

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Southwestern Bell Telephone )  
Company, d/b/a AT&T Missouri’s Notice of ) File No. IO-2017-0132  
Relinquishment of its Eligible Telecommunications )  
Carrier Designation Pursuant to 47 USC §214(e)(4) )  
and Notice of Withdrawal from State Lifeline and )  
Disabled Programs. )

**THE OFFICE OF THE PUBLIC COUNSEL’S OBJECTION**

COMES NOW the Office of the Public Counsel (“Public Counsel”) and for its Objection to Southwestern Bell Telephone Company’s d/b/a AT&T Missouri’s (“AT&T Missouri” or “the Company”) request to relinquish its eligible telecommunications carrier designation as well as its notice of withdrawal from state lifeline and disabled programs and states:

1. On October 28th of 2016, AT&T filed its above-described notice seeking to relinquish its designation pursuant to 47 USC §214(e)(4) and to withdraw from the State Lifeline and Disabled Program. In this filing, AT&T states, in pertinent part:

Dramatic changes have occurred within the telecommunications market since AT&T began serving as an ETC, and those changes affect AT&T’s desire to continue operating as an ETC in Missouri. Customers increasingly are no longer choosing AT&T’s or ILECs’ traditional (i.e., circuit-switched POTS) wireline residential voice service, and instead are choosing among numerous other options for their communications needs, including wireless and VoIP services. From 2005 to 2015, the number of traditional ILEC wireline customers in Missouri decreased by 72%, from 2 million lines to 552,000 lines. AT&T’s traditional retail residential lines declined by 84% during that same period.

2. By Order of the Public Service Commission (“Commission”), Public Service Commission Staff (“Staff”) was directed to file its recommendation as to AT&T’s request “no later than December 9, 2016”.<sup>1</sup>

---

<sup>1</sup> Commission further ordered intervention requests “no later than November 18, 2016” but made no other orders regarding objections or comments despite the Company’s suggested procedural schedule in its October 28<sup>th</sup> filing. Based on public filings on the Commission’s EFIS, no intervention requests were made. However, Public Counsel is an automatic party to all such proceedings and was not required to file a request for intervention.

3. On December 9<sup>th</sup> of this year, Staff filed its recommendation for the Commission to grant this relinquishment and discontinuation despite some relevant information that included:

The Staff has verified that all but 4 customers live in zip codes in which other ETCs also serve Lifeline customers (two in Annada, and one each in Poplar Bluff and Westphalia).

4. However, this information does not include general concerns about the reliability of these other “options” in large, suburban/rural areas of the state. In discussions with relevant stakeholders involving this, questions have arisen as to whether cell phone coverage (the main “competitor” offering similar services) is in fact sufficient.

5. While Public Counsel has been unsuccessful in locating Missouri-specific studies, the Pew Research Group conducted a study as late as 2014, and published on October 29<sup>th</sup> of 2015, showing that cellphone usage in rural areas is 87%; five percent below the national average and seven percent below the percentage of the “urban” population’s cell phone use. Of further concern is this study shows only 78% of individuals over the age of 65 have a cell phone; fourteen percent below the national average.

6. This information suggests AT&T information presented in its filing may be skewed towards younger customers in urban and suburban areas. Without more specific data presented by the Company, Public Counsel has serious concerns that older customers and customers living in rural areas do not have the means or the education of such devices to transition into these other options. Further, as public comments suggest, older customers may simply have physical impediments to consider these other options as viable.

7. What is also absent in AT&T’s (as well as Staff’s) averments is any specific reference to whether cell phone coverage is sufficient in parts of the state. A view of AT&T’s service coverage map (See <https://www.att.com/maps/wireless-coverage.html>) over Missouri itself

shows areas south of Fort Leonard Wood as well as east of Ava that seemingly have limited-to-no cell phone coverage. Without more information as to the quality of cell phone coverage in those areas, Public Counsel has serious concerns as to whether these other options are in fact viable for low-income customers.

