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SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

May 11, 2005

Pam Bonrud
Executive Director
South Dakota Public Utilities Commission
Capitol Building, First Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Re: In the Matter of the Review of Implementation of FCC Requirements for Lifeline and Link-up Programs and the Development of Additional Outreach Efforts

Order Opening Docket and Requesting Information

Docket TC05-058

Dear Director Bonrud:

In its April 15, 2005 order, the South Dakota Public Utilities Commission ("Commission") requested information from all Eligible Telecommunications Carriers ("ETCs") in South Dakota regarding their Lifeline practices. Citizens Telecommunications Company of Minnesota, LLC ("Citizens") provides service to a small portion of South Dakota, from its Jasper, Minnesota exchange. The South Dakota portion of the Jasper exchange is referred to as West Jasper. The bulk of Citizens' customers in the Jasper exchange reside in Minnesota; approximately 80 South Dakotans are provided with telephone service from the Jasper exchange. Currently, there are no Lifeline customers in the South Dakota portion of the Jasper exchange.

In its April 15 order, the Commission requested ETCs to respond to four specific questions. Citizens responds to those questions as follows:

1) the ETC's lifeline and linkup forms and promotional material

The application form used to enroll customers in Lifeline and/or Link-up is enclosed, as Attachment I. Attachment II contains a newspaper advertisement which published in the Jasper Journal, a local newspaper. These advertisements are published annually, most recently in October 2004. Attachment III is a copy of a bill insert which customers also receive annually, most recently in February 2005. The insert refers to the low income support program as "TAP", which is the name of the Minnesota program which matches the federal Lifeline program. Attachment IV is a page from the directory for West Jasper, which notes the existence of programs to support low income customers.

2) a description of how the ETC advertises lifeline and link-up, including the form of advertisement and how often it advertises

As noted, a newspaper advertisement (Attachment II) is published annually. A customer bill insert (Attachment III) is sent to customers annually. And the directory contains information on low income support programs.

3) how the ETC is implementing the new certification procedures

Citizens enrolls new Lifeline customers through a self-certification procedure. Customers seeking to enroll in Lifeline complete the application form, and self-certify that they are eligible to participate in the program. Customers who claim eligibility due to participation in a qualifying program must indicate which program they participate in. Customers claiming eligibility due to income level must submit documentation to substantiate that claim.

4) how the ETC is implementing the new verification procedures.

As noted above, there are currently no Lifeline participants in the South Dakota portion of the Jasper exchange, and therefore no need for verification at this time. On May 5, 2005, the Minnesota Public Utilities Commission decided upon verification procedures for ETCs under its authority. Those procedures mimic the procedures set out by the FCC in its Lifeline order. Citizens will be complying with that Minnesota Public Utilities Commission directive for all of its Minnesota Lifeline customers. Since the South Dakota portion of the Jasper exchange is small compared to the rest of the exchange, Citizens would propose to handle verification for the entire Jasper exchange pursuant to the procedures ordered by the Minnesota Commission. This would include South Dakota customers, should any become Lifeline participants in the future.

Enclosed are copies of the customer application form which Citizens uses to enroll customers into the Lifeline and/or Link-up programs.

If you have any questions, please contact me at (952) 491-5534, or sbohler@czn.com.

Sincerely,

Scott Bohler

Manager, Regulatory Central Region

Sattall

Enclosures

Attachment I

Minnesota Telephone Service Discount Application

(Please Print)

Name:	Last	First		Middle	
Address:	Street	City		State:	Zip
	have service (MUST be in your n		el. # where you can)		
area code +	seven digit number	aı	rea code + seven d	igit number	
Telephone C	ompany	N	o. of people living	in your household	1
☐ Medicaid/. ☐ Fed. Publi ☐ Supplement ☐ National S 2. I live on a ☐ Tribally ac ☐ Bureau of ☐ Head Start ☐ Tribal Nat 3. I do not proverty Gui ☐ Last year's ☐ B consecui ☐ Veterans A ☐ Unemploy	Medical Assistance of Housing Assistance (Section 8) and Security Income (SSI) school Free Lunch Program a reservation and participate in a ministered Temporary Assistance (for those meeting income qualificinal School Free Lunch Program articipate in any programs listered in any programs listered in any programs listered at (For those meeting income qualificinal School Free Lunch Programs articipate in any programs listered in any programs listered in any programs listered in the state of the s	□Food S □Minnes □Low-In (LIHEAP the following p e for Needy Fam e Sying standard) ded in #1 or #2 and documents belowing exchanged by the stub exchanged by the statement □	upport (food stamp sota Family Investment come Home Energe) rogram(s): Check nilies (TANF)	nent Program (Miny Assistance Program) all that apply. t or below 135% ome statement fromefits Statement	of Federal om employer
programs. I on this appl	otify the telephone company what is the telephone company what is the certify under penalty of perjurtication, and understand I must ounts on my primary residential	y the above infe participate in c	ormation is true. I	have read the in	ıformation
Applicant Signature S		Social Security	al Security Number		
	thorized Representative" for this a o assist this applicant in seeking to		_	m on behalf of th	is customer. I
Print "Autl	horized Representative'' Name	Daytime	Phone Number	Date	
	Complete Applicat	ion 🗕 Atta	ıch Income Docu	ments	
Mail to:	Frontier Communications PO Box 3609 Kingman, AZ 86402-3609	Fax to:	1-888-352-44	08	

