

**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                )  
Relinquishment of its Eligible Telecommunications        ) **File No. IO-2017-0132**  
Carrier Designation Pursuant to 47 U.S.C. §214(e)(4) )  
And Notice of Withdrawal from State Lifeline and        )  
Disabled Programs    )

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and responds to the above-referenced filing and requests that the Commission issue a press release through its Public Information Department and states as follows:

1. On October 28, 2016, Southwestern Bell Telephone Company, d/b/a AT&T Missouri (AT&T), filed a Notice of Relinquishment of its Eligible Telecommunications Carrier (ETC) Designation Pursuant to 47 U.S.C. §214(e)(4) and Notice of Withdrawal from State Lifeline and Disabled Programs.

2. 47 U.S.C. §214(e)(4) provides as follows:

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 ... 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.

3. 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. In light of the above-referenced federal requirements, and as described in more detail in the attached Memorandum, the Staff recommends that AT&T's request be granted, with the following conditions:

- AT&T's relinquishment of its ETC status will be effective July 5, 2017.
- AT&T may cease enrolling new customers into the Lifeline and Disabled programs effective March 31, 2017.
- AT&T shall modify its notice to Disabled program customers so they do not believe they may retain their discount through another provider, at least 60 days in advance of July 5, 2017.
- The Commission will issue Notice to all ETCs offering Lifeline service in AT&T's area of their obligation to provide Lifeline service as described in the attached Memorandum.

**WHEREFORE**, the Staff submits Recommendation.

Respectfully submitted,



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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9<sup>th</sup> day of December, 2016.



# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. IO-2017-0132

**From:** Kari Salsman  
John Van Eschen  
Telecommunications Department

**Subject:** Staff's Recommendation for AT&T Missouri's Notice of Relinquishment of Its Eligible Telecommunication Carrier Designation.

**Date:** December 9, 2016

On October 28, 2016 AT&T Missouri (AT&T) notified the Missouri Public Service Commission ("Missouri Commission") of the company's intent to relinquish its Eligible Telecommunications Carrier (ETC) designation in the State of Missouri, effective July 5, 2017. Essentially AT&T no longer wants to participate in the Lifeline and Disabled programs.<sup>1</sup> Specifically, AT&T will continue to provide service to existing customers of these programs but stop providing discounts on July 5, 2017. AT&T requests the Missouri Commission make the following confirmations by January 13, 2017:

- Confirm AT&T's relinquishment of its ETC designation in Missouri, effective July 5, 2017.
- Confirm AT&T will cease enrolling customers in the Lifeline program and the Disabled program on the date the Missouri Commission issues its order or March 31, 2017, whichever is later.
- Acknowledge AT&T's notice that it will cease to provide Lifeline and Disabled discounts on the effective date of its ETC relinquishment.<sup>2</sup>

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AT&T's rationale for relinquishing ETC designation is the declining number of customers choosing landline service and AT&T's Lifeline service. AT&T states consumers prefer obtaining their Lifeline discount from wireless carriers.

## **Lifeline Service Obligations and Relinquishing ETC Status**

Recent reforms to the Lifeline program are likely to have implications on company participation in the Lifeline program. For example, federal Lifeline support for standalone voice service will be gradually phased-out beginning December 1, 2019 through December 1, 2021. This move is part of the FCC's desire to make the Lifeline program solely focused on making broadband

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<sup>1</sup> AT&T intends to file similar notices in all states so AT&T will no longer participate in the Lifeline program in states/areas where it does not receive high cost support.

<sup>2</sup> Lifeline discounts amount to \$15.75 per month (\$9.25 federal and \$6.50 state). The Disabled program discount is \$6.50 per month and is solely funded through the Missouri USF.

service more affordable for low-income consumers.<sup>3</sup> Consequently the ability of a company to participate in the Lifeline program and receive federal Lifeline support may eventually depend on the company's capability to offer broadband service.