8. AT&T Missouri’s representatives have been quoted publicly stating that, while reaching as many customers as they can, ultimately “AT&T is a business that wants to make a profit – so the company focuses improvements on highly populated areas.” See interview with AT&T’ Missouri’s Traffic and Capacity Manager Tim Turner in “Poor Cell Phone Coverage Inconvenience Mid-Missourians” by Emily Rackers for the University of Missouri Convergence Journalism on June 19<sup>th</sup>, 2015.<sup>2</sup>

9. Public comments on this matter suggest these concerns are in fact very real. While we have submitted those comments in a separate attachment, here are some examples of specific comments and why cell phone technology should not be considered a viable solution for elderly customers as well as those customers living in parts of the state:

In the Kirkwood, Missouri WC, there are NO ETC's operating any Lifeline programs in our Immediate area. Because when I checked, none of those Wireless carriers provided decent Voice-Grade service and their ability to provide E911 services were EXTREMELY limited. I would be glad to comment further to AT&T Missouri if they wanted to speak to me regarding this matter.

Additionally:

Please do not end the AT&T lifeline program. Many low income senior citizens rely on this program to have easy access to phone service. They are unable to use the cell phones due to mobility and the low amount of minutes provided is not sufficient for this populations needs. The low amount of minutes provided by the cell phone would be easily used in 1 phone call to the Family Support Division, which has average wait times of 20 minutes just to speak to a representative.

---

<sup>2</sup> <http://convergence.journalism.missouri.edu/?p=13351>

Further:

ATT requesting to relinquish the Lifeline discount on land line service in MO is upsetting. As a social worker at a HUD affordable housing for senior adults (many in their 80's & 90's) only want to use a land line & have no interest in a cell phone. The Lifeline discount in obtaining a free cell phone is an option but the cell phones are extremely small & not user friendly for those that are visually impaired & for arthritic fingers.

Finally:

AT&T Lifeline phone is absolutely necessary for elderly and disabled low-income people. Cell phones are difficult for older people & some mentally challenged people to use. Also for deaf - in order to use a captioned phone service (voice-over-relay) we must have a land-line. Please ask them to keep this service.

10. The recommendation by Staff seemingly has failed to taken into account these concerns, many of which raise valid issues as to use among the elderly and coverage even in St. Louis area suburbs such as Kirkwood.

11. These issues raise a question as to whether this request does comply with federal law.

Per 47 USC §214(e)(4):

Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission (or the Commission in the case of a common carrier designated under paragraph) shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. (Emphasis added.)

12. Based on the concerns raised by Public Counsel, the Company has not yet proven all customers will be served if they are allowed to no longer participate in this program and therefore Public Counsel objects to their request.

13. But rather than simply objecting, Public Counsel seeks an Order from this Commission for further research to be conducted by the Staff on this matter regarding cell phone

use among the elderly and cell phone coverage in rural areas of the state. Public Counsel also seeks an Order for the Company to respond to public comments already made in this docket as well as ordering local public hearings in rural areas where cell phone coverage is identified as unreliable or unavailable.

14. Even with this further work, Public Counsel would refrain from final objection until there was sufficient opportunity to review such additional information to make sure AT&T Missouri's request truly complied with federal law on this matter.

WHEREFORE, Public Counsel respectfully submits its Objection and seeks an Order from the Public Service Commission to require AT&T to provide information as to assure all interested stakeholders that rural areas will still have reliable access to these programs. Additionally, Public Counsel seeks an Order from the Commission to hold public hearings on this matter in rural areas of the state so more public comments can be gathered. Further, the Public Counsel also seeks an Order requiring AT&T and Staff to respond to all public comments made in this docket to provide adequate assurance that their request will comply with the law.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

**BY: /s/ James M. Owen**  
James M. Owen  
Acting Public Counsel  
Missouri Bar No. 65082  
PO Box 2230  
Jefferson City MO 65102  
(573) 751-5318  
(573) 751-5562 FAX  
[james.owen@ded.mo.gov](mailto:james.owen@ded.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 19<sup>th</sup> day of December, 2016.

