

March 13, 2018

PUBLIC DOCUMENT

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

RE: **PUBLIC Complaint of the Minnesota Department of Commerce**
Docket No. P421/C-17-796

Dear Mr. Wolf:

Enclosed for filing is the Minnesota Department of Commerce **PUBLIC** comments in the matter of a Commission's December 13, 2017 Notice of Inquiry into CenturyLink's Compliance with TAP Statutes and Rules.

Sincerely,

/s/ DIANE DIETZ
Public Utilities Rate Analyst

/s/ JOY GULLIKSON
Public Utilities Rate Analyst

DD/JG/lt
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. P421/C-17-796

I. BACKGROUND

On November 8, 2017, the Commission opened Docket No. P421/CI-17-796 after the Commission's Consumer Affairs Office (CAO) identified a pattern of complaints being filed regarding subscribers' inability to enroll in the Telephone Assistance Plan (TAP) with CenturyLink.

On December 13, 2017, the Minnesota Public Utilities Commission (Commission) issued a Notice of Commission Inquiry into CenturyLink's Compliance with TAP Statutes and Rules in this Docket No. P421/CI-17-796. In its Notice, the Commission requested that the Minnesota Department of Commerce (Department), and if applicable, the Office of the Attorney General, conduct a review of customer complaints regarding TAP and file their recommendations with the Commission.

II. STATEMENT OF ISSUES

1. Whether CenturyLink is meeting the requirements of Minnesota Statutes Sections 237.69 - 237.711 and Minnesota Rules Chapter 7817 in administering the Telephone Assistance Plan (TAP) to its customers.

III. LEGAL REFERENCES

A. MINNESOTA STATUTES AND RULES

Under Minnesota Statute section 216A.07, the Department is charged with investigating and enforcing Chapter 237 and Commission orders and rules promulgated pursuant to that Chapter. Under Minnesota Statute section 237.74, subdivision 4, the Department and the Commission may investigate whether a telephone or telecommunications carrier is offering the TAP program in compliance with the requirements of Minnesota Statutes sections 237.69 through 237.72 and related rules.

The Commission has jurisdiction over this matter pursuant to Minnesota Statute sections 237.081 (Commission investigations), 237.461 (Enforcement) and 237.70, subdivision 7(f) (Development of Telephone Assistance Plan; Application, notice, financial administration, complaint investigation).

Minnesota Statutes Sections 237.69 - 237.711 govern the Telephone Assistance Plan (TAP).

Minnesota Rules Chapter 7817 establishes guidelines for the implementation of TAP. Minnesota Rule 7817.1000, subpart 2 states: "Complaints against local service providers regarding the telephone assistance plan must be investigated by the Department of Commerce."

Minnesota Rule part 7817.0200 (Purpose and Construction) states that "the purpose of this chapter is to develop and implement a statewide telephone assistance plan to provide telephone assistance credits to reduce the local telephone rates of eligible residential households." This rule further states that "*this chapter is to be liberally construed to further these purposes.*" Emphasis added.

Minnesota Rule part 7817.0400, subpart 1 (Information Provided) states that, "on request, the local service provider shall mail to a person an application form . . . and a brochure that describes the telephone assistance plan's eligibility requirements and application process."

Minnesota Rule part 7817.0400, subpart 4 (Eligibility for Telephone Assistance Credits; Eligibility Criteria) states that, "to be eligible for a telephone assistance credit the applicant must A. Be a subscriber who resides in Minnesota or has moved to Minnesota and intends to remain; and B. Be eligible for the federal Lifeline telephone service discount."

Minnesota Rule 7817.0400, subpart 8 (Eligibility for Telephone Assistance Credits: local service provider responsibilities) requires a local service provider to begin providing TAP credits to an applicant in the earliest possible billing cycle following submission of a completed application demonstrating eligibility. If an applicant is denied eligibility, the local service provider must notify the applicant in writing of the reasons for the denial, of the right to appeal, and of the right to reapply.

Minnesota Rule 7817.0600, subpart 2 (Verification and Termination of Credits: termination of credits) states that, when a local service provider determines that a recipient is no longer eligible to receive TAP credits, the provider must send written notification to the recipient stating the reasons for finding the recipient ineligible and advising the recipient of the right to appeal. A local service provider may terminate credits if "A. the recipient does not submit an

appeal within 60 days of the date of the notice or B. the recipient submits an appeal and the commission determines that the recipient is not eligible.”

B. FCC ORDERS

The duties and responsibilities associated with the Lifeline program were updated in the Federal Communications Commission’s (“FCC’s”) Lifeline and Link Up Reform and Modernization Order released on April 27, 2016.¹ In its April 27, 2016 Third Report and Order, among other things, the FCC adopted the concept of a “port freeze” to “incentivize investment in high-quali[t]y Lifeline service offerings.”² In its Fourth Report and Order, the FCC subsequently eliminated the “port freeze” effective March 19, 2018 (60 days after the publication of the Order in the Federal Register).³ This latter action was taken by the FCC in response to “significant concerns regarding the port freeze raised in Petitions for Reconsideration and other recent filings in the docket.”⁴

C. COMMISSION ORDER

The duties and responsibilities of the incumbent telephone provider relating to the provision of TAP benefits were clarified by the Commission in its October 11, 2016 Order Clarifying Relationship between Lifeline and TAP, and Maintaining Current TAP Credit and Surcharge Levels in Docket No. P999/CI-16-302. In that Order, the Commission found that Minnesota law only permits TAP benefits to be used to subsidize telephone service and not broadband service.⁵ Thus any restrictions placed on the Lifeline benefits relating to the provision of broadband service are inapplicable to the provision of TAP benefits.

