

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

In the Matter of an Investigatory and Repository                     )  
File to Review Requirements of Eligible                                 ) **File No. TW-2012-0012**  
Telecommunications Carriers, *et al.*   )

**ADDITIONAL COMMENTS OF CRICKET COMMUNICATIONS, INC.**  
**CONCERNING PROPOSED RULE CHANGES**

Cricket Communications, Inc. ("Cricket") respectfully submits the following additional comments and suggestions to the Missouri Public Service Commission and Staff regarding the draft, proposed rule changes to 4 CSR 240-31 that are currently under discussion by the Commission.

1. Cricket agrees with and supports the additional comments filed by the Missouri Telecommunications Industry Association (MTIA) on November 6 in this docket. Cricket supports the latest rule language proposed by Staff concerning customer application forms with the edits recommended by MTIA.
2. Concerning Public Counsel's Supplemental Comments filed on November 8, Cricket would observe that OPC has overlooked very important distinctions in the states it cites between wireline and wireless ETCs and between states that directly administer the Lifeline program vis-à-vis states (such as Missouri) where Lifeline customers apply directly to the ETC provider for Lifeline service.
3. OPC cites six states which, it avers, "*appear* to use generic electronic or hardcopy Lifeline application forms." (*Emphasis added.*)
4. However, it is important to recognize that in at least four of those six states, Lifeline customers apply *to the state*, not to the ETC carrier. For example, in Nebraska, Texas, Utah and Vermont, the state administers the Lifeline

program directly. **Customers send their Lifeline application to a state agency<sup>1</sup>, which gathers the customer's eligibility documentation** and, having established eligibility, sends an "approval list" (monthly or on some established cycle) to the ETC carrier designated by the Lifeline customer. The state agency (not the carrier) also performs the annual recertification of eligibility.

5. In Utah, the generic customer application form only applies, at the present time, to wireline ETC providers. Wireless Lifeline providers use their own, company-specific forms (following the FCC rules and requirements) at this time. Even if that were to change in the future, however, the key point is that Lifeline customers apply directly to the state of Utah, not to the carrier.

6. Missouri is the only state in which Cricket provides Lifeline service (of 21 states) that requires the use of a generic customer application *where the customer applies for Lifeline service directly to the carrier and not to the state.*

7. In Missouri, where Lifeline customers apply directly to the carrier of their choice for Lifeline service rather to a state agency or contractor that performs the eligibility certifications, it only makes sense that the Lifeline provider be able to use its own company-specific customer application form in order to also incorporate that customer into its service ordering, service and billing systems.

8. Cricket encourages the Commission to incorporate Staff's latest proposed language concerning customer application forms into its proposed rules, with the changes recommended by MTIA.

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<sup>1</sup> In some states, an outside contractor provides the services necessary to administer the Lifeline program. For example, Solix, Inc. in Texas and Xerox in California have been contracted by the state to receive all Lifeline applications and qualify and recertify them.

Cricket Communications, Inc. deeply appreciates the Commission's consideration of these additional comments.

Respectfully submitted,

***/s/ William D. Steinmeier***

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COUNSEL FOR CRICKET  
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Dated: November 9, 2012

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) and on the General Counsel's office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov) this 9<sup>th</sup> day of November 2012.

***/s/ William D. Steinmeier***

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William D. Steinmeier