**/s/ James M. Owen**

---

IO-2017-0132

PUBLIC COMMENTS

**Missouri Public Service Commission****Public Comments**

|                                |   |
|--------------------------------|---|
| Public Comment No.             | <b>P201702121</b>   |
| Utility Type                   | <b>Telephone</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                     | <b>Zhanna</b>   |
| Middle Initial                 | <b>N/A</b>  |
| Last Name                      | <b>Bershteyn</b>  |
| Street Address                 | <b>Crown Center</b>   |
| Mailing Address                | <b>N/A</b>  |
| City                           | <b>St. Louis</b>  |
| State                          | <b>MO</b>   |
| County                         | <b>N/A</b>  |
| Phone No.                      | <b>314-620-6637 Ext -</b>   |
| Email                          | <b>N/A</b>  |
| Case No.                       | <b>IO-2017-0132</b>   |
| Public Comments<br>Description | <b>(co) Complaint is regarding LifeLine Program for low income residents. I am assisting older adults, who had been qualified for services for years. Starting 2016 it completely changed to worst experience for residents and social workers. ATT creates all kind of obstacles to reject benefit ( service address and mailing address do not match, fax is not clear). Management not accepting complaints, nor answer messages. Older residents need land line phones for numerous reasons, cannot afford.</b> |
| Date Filed                     | <b>11/22/2016 2:27:00 PM</b>  |



**Missouri Public Service Commission****Public Comments**

|                                |  |
|--------------------------------|--|
| Public Comment No.             | <b>P201701960</b>  |
| Utility Type                   | <b>Telephone</b>   |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                     | <b>Sharon</b>  |
| Middle Initial                 | <b>L</b>   |
| Last Name                      | <b>Curran</b>  |
| Street Address                 | <b>215 Parkland Ave</b>  |
| Mailing Address                | <b>N/A</b>   |
| City                           | <b>Saint Louis</b>   |
| State                          | <b>MO</b>  |
| Zip                            | <b>63122</b>   |
| County                         | <b>St. Louis County</b>  |
| Phone No.                      | <b>314-362-9681 Ext -</b>  |
| Email                          | <b>ssharonn9@aol.com</b>   |
| Case No.                       | <b>IO-2017-0132</b>  |
| Public Comments<br>Description | <b>It is unconscionable that ATT requests discontinuing their<br/>Lifeline service. While it may be ONLY 6,700 some clients, to<br/>some it's all they have. Hence the word LIFELINE. It's bad enough<br/>ATT wants to rule the world and is quickly gaining a monopoly.<br/>Please deny their request and do the right thing.</b> |
| Date Filed                     | <b>11/17/2016 9:03:00 AM</b>   |

**Missouri Public Service Commission****Public Comments**

|                             |  |
|-----------------------------|--|
| Public Comment No.          | <b>P201701958</b>  |
| Utility Type                | <b>ILEC</b>  |
| Utility Company             | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                  | <b>JOHN</b>  |
| Middle Initial              | <b>N/A</b>   |
| Last Name                   | <b>DESHERLIA</b>   |
| Street Address              | <b>621 S FILLMORE AVE</b>  |
| Mailing Address             | <b>PO BOX 220213</b>   |
| City                        | <b>KIRKWOOD</b>  |
| State                       | <b>MO</b>  |
| Zip                         | <b>63122</b>   |
| County                      | <b>St. Louis County</b>  |
| Phone No.                   | <b>314-835-9475 Ext -</b>  |
| Email                       | <b>telephoneguy@outlook.com</b>  |
| Case No.                    | <b>IO-2017-0132</b>  |
| Public Comments Description | <b>In the Kirkwood, Missouri WC, there are NO ETC's operating any Lifeline programs in our Immediate area. Because when I checked, none of those Wireless carriers provided decent Voice-Grade service and their ability to provide E911 services were EXTREMELY limited. I would be glad to comment further to AT&amp;T Missouri if they wanted to speak to me regarding this matter.</b> |
| Date Filed                  | <b>11/16/2016 5:03:00 PM</b>   |

