



Jason D. Topp
Senior Counsel - Regulatory
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March 29, 2018

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of a Commission Inquiry into CenturyLink's Compliance
with TAP Statutes and Rules
Docket No. P-421/CI-17-796**

Dear Mr. Wolf:

Enclosed for filing are Qwest Corporation dba CenturyLink QC's Reply Comments regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--------------------------------------|---------------------------------------|--|--------------------|-------------------|-------------------------------|
| Linda | Chavez | linda.chavez@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 55101-2198 | Electronic Service | No | OFF_SL_17-796_Official PUC |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1800 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_17-796_Official PUC |
| Ian | Dobson | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | No | OFF_SL_17-796_Official PUC |
| Ron | Elwood | relwood@mnlisap.org | Mid-Minnesota Legal Aid | 2324 University Ave Ste 101 Saint Paul, MN 55114 | Electronic Service | No | OFF_SL_17-796_Official PUC |
| Jason | Topp | jason.topp@centurylink.com | CenturyLink | 200 S 5th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_17-796_Official PUC |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_17-796_Official PUC |

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

| | |
|----------------|--------------|
| Nancy Lange | Chair |
| Dan Lipschultz | Commissioner |
| Matt Schuerger | Commissioner |
| Katie Sieben | Commissioner |
| John Tuma | Commissioner |

**In the Matter of a Commission Inquiry into
CenturyLink's Compliance with TAP Statutes
and Rules**

Docket No. P-421/CI-17-796

QWEST CORPORATION DBA CENTURYLINK QC'S REPLY COMMENTS

Qwest Corporation dba CenturyLink QC ("CenturyLink") submits these reply comments in response to comments filed by the Department of Commerce ("Department") on March 13, 2018.

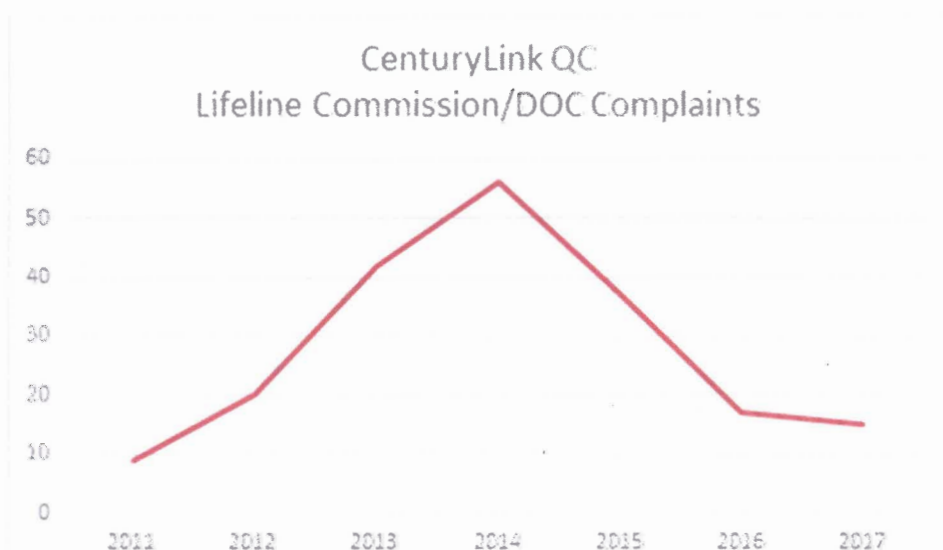
Last fall, CenturyLink reached an agreement with the Department to address its concerns about CenturyLink's administration of the Minnesota Telephone Assistance Plan ("TAP") that was confirmed in a letter dated October 19, 2017 and attached as Exhibit 1 to these comments. It is surprising to see the Department recommend additional measures in this proceeding without attaching the prior agreement.

CenturyLink disagrees with several of the positions taken by the Department in this docket. CenturyLink disagrees with the Department's allegation that CenturyLink has failed to appropriately serve its TAP customers. Commission and Department complaint data suggest otherwise. CenturyLink disagrees with the Department's extraordinarily broad and vague proposed definition of the term "complaint" under Minnesota rules and its recommendation that CenturyLink pay refunds to customers that have been rejected for TAP benefits in the past.