¹ Third Report and Order, Further Report and Order, and Order on Reconsideration in the Matter of Lifeline and Link Up Reform and Modernization . . . , WC Docket No. 11-42 et al., released on April 27, 2016. See https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf

² Ibid at para. 385.

³ Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry in the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 11-42 et al, released December 1, 2017, para. 32. See https://apps.fcc.gov/edocs_public/attachmatch/FCC-17-155A1.pdf

⁴ Ibid at para. 33.

⁵ October 11, 2016 Order Clarifying Relationship between Lifeline and TAP, and Maintaining Current TAP Credit and Surcharge Levels in Docket No. P999/CI-16-302, pages 4 – 5.

IV. ANALYSIS

A. A CUSTOMER MAY RECEIVE TAP WITHOUT RECEIVING LIFELINE

While TAP and Lifeline benefits are generally provided at the same time when an eligible customer subscribes to landline telephone service and the provisioning carrier is an incumbent local exchange carrier, this is not the case when Lifeline benefits are provided on wireless service. With wireless service, an eligible customer receives Lifeline benefits without TAP credits, because Minnesota law does not enable wireless carriers to provide TAP benefits. In such cases, the eligible customer may simultaneously receive TAP credits through a subscription to landline service.

CenturyLink is in a similar position to competitive local exchange carriers (CLECs) when a customer is seeking TAP credits, but not Lifeline credits. Under Minnesota law, CLECs are required to provide TAP, but only those CLECs that have been designated as an eligible telecommunications carriers (ETC) provide Lifeline credits.

B. SUMMARY OF CONSUMER COMPLAINTS WITH CENTURYLINK

The Commission initiated its investigation in the current docket in response to Lifeline and TAP complaints filed with the Commission's Consumer Affairs Office (CAO) by residential customers of CenturyLink. The Department has also received numerous Lifeline and TAP complaints and inquiries from residential customers of CenturyLink.

In the review of the Lifeline and TAP complaints filed with the Commission during the years 2011 through 2017, as well as those filed with the Department during 2013 through 2018, the complaints appear to fall into the following categories, which are not listed in any particular order. An individual complaint sometimes includes several of these categories:

- A. TAP/Lifeline application mistakenly sent to PUC.
- B. General questions about TAP/Lifeline program, application, recertification process.
- C. Request for TAP/Lifeline application or information.
- D. Questions or problems about switching carriers.
- E. Problems in communicating with CenturyLink regarding TAP/Lifeline.
- F. Problems or delays encountered with CenturyLink processing application.
- G. Problems or delays encountered with CenturyLink processing recertification.
- H. TAP/Lifeline credits eliminated from monthly bill.
- I. Customer never received recertification form or received form late.
- J. Problems with TAP/Lifeline credit (other than with application or recertification) or problem not specified in complaint.

K. Problems with recertification not related to CenturyLink

During the period from 2011 through 2018, 39% of all the Lifeline/TAP complaints and inquiries made to the Commission and Department involved problems in communicating with CenturyLink. During that same period, 32% of the complaints and inquiries involved problems in processing recertification forms and 32% involved loss of Lifeline/TAP credits during the recertification process. See Attachment 1 for a summary of CenturyLink Lifeline/TAP complaints filed with the Commission and Department.

A discussion of two representative complaints provides an illustration of the issues in the Lifeline/TAP complaints.

In the first case, the Department received a complaint from a residential CenturyLink customer on or about June 6, 2017. **[TRADE SECRET DATA HAS BEEN EXCISED]**⁶

The June 6, 2017 complainant sought the Department's assistance in obtaining Lifeline and TAP benefits from CenturyLink. On July 20, 2017, the complainant informed the Department that USAC declined to remove the one-year Lifeline port freeze.⁷ The complainant requested the Department's assistance in obtaining Lifeline and TAP benefits through CenturyLink.

To resolve the June 6, 2017 complaint, in addition to two other related complaints with the TAP credit being denied unless the consumer also received the Lifeline credit, the Department engaged in discussions with CenturyLink personnel. Specifically, CenturyLink and the Department discussed providing TAP benefits to customers even though they receive the Lifeline benefit from another provider, or the customer is in a port freeze period with that other provider for Lifeline benefits. At that time, the Department and CenturyLink reached agreement, but a filing was not submitted with the Commission to memorialize that agreement, since the current investigation was opened before the agreement was filed.

⁶ The complainant stated that, when she applied for Lifeline and TAP benefits from CenturyLink, her request was denied because her Lifeline benefits were going to Assurance Wireless. The complainant also stated that, while she had subscribed to wireless service from Assurance Wireless, she never agreed that her Lifeline benefits should be provided through Assurance Wireless. While the complainant received Lifeline benefits through Assurance Wireless, she received no TAP credits through the carrier. The complainant attempted to cancel her Assurance Wireless service around March of 2017, but was ignored by the carrier. On or about June 1, 2017, the complainant again contacted Assurance Wireless and had her service cancelled. At that time, Assurance Wireless placed a one-year port freeze on her Lifeline benefits.