**Missouri Public Service Commission****Public Comments**

|                             |  |
|-----------------------------|--|
| Public Comment No.          | <b>P201702027</b>  |
| Utility Type                | <b>Telephone</b>   |
| Utility Company             | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                  | <b>Vanessa</b>   |
| Middle Initial              | <b>N/A</b>   |
| Last Name                   | <b>Fakes</b>   |
| Street Address              | <b>225 W Rose Hill Ave</b>   |
| Mailing Address             | <b>N/A</b>   |
| City                        | <b>Kirkwood</b>  |
| State                       | <b>MO</b>  |
| Zip                         | <b>63122</b>   |
| County                      | <b>St. Louis County</b>  |
| Phone No.                   | <b>314-822-4928 Ext -</b>  |
| Email                       | <b>vanessa.fakes@lssliving.org</b>   |
| Case No.                    | <b>IO-2017-0132</b>  |
| Public Comments Description | <b>There is a lack of participants due to the fact that AT&amp;Y Lifeline denies seniors for no reason and makes them jump through so many hoops that they just give up. Seniors that have poor vision can't use a cell phone and pacemaker patients need a landline. Low income seniors can't afford to pay the outrageous charges that occur without the lifeline program. The program is a necessity for low income seniors! There would be more participants if they would do their job correctly!</b> |
| Date Filed                  | <b>11/18/2016 8:40:00 AM</b>   |

**Missouri Public Service Commission****Public Comments**

|                                |  |
|--------------------------------|--|
| Public Comment No.             | <b>P201702263</b>  |
| Utility Type                   | <b>ILEC</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                     | <b>Frank</b>   |
| Middle Initial                 | <b>N/A</b>   |
| Last Name                      | <b>Fox</b>   |
| Street Address                 | <b>1211 Warson Pines</b>   |
| Mailing Address                | <b>N/A</b>   |
| City                           | <b>Olivette</b>  |
| State                          | <b>MO</b>  |
| Zip                            | <b>63132-2011</b>  |
| County                         | <b>St. Louis County</b>  |
| Phone No.                      | <b>N/A</b>   |
| Email                          | <b>N/A</b>   |
| Case No.                       | <b>IO-2017-0132</b>  |
| Public Comments<br>Description | <b>I have AT&amp;T lifeline telephone service in St. Louis County. It is the only landline provider that I know of. It would be important to have at least one landline provider for those who prefer that. If they discontinue lifeline telephone, they will not participate in the new lifeline broadband program. That would leave us with no landline provider for both services. Their ACCESS internet program does not serve all lifeline participants, so it does not meet the need of the broadband program.</b> |
| Date Filed                     | <b>12/2/2016 9:31:00 PM</b>  |

**Missouri Public Service Commission****Public Comments**

|                                |   |
|--------------------------------|---|
| Public Comment No.             | <b>P201702035</b>   |
| Utility Type                   | <b>Telephone</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                     | <b>Claire</b>   |
| Middle Initial                 | <b>N/A</b>  |
| Last Name                      | <b>Hack</b>   |
| Street Address                 | <b>1439 Shagbark Ct</b>   |
| Mailing Address                | <b>1439 Shagbark Ct</b>   |
| City                           | <b>Chesterfield</b>   |
| State                          | <b>MO</b>   |
| Zip                            | <b>63017-6301</b>   |
| County                         | <b>N/A</b>  |
| Phone No.                      | <b>N/A</b>  |
| Email                          | <b>ceh1492@hotmail.com</b>  |
| Case No.                       | <b>IO-2017-0132</b>   |
| Public Comments<br>Description | <b>AT&amp;T Lifeline phone is absolutely necessary for elderly and disabled low-income people. Cell phones are difficult for older people &amp; some mentally challenged people to use. Also for deaf - in order to use a captioned phone service (voice-over-relay) we must have a land-line. Please ask them to keep this service</b> |
| Date Filed                     | <b>11/20/2016 7:05:00 PM</b>  |

