

**STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION**

**IN THE RULE DEVELOPMENT  
PHASE OF RM 15-03**

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**JANUARY 7, 2016**

**OUCC COMMENTS ON IURC'S DECEMBER 11, 2015 DRAFT STRAWMAN  
RULE REGARDING PRACTICES AND PROCEDURES FOR WIRELESS  
LIFELINE-ONLY ELIGIBLE TELECOMMUNICATIONS CARRIERS**

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The Indiana Office of Utility Consumer Counselor ("OUCC") commends the Indiana Utility Regulatory Commission ("IURC" or "Commission") staff on its December 11, 2015 revisions to an earlier draft proposed rule to establish practices and procedures to protect consumers and to ensure compliance with state and federal legal requirements when wireless Lifeline-only Eligible Telecommunications Carriers ("ETCs") use itinerant direct-marketing techniques to attract new Lifeline customers.

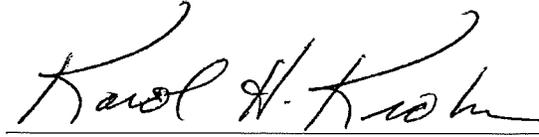
The December 11 revised Strawman rule will adequately protect consumers' interests without unnecessarily limiting wireless Lifeline-only ETCs' flexibility to conduct effective direct-marketing within the bounds of the law.

Accordingly, the OUCC applauds the Commission's staff for its thoughtful and comprehensive consideration and balancing of different stakeholders' interests in the Rule Development Phase of RM 15-03.

Respectfully submitted,

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