



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

August 25, 2009

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

RECEIVED

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PUBLIC SERVICE  
COMMISSION

**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 verification of CBT's 2009 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 audit mailing to re-verify Lifeline eligibility. This follow-up mailing informed the customers that they had 60 days to return an enclosed form and 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.

Questions regarding this audit may be directed to me at 513-397-6858 or by e-mail at bob.wilhelm@cinbell.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Wilhelm, Jr.", written over a white background.

Robert W. Wilhelm, Jr.  
Regulatory Pricing Manager

cc: Mr. Jim Stephens

# Annual Lifeline Certification & Verification

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

1.  Eligible Telecommunications Carrier (ETC) serving **Federal Default State** (complete columns A through E 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.  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.  I certify that my company has not claimed federal Low Income support for any Lifeline customers in \_\_\_\_\_ (insert current year).

| A                                     | B                          | C     | D                                    | E                                       |
|---------------------------------------|----------------------------|-------|--------------------------------------|---|
| Company Name                          | SAC<br>(6 digit<br>number) | State | Customers<br>Surveyed or<br>Verified | Customers<br>Found to be<br>Ineligible* |
| Cincinnati Bell Telephone Company LLC | 265061                     | KY    | 3,002                                | 1134                                    |
| Cincinnati Bell Telephone Company LLC | 305062                     | OH    | Not Required                         | Not Required                            |
|                                       |                            |       |                                      |   |
|                                       |                            |       |                                      |   |

\* Include customers who did not respond to the survey in the ineligible column.

Signed,

(Signature of Officer)

D. Scott Ringo, Jr.

July 2008 Edition

(Printed Name of Officer)

Ass't Secretary & Director - Regulatory Affairs

(Title of Officer)

August 25, 2009

(Person Completing this Sample Letter)

(Date)

Robert W. Wilhelm, Jr. (Phone: 513 397-6858)

Submit to USAC using only ONE method:

(Contact Phone Number)

221 East Fourth Street, Room 103-1280

Cincinnati, OH 45202

(Company Address)

August 25, 2009

Fax to: (202) 776-0080

E-mail to: [LiVerifications@usac.org](mailto:LiVerifications@usac.org)

Mail to: Low Income Program  
2000 L Street, NW, Suite 200  
Washington, DC 20036

## ***Deadline: August 31st***

NOTICE: To implement Section 254 of the Communications Act of 1934, as amended, the Federal Communications Commission has adopted changes to the federal low-income programs. The Commission has expanded the availability of these programs and the level of funding for discounts to low-income customers.

The following worksheet provides a means by which eligible telecommunications carriers may provide their annual Lifeline verification survey results and annual low-income certifications to the Universal Service Administrative Company.

We have estimated that each response to this collection of information will take, on average, four (4) hours for each respondent. Our estimate includes the time to read this data request, review existing records, gather and maintain required data, and complete and review the response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Washington, D.C. 20554, Paperwork Reduction Project (3060-0819). We will also accept your comments on the burden estimate via the internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). Please DO NOT SEND the data requested to this e-mail address.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it has been approved by the Office of Management and Budget (OMB) and displays a currently valid OMB Control Number. This collection has been assigned OMB Control Number: 3060-0819.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. Section 3501, *et seq.*