**Missouri Public Service Commission****Public Comments**

|                                |  |
|--------------------------------|--|
| Public Comment No.             | <b>P201702123</b>  |
| Utility Type                   | <b>ILEC</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                     | <b>R</b>   |
| Middle Initial                 | <b>N/A</b>   |
| Last Name                      | <b>Harris</b>  |
| Street Address                 | <b>61 Wayside Dr.</b>  |
| Mailing Address                | <b>N/A</b>   |
| City                           | <b>St. Louis</b>   |
| State                          | <b>MO</b>  |
| Zip                            | <b>63135-2835</b>  |
| County                         | <b>St. Louis County</b>  |
| Phone No.                      | <b>314-521-7964 Ext -</b>  |
| Email                          | <b>N/A</b>   |
| Case No.                       | <b>IO-2017-0132</b>  |
| Public Comments<br>Description | <b>Recommend the release of the ETC license by AT&amp;T. The FCC is introducing a dynamic rules environment for the Lifeline Program. AT&amp;T offers the services in the new regulations. Consumers need to question the potential in associations that are unwanted. All Missouri consumers should be able to take advantage of affordable Lifeline services for all that those services can do from those who want to assist them. There will be other options. If my money isn't green enough, I'll keep it.</b> |
| Date Filed                     | <b>11/22/2016 3:05:00 PM</b>   |

**Missouri Public Service Commission****Public Comments**

|                             |  |
|-----------------------------|--|
| Public Comment No.          | <b>P201702026</b>  |
| Utility Type                | <b>Telephone</b>   |
| Utility Company             | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>  |
| First Name                  | <b>Savanna</b>   |
| Middle Initial              | <b>N/A</b>   |
| Last Name                   | <b>Litali</b>  |
| Street Address              | <b>7700 michigan ave</b>   |
| Mailing Address             | <b>7700 michigan ave</b>   |
| City                        | <b>st louis</b>  |
| State                       | <b>MO</b>  |
| Zip                         | <b>63111</b>   |
| County                      | <b>St. Louis City</b>  |
| Phone No.                   | <b>314-899-3540 Ext -</b>  |
| Email                       | <b>savanna.arczynski@gmail.com</b>   |
| Case No.                    | <b>IO-2017-0132</b>  |
| Public Comments Description | <b>Please do not end the AT&amp;T lifeline program. Many low income senior citizens rely on this program to have easy access to phone service. They are unable to use the cell phones due to mobility and the low amount of minutes provided is not sufficient for this populations needs. The low amount of minutes provided by the cell phone would be easily used in 1 phone call to the Family Support Division, which has average wait times of 20 minutes just to speak to a representative.</b> |
| Date Filed                  | <b>11/18/2016 8:38:00 AM</b>   |

**Missouri Public Service Commission****Public Comments**

|                             |   |
|-----------------------------|---|
| Public Comment No.          | <b>P201702031</b>   |
| Utility Type                | <b>N/A</b>  |
| Utility Company             | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                  | <b>Sheila</b>   |
| Middle Initial              | <b>N/A</b>  |
| Last Name                   | <b>Longsdon</b>   |
| Street Address              | <b>3455 DePaul Lane</b>   |
| Mailing Address             | <b>N/A</b>  |
| City                        | <b>Bridgeton</b>  |
| State                       | <b>MO</b>   |
| County                      | <b>N/A</b>  |
| Phone No.                   | <b>N/A</b>  |
| Email                       | <b>N/A</b>  |
| Case No.                    | <b>IO-2017-0132</b>   |
| Public Comments Description | <b>ATT requesting to relinquish the Lifeline discount on land line service is going to result in a financial hardship for many seniors. As a social worker at a HUD senior housing complex (many in their 80's &amp; 90's) do not want a cell phone &amp; may have impairments such as visual &amp; physical that would restrict them from using the free govt cell phone based on the size &amp; qualify of the phones issued. This request needs to be reconsidered for seniors living on low income.</b> |
| Date Filed                  | <b>11/18/2016 12:33:00 PM</b>   |



