



Embarq Corporation  
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March 2, 2009

**Public Utilities Commission of Ohio  
Telecommunications Division  
Columbus, Ohio**

**Re: Case No. 00-1532-TP-COI – Application for Rehearing by the Office of the  
Consumers' Counsel**

Dear Ms. Jenkins,

On behalf of United Telephone Company of Ohio d/b/a Embarq ("Embarq"), I am writing to clarify our company's procedures regarding the reestablishment of stand-alone basic local exchange service when a Lifeline customer loses service for nonpayment. The Office of the Ohio Consumers' Counsel ("OCC") is seeking a rehearing of the Commission's January 21, 2009 journalized Finding and Order granting Embarq the ability to market optional non-basic services to Lifeline customers, and allowed Embarq Lifeline customers to subscribe to vertical features.


In its Application for Rehearing, the OCC states: The Order contravenes the Commission's Lifeline commitment for companies operating under elective alternative regulation ("alt. reg."), and is thus unreasonable and unlawful. The OCC cites Rules 6(B)(1)(a) and 6(B)(1)(b) as the Lifeline protections it argues that the Commission's Order in this Case contravenes. OCC is wrong and its Application for Rehearing should be denied. Embarq never sought a waiver of Rules 6(B)(1)(a) and 6(B)(1)(b), a point that OCC acknowledges in its Application for Rehearing. Embarq will continue to abide by all of the Lifeline commitments for which no waiver was sought and are still applicable. The Commission does not need to modify its Order as OCC opines since those provisions of the Lifeline commitments still apply to Embarq as well as other alternative regulation companies. To reiterate, Embarq will abide by the Commission's

rules and provide its Lifeline customers with all the protections of the Lifeline rules, and reaffirms that consumers who are eligible for Embarq's Lifeline program must be allowed to reconnect Lifeline service at the discounted Lifeline rate and without paying a deposit or reconnection charge.

Sincerely,



Barry A. Counts  
Sr. State Executive



**Barry A. Counts**  
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**Case No(s). 00-1532-TP-COI**

Summary: Comments regarding Application for Rehearing by the Office of the Consumers' Counsel electronically filed by Sonya I Summers on behalf of United Telephone Company of Ohio d/b/a Embarq