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July 23, 2012

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

**Re: Docket No. 4337 – RULES AND REGULATIONS GOVERNING
THE CERTIFICATION AND VERIFICATION PROCEDURES
FOR TELECOMMUNICATIONS CARRIERS ELIGIBLE TO
RECEIVE PAYMENTS FROM THE FEDERAL UNIVERSAL
SERVICE FUND.**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter are the original and nine copies of the Comments of Verizon Rhode Island.

Thank you for your assistance.

Sincerely,


Alexander W. Moore *CS*

Enclosures
cc: Service List

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

RULES AND REGULATIONS GOVERNING THE
CERTIFICATION AND VERIFICATION PROCEDURES
FOR TELECOMMUNICATIONS CARRIERS ELIGIBLE
TO RECEIVE PAYMENTS FROM THE FEDERAL
UNIVERSAL SERVICE FUND

Docket No. 4337

COMMENTS OF VERIZON RHODE ISLAND

Verizon New England Inc., d/b/a Verizon Rhode Island (“Verizon RI”) files these comments pursuant to the Notice of Proposed Rulemaking issued by the Commission in the above docket on June 22, 1012. Verizon RI appreciates the opportunity to comment on the proposed ETC rules and has no objection to them.

Verizon RI notes one rule that may require the Commission’s attention in the future. Proposed Rule 8.4 would require each ETC to file with the Commission, by the end of February each year, the number of Lifeline subscribers it had as of the previous June 1. While that is consistent with current filing requirements under the FCC’s recent Lifeline Reform Order,¹ it is possible that in a few years ETCs may no longer file with the FCC the number of its Lifeline customers by state, depending on the nature and implementation of the federal subscriber

¹ *In the Matters of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket Nos. 11-42, 03-109, and 12-23, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking* (rel. Feb. 6, 2012).

database anticipated in the Order. In that eventuality, the Commission may need to revise the state filing requirement to ensure consistency with federal practice.

Respectfully submitted,

VERIZON RHODE ISLAND

By its attorney,



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Dated: July 23, 2012