

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
MAY 19 2005

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE REVIEW OF
IMPLEMENTATION OF FCC REQUIREMENTS
FOR LIFELINE AND LINK-UP PROGRAMS
AND THE DEVELOPMENT OF ADDITIONAL
OUTREACH EFFORTS

TC-05-058

RESPONSE OF
QWEST CORPORATION
TO REQUEST FOR
INFORMATION

Qwest Corporation ("Qwest"), through its undersigned counsel, respectfully submits the following responses to the requests for information set forth in the Public Utilities Commission's Order Opening Docket and Requesting Information dated April 15, 2005.

Commission request:

- (1) ETC's Lifeline and Link-Up forms and promotional materials

Qwest response:

In July 2004, Qwest implemented the additional Temporary Assistance for Needy Families and National School Lunch Program criteria in South Dakota and on Tribal Lands. In late April 2005, Qwest implemented the income level criteria in both of these same areas. A copy of Qwest's revised Telephone Assistance Plan ("TAP") application for South Dakota is attached as Exhibit 1. A copy of Qwest's revised TAP application and brochure for Tribal Lands is attached as Exhibit 2. Both applications reflect these additional criteria and include instructions on what supporting documentation a customer must submit along with the TAP application if the customer is qualifying under the income level criteria. Both of these new applications are available for our service representatives to send out to customers who call Qwest Customer Service to request information on TAP. Please see Qwest's responses below concerning promotional materials.

Commission request:

- (2) A description of how the ETC advertises Lifeline and Link-Up, including the form of advertisement, and how often it advertises the programs

Qwest response:

Currently, Qwest sends each new customer a separate mailing that describes Telephone Assistance Plans in South Dakota. A copy of the current letter is attached as Exhibit 3.

Information on Telephone Assistance Plans can also be found in the "Consumer Tips" section of the Dex telephone books. A copy of that page is attached as Exhibit 4.

Also, information on Telephone Assistance Plans available from Qwest can be found at www.qwest.com/TAP. At the bottom of this web page there is a link to the Universal Service Administrative Company site, where the customer can find specific information regarding TAP in his or her state. The Tribal Lifeline application can be downloaded from the www.qwest.com/TAP page. Currently, Qwest is working to make TAP applications for each state in Qwest's 14-state region available on this site as well.

During the week of April 25, 2005, Qwest issued a press release via Business Wire to all major publications in its 14-state territory. The press release is attached as Exhibit 5. While the press release focuses on the income criteria being added to the Tribal Lifeline program, local Qwest representatives in the states informed their press contacts that the income criteria had also been added to the regular Lifeline program.

Currently, Qwest is working on a very aggressive outreach program regarding Tribal Lifeline. Qwest has developed individualized outreach plans for each of the Tribal Lands it serves in South Dakota. These plans include print ads in Native Voice and Indian Country, press releases, public service announcements, and involvement in local fairs, etc., as identified by Tribes. Additionally, Qwest Network Technicians are leaving a Tribal Lifeline application at every installation and/or repair call they make on Tribal Land.

Commission request:

- (3) A description of how the ETC is implementing the new certification procedures

Qwest response:

Qwest began offering customers the opportunity to qualify for TAP and Tribal Lifeline based on the size and income level of their households beginning the week of April 25, 2005. When Qwest receives an application and supporting documentation in its Omaha customer service center, Qwest personnel scan the documents into an electronic database. Qwest's service representatives work from these documents to add the appropriate TAP credits to a customer's account. If a customer has not included the appropriate supporting documentation with the application, the customer will receive a denial letter explaining what the customer needs to send if he or she is qualifying based on household size and income level. Qwest stores the original application form and supporting documents electronically as long as TAP is on the customer's account.

