



# APS

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## AFFORDABLE PHONE SERVICES

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September 2, 2011

Jim Stevens  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602-0615

RECEIVED

SEP 19 2011

PUBLIC SERVICE  
COMMISSION

**Re: ETC Annual Certification of Lifeline Subscribers**

Mr. Stevens:

Per the state rules, each ETC in the state of Kentucky must recertify each lifeline subscriber and verify that they are still currently meet the requirements of lifeline eligibility by participating in one of the eligible government programs or by income requirements set by the state.

This letter is to illustrate Affordable Phone Service, Inc.'s compliance with those rules but explain the issues they have encountered in the process leading to an incomplete recertification of each lifeline subscriber to date as required by the state to be complete by August 15<sup>th</sup> of each year. To facilitate the annual re-certification/ verification Affordable Phone Service, Inc. executed a business agreement with the Kentucky Cabinet of Family and Child Services to electronically verify each end user's participation in one of the lifeline programs they oversee. Upon receipt of the instructions to perform the electronic dip, information required was not expressed to Affordable Phone Service, Inc. until after agreement was executed. The main issue was the requirement of the end user's social security number, information Affordable Phone Service, Inc. does not currently collect on its end users.

Therefore, Affordable Phone Service, Inc. has to manually collect recertification / verification forms from each of their **574** lifeline customers in the state of Kentucky which cannot be completed by the required date. To complete the process, on August 1, 2011 Affordable Phone Service, Inc. sent each end user forms to be filled out and a request for proof of participation to verify their eligibility. As of the above date, Affordable Phone Service, Inc. has received **211** Kentucky Recertification and Verification Lifeline Forms from customers. Each month, until complete, Affordable Phone Service, Inc. will send a status report to the commission showing the progress made to be in compliance with the state's annual requirements. The next status report will be sent to the Kentucky Public Service Commission will be on or before October 15, 2011.

If you have any questions, please contact Carroll Harris or Tina Allen at 352-433-2116 Monday through Friday, 8:00AM – 5:00PM.

Sincerely,



Tina Allen  
Senior Operations Manager

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UNLIMITED LOCAL RESIDENTIAL TELEPHONE SERVICE

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