Despite this history, CenturyLink believes that some of the Department's recommendations will help consumers. CenturyLink therefore supports portions of the Department's recommendations.

- 1. Complaints regarding CenturyLink's TAP policies suggest that customer concerns related to the program are declining and the spike in complaints that occurred in 2013-2014 are related to federal recertification requirements.**

CenturyLink values every customer, and tries to satisfy our customers, because we know they have multiple choices for voice service. The decreasing number of customer complaints at the Commission show the efforts CenturyLink has made in reducing these complaints. The FCC issued Order FCC-12-11 in early 2012 that significantly changed Lifeline rules and imposed 100% recertification obligations each year. Complaints increased accordingly in 2012-2014 as the customers began to understand recertification and how it could impact their Lifeline benefit. Complaints at the Commission/Department increased to 56 in 2014. As the customers got used to the changes, complaints declined to 37, 17 and 15 for 2015-2017. The FCC changed the rules once again in 2016 (FCC 16-38), and those changes began to be implemented during 2017, and will not be fully implemented until December 2021.



CenturyLink has trained its customer service representatives on each of the changes and will continue to provide training in the future, as additional changes occur. Even with the significant changes to the Lifeline program that have occurred over the past several years, only 0.24% of CenturyLink's Lifeline customers filed a complaint at the Commission/Department for the entire year of 2017 (based on CenturyLink's Lifeline customer count of 6,316 on December 31, 2017).

2. CenturyLink stands willing to implement many of the suggestions made by the Department.

The Department makes a series of suggestions related to CenturyLink's program summarized at page 9 of its comments. CenturyLink responds to those suggestions in turn.

- a. File a plan for how it will train its employees on the TAP program, at some regular interval, to enable the Commission to achieve its statutory goal of making the TAP program available to eligible Minnesotans.**

CenturyLink shares the goal of making the TAP program available to eligible Minnesotans. CenturyLink trains its employees regularly on these procedures.

- b. File a plan with the Commission to show how it will improve its internal practices to provide TAP credits to customers in the "earliest possible billing cycle."**

CenturyLink believes its current processes meet this requirement. Under current processes, CenturyLink commits to review and make a decision on new applications within five days of receipt. Discounts are added to the account immediately upon approval. Customers who recertify through the federal recertification process successfully are sent an auto-dialer message within 24-48 hours after CenturyLink is notified by USAC of the recertification results.

If CenturyLink denies an application, it sends the customer a letter explaining why the application was denied and encloses a new application. Customers who call CenturyLink's Toll Free number are offered a callback from one of its Lifeline specialists (CenturyLink QC) or are transferred to a Lifeline specialist (CenturyLink). Callbacks have a commitment to return calls within 48 hours:

- If voicemail is reached, we will leave a message.
- If no voicemail and no response to our callback, we will attempt to send a new application and letter explaining what is needed by the customer to successfully apply for the Lifeline/TAP discount.

Occasionally, USAC or NLAD requests information from customers on their identity or their qualifications for the Lifeline discount:

- CenturyLink mails letters to impacted customers and requests the needed data, stating clearly in the letter that a failure to respond or failure to provide sufficient data will mean being removed from the Lifeline/TAP programs.
- If the customer provides insufficient data or fails to respond to a USAC request for information, they are removed from the Lifeline/TAP programs.

Often, these issues come up because a customer has been removed from a program. Lifeline and TAP are removed from an account when a customer:

- Fails recertification, form is incomplete.
- Fails to respond to the recertification request.
- Fails the NLAD/USAC audit.
- Fails to respond to the NLAD/USAC audit.

Customers who fail federal recertification are notified by auto-dialer within 24-48 hours after CenturyLink receives the results from USAC:

- They are also sent a letter explaining why they failed recertification within 5-10 days.
- This letter includes a new application for Lifeline.

Customers who do not respond to federal recertification are notified by auto-dialer that they failed to respond, are therefore losing discounts, and are given an option to press 1 to request a new application:

- These applications are mailed out within 5-10 days.