**Missouri Public Service Commission****Public Comments**

|                                |   |
|--------------------------------|---|
| Public Comment No.             | <b>P201702030</b>   |
| Utility Type                   | <b>N/A</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                     | <b>Sheila</b>   |
| Middle Initial                 | <b>N/A</b>  |
| Last Name                      | <b>Longsdon</b>   |
| Street Address                 | <b>3499 DePaul Lane</b>   |
| Mailing Address                | <b>N/A</b>  |
| City                           | <b>Bridgeton</b>  |
| State                          | <b>MO</b>   |
| Zip                            | <b>63044</b>  |
| County                         | <b>N/A</b>  |
| Phone No.                      | <b>N/A</b>  |
| Email                          | <b>N/A</b>  |
| Case No.                       | <b>IO-2017-0132</b>   |
| Public Comments<br>Description | <b>ATT requesting to relinquish the Lifeline discount on land line service in MO is upsetting. As a social worker at a HUD affordable housing for senior adults (many in their 80's &amp; 90"s) only want to use a land line &amp; have no interest in a cell phone. THE Lifeline discount in obtaining a free cell phone is an option but the cell phones are extremely small &amp; not user friendly for those that are visually impaired &amp; for arthritic fingers. A financial hardship will be incurred in losing the discount</b> |
| Date Filed                     | <b>11/18/2016 12:25:00 PM</b>   |

**Missouri Public Service Commission****Public Comments**

|                                |   |
|--------------------------------|---|
| Public Comment No.             | <b>P201702612</b>   |
| Utility Type                   | <b>Telephone</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                     | <b>Rosalind</b>   |
| Middle Initial                 | <b>N/A</b>  |
| Last Name                      | <b>Pellikaan</b>  |
| Street Address                 | <b>27 Schulze Dr</b>  |
| Mailing Address                | <b>N/A</b>  |
| City                           | <b>Troy</b>   |
| State                          | <b>MO</b>   |
| Zip                            | <b>63379</b>  |
| County                         | <b>N/A</b>  |
| Phone No.                      | <b>636-290-6002 Ext -</b>   |
| Email                          | <b>N/A</b>  |
| Case No.                       | <b>IO-2017-0132</b>   |
| Public Comments<br>Description | <b>(co) Customer stated she is POA on behalf of her mother. Claims received recertification form, filled out, and sent in. AT&amp;T claimed didn't send in correct documentation, she claims wasn't notified and bill increased. Contacted AT&amp;T and was advised would remove extra fees. Contacted Lifeline and was advised dropped from program, therefore unable to remove extra fees. Upset due to the amount of years her mother was on the program, it was an error. Tired of AT&amp;T and will find a different co.</b> |
| Date Filed                     | <b>12/12/2016 9:16:00 AM</b>  |

RECEIVED

DEC 1 2016

MO PUBLIC SERVICE COMMISSION  
MAIL ROOM

November 29, 2016

RECEIVED<sup>5</sup>

DEC 01 2016

Earle F. Reimer <sup>Records</sup>  
P.O. Box 45 <sup>Public Service Commission</sup>  
Perryville, Mo. 63775

Governor Office Building  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, Mo. 63102-0360

Dear Commissioners:

The proposal by AT&T to discontinue offering the Lifeline Telephone Service, a discounted telephone rate for low income seniors and the disabled, is not known by all those affected. I believe many of them do not read the daily newspaper or are unable to respond because they do not have computers.

I don't think the Lifeline telephone Service is well known. I would not have been aware of the Service if it had not been noted on the first or second billing I received from AT&T. Since then I have seen no mention of the discount rate on subsequent statements. Because peoples circumstances change, the Lifeline Service should be referred too on aregular basis. Certainly there are many struggling low income seniors and the disabled who need the vital but expensive telephone service that could benefit from the Lifeline discount.

The proposal by AT&T to discontinue offering the Lifeline Service because more subscribers are switching to cellphones does not diminish the need for the service. The commission staf to base its recommenda-tion solely on the volume of responses would be aa disservice. The purpose of the Lifeline Telephone Service and its availability shoud be paramount.

My problem with the AT&T Lifeline Service is one of interuption. AT&T mails the recertification form to an incomplete residence address resulting in the necessity to reapply. This is peculiar because AT&T mails the monthly statements to my mailing address, a P.O. Box and on the previous recertification form I had noted in big, bold letters my complete resident address.

