



August 17, 2015

Indiana Utility Regulatory Commission  
Office of the General Counsel  
Attn: Mr. Jeremy Comeau  
Assistant General Counsel  
101 West Washington - Suite 1500 East  
Indianapolis, Indiana 46204-3407

**Re: IURC Rulemaking RM#15-03 – CenturyLink Comments on Lifeline-Only Eligible  
Telecommunications Carriers Sales Practices Standards**

Dear Assistant General Counsel Comeau:

CenturyTel of Central Indiana, Inc., d/b/a CenturyLink, CenturyTel of Odon, Inc., d/b/a CenturyLink, and United Telephone Company of Indiana, Inc., d/b/a CenturyLink (collectively “CenturyLink”) by counsel, respectfully submit their Comments on Rulemaking (“RM”) 15-03 Lifeline-Only Eligible Telecommunications Carriers Sales Practices Standards.

Please direct any questions or comments regarding CenturyLink’s Comments to Alan Matsumoto on (317) 531-0710 or [alan.i.matsumoto@centurylink.com](mailto:alan.i.matsumoto@centurylink.com).

Respectfully submitted,

**/s/ Charles R. Mercer, Jr.**

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**STATE OF INDIANA**  
**INDIANA UTILITY REGULATORY COMMISSION**

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**RULEMAKING RM#15-03**

**LIFELINE-ONLY ELIGIBLE TELECOMMUNICATIONS CARRIERS SALES  
PRACTICES STANDARDS**

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**CENTURYLINK COMMENTS**

CenturyTel of Central Indiana, Inc., d/b/a CenturyLink, CenturyTel of Odon, Inc., d/b/a CenturyLink, and United Telephone Company of Indiana, Inc., d/b/a CenturyLink (collectively “CenturyLink”) by counsel, respectfully submit their Comments on Rulemaking (“RM”) 15-03, regarding Lifeline-Only Eligible Telecommunications Carriers (“ETC”) Sales Practices Standards. On July 14, 2015, the Commission issued draft rules in this Rulemaking, proposing to add a section to the Indiana Administrative Code, specifically 170 IAC 7-8, regarding certain practices and procedures for Wireless Lifeline-Only ETCs. The Commission conducted a public workshop on the draft rules on July 15, 2015 and invited parties to provide comments on its draft rules by August 17, 2015.

**Federal Communications Commission’s Lifeline and Link Up Reform**

CenturyLink commends the Commission for recognizing that the Federal Communications Commission’s (“FCC”) proposed reforms to the Lifeline program in its *Second*

*Further Notice of Proposed Rulemaking* (“FNPRM”)<sup>1</sup> could have major implications for RM 15-03 and the administration of the Lifeline program in Indiana. CenturyLink intends to actively participate in the aforementioned FNPRM and encourages the Commission to support the FCC’s efforts. CenturyLink is willing to provide its Comments in the FNPRM and is willing to meet with the Commission to share its perspectives on Lifeline reform and modernization.

CenturyLink understands the Commission’s desire to establish policies and rules to curb waste, fraud, and abuse in the Indiana Lifeline program and that it may not want to hold this Rulemaking in abeyance until the FCC has concluded the FNPRM. CenturyLink encourages the Commission to engage in the FCC’s FNPRM and ensure the final rules in RM 15-03 are consistent with the FCC’s new rules resulting from the FNPRM.

### **Indiana Lifeline-Only ETC Sales Practices and Standards**

Despite the Commission’s best efforts to conduct thorough and comprehensive reviews of the Lifeline-only ETC applications, the Commission has been forced to initiate an investigation of the sales practices of at least one wireless Lifeline-only ETC.<sup>2</sup> CenturyLink believes the Commission should clearly spell out penalties for non-compliance and violations of the Lifeline program rules and requirements in Indiana in proposed rule 170 IAC 7-8. CenturyLink recommends that after proposed rule 170 IAC 7-8 takes effect, General Administrative Order (“GAO”) 2013-2 - ETC Filing Guidelines, be modified to reference 170 IAC 7-8. A wireless Lifeline-only Communications Service Provider (“CSP”) seeking ETC

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<sup>1</sup> Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; WC Docket Nos. 11-42, 09-197, 10-90; *Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order.*

<sup>2</sup> IURC Cause No. 44332 - Commission initiated investigation of TerraCom, Inc.

designation should include in its application a certification that it will comply with all of the requirements of 170 IAC 7-8.

### **Lifeline Agents (Proposed 170 IAC 7-8-3)**

CenturyLink does not believe the Commission should prohibit ETCs from employing third-party agents to enroll subscribers in Lifeline service. However, given the importance of correctly enrolling customers in the Lifeline program and the sensitive nature of the personal information provided by prospective Lifeline subscribers, CenturyLink believes the Commission should adopt standards for training agents in addition to the background check requirement in proposed 170 IAC 7-8-3. At a minimum, agents should be trained in state and federal lifeline rules as well as the proper handling of sensitive personal information and be familiar with rules for enrolling Lifeline subscribers.

Given the sensitive nature of the personal information provided by prospective Lifeline subscribers and the potential for loss or misuse of the data, CenturyLink believes the Commission should prohibit third-party agents from using their personal laptops and interconnected devices to enroll Lifeline subscribers.

### **Conclusion**

CenturyLink appreciates the Commission's openness in soliciting input from all stakeholders, to ensure RM 15-03 meets its stated objectives to establish policies and rules to curb waste, fraud, and abuse in the Indiana Lifeline program. The rules should be designed to

strike an appropriate balance between enhancing consumer protections while also ensuring they are not unduly burdensome to Lifeline providers.

While CenturyLink is not a wireless Lifeline-only ETC, it believes that appropriate sales practices standards are necessary to protect Lifeline subscribers. Any improper marketing of Lifeline services risks the integrity and efficacy of the Indiana Lifeline program to all service providers.

CenturyLink appreciates the opportunity to provide Comments on RM 15-03 and believes its perspectives will further the Commission's efforts. CenturyLink is willing to work with Staff through a workshop or other opportunity to foster an effective process for administration of the Lifeline program in Indiana.