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March 26, 2021

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

Re: *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)*
MPUC Docket No. P-999/CI-17-509

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these comments regarding the timing for mobile wireless Lifeline-only eligible telecommunications carriers (“Mobile Wireless Lifeline-Only ETCs”) to distribute a federal Universal Service Lifeline Program (“Lifeline” or “Lifeline Program”) notice to their newly-enrolled Lifeline Program customers. Because changing the notice period from “within seven days” to “within one month” of Lifeline Program enrollment will not negatively impact mobile wireless customers, the OAG does not oppose the change.

Background

On November 20, 2020, the Minnesota Public Utilities Commission (“Commission”) issued an order requiring Mobile Wireless Lifeline-Only ETCs to distribute a notice to new Lifeline subscribers within seven days of Lifeline Program enrollment.¹ The notice will provide, among other things, a Lifeline Program summary and an explanation of the rights and responsibilities of a Lifeline subscriber.² Parties that support the notice do so because it can provide protections to Minnesota’s low-income consumers,³ increase customer knowledge and improve customer decision-making;⁴ and raise consumer Lifeline Program awareness.⁵ Because

¹ See *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)*, Docket No. P-999/CI-17-509, ORDER ESTABLISHING CUSTOMER NOTICE REQUIREMENT at 7-8 (Nov. 20, 2020) (setting a “within seven days” notice period and delineating the content of the notice).

² *Id.* at 7.

³ Docket No. P-999/CI-17-509, Comments of the Office of the Attorney General at 23 (Sept. 27, 2019).

⁴ Docket No. P-999/CI-17-509, Comments of Legal Service Advocacy Project on Notice of Staff Proposal at 4 (Sept. 25, 2019).

⁵ Docket No. P-999/CI-17-509, Comments of the Minnesota Department of Commerce at 9 (Sept. 27, 2019).

the Lifeline Program serves Minnesota's vulnerable low-income consumers, the OAG initially supported a seven-day notice requirement for Mobile Wireless Lifeline-Only ETCs.⁶

Lifeline Program Workshop

On February 5, 2021, Commission staff held a workshop to discuss the content and distribution of the Lifeline Program customer notice.⁷ During the workshop, the Mobile Wireless Lifeline-Only ETCs discussed the challenges of a seven-day notice period and proposed a "within one month" of Lifeline Program enrollment period for the notice instead. For example, the ETCs noted that a "within one month" requirement would allow them to incorporate the notice into their regular monthly billing cycle, thereby eliminating the need to create a separate administrative process for newly-enrolled Lifeline Program subscribers. The ETCs also noted that aggregating the newly-enrolled Lifeline Program subscribers into a monthly notice cycle would increase the probability that all customers would receive the notice, whereas tracking individual seven-day notice periods would create unnecessary administrative complexity and could increase the chance of a customer notice being missed. Overall, the concerns raised by the Mobile Wireless Lifeline-Only ETCs during the workshop were reasonable and did not compromise the consumer protection goals of the notice.

Conclusion

The timing concerns raised by the Mobile Wireless Lifeline-Only ETCs are reasonable and will not compromise the consumer protection goals of the Lifeline notice. Because changing the notice period from "within seven days" to "within one month" of Lifeline Program enrollment will not negatively impact mobile wireless Lifeline customers, the OAG does not oppose the change.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND

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⁶ See, e.g., Docket No. P-999/CI-17-509, Comments of the Office of the Attorney General at 11 (June 15, 2020) ("[G]iven that Lifeline customers are some of Minnesota's most vulnerable consumers, it is reasonable for the Commission to require a wireless Lifeline-only ETC to distribute a customer notice . . . within seven (7) days of a consumer being enrolled in Lifeline . . .").

⁷ Docket No. P-999/CI-17-509, Notice of Comment Period at 1 (Mar. 3, 2021) (mentioning the February 5, 2021 workshop).