ETCs receiving high-cost federal USF support are obligated to offer Lifeline service.<sup>4</sup> AT&T does not currently receive high-cost support in Missouri.<sup>5</sup> Should AT&T receive high-cost support for a specific Missouri area then AT&T will be obligated to offer Lifeline service to consumers in that area.<sup>6</sup>

Companies are able to relinquish their ETC designation. Missouri does not have specific rules concerning relinquishing ETC status but relies on federal criteria.<sup>7</sup> Federal statute 47 U.S.C. §214(e)(4) and FCC rule C.F.R §54.205 primarily have identical language stating:<sup>8</sup>

A state commission *shall permit* an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the state commission of such relinquishment. 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 *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. The state commission shall establish a time,

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<sup>3</sup> Third Report and Order, Further Report and Order, and Order on Reconsideration; In the Matter of Lifeline and Link Up Reform; WC Docket No. 11-42; FCC 16-38; released April 27, 2016; ¶52. (*FCC 2016 Lifeline Reform decision*)

<sup>4</sup> FCC 2016 Lifeline Reform decision; ¶326.

<sup>5</sup> The FCC plans to soon solicit bids from companies to provide broadband service in AT&T's high-cost areas. The winning bidder will submit the lowest bid and be awarded high-cost support over a ten year time period. Bids may be submitted by any ETC, including AT&T.

<sup>6</sup> An ETC receiving high-cost support is required to offer Lifeline service. According to AT&T officials, if AT&T receives high-cost support then AT&T will limit the Lifeline service offering to the specified high-cost area. AT&T does not intend to offer Lifeline service in areas not receiving high-cost support.

<sup>7</sup> Missouri rules regarding ETC application requirements are contained in 4 CSR 240-31.130.

<sup>8</sup> §54.205 contains the following additional language: *"In the case of a Lifeline Broadband Provider eligible telecommunications carrier, a Lifeline Broadband Provider's notice of relinquishment shall be deemed granted by the Commission 60 days after the notice is filed, unless the Commission notifies the Lifeline Broadband Provider that the relinquishment will not be automatically effective. This paragraph (c) shall not apply to Lifeline Broadband Providers that also receive high-cost universal service support."*

not to exceed one year after the state commission approves such relinquishment under this section, within which such purchase or construction shall be completed. (emphasis added)

This federal criteria suggests an ETC simply needs to notify a state commission of its desire to relinquish its designation. State commissions do not appear to have much, if any, discretion when consumers in a given area will be able to obtain Lifeline service from at least one other ETC.

### **Presence of at least one other ETC in areas served by AT&T**

AT&T's filing with the Missouri Commission contains a list of 22 ETCs AT&T claims to be offering Lifeline service in AT&T's areas.<sup>9</sup> **Attachment A** lists these companies along with other information.

The Commission Staff makes the following observations about AT&T's list:

- All 22 ETCs offer wireless Lifeline service and none of these companies offer landline Lifeline service.
- AT&T generally identifies the company by the parent company name and not the company's d/b/a name. In such situations Missouri Commission records may not reflect the name of the company as identified by AT&T.
- Two companies on AT&T's list have relinquished ETC status in Missouri.<sup>10</sup>
- One ETC's website fails to reflect the company offers any Lifeline service in Missouri. Moreover, the company currently does not receive any federal Lifeline support.<sup>11</sup>
- 12 ETCs on AT&T's list have ETC status to serve some, but not all, AT&T Missouri exchanges.
- Three companies recently had their high-cost support phased-out.<sup>12</sup>
- Only three companies are considered facility-based providers.<sup>13</sup> The three companies only provide Lifeline service in relatively small portions of AT&T's area. All other ETCs are resellers who offer Lifeline service by using the facilities of other providers.

Attachment A shows seven wireless companies with ETC status to currently offer Lifeline service in all AT&T exchanges. The seven companies are: Assist Wireless LLC, enTouch

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<sup>9</sup> AT&T's list is identified in Exhibit B of AT&T's filing.

<sup>10</sup> Aegis Telecom LLC d/b/a Off the Hook Telecom and YourTel America, Inc. (previously Pager Company) have relinquished their ETC status in Missouri.

<sup>11</sup> Sage Telecom Communications, LLC. This company's website indicates the company provides services in California and Texas.

<sup>12</sup> US Cellular, Northwest Missouri Cellular Limited Partnership and Missouri RSA 5 Partnership. The high-cost support for all competitive ETCs ended July 1, 2016.

<sup>13</sup> The three ETCs are the three companies identified in the prior footnote.

Wireless, Budget Phone, TAG Mobile LLC, Life Wireless, SafeLink Wireless and Missouri TerraCom. All seven ETCs are solely resellers of wireless service. In addition all seven ETCs only offer “free” wireless Lifeline service. This type of Lifeline service typically includes a free wireless phone to a qualifying consumer and voice service with no monthly fee but with a limited usage plan.

