



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@tntlawfirm.com

August 9, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

In re: PaPUC Docket No. P-00971281
Joint Petition of Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Pennsylvania, LLC, and CTSI, LLC, d/b/a Frontier Communications CTSI, LLC, For Expansion of Eligible Telecommunications Carrier Status to Include Additional Census Blocks

Dear Secretary Chiavetta:

We are counsel to Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Pennsylvania, LLC; and CTSI, LLC, d/b/a Frontier Communications, CTSI, LLC in the above matter and are submitting with this letter, via electronic filing, their Responses to Staff Fourth Data Requests. Addressing the paragraph at the end of the Fourth Data Requests, Frontier Joint Petitioners acknowledge that 66 Pa. C.S. § 3019(f)(5) requires ETCs to provide Lifeline service descriptions to the Department of Public Welfare.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

cc: Tiffany L. Tran, Assistant Counsel (via email, w/encl.)
Theresa Mingarell, BCS, (via email, w/encl.)
Frederick Thomas, Esq. (via email, w/encl.)

Respondent: Michael J. Cicchetti

Date: August 9, 2021

**FRONTIER COMMUNICATIONS COMMONWEALTH
FRONTIER COMMUNICATIONS OF BREEZEWOOD
FRONTIER COMMUNICATIONS OF CANTON
FRONTIER COMMUNICATIONS OF PENNSYLVANIA
FOURTH DATA REQUEST**

DOCKET NO. P-00971281

1. While the Joint Petitioners' broadband and voice/broadband bundles are described on the company's website, information about standalone voice service was not found. What equipment and charges would a Lifeline subscriber incur to establish and maintain standalone voice service?

RESPONSE:

A new voice subscriber could incur service order, premise visit and/or central office non-recurring charges as appropriate per Section 3 of the CTSI tariff to establish service. Voice monthly recurring charges are detailed in Section 2 of the tariff along with regulated ancillary services.

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2. USAC describes outreach per this link - <https://www.usac.org/lifeline/rules-and-requirements/advertise-lifeline>. Describe CSTI's intended outreach plan.

RESPONSE:

CTSI's Lifeline outreach plan includes:

- Document referenced below in response to #3 to be distributed to appropriate social service agencies where low-income consumers are likely to visit.
- Social media posts about the Lifeline program and how to apply.
- Frontier Lifeline website which details the qualifications for Lifeline and has links to apply online or download an application form.

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3. FCC rules at 47 CFR § 54.405(b) requires ETCs to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for service. Please provide a mockup of advertisement for Lifeline offerings and charges that is designed to reach those likely to qualify for Lifeline. Be sure this mockup includes broadband and standalone voice as an option and satisfies 47 CFR 54.405 (c) and (d)

RESPONSE:

See Attachment.

ATTACHMENT



Lifeline Discount Program in Pennsylvania

How much can I save?

Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services. Lifeline service is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of monthly telephone service only (\$5.25) or qualified internet access service with or without telephone service (\$9.25). Lifeline is limited to one discount per household and only eligible customers may enroll. Broadband services with speeds at or above 25M/3M or all voice services are currently available for the Lifeline discount.

How do I qualify?

To receive the Lifeline discount each month, you must certify that you or someone in your household currently receives benefits from one of these programs:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- VA Veterans Pension (Supplemental Income for Wartime Veterans)
- VA Survivors Pension

You may also qualify if your annual income is at or below 135% of the Federal Poverty Guidelines.

How do I apply?

You can apply online with the National Verifier at [CheckLifeline.org](https://checklifeline.org) or call the Lifeline Support Center at 1-800-234-9473 or download an application from the Frontier site at <https://frontier.com/resources/discountprograms/lifelineprogram/pennsylvania> and mail to the address on the application. If there is someone else at the address who is receiving a Lifeline discount and you wish to be considered a separate economic unit, you will be required to submit a Lifeline Household Worksheet with your application.

After your completed application and the required proof of eligibility are received by the National Verifier, you will be notified of your eligibility status. Once approved for Lifeline discount eligibility, call Frontier at 1-800-921-8101 to have the Lifeline discount added to your account.

For further information about the Lifeline program visit [CheckLifeline.org](https://checklifeline.org) or contact Frontier Customer Service at 1-800-921-8101. A Frontier representative will be happy to answer your questions.

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4. Please provide a description of equipment and related charges/fees necessary to establish and maintain Lifeline standalone voice and/or broadband service.

RESPONSE:

For stand-alone voice, see response to #1. For stand-alone broadband service, the installation charge will not exceed \$85.00 on plans currently offered. Frontier regularly waives non-recurring fees with promotional offers. Equipment such as modems are included in the monthly recurring charges in currently available plans.

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5. What provision will CTSI make for Lifeline consumers who do not use the internet to receive a copy of CTSI's terms of service including E911 Limitations?

RESPONSE:

Customers will be mailed a copy of terms and conditions upon request to customer service.

VERIFICATION

I, Michael J. Cicchetti, Vice President, Government and External Affairs of Frontier Communications Corporation, hereby state that the facts set forth in the foregoing responses to Fourth Data Requests are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Michael J. Cicchetti
Vice President, Government and External Affairs

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