⁷ Subsequent to contacting the Department, the complainant contacted the customer assistance representatives at the Universal Service Administrative Company ("USAC") in an attempt to have the Lifeline port freeze removed from her Assurance Wireless account.

The Department recommends that CenturyLink be directed to 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. CenturyLink should also be directed to file documentation showing the length of time in which each affected customer was denied TAP benefits, and whether the customer is currently enrolled in TAP. The Commission may wish to require CenturyLink to provide a credit to any customers for which it did not provide the TAP credit, when it was obligated to so. The Department also recommends that the Commission memorialize through its Order that CenturyLink is required to provide TAP benefits to eligible customers even though they receive the Lifeline benefit from another provider.

In a second case, the Department received a complaint from the daughter of a residential CenturyLink customer on October 9, 2017. **[TRADE SECRET DATA HAS BEEN EXCISED]**

The Department recommends that CenturyLink ensure all employees have the appropriate training so no other customer is given erroneous information.

C. CENTURYLINK'S DEFINITION OF A COMPLAINT AND THE COMPLAINT INFORMATION CENTURYLINK RETAINS

Minnesota Administrative Rule 7810.1200 states:

Each utility shall keep a record of all complaints received by it from its customers which shall be classified as directed by the Public Utilities Commission. The record shall show the name and address of the customer, the date and nature of the complaint, and its disposition and date thereof. The utility shall keep records of the customer complaints in such a manner as will enable it to review and analyze its procedures and actions.

In response to a Department information request, CenturyLink provided information regarding TAP complaints filed with CenturyLink, by Minnesota customers, over the past two years. In its response CenturyLink stated that it 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 or intervention by CenturyLink executives, outside agencies (such as regulatory bodies, elected officials, the Better Business Bureau or the media) are considered complaints and are handled accordingly.

CenturyLink's definition of what constitutes a complaint is very narrow and precludes the collection of data that would enable it to review and analyze its procedures and actions. The summary of the individual complaints contained little detail on which to base a conclusion, and CenturyLink's definition of "complaint" excludes numerous cases that would constitute complaints under a broader definition. The Commission should consider clarifying how the

term “complaint” should be defined to reduce the gamesmanship that otherwise can occur. The Department offers the following definition for the Commission’s consideration:

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.

D. REGULATORY COMPLIANCE ISSUES

CenturyLink’s response to the October 9, 2017 complaint, along with the Department’s review of other Lifeline/TAP complaints and inquiries raises three concerns

Minnesota Statute section 237.71 and Minnesota Rule 7817.0200 and 7817.0400, subpart 1

CenturyLink is required, under the Commission rules, to provide accurate and complete information on the TAP program and application process. As discussed above, a significant percentage of complaints filed with the Commission and Department alleged communication problems between customers and CenturyLink. From the years 2011 through 2018, 39% of Lifeline/TAP complaints and inquiries made to the Commission and Department, combined, involved problems in communicating with CenturyLink. The October 9, 2017 customer complaint, discussed above, involved communication errors, which were verified through CenturyLink’s own investigation into that particular complaint.

The provision of complete and accurate Lifeline/TAP information by CenturyLink is mandated by Minnesota law and is a necessary prerequisite to administering a successful TAP program that fulfills the needs of eligible customers. The Department recommends that CenturyLink be directed to file a plan with the Commission for training and promoting the TAP program among its own employees so as to enable the Commission to achieve its statutory goal of making the TAP program available to eligible Minnesotans.

Minnesota Statute section 237.70, subdivision 7(c) and 237.71 and Minnesota Rules part 7817.0400, subpart 8A.

CenturyLink is required, under Minnesota law and the Commission rules, to begin providing telephone assistance credits to an applicant in the earliest possible billing cycle but not later

that the second billing cycle following the submission of a completed application demonstrating eligibility.

The review of Lifeline/TAP complaints filed by CenturyLink customers who have filed (sometimes multiple) applications and waited for months with no response from CenturyLink, raises the issue of compliance with the statutory and regulatory mandate for CenturyLink to provide TAP credits promptly.

The Department recommends that CenturyLink be directed to 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.”

Minnesota Rule 7817.0400, subpart 8B, 7817.0600, subpart 2, and 7817.1000, subpart 1.

CenturyLink is required, under the Commission rules, to “*send written notification to the recipient [of credits] stating the reasons for finding the recipient ineligible and advising the recipient of the right to appeal. A local service provider may terminate credits if: A. the recipient does not submit an appeal within 60 days of the date of the notice; or B. the recipient submits an appeal and the commission determines that the recipient is not eligible.*” Emphasis added.

The Department has reviewed the written notice sent by CenturyLink to Minnesota TAP recipients. A copy of the template for this notice is included as Attachment 2. While the notice provides “the reasons for finding the recipient ineligible,” the notice is not satisfactorily fulfilling its statutory and regulatory duty to “*advise the recipient of the right to appeal.*” A review of Lifeline/TAP complaints filed with the Commission and Department includes numerous complaints from CenturyLink customers who indicate that the first notice of loss of TAP benefits occurred when customers reviewed their monthly bills and realized that the TAP credit suddenly disappeared from the bills. In such situations, customers no longer have the option to appeal the loss of TAP benefits before the loss occurs, and are forced to reapply for TAP benefits anew.

