

July 23, 2012

Via E-Mail and Regular Mail

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Lifeline Certification Rulemaking – Docket No. 4337

Dear Luly:

In response to the Commission's Notice of Proposed Rulemaking, dated June 22, 2012, Cox Rhode Island Telcom LLC ("Cox") provides the following comments, and suggestions, to two of the proposed sections of the proposed rules.

Section 6.2. One per Household Rule

The proposed new rules, at Section 6.0, provide for new procedures for ETC's to determine eligibility for enrolling and retaining lifeline discounts to customers. These new rules seek to implement the new rules set forth in 47 C.F.R. 54.400, as further explained in the recent FCC Lifeline and Link up Reform and Modernization Order (WC Docket No. 11-42, FCC 12-11 (February 6, 2012 ("Lifeline Reform Order")). The Commission's proposed Section 6.2 seeks to implement one aspect of the new FCC rules, the so-called "one per household" requirement.

6.2 Household is defined as any individual or group of individuals who are living together at the same address as one economic unit, as further defined in 47 C.F.R. 54.400.

To further explain how this new one-per-household rule is supposed to work, Cox suggests that this proposed Section 6.2 also explain what is meant by the term "economic unit" as this is an important requirement describing how the ETC, in accordance with the new FCC rules, will determine whether an applicant qualifies under the new one-per-household rule. Similarly, Cox also suggests that this proposed Section 6.2 also provide for the requirement that an applicant submit the required "worksheet," where necessary to resolve the instances where multiple "households" reside at the same address (as separate "economic units"), as more fully explained at the FCC's Lifeline Reform Order, beginning at paragraph 77.

These two additional provisions will assist ETCs and the public with the basic rules that the ETC will follow to determine whether the applicant complies with the one-per-household

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requirement, as well as whether more than one Lifeline discount will provided to other “households” that reside at the same address. Cox recommends the following or similar language (in bold):

6.2: Household is defined as any individual or group of individuals who are living together at the same address as one economic unit, as further defined in 47 C.F.R. 54.400. **An economic unit consists of all adult individuals contributing to and sharing in the income and expenses of a household. Whenever there is another Lifeline subscriber at the same address, a Lifeline applicant must first complete the USAC “Household Worksheet” that the ETC will use to determine whether the applicant resides at an address with one household, or multiple households in accordance with 47.C.F.R. 54.400.**

Section 7.3 Re-Certification

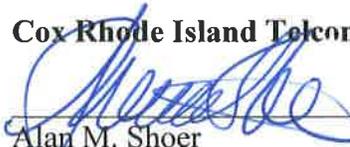
Proposed Section 7.3 requires that “ETC’s must also comply with the FCC’s requirements set forth in 47 C.F.R. 54.410(g)” without explaining in any way what this section of the FCC rules is about. Cox suggests a very brief insertion that summarizes what this section of the C.F.R. is referring to, similar to the way the rest of the proposed rules are set up. This will at least provide the reader with an introduction to what the Commission is requiring, with reference to the FCC rule for further details. Cox suggests the following language instead:

Section 7.3 ETC’s must also re-certify the residential address of each of its subscribers who have provided a temporary address, in compliance with the FCC’s requirements set forth in 47 C.F.R. 54.410(g). In addition, an eligible telecommunications carrier must re-certify, every 90 days, the residential address of each of its subscribers who have provided a temporary address as part of the subscriber's initial certification or re-certification of eligibility.

Respectfully submitted,

Cox Rhode Island Telcom, LLC

By:


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