In Staff’s opinion, the long-term viability of a free wireless Lifeline service remains unclear. Recent FCC Lifeline program reforms are likely to make it more difficult for any ETC to continue offering free wireless Lifeline service, if at all. Examples of reforms making it more difficult include raising the minimum number of monthly usage minutes<sup>14</sup>; phasing-out federal Lifeline support for voice service; shortening the non-usage time period<sup>15</sup>; and establishing minimum standards for Lifeline broadband service. This latter reform may require wireless ETCs to provide smart phones which can be more expensive than the wireless phones currently provided by free Lifeline service providers. In addition, some critics of the Lifeline program continue to urge the FCC to establish a requirement for all ETCs to apply a minimum monthly fee.<sup>16</sup>

It remains uncertain whether any of the ETCs in AT&T’s Missouri territory will offer broadband Lifeline service. As of December 2, 2016 federal Lifeline support began for broadband Lifeline service. All ETCs operating in AT&T’s Missouri territory can be classified as “Lifeline-only” meaning they do not currently receive high-cost support. According to the FCC, Lifeline-only ETCs are not required to offer broadband Lifeline service and can option to continue to provide voice Lifeline service until federal Lifeline support for voice service is phased out.<sup>17</sup> Consequently it remains unclear whether any company in AT&T’s territory will offer broadband, or continue to offer voice, Lifeline service.

Despite these issues the presence of at least one ETC in all AT&T exchanges suggests AT&T currently meets the basic criteria for relinquishing ETC designation as identified in 47 U.S.C. §214(e)(4) and FCC rule C.F.R §54.205. Federal statutes and rules do not appear to provide state commissions with much discretion on whether remaining ETCs should be facility-based providers or whether the Lifeline service has long term viability. Conceivably federal criteria indicate companies may continue to relinquish ETC designation as long as consumers are left with at least one Lifeline service provider. State commissions are currently seeking guidance from FCC staff on issues surrounding the ETC relinquishment process but no guidance has been provided so far.

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<sup>14</sup> Increased from 250 minutes per month to 500 minutes per month effective December 2016. The FCC is raising this minimum usage threshold to 750 minutes on December 1, 2017 and 1,000 minutes on December 1, 2018.

<sup>15</sup> Reduced from 60 days to 30 days the time period of for de-enrolling a Lifeline subscriber with free wireless Lifeline service effective December 2016.

<sup>16</sup> Such critics contend free wireless Lifeline service is the root cause of fraud and waste within the Lifeline program.

<sup>17</sup> FCC 2016 Lifeline Reform decision; ¶298-300.

## Impact to AT&T Subscribers

Notice has not yet been provided by AT&T to its subscribers currently participating in the Lifeline and Disabled programs. AT&T's plan is to notify affected customers at least 60 days prior to July 5, 2017. AT&T's notice will indicate AT&T will no longer provide the discounts offered through the Lifeline and Disabled programs. In addition, AT&T's notices provide a website and phone number to call if the customer wants to try and contact another provider and retain the discounts. AT&T intends to apply the full monthly rate for local service.<sup>18</sup>

On November 14, 2016 the Missouri Commission issued a press release regarding AT&T's filing. To date, eighteen comments have been submitted. A summary of these comments are shown in **Attachment B**. Among these eighteen comments, one comment is supportive while seventeen comments express concerns. The comments expressing concerns indicate AT&T's proposal will negatively affect them and they will have difficulty finding an acceptable and affordable service.

Staff requested and only recently received information regarding the number of Lifeline customers within each of AT&T's exchanges. As of June 2016 AT&T had 6,877 Lifeline subscribers in 157 exchanges.<sup>19</sup> AT&T does not have any Lifeline subscribers in 3 exchanges. The number of AT&T Lifeline subscribers within an exchange ranges from 1 to 2,402. In regards to Disabled program customers, AT&T had 193 customers in 54 exchanges as of October 2016.<sup>20</sup>

In order to supplement AT&T's Lifeline subscriber participation information, Staff was able to obtain relevant information from Universal Service Administrative Company (USAC) who administers the federal USF fund and National Lifeline Accountability Database.<sup>21</sup> USAC was able to provide to Staff a list of 321 Missouri zip codes with at least one AT&T Lifeline subscriber. Among each of these zip codes, USAC identified the number of Lifeline subscribers served by AT&T as well as any other Missouri ETCs. This information is provided in **Attachment C**.<sup>22</sup> Only 3 out of the 321 zip codes on this list have Lifeline subscribers solely

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<sup>18</sup> AT&T's monthly rate for flat rate local service ranges from \$26.00 to \$36.00. AT&T response to Staff Data Request No. 2 asks if AT&T will offer existing Lifeline subscribers an alternative plan or service. AT&T's response suggests AT&T will only reveal alternative AT&T promotions and services, if asked.