A review of the individual complaints provides no indication that any of the Lifeline/TAP complainants were aware of their right to appeal a finding of ineligibility for TAP benefits by CenturyLink or an awareness of the 60 day notice period before the prospective termination of TAP benefits. Without a reference to the right of appeal and the 60 day notice in the written letter sent by CenturyLink to TAP applicants, the Department can find no means by which Minnesota customers would be made aware of these two regulatory requirements.

The Department recommends that CenturyLink be directed to 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 and giving them 60 days in which to file appeals, in compliance with Minnesota Rule 7817.0400, subpart 8B. 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, pursuant to Minnesota Rule 7817.0600, subpart 2.

V. ALTERNATIVES

1. Direct Qwest Corporation dba CenturyLink to take the following actions within 30 days of the Commission's Order:
 - 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.
 - 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."
 - C. Provide TAP benefits to eligible customers even though they receive the Lifeline benefit from another provider,
 - 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.
 - 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.
2. Provide the following clarification on what constitutes a complaint as provided in Minnesota Rule 7817:

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.

3. CenturyLink is required to provide TAP benefits to eligible customers even though they may receive the Lifeline benefit from another provider.
4. Take other action as the Commission deems appropriate.
5. Take no action at this time.

VI. RECOMMENDATION

The Department recommends adoption of Alternatives 1, 2 and 3.

CenturyLink
PO Box 4918
Monroe, LA 71211



Customer Name
Address
City, State ZIP

**CENTURYLINK LIFELINE
NOTIFICATION**

Ref #: (BTN/BAN)

Dear (Customer Name):

Our goal at CenturyLink® is to offer products that meet your communications needs and to provide timely information regarding changes or events that impact your service.

We are writing to let you know that we received your recent Lifeline program application. Unfortunately, the application was received incomplete; therefore, we are unable to qualify you for Lifeline discounts at this time.

The returned application was rejected due to the following reason(s):

{Enter rejection reason here from table}

Enclosed with this letter you will find a new Lifeline application. Please complete and return the application, along with copies of the eligibility documentation if you feel you are eligible for Lifeline and wish to reapply.

When completing the Lifeline application included with this letter, please be sure to follow the Application Checklist below. If any of the steps below are missed, your application may be rejected.

1. Signed and completed Lifeline application form.
2. If applying based on program eligibility, a copy of a program approval letter or other social service agency documentation showing current participation. Documentation for at least one program is necessary as proof of eligibility.
3. If applying based on the size and income level of customer's household¹, 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

Thank you for choosing CenturyLink to meet your communications needs.

Master Rejection Reasons Lifeline - (Cons)

Created: July 10, 2017

Updated: November 10, 2017

Document Contents:

Overview

[Reject Reasons](#)

States: ALL

Business Unit: Consumer

Reject Reasons

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Form #:	Rejection Reason	Vendor Action	Verbiage	Spanish Translation
1	Page 3 Statements not Initialed.	Add proper verbiage to letter. Send new state application.	Account holder must initial each statement on page 3 of the application.	El titular de la cuenta debe inicializar cada declaración en la página 3 de la solicitud.
2	Current proof of assistance	Add proper verbiage to letter. Send new state application.	A copy of your current proof of assistance is required. Documentation must have current effective dates as well as the participants name and address.	Se requiere una copia de la prueba actual de la asistencia . La documentación debe tener fechas de vigencia actuales, así como el nombre y la dirección de los participantes.
3	Copy of Medicaid card	Add proper verbiage to letter. Send new state application.	A copy of your recent Medicaid Approval Letter is required. (Medicare is not a qualifying program.) The approval letter should contain the participants name, address and current effective dates.	Se requiere una copia de su reciente Carta de Aprobación de Medicaid . (Medicare no es un programa de clasificación.) La carta de aprobación debe contener el nombre de los participantes , la dirección y actuales fechas de vigencia
4	Most recent individual tax return	Add proper verbiage to letter. Send new state application.	A copy of your most recent Individual Tax Return (Form 1040, 1040A, or 1040EZ) is required.	Se requiere una copia de su Declaración Individual de Impuestos más reciente (Formulario 1040, 1040A, ó 1040EZ).
5	NO LONGER USED			
6	DOB not included	Add proper verbiage to letter. Send new state application.	Date of Birth was not included on application.	La Fecha de Nacimiento no fue incluida en la aplicación
7	SSN not included	Add proper verbiage to letter. Send new state application.	The last four digits of your social security number (Tribal identification number) were not included on the application.	Los últimos cuatro dígitos de su número de seguro social (número de identificación Tribal) no fueron incluidos en la aplicación.
8	Proof of	Add proper verbiage to letter.	Proof of assistance not identified on	Una prueba de asistencia no fue identificada en la

