch-tone service)
4. access to emergency service
5. access to operator services
6. access to interexchange service
7. access to directory assistance
8. toll limitation

The FCC also determined that Lifeline Service customers shall not be disconnected for non-payment of toll charges; nor should service deposits be required for Lifeline Service customers who accept toll blocking.² The FCC also ruled that Lifeline

¹ FCC Universal Service Order. ¶326, slip op at p. 177.

² FCC Universal Service Order. ¶328, slip op at p. 177; and ¶ 398-400, slip op at pp. 213-215.

customers should receive toll-blocking and toll-control services at no charge in order to increase the use of these services by low-income consumers.³

As part of its effort to implement the Joint Board's suggestion that the current per-minute CCL charge be modified to reflect the non-traffic sensitive nature of loop costs, the FCC, in its *Access Charge Reform Order*, (FCC May 7, 1997), CC Docket No. 96-262, implemented a flat charge per primary residential line that is to be assessed against the presubscribed interexchange carrier (PIC). If the customer does not select a PIC, however, the presubscribed interexchange carrier charge (PICC) will be assessed against the end user. However, the FCC also wants to ensure that the Part 69 changes will not have an adverse impact on Lifeline customers. Specifically, the FCC is concerned that the PICC may be assessed against Lifeline customers who elect to receive toll blocking because they will have no PIC associated with their lines. Accordingly, the FCC is seeking further guidance from the Joint Board on how to ensure the integrity of the Lifeline program in light of changes made in its Part 69 rules.⁴

With regard to federal Universal Service funding support, we note that the FCC's Universal Service Order provides for a minimum of \$5.25 in federal support consisting of the current \$3.50 SLC offset plus an additional amount of \$1.75. In order for Lifeline subscribers to receive the \$5.25 in federal support the states need not provide matching funds, but only approve the reduction of \$1.75 in the portion of the intrastate rate that is paid by the end user; the \$3.50 reduction would be applied as an offset to the current Federal Subscriber Line Charge (SLC) of \$3.50 per month. In addition, the FCC will provide for additional federal support equal to one half of any support generated from the intrastate jurisdiction, up to a maximum of an additional \$1.75, or \$7.00 in

³ FCC Universal Service Order. ¶385, slip op at pp. 205-6.

⁴ FCC Universal Service Order. ¶¶362-363, slip op at p. 193.

federal support (\$3.50 + \$1.75 + \$1.75). In other words, if a state provides the minimum amount of matching support to receive the full federal matching support amount, the state would provide \$3.50 and the FCC would match one half that amount, or \$1.75. This would provide for \$7.00 in federal support plus \$3.50 in state support for a total support of \$10.50 to the Lifeline consumer. Again, in order to achieve the full \$10.50 offset for Lifeline rates, states must approve the reduction in intrastate rates provided by the additional federal support amount. In addition, the federal support amounts in no case should exceed the Lifeline rate.⁵ The FCC's modified Lifeline Plan is to take effect on January 1, 1998.

We note that our Order on Reconsideration, in re Formal Investigation to Examine and Establish Updated Universal Service Principles and Policies for Telecommunications Services in the Commonwealth, Docket No. I-00940035 (July 31, 1997), addressed the issue of Lifeline Plans. In that Order we determined that both ILECs and CLECs qualifying as eligible telecommunications carriers for federal funding purposes will be required to make Lifeline services available to low-income residence consumers. In addition, in that Order, we granted the Pennsylvania Telephone Association's request for extension of time to file Lifeline Plans⁶ and required all LECs which had not yet filed their Lifeline Plans with the Commission to do so on, or before, September 30, 1997, with an effective date of January 1, 1998. Also, in that Order, we directed companies to use the Bell Atlantic-Pennsylvania, Inc. Lifeline Plan⁷ as a "minimum standard," subject to any amendments that are now required as a result of the FCC Universal Service Order. These directives were in addition to our previous order on

⁵ FCC Universal Service Order. ¶¶351-352, 355, slip op at pp. 188-190.

⁶We note that we originally required all LECs to file a proposed Lifeline Plan for low income customers by no later than March 21, 1997, as was directed by our Opinion and Order entered January 27, 1997, at Docket No. I-00940035.

⁷ Bell Atlantic-Pa., Inc.'s Lifeline Plan was approved in accordance with our Order entered August 4, 1995, at Docket Nos. P-00930715 and P-00950958.

Universal Service at Docket No. I-00940035, entered January 28, 1997, in which we ordered all LECs “to file proposed Lifeline plans to assist low income subscribers in their service territories.”⁸

The Filings

On December 15, 1997, Commonwealth filed a tariff supplement *setting* forth its Lifeline Service. Commonwealth originally filed its Lifeline Service plan in its Rate Rebalancing/Restructuring filing at Docket No: R-00974128. This filing was subsequently rejected by the Commission during its December 4, 1997 Public Meeting. Therefore, in order to meet the FCC designated deadline date of January 1, 1998, Commonwealth’s Lifeline Service plan and tariff filing have been filed on less than statutory notice.