<sup>19</sup> AT&T response to Staff Data Request No. 1. This information indicates AT&T does not currently have any Lifeline subscribers in 3 out of 160 exchanges.

<sup>20</sup> AT&T response to Staff Data Request No. 3.

<sup>21</sup> The National Lifeline Accountability Database contains the names, addresses and other information associated with all Lifeline subscribers. The database was formed to primarily help minimize the problem of a Lifeline subscriber receiving multiple Lifeline benefits.

<sup>22</sup> USAC's data shows AT&T had 4,171 Missouri Lifeline subscribers in November 2016. This number is significantly below AT&T's 6,877 Lifeline subscribers as of June 2016. One contributing factor may be the timing of a company's required annual verification of continued Lifeline subscriber eligibility which is usually conducted sometime during the last half of a calendar year. During this effort, a company's Lifeline subscriber quantities can temporarily decline. For example a common occurrence is Lifeline subscribers are de-enrolled for failing to respond

served by AT&T.<sup>23</sup> Conversely 318 zip codes have Lifeline subscribers served by AT&T as well as by at least one other ETC.

USAC's information suggests in most zip codes where AT&T currently has Lifeline subscribers another ETC is currently providing Lifeline service to other customers within the zip code. Admittedly, since all other ETCs are wireless providers, it is difficult to determine whether a provider's wireless signal will be acceptable for a specific location. In addition, it is unclear whether an existing AT&T Lifeline subscriber will find the available Lifeline wireless service to be an acceptable substitute service, especially for some elderly consumers as suggested by comments filed with the Missouri Commission.

### **Disabled Program**

In contrast to the Lifeline program, existing AT&T subscribers participating in the Disabled program will not have the potential ability to retain the \$6.50 monthly discount by obtaining service from another ETC. The Disabled program is a unique program in Missouri providing discounted landline voice service to qualifying disabled customers. (Wireless providers cannot participate in the MoUSF.) Missouri rules do not mandate company participation in the Disabled program.<sup>24</sup> No other landline providers operating in AT&T's area currently participate in the Disabled program. Therefore, existing AT&T Disabled program subscribers will simply lose the monthly discount and be required to pay the full price for service.

AT&T proposes to use the same notice for Lifeline and Disabled program subscribers. In Staff's opinion AT&T's notice intended for Disabled program subscribers is misleading because it suggests the discount may be retained through another provider. Therefore, Staff recommends the Commission direct AT&T to have separate notices for Lifeline subscribers versus Disabled program subscribers and ensure AT&T's notice to Disabled program subscribers does not suggest the discount can be retained through another provider.

### **Staff Recommendation**

Staff recommends the Missouri Commission respond to AT&T's notice by issuing an order acknowledging AT&T's three requests to:

- Relinquish ETC status effective July 5, 2017.
- Cease providing discounts from the Lifeline and Disabled programs effective July 5, 2017.

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but then later re-apply after discovering they have been de-enrolled. In 2016, AT&T de-enrolled 3,424 Lifeline subscribers during its recertification effort in Missouri.

<sup>23</sup> The three zip codes are 63330 (Annada), 65085 (Westphalia), and 63901 (Poplar Bluff). Staff did review several ETC websites to see if an ETC acknowledged offering Lifeline service within these zip codes. Staff found multiple ETCs offer Lifeline service in these three zip codes.

<sup>24</sup> Missouri Commission rule 4 CSR 240-31.120(2) describes how a carrier must be designated as an ETC in order to participate in the Lifeline or Disabled programs.



- Cease enrolling new customers into the Lifeline and Disabled programs effective March 31, 2017.

In addition, Staff recommends the order instruct AT&T to modify its proposed notice to Disabled program customers so these customers are not misled into believing they may retain their discount through another provider.