135% of the 2005 Federal Poverty Guidelines

Household Size	Annual Income	
1	\$12,920	
2	\$17,321	
3	\$21,722	
4	\$26,123	
5	\$30,524	

For each additional person, add \$4,401

Attachment II

Frontier, A Citizens Communications Company, is a telecommunications service provider that offers basic and enhanced services at reasonable rates within its serving areas in your community. Basic services* are offered at the following rates:

Single Party Residence Service	Rate Group 1 \$14.25/mo	Rate Group 2 \$21.95/mo
Single Party Business Service	\$28.50/mo	\$43.92/mo
Residential Federal Subscriber Line Charge- Single Line	\$6.50/mo	\$6.50/mo
Business Federal Subscriber Line Charge - Single Line	\$6.50/mo	\$6.50/mo
Business Federal Subscriber Line Charge - Multi Line	\$9.20/mo	\$9.20/mo
Residential Touch Tone Service	No Charge	No Charge
Business Touch Tone Service	No Charge	No Charge

Low-income individuals eligible for Lifeline and Link-up telephone assistance programs may be eligible for discounts off these basic local service charges through state-specified telephone assistance plans.

Basic services are offered to all consumers in the Company's territories at the rates, lerms and conditions specified in the tariffs. If you have any questions regarding Frontier's services, please call us at 800-921-8101 for further information.

*Excludes EAS and other surcharges.

CTC-MN 10/04

www.FrontierOnline.com



Attachment III



Telephone Consumer Bill of Rights

Payment Responsibility/Payment Allocation – As a subscriber, your name will appear on the bill provided by Frontier, and you are responsible for all charges billed to that account for services you order. If you decide not to pay your entire telephone bill, unless you expressly direct otherwise, your partial payment will first be applied to pay for local telephone services provided by Frontier. The remaining payment will be applied first to other telephone services and then to pay for non-telephone services including information services.

Local Service Disconnection Policy – Your local telephone service cannot be disconnected for nonpayment of long distance charges or charges for 900 number calls. Your local service may be disconnected if you fail to pay the local portion of your telephone bill.

Long Distance Service – You have the right to choose the long-distance carrier of your choice (subject to availability). You also can block access to all long-distance service from your telephone at no extra charge.

Unauthorized Changes of Long Distance Carrier — Your long distance carrier cannot be changed without your permission. If an unauthorized change occurs, call either the long distance carrier you wish to provide service or Frontier. There will be no charges for correcting an unauthorized change.

Information Services – Information services are services where a charge is imposed for information provided to the call. Such services are normally provided through 1-900 numbers. You have the right to dispute charges for information service calls. Neither your local nor long distance service may be disconnected because you refuse to pay information services charges. There is no monthly charge for blocking 1-900 calls and the service order charge is waived when you order 1-900 blocking for the first time.





Your Privacy and Personal Information – You have the right to block the release of your telephone number when calling customers with caller ID. For per-call blocking use *67 (or 1167 on rotary phones). For per-line blocking, please call our customer service telephone number.

Harassing/Obscene Phone Calls – If you receive harassing or obscene phone calls, please call our customer service number or consult your local police department.

Telephone Equipment/Inside Wiring – You are responsible for all telephone equipment and all telephone wiring inside your home or business. However, Frontier offers a variety of maintenance plans for a monthly fee.