CenturyLink's processes seem reasonably designed to address the Department's concerns.

- c. Provide TAP benefits to eligible customers even though they receive the Lifeline benefit from another provider.**

CenturyLink agreed to do this on a going forward basis last fall. We expect this issue to greatly diminish in importance due to recent changes in the Federal Lifeline program that eliminated the ability of wireless carriers to impose a port freeze for a period of up to 12 months after a customer enrolls. This port freeze frequently was a reason why customers were rejected.

- d. File a report identifying each eligible Minnesota customer denied TAP benefits over the last two years, due to the customer receiving the Lifeline benefit from another provider. The report should include documentation showing the length of time in which each affected customer was denied TAP benefits, whether the customer is currently enrolled in TAP, enroll the customer if appropriate and provide credit to the customer in the amount of TAP credit that should have been received.**

CenturyLink is willing to file a report identifying customers that were denied TAP benefits due to being listed as having received Lifeline benefits from another provider and as

having a port freeze in place. The report will not show whether or not the customer received TAP benefits from another provider or whether the customer retained eligibility in the intervening time period. CenturyLink would not have that information if the customer obtained services elsewhere.

- e. **File a revised version of its written notice to CenturyLink customers who are recipients of TAP benefits, notifying them of their right to appeal decisions of CenturyLink to the Commission. In cases where CenturyLink determines that recipients are no longer eligible to receive TAP credits, the notice must state that CenturyLink will terminate credits if (1) the recipient does not submit an appeal within 60 days of the notice or (2) the recipient submits an appeal and the commission determines that the recipient is not eligible.**

CenturyLink is willing to work with the Commission and the Department to modify its written notice to address this concern.

3. **The Commission should reject the Department's proposed definition of the term "complaint" under Minnesota Rules.**

The Department suggests that the Commission adopt the following definition of complaint:

A complaint is any **expression of dissatisfaction, whether oral or written, and whether justified, and resolved in the customer's favor or not**, from or on behalf of an eligible complainant about the firm's provision, repair and, billing of, or failure to provide such functions, of a regulated service. Telephone and telecommunications carriers' records of complaints must include detailed descriptions of each individual customer complaint and the accompanying resolution, to allow the carrier to review and analyze its procedures and actions, as required in Minnesota Administrative Rule 7810.1200. (Emphasis added.)

Each of the highlighted terms is extraordinarily vague. Is a statement that a price "seems high" an expression of dissatisfaction or an attempted negotiating ploy? Is a statement that "service should be available in the middle of Lake Harriet" to be considered a complaint even though there is no serious justification for such an inquiry and the more likely explanation is an attempt at humor rather than a serious complaint? When does a statement

constitute an “expression of dissatisfaction” as proposed by the Department and when does it not?

In addition to being vague, the proposed rule is extraordinarily broad and burdensome. It is difficult to imagine how the Commission, state agencies or providers could in any meaningful way enforce or comply with this interpretation. It is unreasonable to expect every customer care representative to create records every time a customer says something that might be construed as an “expression of dissatisfaction.”

Under the Department’s proposed rule, such utterances are complaints even if the customer pursued the issue no further and is fully satisfied with the company’s answer. Imagine a carrier attempting to train personnel who answer phones on when to classify a stray customer comment or a customer concern as a complaint. The Department’s proposed definition is over-inclusive and creates so many implementation hurdles that it should be rejected.

CenturyLink’s approach is much more reasonable. CenturyLink identifies situations in which the customer takes its concern beyond normal business channels and expresses concern about an issue:

CenturyLink defines a complaint as any customer issue or concern that cannot be (or is not) addressed or resolved through normal business practices and channels. Issues that require escalation to or intervention by CenturyLink executives, outside agencies such as regulatory bodies, elected officials, the Better Business Bureau or the media are considered complaints and handled accordingly.

This definition relies not on an interpretation of the content of a customer communication but rather depends on whether or not the customer considers the issue significant enough to pursue beyond normal business channels. Such a bright line test makes compliance and enforcement more manageable. A bright line test makes gamesmanship much less likely and

gives statistics comparing performance from year to year far more meaning than would a standard that would involve individual interpretation of widespread events.