	assistance not checked on application	Send new state application.	application.	aplicación.
9	Number in Household missing	Add proper verbiage to letter. Send new state application.	The number of household members must be included when qualifying under the income guidelines.	El número de miembros del hogar debe ser incluido cuando se está calificando bajo los lineamientos de ingresos.
10	Documentation does not match acct holder name	Add proper verbiage to letter. Send new state application.	The documentation provided does not match the name of the account holder. If qualifying member of household is not the account holder, please include the name of the qualifying household member in the appropriate portion of the application. The Account Holder must complete and sign the application.	La documentación proporcionada no coincide con el nombre del titular de la cuenta. Si el miembro del hogar que califica no es el titular de la cuenta, por favor incluya el nombre del miembro del hogar que califica en la parte correspondiente de la aplicación. El Titular de la Cuenta debe completar y firmar la aplicación.
11	No match on acct name	Add proper verbiage to letter. Send new state application.	The name of the person applying for Lifeline does not match the name on the bill for this account.	El nombre de la persona que está aplicando para Lifeline no coincide con el nombre en la factura de esta cuenta.
12	No match on phone number.	Add proper verbiage to letter. Send new state application.	The telephone number you provided could not be found in our records. Please be sure you have provided the correct area code and telephone number for your home. To establish or move service, please call CenturyLink at 1-800-244-1111 Monday through Friday between 8:00 a.m. and 6:00 p.m.	El número de teléfono que usted proporcionó no pudo encontrarse en nuestros registros. Por favor asegúrese de haber proporcionado el código de área y número de teléfono correctos para su hogar. Para establecer o cambiar el servicio, por favor llame a CenturyLink al 1-800-244-1111, de lunes a viernes, de 8:00 a.m. a 6:00 p.m.
13	No phone number provided	Add proper verbiage to letter. Send new state application.	You did not provide your home telephone number. If you do not yet have phone service, please call CenturyLink at 1 800-244-1111 to order your service, and then include your new	Usted no proporcionó el número de teléfono de su casa. Si todavía no tiene servicio telefónico, por favor llame a CenturyLink al 1 800-244-1111 para ordenar su servicio, y después incluya su nuevo número de teléfono en su aplicación. (Asegúrese de que el representante de servicio sepa que

			phone number on your application. (Be sure to let the service representative know that you will be applying for Telephone Assistance.)	usted va a solicitar Asistencia Telefónica.)
14	Local svc not provided by CenturyLink	Add proper verbiage to letter. Do not send new state application. REP ACTION: If you wish to send an application to this customer a manual Rejection Letter must be completed.	Your local telephone service is not provided by CenturyLink. No need to complete another application.	Su servicio telefónico local no es proporcionado por CenturyLink. No es necesario completar otra aplicación.
15	No Signature on Application	Add proper verbiage to letter. Send new state application.	Application must be signed by account holder.	La aplicación debe estar firmada por el titular de la cuenta.
16	Old application	Add proper verbiage to letter. Send new state application.	The FCC has made certain revisions to the Lifeline program that became effective December 2, 2016. As a result, we need additional information from you before we can determine your Lifeline eligibility status. The application you have provided does not request this additional information. In order for us to meet these new obligations we need you to complete the enclosed revised Lifeline application form.	La FCC ha hecho ciertas revisiones al programa Lifeline que entró en vigencia el 2 de diciembre de 2016. Por este motivo, necesitamos información adicional de su parte antes de que podamos determinar su elegibilidad para Lifeline. La aplicación que usted proporcionó no solicita esta información adicional. Para que podamos cumplir con estos nuevos requisitos, necesitamos que complete el formulario revisado de aplicación para Lifeline adjunto.
17	Svc not in Tribal Land location	Add proper verbiage to letter. Send regular state application.	Your service address is not located in an approved Tribal Land location.	Su dirección de servicio no se localiza en una ubicación de tierra Tribal aprobada.
18	Send Tribal Application	Add proper verbiage to letter. Send Tribal application, not State application.	Our records indicate your service address is on Tribal land. A Tribal Application must be completed and returned to our office along with supporting documentation. A copy of the required Tribal Application is enclosed.	Nuestros registros indican que su dirección de servicio se encuentra en una tierra Tribal. Una Aplicación Tribal debe ser completada y devuelta a nuestra oficina junto con la documentación de apoyo. Se adjunta una copia de la Aplicación Tribal requerida.
19	NO LONGER			

	USED			
20	Cass County	Add proper verbiage to letter. Send new state application.	Cass County Social Services letter is not a qualifying document. Please provide a copy of your current proof of assistance. Documentation must have current effective dates.	La carta de Servicios Sociales de Cass County no es un documento para calificar. Por favor proporcione una copia de su prueba de asistencia actual. La documentación debe tener fechas de vigencia actuales.
21	NE TAP	Add proper verbiage to letter.	Please contact the Nebraska Telephone Assistance Program at 800 526-0017 to apply for Lifeline benefits. No application available.	Por favor comuníquese con el Programa de Asistencia Telefónica de Nebraska al 800 526-0017 para solicitar los beneficios de Lifeline. No hay ninguna aplicación disponible.
22	NO LONGER USED			
23	OR TAP	Add proper verbiage to letter.	Please contact the Oregon Telephone Assistance Program at 800 848-4442 to apply for Lifeline benefits. No application available.	Por favor comuníquese con el Programa de Asistencia Telefónica de Oregon al 800 848-4442 para solicitar los beneficios de Lifeline. No hay ninguna aplicación disponible.
24	TX Dept of Social Svc	Add proper verbiage to letter.	Please contact the Department of Human Services at 866 454-8387 to apply for Lifeline benefits. No application available.	Por favor póngase en contacto con el Departamento de Servicios Humanos en 866 454-8387 para solicitar beneficios Supervivencia. No hay ninguna aplicación disponible.
25	UT Department of Community and Culture	Add proper verbiage to letter.	Please contact the Department of Community and Culture at 1 800 948-7540. No application available.	Por favor comuníquese con el Departamento de Comunidad y Cultura al 1 800 948-7540. No hay ninguna aplicación disponible.
26	WI Homestead	Do not send Rejection Letter. Only send WI Homestead Tax Form instead of WI Lifeline application.		
27	WTAP Denial Letter – NO LONGER USED	Send WTAP Denial Letter and not the Rejection Letter		