Commission request:

- (4) A description of how the ETC is implementing the new verification procedures


Qwest response:

On May 12, 2005, Qwest sent TAP verification letters to 43 customers (a statistically valid sample size according to Appendix J of the FCC's 2004 Order on TAP) currently receiving TAP

credits on their telephone bills. A copy of the letter is attached as Exhibit 6. The letters asked customers to complete the enclosed TAP application and return it to Qwest, along with supporting documentation, no later than June 3, 2005. For those customers who fail to return the application, Qwest will send a second letter informing them that TAP credits will be removed from their accounts in 60 days. For customers who do not complete the application correctly or who fail to send supporting documentation, Qwest will send a denial letter informing those customers of additional steps they can take in order to continue to receive TAP. A copy of the denial letter is attached as Exhibit 7. Qwest will report results of its annual verification to the FCC by June 22, 2005. Qwest is conducting a similar sample survey of 43 tribal customers located across Qwest's 14-state region.

RESPECTFULLY submitted this 18th day of May, 2005.

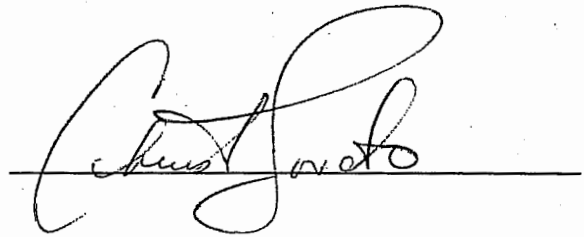
QWEST CORPORATION

By: 
Melissa K. Thompson
Qwest Services Corporation
1005 17th Street, Suite 200
Denver, CO 80202
(303) 896-1518

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2005, an original and 10 copies of the foregoing **QWEST CORPORATION'S RESPONSE** was served upon the following party:

Ms. Pam Bonrud
Executive Secretary
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, SD 57501-5070



A handwritten signature in cursive script, appearing to read "Christy J. Bonrud", is written over a horizontal line.

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EXHIBIT 1

May 18, 2005

TELEPHONE ASSISTANCE APPLICATION FOR SOUTH DAKOTA

(Please Print)

Name _____
(First) (Middle) (Last)

Address _____
(Street) (City) (State) (Zip)

Home Telephone Number: _____
(The name of the person applying for Telephone Assistance must appear on the telephone account.)

Telephone Number where you can be reached or receive messages: (_____) _____
area code & 7-digit number

1. I currently participate in the following program(s): *Check all that apply*
- _____ Medicaid (e.g. Title XIX/Medical, State Supplemental Assistance)
 - _____ Food Stamps
 - _____ Supplemental Security Income (SSI)
 - _____ Federal Public Housing Assistance
 - _____ Low-Income Home Energy Assistance
 - _____ Temporary Assistance to Needy Families program (TANF)
 - _____ National School Lunch program (NSL)

2. IF YOU DO NOT PARTICIPATE IN ONE OF THE PROGRAMS LISTED ABOVE, you may qualify for telephone assistance based on the size and income level of your household. (Household refers to the number of people who occupy your housing unit as their place of residence.)

Please check the box below which applies to your household and attach the supporting documentation described on the previous page:

Please Check Box	Size of Household Unit:	Household Income at or Below:	Please Check Box	Size of Household Unit:	Household Income at or Below:
<input type="checkbox"/>	1	\$12,920	<input type="checkbox"/>	6	\$34,925
<input type="checkbox"/>	2	\$17,321	<input type="checkbox"/>	7	\$39,326
<input type="checkbox"/>	3	\$21,722	<input type="checkbox"/>	8	\$43,727
<input type="checkbox"/>	4	\$26,123	<input type="checkbox"/>	No: _____	*\$ _____
<input type="checkbox"/>	5	\$30,524	*For each additional person, add \$4,401		

I agree to notify Qwest when I no longer participate in any of the above qualifying public assistance programs or when there has been a change in the size or income level of my household.

I certify under penalty of perjury the above information is true. I have read the information on this application and understand I must meet the above qualifications to receive Telephone Assistance (Lifeline and/or Link-Up) on my primary residential line.