Yours respectfully,

*Earle F. Reimer*

Earle F. Reimer

RECEIVED

DEC 1 2016

November 29, 2016

RECEIVED<sup>5</sup>

DEC 01 2016

MO PUBLIC SERVICE COMMISSION  
MAIL ROOM

Earle F. Reimer <sup>Records</sup>  
P.O. Box 45 <sup>Public Service Commission</sup>  
Perryville, Mo. 63775

Governor Office Building  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, Mo. 63102-0360

Dear Commissioners:

The proposal by AT&T to discontinue offering the Lifeline Telephone Service, a discounted telephone rate for low income seniors and the disabled, is not known by all those affected. I believe many of them do not read the daily newspaper or are unable to respond because they do not have computers.

I don't think the Lifeline telephone Service is well known. I would not have been aware of the Service if it had not been noted on the first or second billing I received from AT&T. Since then I have seen no mention of the discount rate on subsequent statements. Because peoples circumstances change, the Lifeline Service should be referred too on aregular basis. Certainly there are many struggling low income seniors and the disabled who need the vital but expensive telephone service that could benefit from the Lifeline discount.

The proposal by AT&T to discontinue offering the Lifeline Service because more subscribers are switching to cellphones does not diminish the need for the service. The commission staf to base its recommenda-tion solely on the volume of responses would be aa disservice. The purpose of the Lifeline Telephone Service and its availability shoud be paramount.

My problem with the AT&T Lifeline Service is one of interuption. AT&T mails the recertification form to an incomplete residence address resulting in the necessity to reapply. This is peculiar because AT&T mails the monthly statements to my mailing address, a P.O. Box and on the previous recertification form I had noted in big, bold letters my complete resident address.

Yours respectfully,

*Earle F. Reimer*

Earle F. Reimer

**Missouri Public Service Commission****Public Comments**

|                                |   |
|--------------------------------|---|
| Public Comment No.             | <b>P201702118</b>   |
| Utility Type                   | <b>Telephone</b>  |
| Utility Company                | <b>AT&amp;T Missouri-ILEC<br/>(Telephone)</b>   |
| First Name                     | <b>Trudy</b>  |
| Middle Initial                 | <b>N/A</b>  |
| Last Name                      | <b>Stoien</b>   |
| Street Address                 | <b>na</b>   |
| Mailing Address                | <b>N/A</b>  |
| City                           | <b>St Louis</b>   |
| State                          | <b>MO</b>   |
| County                         | <b>N/A</b>  |
| Phone No.                      | <b>N/A</b>  |
| Email                          | <b>N/A</b>  |
| Case No.                       | <b>IO-2017-0132</b>   |
| Public Comments<br>Description | <b>(sc) My brother is in a nursing home. He is disabled and needs<br/>his lifeline telephone service.</b> |
| Date Filed                     | <b>11/22/2016 10:51:00 AM</b>   |

**From:** [PSC Info \(Public Info Email Address\) - PSC](#)  
**To:** ["Daniel Sullivan"](#)  
**Subject:** RE: Comment on Emergency Cell Phones for needy stopping  
**Date:** Friday, November 18, 2016 9:51:10 AM

---

Dear Mr. Sullivan,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your public comments regarding AT&T Missouri. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission Staff will be able to view all public comments for consideration.

Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office at 1-800-392-4211 or out-of-state 1-573-751-1881.

Sincerely,

Consumer Services Unit  
Missouri Public Service Commission  
P.O. Box 360  
200 Madison Street  
Jefferson City, MO 65102

Phone: 800-392-4211  
Fax: 573-526-1500

---

**From:** Daniel Sullivan [mailto:danmar17@sbcglobal.net]  
**Sent:** Friday, November 18, 2016 9:19 AM  
**To:** PSC Info (Public Info Email Address) - PSC  
**Subject:** Comment on Emergency Cell Phones for needy stopping

At every opportunity AT&T abandons any responsibility that carries over from the not -too-long ago years. Our state provided a protracted holiday from review while SWBT sunk enormous sums into a marvelous fiber network. It was a partnership of trust. They aim to get out of the copper wire connection business, Customer service borders on abuse. Make them prove real operating loss on any concession they request!!!