		Send WA Lifeline application		
28	KS State Certification Application – NO LONGER USED	No verbiage – send KS Auto Enroll application instead of regular application.		
29	NV State Certification Application – NO LONGER USED	No verbiage – send NV Auto Enroll application instead of regular application.		
30	Send MT Medicaid Application	No verbiage – send MT Medicaid application instead of regular application.		
31	USAC Duplicate Lifeline Benefits	Add proper verbiage to letter. Send USAC Letter & state application	Our records indicate that you are currently receiving lifeline credits with another telephone provider. Please complete and return to our office the signed Attestation Letter.	Nuestros registros indican que actualmente usted está recibiendo créditos de Lifeline con otro proveedor de servicio telefónico. Por favor complete y envíe a nuestra oficina la Carta de Certificación firmada.
32	Transfer of Benefit Denied	Add proper verbiage to letter and send a new state application.	The National Lifeline Accountability Database (NLAD) administered by Universal Service Administrative Company (USAC), shows that you are currently receiving Lifeline benefits from another provider. In order to obtain Lifeline benefits from CenturyLink, you will need to cancel your Lifeline benefits with the other provider and reapply for Lifeline with CenturyLink. Once you no longer have Lifeline with the other provider, please complete the new Lifeline application and provide new copies of supporting documentation.	La Base de Datos Nacional de Rendición de Cuentas Lifeline (NLAD), administrado por la Compañía Administrativa de Servicio Universal (USAC), muestra que actualmente recibe beneficios de Lifeline de otro proveedor. Con el fin de obtener beneficios de Lifeline de CenturyLink, tendrá que cancelar los beneficios de Lifeline con el otro proveedor y volver a solicitar Lifeline con CenturyLink. Una vez que ya no tienen Lifeline con el otro ofrecen, por favor complete la nueva aplicación de Lifeline y enviar una nueva copia de la documentación de apoyo.
33	Less than 18 Years of Age	Add proper verbiage to letter and send a new state application.	The Lifeline subscriber must be the account holder of the CenturyLink account. To be a CenturyLink account holder or a Lifeline recipient, you must be 18 years of age or older, or an emancipated minor. Please have the	El suscriptor Lifeline debe ser el titular de la cuenta de la cuenta de CenturyLink. Para ser titular de una cuenta de CenturyLink o un destinatario Lifeline, usted debe tener 18 años de edad o más, o un menor emancipado. Por favor, tenga en cuenta el soporte completo y enviar la

			account holder complete and submit the Lifeline application or send proof of emancipation if you would like to be approved for Lifeline.	solicitud de Lifeline o enviar prueba de emancipación si usted desea para ser aprobado para Lifeline.
34	TPIV Failure	Add proper verbiage to letter and send a new state application.	CenturyLink submitted your information to the National Lifeline Accountability Database administered by USAC (The Universal Service Administrative Company which is designated by the FCC to administer Lifeline), but USAC denied your request for Lifeline Assistance because there has been a problem validating the last four digits of the social security number and/or the date of birth provided on your application. CenturyLink was not provided any information on the exact cause of the validation failure, but as a result we are unable to process your application for Lifeline discounts on your telephone service. Although we cannot provide you with the Lifeline discounts you requested, your CenturyLink telephone service will continue without interruption. If you'd like to re-apply for Lifeline discounts, please ensure that the date of birth and the last four digits of the social security number you provide on the Lifeline application are those of the CenturyLink account holder who is applying for Lifeline service. If you re-apply, in addition to completing a new application and providing documentation of program or income eligibility you will also need to provide documents that verify the account holder's date of birth and social security number, such as a copy of a driver's license, a birth certificate, and a social security card.	CenturyLink presentó su información para la Base de Datos Nacional de Rendición de Cuentas Lifeline administrado por la USAC (El Universal Service Administrative Company que es designado por la FCC para administrar Lifeline) , pero USAC negó su solicitud de Lifeline Assistance porque no ha habido un problema de validación de los últimos cuatro dígitos de el número de seguro social y / o la fecha de nacimiento proporcionado en su solicitud. CenturyLink no se proporcionó ninguna información sobre la causa exacta del fallo de validación , pero como resultado no hemos podido procesar su solicitud de descuentos Lifeline en su servicio telefónico. Aunque no podemos proporcionarle los descuentos Lifeline requeridos , su servicio telefónico CenturyLink continuará sin interrupción. Si desea volver a solicitar descuentos Lifeline , asegúrese de que la fecha de nacimiento y los últimos cuatro dígitos del número de seguro social que usted proporciona en la solicitud de Lifeline son los del titular de la cuenta CenturyLink que solicita el servicio Lifeline . Si vuelve a aplicar , además de completar una nueva solicitud y proporcionar la documentación del programa o la elegibilidad de ingresos también tendrá que proporcionar documentos que verifiquen la fecha de la titular de la cuenta de nacimiento y número de seguro social, como una copia de la licencia de conducir , un certificado de nacimiento , y una tarjeta de seguro social.
35	Duplicate Address	Add proper verbiage to letter and send a new state application.	The National Lifeline Accountability Database indicates there is already a Lifeline benefit being given at this address. If you are a separate	La Base de Datos Nacional de Rendición de Cuentas Lifeline indica que ya existe un beneficio Lifeline está dado en esta dirección. Si usted es una casa independiente de los beneficios de