CERTIFICATE OF SERVICE

Re: *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)*
MPUC Docket No. P-999/CI-17-509

I, JUDY SIGAL, hereby certify that on the 26th day of March, 2021, I e-filed with eDockets *a Letter of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_17-509_Official
Jeffrey	Ansted	JAnsted@ambt.net	American Broadband and Telecommunications Company	One Seagate Toledo, OH 43604	Electronic Service	No	OFF_SL_17-509_Official
Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	OFF_SL_17-509_Official
Issa	Asad	issa@quadrantholdings.com	Q LINK	N/A	Electronic Service	No	OFF_SL_17-509_Official
Stephen	Athanson	sathanson@tracfone.com	TracFone Wireless Inc.	9700 NW 112th Avenue Miami, FL 33178	Electronic Service	No	OFF_SL_17-509_Official
Sam	Bailey	Sam.Bailey@iwirelesshome.com	i-Wireless	1 Levee Way Ste 3116 Newport, KY 41071	Electronic Service	No	OFF_SL_17-509_Official
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Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP	Suite 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-509_Official
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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_17-509_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brent	Christensen	brentc@mmta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_17-509_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-509_Official
Regulatory	Contact	N/A	Assurance Wireless	PO Box 5040 Charleston, IL 61920-9907	Paper Service	No	OFF_SL_17-509_Official
Jason	Danowsky	jason@mfofsterlaw.com	FosterLaw	904 West Avenue Ste. 107 Aurora, IL 60009	Electronic Service	No	OFF_SL_17-509_Official
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Melissa	Driskell	Melissa.driskell@telrite.com	Telrite dba Life Wireless	N/A	Electronic Service	No	OFF_SL_17-509_Official
Ron	Elwood	relwood@mrlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_17-509_Official
Vanessa	Favier	consumer.complaints@tracfone.com	Tracfone Wireless, Inc. dba SafeLink Wireless	9700 NW 112th Ave Miami, FL 33178	Electronic Service	No	OFF_SL_17-509_Official
Vanessa	Favier	VFAVIER@tracfone.com	Tracfone Wireless, Inc. dba SafeLink Wireless	9700 NW 112th Ave. Miami, FL 33178	Electronic Service	No	OFF_SL_17-509_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
April	Gilstrap	April.gilstrap@lingo.com	Tempo Telecom, LLC. - LIFELINE Contact	115 Gateway Dr Macon, GA 31210	Electronic Service	No	OFF_SL_17-509_Official
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Angela	Howard	angela.howard@lingo.com	Tempo Telecom (Lingo)	N/A	Electronic Service	No	OFF_SL_17-509_Official
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Bill	Morris	bill.morris@lingo.com	Lingo Communications North, LLC	N/A	Electronic Service	No	OFF_SL_17-509_Official
Scott	Randklev	srandklev@readywireless.com	enTouch Wireless (Boomerang)	N/A	Electronic Service	No	OFF_SL_17-509_Official
Julia	Redman Carter	email.in.another.account@gmail.com	enTouch Wireless	955 Kacena Rd Ste A Hiawatha, IA 52233	Paper Service	No	OFF_SL_17-509_Official
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Electronic Service	No	OFF_SL_17-509_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-509_Official
Javier	Rosado	jrosado@tracfone.com	Tracfone Wireless, Inc. dba SafeLink Wireless	9700 NW 112th Ave Miami, FL 33178	Electronic Service	No	OFF_SL_17-509_Official
Lesli	Rowe	lesli.rowe@viaoneservices.com	Assist Wireless, LLC	3030 Lyndon B Johnson Fwy Ste 1320 Dallas, TX 75234	Electronic Service	No	OFF_SL_17-509_Official
Karen	Russell	karen.russell@telrite.com	Telrite dba Life Wireless	N/A	Electronic Service	No	OFF_SL_17-509_Official
Heather	Russell	regulatory@terraconinc.com	TerraCom, Inc.	710 Cedar Lake Blvd Ste 100 Oklahoma City, OK 73114	Electronic Service	No	OFF_SL_17-509_Official
Karen	Russell	karen.russell@lifewireless.com	Life Wireless	d/b/a Telrite Corporation 11100 Alcovy Road Covington, GA 30014	Electronic Service	No	OFF_SL_17-509_Official
Eric	Schimpf	eschimpf@standupwireless.com	Global Connection Inc. of America	N/A	Electronic Service	No	OFF_SL_17-509_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-509_Official
Todd	Shores	tshores@readywireless.com	enTouch Wireless (Boomerang)	N/A	Electronic Service	No	OFF_SL_17-509_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Tatum	david@terracominc.com	TerraCom, Inc.	745 E Main St Chattanooga, TN 37408	Electronic Service	No	OFF_SL_17-509_Official
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