



State of Rhode Island
Division of Public
Utilities & Carriers

Administration
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September 24, 2019

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 3533

Dear Ms. Massaro,

I write relative to the above-entitled matter in response to a September 24, 2019 request from Commission counsel. Kindly include this correspondence in the record of the docket.

The Amended Petition that was filed in the above matter provides for “two notifications”: the first, a separate letter via U.S. mail to all impacted customers provided at least 60 days prior to the ETC relinquishment date, and the second, a letter to impacted customers, at least 30 days prior to the ETC relinquishment date. *Amended Petition* at 4.

In response to the Division data request “What part of the letter will be in the bill message?” Cox stated:

“The entire letter will constitute the bill message, so only one exhibit will be utilized (the revised letter attached).”

From the plain language of the Amended Petition, this response, and Cox’s representations to the Division in discussions that transpired regarding the Division’s initial comments, it was the Division’s understanding that the letter which would be forwarded to impacted customers at least 60 days prior to the ETC relinquishment date would also be inserted in impacted customers’ bills at least 30 days prior to the effective relinquishment date (in lieu of a message on the bill itself).

The Division believes it is important that Cox provide two notifications to impacted lifeline customers via separate mailings as promised to provide them with adequate and sufficient notice about the impending change to their telephone service. Providing notice in this manner, moreover, may be of particular assistance to some lifeline customers who may be more likely to pay attention to a notice accompanying a bill rather than received separately in the U.S. Mail, and plan the

services they receive on this basis. Accordingly, the Division opposes Cox's proposal to modify its amended petition to "allow the customer notification letter to be sent by Cox only once, at least 60 days prior to the relinquishment effective date."

Further, kindly ensure that I am added to the Service List in above matter as I seem not to have received the most recent correspondence from Cox or Commission counsel.

Thank you for your anticipated cooperation.

Very truly yours,

Leo J. Wold
Deputy Chief of Legal Services, DPUC