**MISSOURI ETCs IDENTIFIED BY AT&T AS OFFERING LIFELINE SERVICE IN AT&T'S AREA**

Name of Company Identified by AT&T	Recognized by PSC	Case No.	Area Granted ETC Status	Number of Lifeline Subscribers in AT&T Service Area	Solely Offers Free Lifeline Service?
AEGIS TELECOM LLC	Off the Hook Telecom <b>Relinquished ETC status</b>			0	
AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	American Assistance	RA-2014-0225	Sprint coverage area	5,122	Yes
ASSIST WIRELESS LLC	Assist Wireless LLC	RA-2011-0384	Statewide	4,620	Yes
ASSURANCE HOME PHONE SERVICE INC	Surety Wireless	RA-2011-0298	AT&T exchanges however didn't list Belton, Blue Springs, Bridgeton, Deering, Fair Grove, Florissant, Kirkwood, Ladue, Lees Summit, Liberty, Nixa, Overland, Republic, Riverview, Rogersville, Sappington, Spanish Lake, Strafford or Willard.	6	Yes
BLUE JAY WIRELESS LLC	Blue Jay Wireless LLC	TA-2013-0272	Wireless service areas of Sprint and Verizon Wireless	377	Yes
BOOMERANG WIRELESS LLC	enTouch Wireless	RA-2013-0115	AT&T, CenturyLink and Windstream exchanges	4,165	Yes
BUDGET PREPAY INC.	Budget Phone	CO-2012-0043	AT&T exchanges	6,046	Yes
DPI TELECONNECT LLC	Tag Mobile LLC	RA-2012-0296	AT&T exchanges	748	Yes
EASY PHONE	Easy Wireless	TA-2011-0164	AT&T exchanges however didn't list Belton, Blue Springs, Bridgeton, Deering, Fair Grove, Florissant, Kirkwood, Ladue, Lees Summit, Liberty, Nixa, Overland, Republic, Riverview, Rogersville, Sappington, Spanish Lake, Strafford or Willard.	2	Yes
GLOBAL CONNECTION INC OF AMERICA	Stand Up Wireless	RA-2011-0299	AT&T exchanges however didn't list Belton, Blue Springs, Bridgeton, Deering, Fair Grove, Florissant, Kirkwood, Ladue, Lees Summit, Liberty, Nixa, Overland, Republic, Riverview, Rogersville, Sappington, Spanish Lake, Strafford or Willard.	779	Yes
I-WIRELESS LLC	Access Wireless	TA-2011-0377	AT&T exchanges however didn't list exchanges of Carrolton, Dekalb, Florissant, Freeburg, Glasgow, Kennett, Kirksville, LaMonte, Macks Creek, Pierce City, Poplar Bluff, Puxico, Sixeton and Ste Genevieve	1,181	Yes
MISSOURI RSA 5 PARTNERSHIP	Chariton Valley Wireless	TO-2006-0172	AT&T's exchanges of Brookfield, Marceline and Moberly and a portion of Armstrong, Higbee and Glasgow. Portion of Century Telephone of Mo, entire rural area of Chariton Valley, a portion of Alltel, Grand River, Mark Twain, Northeast Missouri Rural, and Spectra.	27	No
NORTHWEST MISSOURI CELLULAR LIMITED PARTNERSHIP	Northwest Missouri Rural Telephone	TO-2005-0466	Stanberry AT&T exchange, entire rural areas of Holway, Iamo, Iowa Telecom, Oregon, and Rockport, and portions of Alltel, Sprint and Grand River.	14	No
Q LINK WIRELESS LLC	Q Link Wireless, LLC	RA-2012-0205	AT&T exchanges however didn't list exchanges of Carrolton, Dekalb, Florissant, Freeburg, Glasgow, Kennett, Kirksville, LaMonte, Macks Creek, Pierce City, Poplar Bluff, Puxico, Sixeton and Ste Genevieve	45,043	Yes
SAGE WIRELESS	Sage Telecom Communications, LLC	TA-2014-0008	Statewide but website says now part of True Connect and only provides service in CA & TX.	0	No
TELRITE CORPORATION	Life Wireless	X0-2011-0062	AT&T exchanges	14,502	Yes
TEMPO TELECOM LLC	Tempo	TA-2013-0545	Sprint PCS coverage area	2,483	Yes
TRACFONE WIRELESS INC.	SafeLink Wireless	TA-2009-0327	Statewide	47,990	Yes
US CELLULAR	US Cellular	TO-2005-0384	Statewide however relinquished ETC in AT&T areas of Bloomsdale, Bonne Terre, Bismarck, Flat River, Farmington, Leadwood, Richwoods, Ste Genevieve and St Mary's December 2013.	57	No
VIRGIN MOBILE USA LP	Assurance Wireless brought to you by Virgin Mobile	RA-2012-0264	Statewide	7,079	Yes
YOURTEL AMERICA, INC. (previously Pager Company)	<b>Relinquished ETC status</b>			0	
YOURTEL AMERICA, INC. WIRELESS	Missouri TerraCom	RN-2017-0082 CP-2009-0257 RA-2011-0376	Statewide	2,408	Yes
<b>TOTAL</b>				<b>142,649</b>	