Your Signature

Social Security Number

Date

Mail completed form and supporting documentation to:

Qwest
 PO Box 2738
 Omaha, NE 68103-2738

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EXHIBIT 2

May 18, 2005



NOW, IF YOU QUALIFY, TELEPHONE SERVICE CAN BE MUCH MORE AFFORDABLE.

Tribal Lifeline

Low-cost connections for low-income persons living on Tribal Lands.

Tribal Lifeline provides eligible customers who live on Tribal Lands basic in-home local telephone service for as low as \$1.00 a month, plus applicable taxes and surcharges. Optional calling features such as Call Waiting, Caller ID, Voice Mail and others are available at the full retail rate.

Tribal Link-Up

Reduced new telephone service connection charges.

If you don't have telephone service currently, the Tribal Link-Up program will pay one-half of the cost to install your main phone line, up to \$30.00. Also, you will receive an additional \$70.00 credit to help offset remaining installation-related service charges.

If you qualify for Tribal Lifeline, you will automatically be given Tribal Link-Up credit:

- If your Tribal Lifeline application is received within 60 days following installation of your phone service
- If you have not previously received a Tribal Link-Up credit at this same address

The telephone can be your link with friends, children, parents, grandparents; it can even be a life-saving link in an emergency. If you live on Tribal Land, you may qualify for telephone service for as low as \$1.00 a month. And if you don't currently have telephone service, you may qualify for a reduced new service connection charge, too.

Who Is Eligible?

1. Applicants qualify for Tribal Lifeline if they live on Tribal Lands and participate in at least one of the following public assistance programs:

- Food Stamps
- Medicaid
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low Income Home Energy Assistance Program
- BIA/General Assistance Programs
- Tribally Administered Temporary Assistance for Needy Families
- Head Start (meeting income test)
- National School Lunch Program
- Other qualifying low-income programs in your state (call Qwest at **1 800-244-1111** to inquire about these programs)

2. Applicants may also qualify for Tribal Lifeline if they live on Tribal Lands and their household income is at or below 135% of the Federal Poverty Guidelines. (See application form for details.)

If you are applying for Tribal Lifeline based on your household size and income level, you must provide a copy of one of the following:

- Last year's Federal, State, or Tribal Income Tax Return
- Current Income Statement or Paycheck Stubs for three consecutive months
- Veteran's Administration Statement of Benefits
- Retirement or Pension Statement of Benefits

- Unemployment or Worker's Compensation Statement of Benefits
- Letter of Participation In Federal or BIA General Assistance
- Divorce Decree
- Child Support Documentation

Other Telephone Assistance Plans:

If you are not currently living on Tribal Land, you may be eligible for a similar Telephone Assistance Plan:

- If you participate in a low-income public assistance program
- If your household size and income level is at or below 135% of the Federal Poverty Guidelines

Call **1 800-244-1111** for more information.

How Do I Apply?

To apply for Tribal Lifeline and/or Tribal Link-Up, simply fill out the attached application form and mail it to:

**Qwest
P.O. Box 2738
Omaha, NE 68103-2738**

If you do not currently have phone service with Qwest, please call Customer Service at **1 800-244-1111** to place an order for service BEFORE sending in your completed application. Not available in all areas, long distance not included.



TRIBAL LIFELINE / TRIBAL LINK-UP Application Form

Name: _____
last first middle

Address: _____
street city state zip

Home Telephone Number: _____
(The name of the person applying for Telephone Assistance must appear on the telephone account.)

Telephone Number where you can be reached or receive messages: _____
area code + 7-digit number

I currently reside on: _____
Name of Tribal Land

1. I CURRENTLY PARTICIPATE IN THE FOLLOWING PROGRAM(S): Check all that apply

- | | | |
|--|--|--|
| <input type="checkbox"/> Food Stamps | <input type="checkbox"/> BIA/General Assistance Programs | <input type="checkbox"/> Other qualifying low income programs in your state (call Qwest at 1 800-244-1111 to inquire about these programs) |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> Tribally Administered Temporary Assistance for Needy Families | |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Head Start (meeting income test) | |
| <input type="checkbox"/> Federal Public Housing Assistance | <input type="checkbox"/> National School Lunch Program | |
| <input type="checkbox"/> Low Income Home Energy Assistance Program | | |

2. IF YOU DO NOT PARTICIPATE IN ONE OF THE PROGRAMS LISTED ABOVE, you may qualify for telephone assistance based on the size and income level of your household. (Household refers to the number of people who occupy your housing unit as their usual place of residence.)