			household from the household receiving Lifeline benefits, please be sure to complete the last page of the application attesting to your Independent Household status.	Lifeline recepción hogar, por favor asegúrese de completar la última página de la solicitud que acredite su condición de hogar independiente.
36	NJ LL DB Denial	Add proper verbiage to letter and send a new state application.	The New Jersey Lifeline Database denied your request for Lifeline. You may attempt to apply for Lifeline under the Federal Public Housing Assistance (FPHA)/Section 8 or the National School Lunch Program's Free Lunch Program that require proof of participation or by providing proof of Income level. For questions on the denial, please contact your local DSHS.	La base de datos de Nueva Jersey Lifeline negó su solicitud para Lifeline . Usted puede intentar solicitar Lifeline bajo la Asistencia Pública Federal de la Vivienda (FPHA) Programa de Almuerzo Gratuito del Programa Nacional de Almuerzos Escolares / Sección 8 o que requieren prueba de la participación o por presentar la prueba de nivel de ingresos . Para preguntas sobre la negación , por favor póngase en contacto con su local de DSHS
37	NV LL Referral	Add proper Verbiage to letter. No application attacked.	In order to obtain the Lifeline benefit on your CenturyLink phone, please contact Solix at their website below. URL: http://www.nvlifeline.org/	Con el fin de obtener el beneficio de Lifeline en su teléfono CenturyLink , por favor póngase en contacto con Solix en su sitio web a continuación. URL: http://www.nvlifeline.org/
38	WI DB Failure	Add proper verbiage to letter and send a new state application.	CenturyLink is required to verify all Lifeline subscribers' eligibility for the Lifeline by querying the Wisconsin Lifeline Database. Unfortunately, the query identified that you are not participating in one of the Lifeline-qualifying programs or that your income does not meet the Lifeline qualifications; therefore, we are unable to certify you for Lifeline discounts at this time.	CenturyLink es necesaria para verificar la elegibilidad todos los suscriptores de Lifeline 'dentro de la línea de vida mediante la consulta de la base de datos de Wisconsin Lifeline. Por desgracia, la consulta identificó que no está participando en uno de los programas Lifeline - calificación o que sus ingresos no cumple con los requisitos de Lifeline; Por lo tanto, no somos capaces de certificar que los descuentos de Lifeline en este momento.
39	Broadband speed not eligible	Add proper verbiage to letter and send a new state application.	The broadband requirements for receiving the Lifeline discount are for speeds of 15 Mbps download and 2 Mbps Upload speed or higher.	Los requisitos de banda ancha para recibir el descuento Lifeline son para velocidades de 15 Mbps de descarga y 2 Mbps Velocidad de carga o superior.
40	State Only Program	Add proper verbiage to letter and send a new state application.	The program selected or proof supplied is good for the State only Telephone Assistance discount. To receive the Federal Lifeline discount please reapply based on one of the federal programs or by an income level of 135% of the Federal Poverty level as described on	El programa seleccionado o pruebas que aporte es bueno para el Estado sólo Teléfono de Asistencia de descuento. Para recibir el descuento Federal Lifeline por favor, vuelva a aplicar sobre la base de uno de los programas federales o por un nivel de ingresos del 135% del nivel federal de pobreza como se describe en la solicitud.

			the application.	
41	PBB not eligible for State	Add proper verbiage to letter and send a new state application.	The state only program you selected is not eligible for broadband service.	El estado único programa que ha seleccionado no es elegible para el servicio de banda ancha.
42	Household Wksht Not Complete	Add proper verbiage to letter and send a new state application.	Lifeline application incomplete. Please complete all sections including the Lifeline Household Worksheet located after the Income section of the application.	La aplicación de Lifeline es incompleta. Por favor complete todas las secciones incluyendo la Hoja de Trabajo del Hogar Lifeline ubicada después de la sección de Ingresos de la aplicación.
43	Port Freeze Transfer Denial	Add proper verbiage. NO APPLICATION NECESSARY REP ACTION: Enter date that customer is eligible to transfer in OTHER field.	DOCS/CMS VERSION: The National Lifeline Accountability Database (NLAD) administered by the Universal Service Administrative Company (USAC) on behalf of the Federal Communications Commission (FCC) has identified that you are currently subject to a port freeze with your current or previous Lifeline provider. You will be eligible to port your Lifeline to a new provider on or after: COPY AND PASTE VERSION (Other Field): USAC has identified that you are currently subject to a port freeze with your previous Lifeline provider. You will be able to port your Lifeline after: MM/DD/YYYY	DOCS/CMS VERSION: La National Lifeline Accountability Database (NLAD), administrada por la Comisión Administrativa de Servicio Universal (USAC) en nombre de la Comisión Federal de Comunicaciones (FCC), ha identificado que usted está actualmente sujeto a un congelamiento de puertos con su proveedor actual o anterior. Usted será elegible para portar su Lifeline a: COPY AND PASTE VERSION (Other Field): USAC ha identificado que actualmente está sujeto a un congelamiento de puertos con su proveedor de Lifeline anterior. Usted será capaz de portar su Lifeline después de: MM / DD / AAAA
44	MN TAP	Add proper verbiage to letter and send a new state application.	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.	Usted no es elegible para el descuento Federal Lifeline de CenturyLink en este momento; Sin embargo usted es elegible para el descuento de Minnesota State Telephone Assistance de \$ 3.50 que se aplicará a su cuenta.
45	NV Not Found/Complete	Add proper verbiage to NV reject letter and send new NV application. (LI_App &	CenturyLink submitted your information to the National Lifeline Accountability Database administered by USAC (The	CenturyLink envió su información a la base de datos National Lifeline Accountability administrada por USAC (The Universal Service Administrative

