

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

Cricket Communications, Inc.<sup>1</sup> (“Cricket”) respectfully submits the following supplemental comments and suggestions to the Missouri Public Service Commission and Staff regarding the draft, proposed rule changes to 4 CSR 240-31 that were presented to the Commission before its October 3, 2012 Agenda meeting.

(1) In its Comments of October 16, and on previous occasions since late May, Cricket has set out the reasons the Commission rules and the Missouri Universal Service Board should authorize ETC providers to use company-specific Lifeline customer application forms rather than being required, without exception, to use the MoPSC “generic” form. *See, Comments of Cricket Communications Inc. Concerning Proposed Rule Changes*, filed on October 16, 2012 in MoPSC File No. TW-2012-0012, pages 1-5. Those reasons have been summarized by Staff in its presentations to the Commission on October 3 and via email on October 22.

<sup>1</sup> Cricket Communications, Inc. has ETC status from the Missouri Public Service Commission for low-income ETC services (not high-cost fund) pursuant to the Commission's Order of March 10, 2010 in MoPSC File No. TA-2010-0229.

Cricket hereby recommends the following changes to this section of Staff's draft, proposed rules:

(9) The board may establish a generic form for ETCs to use to enroll end-users in the Lifeline or Disabled programs and shall post a ~~generic acceptable~~ that form on its web site. All ETCs shall use the form established by the board, unless the board specifically authorizes an ETC to use a company-specific form. If a company wants to provide additional information for the applicant in the generic form, ~~such as that information which is interpreted by the company as or is required to do so by an FCC compliance order~~, then a company may be permitted to attach an additional sheet(s) to the form. At least one business day prior to use, the ETC shall electronically submit a copy of such additional sheet(s) to the board staff. If the additional sheet(s) is changed, the ETC shall electronically submit a copy of that additional sheet(s) to the board staff with the changes highlighted, at least one business day prior to the use of the changed form. There is no obligation on the board or its staff to review or approve such sheet(s).

(3) This proposed language also addresses objections Cricket raised about the addendum language (within this same subsection) in the current Staff draft. See, *Comments of Cricket Communications Inc. Concerning Proposed Rule Changes*, filed on October 16, 2012 in MoPSC File No. TW-2012-0012, pages 5-6, especially at B. (2).

(4) These changes would give the board the flexibility to authorize company-specific customer application forms in the future, if it decided to do so. MTIA, AT&T Missouri, Cricket Communications and others (*i.e.*, both wireline and wireless ETC providers) have urged the use of company-specific forms instead of only the generic form, in comments at the MoPSC workshop on August 29 and in written comments on September 14 and October 16 and 17 in TW-2012-0012.

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

Respectfully submitted,

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

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Dated: October 26, 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 26<sup>th</sup> day of October 2012.

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

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William D. Steinmeier