



AGE FILE

ALLIANCE FOR GENERATIONAL EQUITY

FAX

July 13, 2012

Public Utilities Commission of Ohio (PUCO)
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

PUCO

2012 JUL 13 PM 5:26

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Case No. 10-2377-TP-COI

To whom it may concern:

I am writing on behalf of the Alliance for Generational Equity, AGE¹. We are writing to voice our concern with a recent decision that impacts low-income consumers benefiting from wireless Lifeline services in Ohio. The PUCO has determined that 911 and TRS fees are applicable to ETCs that provide wireless Lifeline -- even ETCs that offer non-billed, free Lifeline services. We find this decision problematic, for many reasons.

The Commission's decision to impose funding 911 and TRS on qualified low-income households enrolled in non-billed, free, Lifeline programs is unnecessarily burdensome on the state's neediest residents. These consumers are getting a free service subsidized by the Universal Service Fund for a reason: they are poor! Furthermore, asking companies to start charging consumers a fee retroactively for a service the consumers have been receiving free seems like a "switcheroo." It is also unfair to ask companies to collect a fee from a consumer who is receiving a free service. There are no monies exchanged between the consumer and the company when a consumer signs up for and receives the Lifeline service from these providers. It is our understanding that when these consumers do go in to buy extra minutes for their Lifeline phones, the companies are collecting the fees. But to ask them to collect a fee when there is no interaction that includes the exchange of monies seems pointless. And to pick the pockets of these low-income and neediest consumers seems cruel.

We urge you to review how these issues have been resolved in other states. It is our understanding that the Attorneys General of South Carolina and Tennessee each have concluded that Lifeline customers are not required by law to pay such fees. We would support their assessment.

¹ AGE is an advocacy group made up of people of each generation who are committed to raise their voices so that elected officials at all levels of government will hear the concerns of real Americans. We are a nonprofit organization founded in 2008.

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Technician SW Date Processed 7/16/2012

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AGE believe that wireless resellers providing Lifeline services should not be singled out for a retroactive obligation to remit fees which were not collected from Lifeline consumers and which could not have been collected from Lifeline consumers. We think *collecting these fees is an unfair burden for the low-income consumers receiving this free service*, as well as on the companies providing these services. We urge the PUCO to reconsider their decision, and not to impose these fees.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mac Haddow", with a long horizontal flourish extending to the right.

Mac Haddow

Senior Fellow on Public Policy