

221 E. Fourth St. P.O. Box 2301 Cincinnati, Ohio 45201-2301

August 26, 2011

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: Administrative Case No. 360

Dear Mr. Derouen:

This letter is to certify that Cincinnati Bell Telephone Company LLC (CBT) has procedures in place to annually re-verify the eligibility of all of its Kentucky Lifeline customers in accordance with Administrative Case No. 360. The results and certification of CBT's 2011 Lifeline audit are shown on CBT's Annual Lifeline Certification and Verification form to USAC, which is attached.

Consistent with the FCC's procedures for terminating Lifeline benefits, CBT sent a follow-up mailing to all customers who did not respond to CBT's initial audit mailing to re-verify Lifeline eligibility or who responded with inappropriate documentation. This follow-up mailing informed the recipients that they had 60 days to return an enclosed form and supporting documentation to demonstrate their continued eligibility for Lifeline, or CBT would discontinue their Lifeline benefits. The 60-day period has expired, and the results on the attached form include the results from this second mailing. CBT is beginning to remove the Lifeline discount for the customers who did not verify continued Lifeline eligibility.

Any questions regarding this filing or CBT's Lifeline audit may be directed to me at 513-397-6858 or bob.wilhelm@cinbell.com.

Sincerely

Robert W. Wilhelm, Jr. Regulatory Pricing Manager



Annual Lifeline Certification & Verification

Complete Section 1, 2, 3, or 4. Then complete the chart below.

1. Eligible Telecommunications Carrier (ETC) serving Federal Default State (complete columns A through F and sign below)

I certify that the company listed below has procedures in place to verify the continued eligibility of a statistically valid random sample of its Lifeline customers. Results are provided in the chart below. I certify that the company listed below has procedures in place to review income documentation and that, to the best of my knowledge, the company was presented with documentation of the consumer's household income. I am an officer of the company named below. I am authorized to make this certification for the Study Area(s) listed below.

OR

2. \square Eligible Telecommunications Carrier (ETC) serving Non-Federal Default State (complete columns A through C and sign below; complete columns D and E if required by your state commission)

I certify that the company listed below is in compliance with the Lifeline and Link Up verification procedures in place in the state(s) listed below. If any Lifeline customers of the company listed below qualify based on income, I certify that the company listed below is in compliance with state Lifeline income certification procedures and that, to the best of my knowledge, documentation of income was presented. I am an officer of the company named below. I am authorized to make this certification for the Study Area(s) listed below.

OR

3. Wireless Eligible Telecommunications Carrier (ETC) serving Non-Federal Default State that does not assert jurisdiction over Wireless ETCs, and, therefore, are following federal default certification and verification procedures (complete columns A through F and sign below)

I certify that the company listed below has procedures in place to verify the continued eligibility of a statistically valid random sample of its Lifeline customers. Results are provided in the chart below. I certify that the company listed below has procedures in place to review income documentation and that, to the best of my knowledge, the company was presented with documentation of the consumer's household income. I am an officer of the company named below. I am authorized to make this certification for the Study Area(s) listed below.

OR

4. I certify that my company has not claimed federal Low Income support for any Lifeline customers in _____ (insert current year).

A	В	C	D	Е	F
Company Name*	SAC (6 digit number)	State	Customers Surveyed or Verified	Customers Found to be Ineligible	Non- Responding Customers
Cincinnati Bell Telephone Company LLC	265061	KY	2,288	784	515
Cincinnati Bell Telephone Company LLC	305062	ОН	Not Required	Not Required	

* Companies with more than 5 SACs in any of the categories enumerated as 1-4 above may attach an Appendix with the requested information for the chart.

Signed,

Leodore W Heckmann

(Signature of Officer)

Theodore W. Heckmann (Printed Name of Officer)

Assistant Corporate Secretary and Managing **Director Regulatory Affairs** (Title of Officer)

Robert W. Wilhelm, Jr. (Person Completing this Sample Letter)

513-397-6858

(Contact Phone Number)

221 East Fourth Street, Room 103-1280 Cincinnati, OH 45202

(Company Address)

August XX 2011

(Date)

Submit to USAC using only <u>ONE</u> method:

Fax to: (202) 776-0080 E-mail to: LiVerifications@usac.org USAC - Low Income Program Mail to: 2000 L Street, NW, Suite 200 Washington, DC 20036

Deadline: August 31st