		LI_Work)_	Universal Service Administrative Company which is designated by the FCC to administer Lifeline), but USAC denied your request for Lifeline Assistance because they did not find a completed application with the National Verifier. Please use the attached form to apply for the Lifeline program via the National Verifier or you can apply online at www.CheckLifeline.org .	Company designada por la FCC para administrar Lifeline), pero USAC rechazó su solicitud de Lifeline Assistance porque no encontraron una solicitud completa con National Verifier. . Utilice el formulario adjunto para solicitar el programa Lifeline a través del National Verifier o puede presentar una solicitud en línea en www.CheckLifeline.org .
46	NV Pending	Add proper verbiage to the NV reject letter. Do not send application.	CenturyLink submitted your information to the National Lifeline Accountability Database administered by USAC (The Universal Service Administrative Company which is designated by the FCC to administer Lifeline), but USAC identified that your application with the National Verifier is still pending. Please contact the National Verifier Customer Support at (800) 234-9473.	CenturyLink envió su información a la Base de datos nacional de responsabilidad vitalicia administrada por USAC (The Universal Service Administrative Company, designada por la FCC para administrar Lifeline), pero USAC identificó que su solicitud con National Verifier aún está pendiente. Comuníquese con Atención al cliente de National Verifier al (800) 234-9473.
47	NV – Duplicate BQP	Add proper verbiage to NV reject letter. Do not send application.	CenturyLink submitted your information to the National Lifeline Accountability Database administered by USAC (The Universal Service Administrative Company which is designated by the FCC to administer Lifeline), but USAC identified that the Benefit Qualifying Person is duplicate of another Lifeline recipient. Please contact the National Verifier Customer Support at (800) 234-9473.	CenturyLink envió su información a la base de datos nacional Lifeline Accountability administrada por USAC (The Universal Service Administrative Company, designada por la FCC para administrar Lifeline), pero USAC identificó que la persona calificada es duplicada de otro receptor de Lifeline. Comuníquese con Atención al cliente de National Verifier al (800) 234-9473.
48	NV – DeEnroll Error	Send special NV DeEnrolled in Error letter and new NV application.(LI_App & LI_Work)_		
49	NV – Benefit Transfer No App	Send special NV reject letter and application.(LI_App & LI_Work)_	CenturyLink submitted your information to the National Lifeline Accountability Database administered by USAC (The Universal Service Administrative Company which is designated by the FCC to administer Lifeline), but USAC identified that your application with the National Verifier is no longer valid. Please use the attached form to apply	CenturyLink envió su información a la Base de Datos Nacional de Responsabilidades de Lifeline administrada por USAC (The Universal Service Administrative Company designada por la FCC para administrar Lifeline), pero USAC identificó que su solicitud con National Verifier ya no es válida. Utilice el formulario adjunto para solicitar el programa Lifeline a través del National Verifier o puede presentar una solicitud en línea en

			for the Lifeline program via the National Verifier or you can apply online at www.CheckLifeline.org . Once you are approved, please return the last page of this letter to CenturyLink at the address at the top of the letter so that we can process your request to transfer your Lifeline benefit to your CenturyLink account.	www.CheckLifeline.org . Una vez que lo aprueben, envíe la última página de esta carta a CenturyLink a la dirección que figura en la parte superior de la carta para que podamos procesar su solicitud de transferencia de su beneficio de Lifeline a su cuenta de CenturyLink.
50	NV – Benefit Transfer Form	Send NV Benefit Transfer Approval Form.		
51	NV - Old Application	Send special NV reject letter and application (LI_App & LI_Work)_	The FCC has established a new Lifeline administrator effective December 5, 2017. The National Verifier will assist you become approved for the Lifeline program. In order to avoid any confusion we ask that you please complete and return the attached National Verifier Lifeline application and Household Worksheet along with proof of eligibility to the address on the application.	La FCC estableció un nuevo administrador de Lifeline a partir del 5 de diciembre de 2017. National Verifier lo ayudará a obtener la aprobación para el programa Lifeline. Para evitar cualquier confusión, le pedimos que complete y devuelva la aplicación National Verifier Lifeline y la Hoja de trabajo del hogar junto con el comprobante de elegibilidad a la dirección que figura en la solicitud.
52	NV – NOT NV State	Send normal rejection letter and state specific application.	We do not have a valid application on file for you. Please complete and return the attached application to the address on the application.	No tenemos una solicitud válida archivada para usted. Complete y devuelva la aplicación adjunta a la dirección que figura en la solicitud.
OTHER FIELD	Remote Call Forwarding	Add proper verbiage to letter and send a new state application.	Remote Call Forwarding is not an eligible voice line under the Lifeline program.	Remoto Desvío de llamadas no es una línea de voz elegible bajo el programa Lifeline.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. P421/C-17-796

Dated this 13th day of March 2018

/s/Sharon Ferguson

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@mnlsap.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