Telephone Assistance for Low Income and Communications Impaired — Depending on your income, you may qualify for assistance under the Telephone Assistance Plan (TAP). For more information, call our customer service telephone number. If you are communications impaired, you may qualify for assistance under Telecommunications Access Minnesota (TAM). For more information on TAM, please call our customer service telephone number

Complaints and Inquiries — If you have a complaint or question regarding your rights and responsibilities as a telephone subscriber, call Frontier customer service telephone number. If Frontier does not resolve your complaint to your satisfaction, you may request assistance from the Minnesota Public Utilities Commission (MPUC) by writing: MPUC Consumer Affairs Office, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147, or by calling (651) 296-0406 or 1-800-657-3782.

Deposits – A customer who has not established good credit with Frontier may be required to make a deposit. A customer, who has not been held liable for disconnection within the last 12 months, is deemed to have established good credit. Frontier may not rely on any criteria which does not bear a reasonable relationship to the assurance of payment.

Credit for Incorrect Directory Assistance – If you inform us you were provided incorrect local directory assistance information for which you were charged a fee, you have the right to receive an immediate credit.

Service Performance Guarantee – If a customer requests installation or repair of Company facilities and the installation or repairs is not completed as agreed, you may request: Residential - either \$25 credit per primary or additional line order or equal value in form of a pre-paid debit calling card. Business - either \$100 credit per primary or additional line order or equal value in form of a pre-paid debit calling card.

Attachment IV

General Information Call Center: 1-800-435-1504 www.FrontierOnline.com

Did You Know?

You can order additional phone books, piease cali 1-800-435-1504

Consumer Bill of Rights

Payment Responsibility/Payment Allocation

As a subscriber, your name will appear on the bill provided by Frontier, and you are responsible for all charges billed to that account for services you order. If you decide not to pay your entire telephone bill, unless you expressly direct otherwise, your partial payment will first be applied to pay for local telephone services provided by Frontier. The remaining payment will be applied first to other telephone services and then to pay for non-telephone services including information services.

Local Service Disconnection Policy

Your local telephone service cannot be disconnected for nonpayment of long distance charges or charges for 900 number calls. Your local service may be disconnected if you fail to pay the local portion of your telephone bill.

Long Distance Service

You have the right to choose the long-distance carrier of your choice (subject to availability). You may call your local telephone service provider to find the names and telephone numbers of long-distance companies offering service in your area. You can block access to long-distance service from your telephone at no extra charge.

Unauthorized Changes of Long Distance Carrier

Your long distance carrier cannot be changed without your permission. If an unauthorized change occurs, call either the ong distance carrier you wish to provide service or Frontier. There will be no charges for correcting an unauthorized change. You may elect to freeze your long distance account to that your long distance carrier cannot be changed without your express authorization.

nformation Services

nformation services are services where a charge is imposed or information provided to the caller. Such services are ormally provided through 1-900 numbers. You have the ght to dispute charges for information service calls. Neither our local nor long distance service may be disconnected ecause you refuse to pay information service charges. There no monthly charge for blocking 1-900 calls and the service rder charge is waived when you order 1-900 blocking for se first time.

Your Privacy and Personal Information

You have the right to block the release of your telephone multiple when calling customers with Caller ID. Per-call blocking is automatically available on your phone at no charge. For per-call blocking use *67 (or 1167 on rotally phones). For per-line blocking, please call our customer service telephone number. There is no monthly charge for per-line blocking.

Harassing/Obscene Phone Calls

If you receive harassing or obscene phone calls please call our customer service humber or consult your local police department.

Telephone Equipment/Inside Wiring

You are responsible for all telephone equipment and all telephone wiring inside your home or business. Consult your yellow pages for information on companies that can assist with your repair needs. In addition, Frontier offers a variety of maintenance plans for a monthly fee.

Telephone Assistance for Low Income and Communications Impaired

Depending on your Income, you may qualify for assistance under the Telephone Assistance Plan (TAP). If you are, communications impaired you may qualify for assistance under TACIP. For more information on TAP or TACIP, please call our customer service telephone number.

Complaints and Inquiries

If you have a complaint or question regarding your rights and responsibilities as a telephone subscriber call Frontier's customer service telephone number below. You may also call the Public Utilities Commission at 1-800-657-3782.

Customer Service Telephone Numbers

Residential	*******************************	1-800-435-1504
Commercial	· ····	1-800-953-9335
TDD Users		
For customers in Bigelow,)	lasper and Hardw	ick:
For customers in Bigelow,)	***************************************	7-800-921-8101
Rusiness	•	*****