Please check the box below which applies to your household and attach the supporting documentation described on the previous page:

PLEASE CHECK BOX	Size of Household:	Household Income at or Below:	PLEASE CHECK BOX	Size of Household:	Household Income at or Below:
<input type="checkbox"/>	1	\$12,920	<input type="checkbox"/>	6	\$34,925
<input type="checkbox"/>	2	\$17,321	<input type="checkbox"/>	7	\$39,326
<input type="checkbox"/>	3	\$21,722	<input type="checkbox"/>	8	\$43,727
<input type="checkbox"/>	4	\$26,123	<input type="checkbox"/>	No.	\$
<input type="checkbox"/>	5	\$30,524	*For each additional person, add \$4,401		

I agree to notify Qwest when I no longer participate in any of the above qualifying public assistance programs or when there has been a change in the size or income level of my household.

I certify under penalty of perjury the above information is true. I have read the information on this application and understand I must meet the above qualifications to receive Tribal Lifeline and/or Tribal Link-Up on my primary residential line.

signature date

Mail completed form and supporting documentation to: Qwest, PO Box 2738, Omaha, NE 68103-2738

© 2005 Qwest. All Rights Reserved.

See if you qualify:
**Tribal Lifeline
 Tribal Link-up**

Qwest
 Spirit of Service™



Qwest® offers a special program that can help you keep connected with loved ones, friends and help in an emergency.

**IF YOU LIVE
 ON TRIBAL LAND,
 YOU COULD QUALIFY
 FOR
 TELEPHONE SERVICE
 AS LOW AS
 \$1.00 A MONTH!**

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EXHIBIT 3
May 18, 2005

TELEPHONE ASSISTANCE PROGRAMS AVAILABLE AT QWEST FOR SOUTH DAKOTA CUSTOMERS

In order to make telephone service more affordable for low-income households, Qwest supports the federal government's Lifeline and the Link-Up telephone assistance programs.

WHAT DO THESE PROGRAMS PROVIDE?

- **LIFELINE** provides eligible customers with a **monthly credit** of \$8.12 to help offset the cost of their home telephone line. In order to receive this credit, the telephone service must be billed to the individual applying for telephone assistance.
- **LINK-UP** provides eligible customers with a **one-time credit** of \$12.50 to help offset the installation charge associated with their home telephone line. Customers who qualify for Lifeline assistance will also be given the Link-Up credit, if their application for telephone assistance is received within 60 days following the installation of their phone service and if they have not previously received a Link-Up credit at this address.

WHO IS ELIGIBLE FOR TELEPHONE ASSISTANCE?

Customers qualify for telephone assistance when they participate in one of the following low-income programs:

- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low-Income Home Energy Assistance
- Temporary Assistance to Needy Families program (TANF)
- National School Lunch Program (NSL)

Customers may also qualify for telephone assistance if their household income is at or below 135% of the Federal Poverty Guidelines (see application form for details).

HOW DO I APPLY?

If you meet one of the eligibility requirements above, please complete and sign the attached Telephone Assistance Application form and mail it to:

Qwest, PO Box 2738, Omaha, NE 68103-2738.

Customers applying for Lifeline based on the size and income level of their household must provide a copy of one of the following:

- Last year's Federal or State Income Tax Return
- Current Income Statement or Paycheck Stubs for three consecutive months
- Social Security Statement of Benefits
- Veteran's Administration Statement of Benefits
- Retirement or Pension Statement of Benefits
- Unemployment or Worker's Compensation Statement of Benefits
- Letter of Participation in Federal or BIA General Assistance
- Divorce Decree
- Child Support Documentation

FOR MORE INFORMATION

If you have additional questions about Lifeline or Link-Up, please call Qwest at 1-800-244-1111.

