



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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*Patrick C. Lynch, Attorney General*

October 27, 2008

Luly Massaro, Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02889

**Re: Docket No. 3692**

Dear Ms. Massaro,

On August 19, 2008, at a conference in the above-entitled matter, Commission counsel requested the Division of Public Utilities and Carriers ("Division") to provide a position statement regarding: (i) whether the Division believes any changes need to be made to the existing Alternative Regulation Plan ("ARP"), and (ii) how the Commission should proceed in connection with Cox Communications' desire to perform statistical sampling of its Lifeline customers in accordance with a table of the Universal Service Administrative Company.

With respect to the first issue, the Division recommends that the existing ARP should remain in place for an additional three-year term. No other changes are recommended at this time. With respect to the second issue, in Docket No. 3692, Order No. 18550 at 39, the Commission ordered that, "The Commission shall initiate an investigation to determine if all eligible telecommunications carriers in Rhode Island must provide basic measured service for Lifeline customers." The Commission, therefore, may desire to open up a docket to examine mandatory Lifeline, eligibility rules, *etc.*

If you have any other questions or comments, please do not hesitate to contact me.

Very truly yours,

Leo J. Wold

Special Assistant Attorney General

cc: Service List

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