Commonwealth’s proposed Lifeline Service is substantially the same as the Lifeline Service Plan approved in the Pennsylvania Telephone Association’s Lifeline Service Petition (hereinafter referred to as the PTA Lifeline Petition) approved by this Commission on November 21, 1997, at Docket No. P-00971274. Commonwealth submits the filed tariff supplement in compliance with the Commission’s, July 31, 1997 Order at Docket No. I-00940035.

Discussion and Conclusion

In our opinion, it appears that the proposed Lifeline Service tariff filing is in accordance with the directives contained in our Order On Reconsideration entered July 31, 1997, at Docket No. I-00940035, and the FCC

⁸ Formal Investigation to Examine and Establish Updated Universal Service Principles and Policies for Telecommunications Services in the Commonwealth, I-00940035, January 28, 1997; p.134 and ordering ¶8 at p. 139.

Universal Service Order. However, there are several points that we wish to clarify.

Commonwealth's filing discusses the issue of customer notifications in accordance with the Pennsylvania Telephone Association's Lifeline Filing, at Docket No. P-00971274, approved November 21, 1997. We will hold the Commonwealth to these same notification procedures and will require Commonwealth to work with our Communications Office and Bureau of Consumer Services for plain language review on all customer notifications.

We also note that Commonwealth proposed to file Lifeline Service Annual Tracking Reports with the Commission for the first two years following the establishment of their Lifeline Service. As we put forth in the PTA Lifeline Petition Order, we believe that the history of Lifeline Service shows that it may take longer than two years to reach an acceptable Lifeline Service penetration level. Accordingly, we will direct that the Lifeline Service Annual Tracking Report,⁹ in Attachment A to this Opinion and Order, be submitted to the Commission on an ongoing basis. We will further direct that the Lifeline Service Annual Tracking Report be submitted to the Commission within 90-days of the anniversary of implementation of the Lifeline Service. We will take further action to eliminate these reports at such time that we deem these reports are no longer necessary.

The FCC Universal Service Order provides for an additional federal support amount (in addition to the \$3.50 SLC) of \$1.75. For Lifeline consumers in a given state to receive this additional support, that state must approve the reduction in the portion of the intrastate rate paid by the end user. The FCC Universal Service Order determined

⁹ The Annual Lifeline Service Tracking Report was approved in the Bell Lifeline Filing at Docket No. P-00971274, at Public Meeting November 21, 1997.

that the states need only approve this reduction in intrastate rates provided by the additional federal support amount.¹⁰

The FCC Universal Service Order provides for additional federal support equal to one half of any support generated from the intrastate jurisdiction, up to a maximum of an additional \$1.75 in federal matching support, or a maximum amount of \$3.50 of intrastate support qualifying for matching federal support. Pennsylvania's Universal Service support mechanism is not currently in place and a determination as to whether or not that mechanism will apply to Lifeline Service has not yet been made. However, we intend to leave the door open for further review of intrastate rate reductions in support of lowering Lifeline rates for low-income consumers in the future. Further, we place no limitations on the funding mechanism for these potential future intrastate rate reductions nor place any requirement that the funding mechanism must be the Universal Service fund. When and if we approve intrastate rate reductions for Lifeline, we will approve the reduction in intrastate rates provided by the qualifying additional federal support amount and provide FCC notification of such approval.

The FCC Universal Service Order requires all eligible telecommunications carriers to provide Lifeline Service.¹¹ On August 14, 1997, the FCC issued a public notice stating that designation as an eligible telecommunications carrier is necessary for receipt of specific federal universal service support for high cost, low income, and most rural health care purposes. As a result, several parties have petitioned this Commission for designation as eligible telecommunications carriers. Consequently, we must review and approve any Lifeline Service plan as a prerequisite to designation as an eligible telecommunications carrier. Commonwealth must provide the FCC with information about the Commission's approval of a Lifeline Service plan and designation as an eligible

¹⁰ FCC Universal Service Order. ¶¶351-352, slip op at p. 188.

¹¹ FCC Universal Service Order. ¶¶326, slip op at p. 177.

telecommunications carrier in order for the Company to receive specific federal universal service support.

The FCC's Public Notice, DA 97-1892, released September 29, 1997, announced procedures that states must follow in order to receive universal service support. The FCC determined that in order to accept increased Lifeline support, states must send a one-page letter authorizing the reduction of intrastate rates to the Universal Service Administrative Company (USAC) with a copy to Sheryl Todd and the Office of the Secretary at the FCC. Letters must be received by the Office of the Secretary by December 31, 1997 to be eligible for increased support beginning January 1, 1998. The purpose of this letter is to notify the FCC that a state approves the reduction in the portion of the intrastate rate paid by the Lifeline customer. Accordingly, we will approve the reduction in intrastate rates of the additional \$1.75 in federal support and will provide letter notification to the FCC of this approval.