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EXHIBIT 4

May 18, 2005

Consumer Tips

Pay Per Call Service Information

What "900" Numbers are

Private companies offer a variety of informational programs using phone numbers that begin with "900". There is a charge for calls to these numbers. Charges for "900" calls appear on the Interexchange Carrier page of your bill. "900" calls contain an introductory disclosure message specifying types of charges, time necessary to complete the call, and an option to disconnect without charge at the end of the introductory message.

The price and content of "900" services are the responsibility of the companies that provide the information.

How to Block Calls to "900" Numbers

Your local telephone company will assist you in blocking calls from your line to "900" numbers

Other Questions About "900" Numbers

If you have a complaint or dispute about the "900" services, call the interexchange carrier. Services that contain illegal or sexually explicit material are not allowed. Nor is your telephone service disconnected for disputes about payment of "900" charges.

Unwanted Sales & Survey Calls

If you receive unwanted sales and/or survey calls, please take the following steps:

- Be skeptical of offers that sound too good to be true; they usually are.
- Report companies using questionable sales practices to the Better Business Bureau or your State Attorney General's office.
- Disconnect computer-generated calls by hanging up your telephone for 12 to 15 seconds.
- Call your local telephone company to have your name removed - at no charge - from any lists that they may lease to other firms. Customers with non-listed or non-published numbers are never included on the lists.
- Do not give your telephone credit card number to anyone who calls and asks for the number.

Telephone Assistance Programs

The Telephone Assistance Program (TAP) provides reduced phone bills for qualified low-income residence customers.

The Link-Up program provides financial help with telephone service connection charges for qualified low-income residence customers.

If you live on Tribal Lands and participate in a qualifying low-income program, you could receive additional benefits.

Call your local telephone company for more information about Telephone Assistance Programs.

You may also contact www.lifelinesupport.org for more information.

South Dakota Do-Not-Call Register

Sign-Up Is Free

Register on line at www.donotcall.gov

Or Call Toll Free1 888 382-122
 TTY1 866 290-423

If you have problems registering, please contact the South Dakota Public Utilities Commission at 1 800 332-1782 or www.state.sd.us/puc.

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EXHIBIT 5

May 18, 2005



NEWS

QWEST EXPANDS OUTREACH TO LOW-INCOME RESIDENTS ON TRIBAL LANDS

More are Now Eligible for Low-Cost Telephone Service

DENVER, April 28, 2005 – Qwest today announced an expanded outreach effort aimed at promoting low-cost telephone service to individuals living on the more than 60 tribal lands across its 14-state region. The effort, combined with new federal guidelines making more residents eligible for Qwest's Tribal Lifeline and Tribal Link-Up telephone assistance programs, means even more now qualify for low-cost telecommunications installation and service.

"Qwest is proud of its role in connecting families with technology and telecommunications services on tribal lands," said Paula Kruger, Qwest executive vice president, consumer markets. "Partnering with tribal leaders, we will work to increase awareness of these programs, and encourage more to sign up for them."

Under recently expanded Federal Poverty Guidelines, customers whose household income is at or below 135 percent of the Federal Poverty Guidelines now qualify for assistance. Household income was not part of the eligibility requirements before.

Qwest will expand its outreach, working with leaders in tribal communities throughout its 14-state region to publicize the availability of these programs. That outreach includes public service announcements and on-the-ground marketing on reservations and at Native American "pow wows," which draw thousands of participants. Qwest's outreach efforts are designed to encourage eligible participants to sign up.

Qwest began offering Tribal Lifeline and Tribal Link-Up in June 2000, when the Federal Communications Commission (FCC) established the programs in an effort to promote telephone service in underserved tribal areas. Tribal Lifeline, provides residential customers who live on tribal lands with basic local telephone service for as low as \$1.00 per month, plus applicable taxes and surcharges. Tribal Link-Up, reduces the cost of installing a customer's main telephone line by 50 percent.