This is not to say that information in CenturyLink's possession about "complaints" is the only information that it possesses. CenturyLink maintains customer care records about all customers. As Attachment 2 to the Department's Comments demonstrates, CenturyLink tracks the reasons that every TAP and Lifeline application is rejected. CenturyLink maintains customer records designed to track every phone call and every communication with a customer, regardless of whether or not CenturyLink classifies the communication as a complaint. CenturyLink keeps all of the necessary records that "allow it to review and analyze its procedures and actions" as is required by Minn. R. 7810.1200. The Department's concerns about "gamesmanship" associated with complaint tracking do not apply in this context.

CONCLUSION

CenturyLink shares the Commission and Department's interest in taking reasonable steps to ensure that as many Minnesota customers as possible take advantage of the TAP program. We endorse the Department's proposed changes in our customer letters and are willing to provide the data the Department suggests should be provided to the Commission. We are willing to listen to process improvements that should be made and will continue to participate in the TAP Working Group organized by the Commission and Department to improve outreach and customer participation.

We respectfully suggest, however, that the Commission reject the Department's proposed definition of "complaint" and the Department's proposal that CenturyLink provide payments to all customers who have been rejected for TAP benefits over the last two years because they have been identified as being served by another carrier.

Dated this 29th day of March, 2018.

QWEST CORPORATION DBA
CENTURYLINK QC

/s/ Jason D. Topp
Jason D. Topp
200 South 5th Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364



Jason D. Topp
Senior Counsel - Regulatory
(651) 312-5364

October 19, 2017

Ms. Linda S. Jensen
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1800
St. Paul, MN 55101-2134

Dear Ms. Jensen:

In August of 2017, the Minnesota Department of Commerce (“Department”) sought information about the manner in which CenturyLink was handling eligibility for the Minnesota Telephone Assistance Plan reimbursement. The Department expressed concern that CenturyLink’s procedures were resulting in customers improperly being excluded from the TAP program.

CenturyLink disagrees that these concerns are valid. Nonetheless, in order to address the Department’s concerns, CenturyLink agreed to take the following steps on a going forward basis. In exchange, the Department agreed to not file a complaint related to CenturyLink’s past practices. If the Commission decided to take action with respect to past practices, the Department reserved the right to support such an effort.

Without waiver of any legal rights, CenturyLink agreed to take the following actions for all of its entities offering local telephone service in Minnesota:

1. CenturyLink agreed to offer credits for the customer complaints the Department had identified and provide a TAP credit retroactively to the date nearest their applications. CenturyLink will review other complaints that arise on the merits, and if the complaint is meritorious, it will offer credits in a similar fashion on other issues identified by the Department.
2. Effective September 1, CenturyLink modified its TAP eligibility criteria consistent with the Department’s position. That process is attached as Exhibit 1.

Exhibit 1

200 South 5th Street, Room 2200
Minneapolis, MN 55402

www.centurylink.com

Ms. Linda S. Jensen
October 19, 2017
Page 2

3. Between August 14 and August 31, CenturyLink provided training to all service representatives involved with administering TAP and Lifeline for all entities offering local telephone service in Minnesota regarding TAP eligibility and verification procedures.
4. CenturyLink has modified its TAP application consistent with the Department's edits, effective September 21, 2017. Those edits are on the document attached as Exhibit 2. CenturyLink reserves the right to make modifications to this application consistent with future Commission orders in this area.

CenturyLink believes that these actions resolve the concerns raised by the Department. In the event a dispute should arise before the Commission or elsewhere regarding state and federal requirements associated with TAP and/or Lifeline, CenturyLink and the Department reserve all rights to advocate as they see fit.

