

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben
Joseph K. Sullivan
Valerie Means
Matt Schuerger
John Tuma

Chair
Vice Chair
Commissioner
Commissioner
Commissioner

**In the Matter of a Commission Inquiry into the
Advertising, Outreach, and Offering of Lifeline by
High Cost ETCs**

Docket No. P999/CI-20-747

**COMMENTS OF
FRONTIER COMMUNICATIONS OF MINNESOTA, INC. and
CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC**

On October 7, 202, the Commission issued a *Notice of Comment Period* in this docket inviting comment on the several topics related to the best practices in advertising, outreach, and offering of Lifeline by High Cost Eligible Telecommunications Carriers (“High Cost ETCs”). The Commission specifically sought information regarding:

- How many Lifeline customers each High Cost ETC it is currently serving and identification of any patterns or trends it has seen in Lifeline enrollment for its service area.
- How are High Cost ETCs advertising Lifeline services, with special explanation given to advertising and outreach to diverse populations.
- A sample of Lifeline advertising materials and an explanation of the types of outreach and advertising ETCs use to most effectively reach eligible populations.
- Other observations or experience that High Cost ETCs have about Lifeline that is relevant to the Commission’s inquiry into advertising and outreach?

In response, Citizens Telecommunications Company of Minnesota, LLC (“CTC-MN”) and Frontier Communications of Minnesota, Inc. (“FTR-MN”, collectively “Frontier”) offer the following comments.

Number of Lifeline customers and trends

The following table shows the number of Frontier customers receiving the federal Lifeline customers over the past 6 years as reported to USAC. The federal credit is available to customers

with stand-alone broadband service as well as voice service, whereas the Minnesota Telephone Assistance Plan (“TAP”) credit is only available to customers with voice service.

	FTR-MN	CTC-MN	Total
September 2020	178	331	509
August 2020	179	330	509
July 2020	180	327	507
June 2020	179	331	510
May 2020	179	328	507
April 2020	180	326	506
March 2020	182	328	510
February 2020	187	326	513
January 2020	187	332	519
December 2019	191	342	533
December 2018	252	406	658
December 2017	347	545	892
December 2016	421	629	1050
December 2015	485	699	1184

Methods and examples of Lifeline services advertising

Frontier annually advertises Lifeline and TAP services via notifications in customer bills. In addition, Frontier provides information regarding both programs in its telephone directories, as well as on its website. Information regarding Lifeline is also part of Frontier’s Eligible Telecommunications Carrier advertising in newspapers across its service territory. Examples of those are included in Attachment A.

Dated October 30, 2020

Respectfully submitted,

FRONTIER COMMUNICATIONS OF MINNESOTA, INC.

CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC

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Attachment A