Individuals living on tribal lands qualify for the Tribal Lifeline and Tribal Link-Up if they participate in one of the following low-income programs.

1. Medicaid
2. Food Stamps
3. Supplemental Security Income (SSI)
4. Head Start (Meeting Income Requirement)
5. Tribally Administered Temporary Housing for the Needy Families

6. Bureau of Indian Affairs General Assistance Programs
7. Federal Public Housing Assistance
8. Low-income Home Energy Assistance
9. National School Lunch Program
10. Any other qualifying program approved by the state Lifeline and Link-Up program

As of this week, individuals can also qualify for Tribal Lifeline if their household income is at or below 135 percent of the Federal Poverty guidelines.

Enrollment is easy. Qualified individuals need to complete and return a simple application that can be obtained by calling Qwest at 1 800-244-1111. The application can also be found at the Qwest Web site at www.qwest.com/TAP.

About Qwest

Contacts:

Media Contact:

Melissa Reffel
303-896-3011
Melissa.Reffel@qwest.com

Investor Contact:

Stephanie Comfort
800-567-7296
IR@qwest.com

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EXHIBIT 6

May 18, 2005

May 12, 2005

**Please confirm your continued qualification
for telephone assistance credits**

Dear Qwest Customer:

Qwest® recognizes how important telephone service is to help connect people to family, friends, businesses and emergency services. Our goal is to ensure that eligible program participants continue to enjoy access to this low-cost service each month. We are in the process of verifying customers' continued eligibility for receiving monthly telephone assistance.

Our records indicate that you currently receive Lifeline credit on your residential telephone line. Lifeline is a telephone assistance program available to qualified low-income residents. In order for us to continue providing you with the telephone assistance credits, we need you to verify whether or not you still participate in one of the qualifying programs, or if you qualify based on the size of your family and income level.

If you do, please complete the enclosed telephone assistance application and return it to Qwest in the enclosed envelope. In addition to the completed application, you must include **one of the following**:

- Documentation confirming that you are currently on a qualifying public assistance program (such as a copy of your Medicaid card).
- or
- Documentation confirming that the size and income level of your household qualifies you for Telephone Assistance.

Please return this application and the supporting documentation as soon as possible. If we do not receive it by June 3, 2005, we will have to remove the Lifeline credits from your account.

If you have any questions, please call us at 1 402-422-8345. Collect calls will be accepted.

Sincerely,

Gerri Hogan
Manager – Telephone Assistance Plans
Attachments

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EXHIBIT 7

May 18, 2005

Qwest
Post Office Box 2738
Omaha, NE 68103-2738

Dear Telephone Assistance Applicant:

We received your application for Telephone Assistance. Unfortunately, however, we are unable to process your application because of the reason checked below:

- You did not provide your home telephone number. If you do not yet have phone service, please call Qwest at 1-800-244-1111 to order your service, and then include your new phone number on your application. (Be sure to let the service representative know that you will be applying for Telephone Assistance.)
- The telephone number you provided could not be found in our records. Please be sure you have provided the correct area code and telephone number for your home.
- You did not provide your Social Security number.
- The telephone number you listed is not provided by Qwest.
- The name of the individual applying for Telephone Assistance does not match the name on the bill for this account.
- You must include a copy of your LIHEAP Approval Letter, along with your application.
- You must include a copy of your Medicaid Card, along with your application.
- You must include a copy of your Equality Care Card, along with your application.
- You must include documentation, such as last year's income tax return or three consecutive months of pay stubs, in order to certify your annual income.
- Other: _____

Please update your application with the information requested and return it to:

Qwest
Post Office Box 2738
Omaha, NE 68103-2738

If you have any questions or need additional assistance, please feel free to call our office at 402-422-8345.

Sincerely,

Geri Hogan
Manager – Telephone Assistance Programs