Very truly yours,



Jason D. Topp

JDT/bardm

Enclosures

Minnesota Lifeline and State Telephone Assistance Program Rules

The state of Minnesota has determined that customers receiving the federal discount from a cell phone provider are still eligible for the state Telephone Assistance Program (TAP) discount from CenturyLink on their voice service. Effective 09/01/2017 we will give a state only discount to customers in Minnesota who meet the following conditions:

1. Applied for Lifeline with CenturyLink.
2. NLAD fallout of one or a combination of the following errors:
 - a. CANNOT_TRANSFER_WITHIN_12_MONTHS
 - b. CANNOT_ENROLL_WITHIN_12_MONTHS
 - c. CANNOT_TRANSFER_WITHIN_60_DAYS
 - d. CANNOT_ENROLL_WITHIN_60_DAYS
 - e. DUPLICATE_ADDRESS
 - f. DUPLICATE_SUBSCRIBER
 - g. DUPLICATE_PRIMARY_ADDRESS
3. No other NLAD errors
 - a. If there are other NLAD errors, we will deny both Federal Lifeline and State TAP until we can resolve all errors except those above.

Minnesota Lifeline Process:

1. Attempt to add Lifeline via normal process.
2. If you receive NLAD fallout, analyze fallout based on above criteria.
3. If one or a combination of the approved fallout reasons only:
 - a. CRIS: Submit CHANGE request in CShare and choose SPG as the qualifying program.
 - i. Manual process: /RTE 0.00 each ASGF+ USOC.
 - b. ENS: Change account to State Only lifeline. Change Qual Prog to SPG.
 - c. Send a reject letter. Copy and Paste into the OTHER box:
 - i. *USAC has identified that you are subject to a port freeze with your previous Federal Lifeline provider. You will be able to port your Federal Lifeline after: MM/DD/YYYY*
 - d. Select from the Reject Menu (MN TAP):
 - i. *You are not eligible for the Federal Lifeline discount from CenturyLink at this time; however you are eligible for the Minnesota State Telephone Assistance Discount of \$3.50 which will be applied to your account.*
4. If more than the above approved fallout reasons, send a normal rejection letter to the customer and remove lifeline.

Exhibit 1

MINNESOTA APPLICATION - LIFELINE AND TELEPHONE ASSISTANCE PROGRAMS

Please Read All Instructions Before Completing

Federal Lifeline Benefits are now available for qualifying broadband as well as voice services.

Voice Lifeline discounts are available to participants of both state and federally recognized aid programs and to those meeting income qualifications. Lifeline discounts on voice include a transfer restriction (port freeze) for 60 days. This means that you are unable to obtain the Lifeline discount on service with another provider for 60 days from the date that your current voice service Lifeline discounts began.

Broadband Lifeline discounts are only available to participants of federally-recognized aid programs and to those meeting Federal income qualifications (income at or below 135% of the federal poverty level). Broadband speeds must be 10 Mbps download and 1 Mbps upload or faster to qualify. Lifeline discounts on broadband include a transfer restriction (port freeze) for 12 months. This means that once Lifeline broadband discounts begin, you will be unable to obtain a Lifeline discount with another provider for 12 months if you switch your service. ~~State Lifeline discounts do not apply to broadband service.~~

Telephone Assistance Plan (TAP)

The TAP program is a Minnesota program that provides a monthly discount to low income residential customers' landline telephone bill. The TAP discount does not apply to broadband service. Eligibility requirements are the same as the federal Lifeline program. The TAP program is subject to the same 60 day transfer restriction as Lifeline voice service. If you receive Lifeline for broadband and have 12 month transfer restriction, you may still transfer your voice service and receive the TAP discount after 60 days.

If you purchase voice and qualifying broadband services, the federal Lifeline discount will apply to your broadband service, and the state Lifeline discount will apply to your voice service.

If you purchase only voice service or voice service with non-qualifying broadband service, you may receive both state and federal Lifeline discounts on your voice service. Certain exceptions to the transfer restrictions may apply. See <http://www.lifelinesupport.org/ls/change-my-company.aspx> for more information.

