

RECEIVED

May 24, 2012 2012 MAY 24 PM 2: 58

T.R.A. DOCKET ROOM

**VIA HAND DELIVERY**

Sharla Dillon, Docket Room Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Docket No. 12-00035: Petition to Eliminate State Lifeline Credit

Dear Ms. Dillon:

Pursuant to the May 14, 2012 letter request from the Tennessee Regulatory Commission ("TRA") in the above-referenced matter, enclosed please find an original and 13 copies of redacted responses to the TRA's information request. The enclosed responses are submitted on behalf of the following entities: United Telephone Southeast LLC d/b/a CenturyLink; CenturyTel of Claiborne, Inc. d/b/a CenturyLink Claiborne; CenturyTel of Adamsville, Inc. d/b/a CenturyLink Adamsville; and CenturyTel of Ooltewah-Collegedale, Inc. d/b/a CenturyLink Ooltewah-Collegedale (collectively "CenturyLink").

Proprietary copies of the attached responses will be provided upon entry of a Protective Order in this matter. To this extent, CenturyLink respectfully requests that the TRA enter a Protective Order in the above-referenced docket.

Should you have additional questions, please contact me or Sue Benedek (717-245-6346).

Sincerely yours,



Pam Wescott

cc: Sue Benedek, Esquire

**State of Tennessee**  
**Requests for Information**  
**Docket No. 12-00035: Petition To Eliminate State Lifeline Credit**

- 1. Provide the number of customers that receive the Lifeline credit from your company. Please separate the number into those subscribing to basic local exchange service and those subscribing to bundled services. If known, please identify the number of Lifeline customers of basic local exchange service that do not purchase custom calling features.**

As of May 14, 2012, CenturyLink's four ILECs in Tennessee provided the state-mandated Lifeline credit to **BEGIN CONFIDENTIAL** **END** **CONFIDENTIAL** subscribers. Of those subscribers, **BEGIN CONFIDENTIAL** **END CONFIDENTIAL** subscribed to a bundle of services that included basic local exchange service and a variety of other services. CenturyLink does not have available the number of Lifeline subscribers to basic local exchange service (not part of a bundle) that do not purchase any custom calling features.

- 2. Provide the amount of money expended by your company to provide the state-mandated Lifeline credit over the past year. If readily available, provide the amount expended for prior years.**

During 2011, CenturyLink's four ILECs in Tennessee provided state-mandated Lifeline credits totaling **BEGIN CONFIDENTIAL** **END** **CONFIDENTIAL**

- 3. Discuss the administrative costs associated with providing the state-mandated lifeline credit. Would the administrative costs of providing the state-mandated Lifeline credit change if the credit were limited to smaller set of services or recipients than the currently required. Please describe and quantify any other cost savings if the relief requested in the Petition is granted.**

CenturyLink incurs a number of administrative costs associated with Lifeline service, including (but not limited to) costs to verify eligibility, place the credit on the account, monitor the accounts to ensure credits are properly applied, continue to determine the eligibility of the subscriber, removing the credit when the subscriber is no longer eligible for the credit, responding to customer inquiries regarding the program, and ensuring continued compliance with all program rules. CenturyLink does not anticipate that these costs would change appreciably if the state-mandated Lifeline credit applied to a smaller set of services or recipients. CenturyLink has not performed a cost study to quantify the administrative costs associated with providing the Tennessee state-mandated Lifeline credit.

- 4. If the Petition is approved, please describe how your company proposes to notify customers.**

CenturyLink will provide notice to its subscribers receiving the state-mandated Lifeline credit in the form that the TRA requires.