In addition, the FCC also requires that in a separate filing sent to the Administrator by December 31, 1997, state commissions or carriers must demonstrate that the carrier's Lifeline Service plan complies with the FCC's rules and state the number of qualifying low-income consumers and the amount of state assistance (see 47 C.F.R. §54.401(d)). Copies of this information will be sent to the FCC by this Commission. Therefore, we shall direct Commonwealth to provide us with the number of qualifying low-income consumers and the amount of state assistance used to fund Lifeline Service so that we can demonstrate to the FCC, after our independent review, that Commonwealth's Lifeline Service plan complies with the FCC's rules. Given the time constraints to meet the FCC's December 31, 1997 deadline, we will grant Commonwealth five (5) days to provide this information to this Commission.

Before concluding, we believe it is important to note that to the extent that various intrastate Lifeline activities and plans that are being filed and implemented in

response to our January 28, 1997 Universal Service Order at Docket No. I-00940035, need to be coordinated in some fashion with the federal Lifeline program, such coordination may become the subject of future Orders by this Commission.

Upon our review, Commonwealth's tariff supplement appears to be reasonable, in the public interest and in compliance with our Opinion and Order entered July 31, 1997, at Docket No. I-00940035, and the FCC Universal Service Order. Therefore, we shall permit the proposed tariff to become effective. In addition, we shall require the Company to comply with all of the directives contained in this Opinion and Order. However, this permission does not constitute a determination that the tariff revisions are lawful, just and reasonable, but only that suspension or further investigation is not warranted at this time; **THEREFORE,**

IT IS ORDERED:

1. That the Lifeline Service tariff supplement of Commonwealth Telephone Company, be, and hereby is, permitted to become effective January 1, 1998.
2. That Commonwealth shall submit an Lifeline Service Annual Tracking Report, as included in Attachment A to this Opinion and Order, annually, on an on-going basis until the Commission decides otherwise, within 90 days of its anniversary date of implementation of Lifeline Service.
3. That the reduction in the portion of the intrastate rate paid by the end user provided by the additional federal support amount of \$1.75, be and hereby is, approved.
4. That, within five (5) days after the date of entry of this Opinion and Order, Commonwealth shall provide appropriate information to this Commission so that this Commission can forward the information to the FCC, in accordance with the FCC's

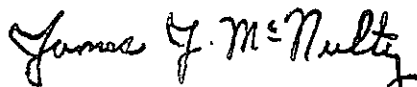
directive, demonstrating that the carrier's Lifeline Service plan complies with the FCC's rules and stating the number of qualifying low-income consumers and the amount of state assistance.

5. That Commonwealth shall abide by the FCC's final determination regarding the PICC as discussed in this Opinion and Order.

6. That Commonwealth shall comply with the directives contained in the body of this Opinion and Order.

7. That a copy of this Opinion and Order be served upon Commonwealth Telephone Company, the Office of Consumer Advocate, the Office of Trial Staff, the Bureau of Consumer Services, and all parties to the Universal Service Investigation at Docket No. I-00940035.

BY THE COMMISSION,



James J. McNulty
Secretary

(SEAL)

ORDERED ADOPTED: December 18, 1997

ORDER ENTERED: **DEC 22 1997**

PENNSYLVANIA TELEPHONE ASSOCIATION

LIFELINE SERVICE - MONTHLY RECURRING CHARGE - \$5.25 OFFSET

LINK UP AMERICA - 50% DISCOUNT OFF OF LINE CONNECTION CHARGE

TRACKING REPORT - 1998

	January	February	March	April	May	June	July	August	September	October	November	December
LIFELINE ADDITIONS:												
New Lifeline Customers												
Existing Customers converting to Lifeline Service												
LIFELINE DISCONNECTS:												
Customer Disconnects												
Customer upgrades to regular dial tone service												
NET CHANGE IN LIFELINE SERVICE CUSTOMERS												
TOTAL LIFELINE SERVICE CUSTOMERS												
LINK UP AMERICA CONNECTIONS												

SENDER:

- Check box at right if you require restricted delivery.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

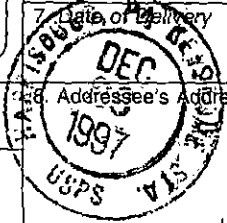
R-00974236 40
LILLIAN A HARRIS ESQUIRE
NORMAN J KENNARD ESQUIRE
MALATESTA HAWKE & MCKEON
PO BOX 1778
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4a. Article Number

P 969 321 292

4b. Service Type CERTIFIED

7. Date of Delivery



8. Addressee's Address

6. Signature: (Addressee or Agent)

X *E. Hoffma*

PS Form 3871, December 1994

Domestic Return Receipt

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