Please respond completely. Inaccurate or incomplete responses may cause your application to be rejected. The information on this application will only be used to assess your eligibility for Lifeline Assistance or TAP. Information provided below should be that of the account holder.

| | | |
|--|--------------------------|---------------|
| Telephone Number or Existing Account # | First Name (No Initials) | Last Name |
| Address Where Service Is Located (No PO Boxes) | City | State |
| Check here if this is a temporary address | Zip Code | |
| Check here if you participate in the Address Confidentiality Program | | |
| Billing Address, City, State & Zip Code (If different from Service Address) (PO Boxes Allowed) | | |
| Last 4 Digits of Social Security Number OR Tribal Identification Number | | Date of Birth |
| SSN: | Tribal: | |

PLEASE CHECK programs in which you or your household currently participate and attach a copy of eligibility documentation: (If qualifying under Income, see Income Guidelines below.)

Exhibit 2

Federal Public Housing Assistance (FPHA) or Section 8 Supplemental Security Income (SSI)
 Supplemental Nutrition Assistance Program (SNAP) Formerly Known As Food Stamps Medicaid
 Veteran's Pension and Survivor's Pension Program

If you are applying for Lifeline assistance **and/or TAP** because a member of your household besides you participates in one of these programs, provide his/her name and certify that he/she is a member of your household here:

Name of Program Participant (please print)

_____ (Please Initial) I certify that this program participant is a member of my household.

INCOME GUIDELINES: Documentation required If you do not participate in any of the programs above, you may still be eligible for Lifeline Assistance **and/or TAP** if your annual household income is at or below the amounts shown below depending on the size of your household. PLEASE CHECK (on the next page) the corresponding box if you are eligible on this income basis. Please indicate the number of household members if more than 5.

| Number in Household | IF YOUR TOTAL YEARLY HOUSEHOLD INCOME IS AT OR BELOW THE AMOUNTS LISTED, WHICH ARE: 135% of Federal Poverty Level |
|---|---|
| 1 | \$16,281 |
| 2 | \$21,924 |
| 3 | \$27,567 |
| 4 | \$33,210 |
| 5 | \$38,853 |
| 6 | \$44,496 |
| 7 | \$50,139 |
| 8 | \$55,782 |
| For each additional household member add | \$5,643 |
| Number of household members greater than 5: _____ | Actual Monthly Income: \$ _____ |

A household is defined as a group of individuals who live together, at the same address, and share income and expenses. For example, apartments in an apartment building are usually unique households. Individuals living in a nursing home can be considered unique households. Answer the questions below to determine if there is more than one household living at your address. Providing false information on this form may result in losing your Lifeline **and/or TAP** service and/or criminal penalties.

Does another adult (age 18 or older or emancipated minor) live with you AND have a Lifeline-discounted service or a "free" wireless Lifeline service? For example, husband, wife, domestic partner, parent, son, daughter, another relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.), a roommate, or another person.

_____ No. You are ELIGIBLE for Lifeline **and/or TAP** because no one in your household has Lifeline **and/or TAP**. Please SIGN below to certify that this is true.

_____ Yes. Please answer question 2 below.

2. Do you share expenses for bills, food, or other living expenses AND share income (salary, public assistance benefits, social security payments or other income) with the person in question #1 that has a Lifeline-discounted service?

No. You are ELIGIBLE for Lifeline and/or TAP because no one in your household has Lifeline. Please SIGN below to certify that this is true.

Yes. ~~STOP. Do not sign the form.~~ You are NOT ELIGIBLE for Lifeline because someone in your household already has Lifeline/TAP. You may still be eligible for TAP if the Lifeline discount received is for wireless service.

I certify that the information provided above is true and that no one in my household already has Lifeline. I understand that violating the one-per-household requirement is against the Federal Communications Commission's rules and I may lose my Lifeline/TAP benefits, and may be prosecuted by the United States government for violating the rules.

PLEASE READ THE FOLLOWING IMPORTANT INFORMATION ABOUT THE LIFELINE/TAP PROGRAMS BEFORE YOU SIGN BELOW:

- Lifeline is a federal benefit and TAP is a state program. Willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the programs.
- Only one Lifeline/TAP-service discount is available per household. A household is defined for the purposes of the Lifeline/TAP programs as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline assistance from multiple service providers. This includes both wireless and wireline providers.
- I understand that if I am currently receiving Lifeline benefits from another carrier, by submitting this form I am agreeing to discontinue receiving that other carrier's benefit and instead to receive my one Lifeline benefit from CenturyLink.
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government.
- Lifeline/TAP is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

EACH OF THE FOLLOWING CERTIFICATIONS MUST BE INITIALED IN ORDER TO RECEIVE LIFELINE. FAILURE TO INITIAL ANY OF THE CERTIFICATIONS BELOW WILL RESULT IN REJECTION OF YOUR APPLICATION FORM.

