



Jason D. Topp
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July 27, 2016

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 Telephone Assistance Plan (TAP) Review
Docket No. P-999/CI-16-302

Dear Mr. Wolf:

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

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosure

cc: Service List

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

www.centurylink.com

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

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

**Re: In the Matter of Telephone Assistance Plan (TAP) Review
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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 27th day of July, 2016, she e-filed a true and correct copy of Qwest Corporation dba CenturyLink QC's Comments by posting it on www.edockets.state.mn.us. Said document was also served on the service list via U.S. mail and e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel _____
Dianne Barthel

Subscribed and sworn to before me
this 27th day of July, 2016.

/s/ LeAnn M. Cammarata _____
Notary Public

My Commission Expires Jan 31, 2020

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**In the Matter of Telephone Assistance Plan
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QWEST CORPORATION DBA CENTURYLINK QC'S COMMENTS

Qwest Corporation dba CenturyLink QC ("CenturyLink QC") submits these comments in response to the Commission's Notice of Comment Period issued May 25, 2016. The Commission requested comments on four issues related to the Minnesota Telephone Assistance Plan as a result of the FCC's Order changing the federal Lifeline program.

1. Should the Commission issue any clarifications with respect to TAP eligibility?

CenturyLink agrees with AT&T's comments regarding the changes to the federal Lifeline program eligibility rules. Minnesota Statute § 237.70(4)(a) states that Minnesota TAP is only available to a "residential household in Minnesota that is eligible for the federal Lifeline telephone service discount." Since the federal Lifeline rules will eliminate TANF as a federal Lifeline eligibility program, and the Minnesota Family Investment Program (MFIP) is the Minnesota TANF program, MFIP recipients will no longer be eligible for Lifeline on December 1, 2016.

Although MFIP will no longer be a Lifeline-eligible program, the FCC estimates that nationally only 1.20 percent of current Lifeline consumers enroll through participation in

TANF,¹ and concludes that “[the remaining Lifeline-eligible] programs target a wide variety of low-income consumers in different age and life situations, thereby alleviating commenters’ concerns of ‘eligibility gaps’ resulting from limiting Lifeline eligibility.”²

2. Should the Commission issue any other clarifications in an Order regarding TAP? If any clarifications should be made, please cite to relevant portions of Minnesota Statutes Chapter 237 or other relevant law.

The FCC’s Lifeline Order decouples the federal Lifeline program from the Minnesota TAP because the Order expanded Lifeline to broadband service and phases out voice service credits. Minnesota legislators and the Commission need to identify the policy direction for TAP. Should it continue? If so, should it support voice, broadband or both? Regardless of the direction chosen, updates will be needed to at least the Commission Rules and could require Minnesota Statute changes as well.

3. Should other changes to the TAP program, its administration, participation rates, or funding levels be considered as a result of the FCC Lifeline Modernization Order? If so, what specific steps would be required to make any such change?

CenturyLink supports AT&T’s encouragement for “the state of Minnesota to work with interested industry members, USAC, the FCC, and others to look for opportunities to use the National Lifeline Eligibility Verifier to perform consumer TAP eligibility verifications and recertifications in order to increase TAP program efficiency and minimize provider costs and burdens.”³ The changes required by the FCC’s Lifeline Order will require substantial systems and process changes, time-consuming training updates and participant education for both the

¹ See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support and Connect America*, FCC-16-38, WC Docket Nos. 11-42, 09-197, and 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration (rel. Apr. 27, 2016), ¶ 190, n498.

² *Id.* at ¶ 191.

³ Comments of AT&T Corp., 3-4.

state and the providers in an effort to minimize consumer confusion to the constantly changing Lifeline landscape over the next five years. Continuing to mirror the federal requirements and certifying eligible participants through a federally available National Verifier will assist in reducing participant confusion during this demanding transition.

Dated this 27th day of July, 2016.

QWEST CORPORATION DBA
CENTURYLINK QC

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