## PUBLIC COMMENTS<sup>1</sup>

P201701953 - I have a 95 year old grandmother who uses the Lifeline through ATT and benefits from this service. She rarely leaves home and doesn't know how to use a cell phone removing this service would be a huge disservice to the elderly at home utilizing this benefit.

P201701958 - 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.

P201701959 - I am writing in response to the request of AT&T Lifeline MO to stop the program due to lack of people requesting the program. Please see my attached letter to the US Attorney Office in St Louis that I sent regarding the difficulty I have had trying to get my mother accepted in this program. She still has not been accepted.

P201701960 - It is unconscionable that ATT requests discontinuing their Lifeline service. While it may be ONLY 6,700 some clients, to some it's all they have. Hence the word LIFELINE. It's bad enough ATT wants to rule the world and is quickly gaining a monopoly. Please deny their request and do the right thing.

P201701964 - I am Service Coordinator for subsidized building. Many of my tenants have relied on Life Line to allow them to have phone service and have done so for many years. These people are either over 62 or on disability and we live in a secure building which tenants must have a phone in able to let visitors in. Therefore my tenants need phone service and many cannot afford it without assistance.

P201701965 - Regarding at&t ending lifeline phone rates for the under privileged. I am totally against such a proposal, whatever happened to "universal service " for all citizens. My mother would be without service if this ended and wouldn't be able to contact me.. So I ask you to reconsider this proposal for the good of all!

P201701966 - AT&T is losing participants because they deny for whatever reason they decide. If you argue what they are telling you they blame it on their fax system, say that they can't verify birthdays, say mailing addresses and service addresses aren't the same thing. Older adults want and (pacemaker) need house phones. The cellphone lifeline isn't a viable option for all. The cellphone has a limit on minutes and if an applicant ever needs to get in touch with FSD they will quickly run through them.

P201702026 - 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.

P201702027 - There is a lack of participants due to the fact that AT&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!

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<sup>1</sup> Public comments are filed in the Commission's Electronic Filing Information System (EFIS). They can be viewed in EFIS under Resources by doing a Public Comments Search with the corresponding comment number.

P201702028 - 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!!!

P201702031 - 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 & 90's) do not want a cell phone & may have impairments such as visual & physical that would restrict them from using the free govt cell phone based on the size & quality of the phones issued. This request needs to be reconsidered for seniors living on low income.

P201702033 - I am a former parish nurse, and I was very surprised to hear that AT&T wants to stop helping 6877 Missourians with their discounted lifeline. The source of my information is the Post. This is a vital service for disadvantaged residents, and I don't understand how a large company would not want to assist those less fortunate. If the issue is that it must be a landline, then perhaps the rules should be changed to include cell phones. Please review this most important issue carefully. Thank you.

P201702035 - 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

P201702118 - My brother is in a nursing home. He is disabled and needs his lifeline telephone service.

P201702121 - 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.

P201702123 - Recommend the release of the ETC license by AT&T. The FCC is introducing a dynamic rules environment for the Lifeline Program. AT&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.

P201702240 – (Summarized) AT&T proposal unknown by many affected and many are unable to respond because they don't have computers. AT&T doesn't advertise the Lifeline service enough. AT&T proposal based on subscribers switching to wireless doesn't diminish the need for the service. The purpose of the Lifeline service and its availability should be paramount. AT&T mails recertification forms to incomplete addresses resulting in the necessity to reapply.

P201702263 - I have AT&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.