I certify, under penalty of perjury, that:

- I understand and consent to CenturyLink providing my Lifeline/TAP service information, including but not limited to, my name, residential address, phone number, date of birth; the last 4 digits of my social security number; the date on which my Lifeline/TAP service was initiated/terminated, and the means through which I qualified for Lifeline/TAP, to the Universal Service Administrative Company (USAC), USAC's agents, the National Lifeline Accountability Database, and/or state agencies involved in Lifeline to ensure the proper administration of the Lifeline/TAP programs. I understand that if I fail to provide this consent, I will not be able to receive Lifeline/TAP support on my CenturyLink account.
- My household meets the program-based or income-based eligibility criteria indicated above.
- I must notify CenturyLink within 30 days if for any reason my household no longer satisfies the criteria for receiving Lifeline/TAP assistance. This includes if I no longer meet the income-based or program-based criteria for receiving Lifeline/TAP support, if I am receiving more than one Lifeline/TAP benefit, if another member of my household is receiving a Lifeline/TAP benefit, or for any other reason, my household no longer satisfies the criteria for receiving Lifeline/TAP support. Failure to notify CenturyLink may result in penalties and deenrollment from the program.
- I must notify CenturyLink within 30 days if I move to a new address.
- Only one Lifeline/TAP service benefit is available per household. To the best of my knowledge, my household is not already receiving a Lifeline service.
- I understand that my CenturyLink Lifeline/TAP service is not transferrable. I may not transfer my service to any individual, including another eligible low-income consumer.
- I understand that providing false or fraudulent information to receive Lifeline/TAP assistance is punishable by law.

- I understand that I may be required to re-certify my household's eligibility for Lifeline/TAP assistance at any time, and if I fail to re-certify as to my continued eligibility, it will result in de-enrollment and the termination of my household's Lifeline/TAP assistance.
- The information contained in this form is true and correct to the best of my knowledge.
- Once I sign up for discounts with one provider, I cannot receive Lifeline/TAP benefits from another provider for a period of time. I understand that if I purchase only voice services that qualify for Lifeline/TAP discounts I cannot move my benefits to another provider for 60 days. If I have broadband products that qualify for Lifeline discounts, I cannot move my Lifeline benefits to another provider for 12 months.

Signature _____ Date _____

Lifeline Assistance/TAP Applicant Signature (Must be the CenturyLink account holder listed at the top of page one)

Please mail this completed application and any supporting documents to (Original Documents are not returned):

| | |
|---|---|
| CenturyLink Customer Service: | Former Qwest: (888) 833-9522 |
| P. O. Box 2738 | Former CenturyTel/Embarq: (855) 954-6546 |
| | Omaha, NE 68103-2738 |
| Email: TAPCenter@CenturyLink.com | Fax: (402) 998-7341 |

Application Checklist – Please provide the following:

1. Signed and completed Lifeline/TAP application form. Applicant name must be Account Holder name.
2. If applying based on program eligibility, a copy of a program award letter or government agency document containing your name, your address, the program name and the effective date of the award.
3. Only program cards that display your name, your address or state, program name and effective date will be accepted.
4. If applying based on the size and income level of customer's household, provide a copy of one of the following:
 - Last year's Federal or State Income Tax Return
 - Current Annual Income Statement from Employer
 - Paycheck stubs or other official document containing income information for any three consecutive months within the last twelve months
 - Social Security Statement of Benefits
 - Veteran's Administration Statement of Benefits
 - Retirement or Pension Statement of Benefits
 - Unemployment or Worker's Compensation Statement of Benefits
 - Letter of Participation in General Assistance
 - Divorce Decree or Child Support Documentation containing income information
 - Bank Statement is not valid proof of income.