Windstream Communications 17 S. High Street Suite 750 Columbus, Ohio 43215 (614) 228-9484

Kathy E. Hobbs VP - State Government Affairs



May 19, 2011

Ms. Renee Jenkins Chief, Docketing Division The Public Utilities Commission of Ohio 1870 East Broad Street Columbus, Ohio 43215-3793

Re: Case No. 11-2819-TP-ATA 90-5045-TP-TRF

> In the Matter of the Application of Windstream Western Reserve, Inc. to Detariff Services and make other changes related to the Implementation of Case No. 11-1010-TP-ORD

Dear Ms. Jenkins:

Enclosed, please find an original and ten copies of Exhibit B replacement pages to the original filing on May 3, 2011. Please file these in the above referenced proceedings.

If you have any questions, please advise.

Sincerely,

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S7. LOCAL ACCESS LINE SERVICE

S7.1 EXTENDED LOCAL CALLING SERVICE (ELCS)

S7.1.1 Description

- A. Extended Local Calling Service will be provided in lieu of new Extended Area Service (EAS), whether one-way or two-way, between specific exchanges of the Company and to exchanges of other telephone companies when ordered by the Public Utilities Commission of Ohio (PUCO) in an Extended Area Service complaint case.
- B. All Extended Area Service existing prior to the establishment of Extended Local Calling Service will continue in its present form unless discontinued by order of the Public Utilities Commission of Ohio.
- C. Extended Local Calling Service is a local service offering; therefore, any stimulation to calling volumes between exchanges that occurs after its implementation may not be used as a basis for requests for any type of flat rate toll alternative.
- D. Extended Local Calling Service is available with all classes of service and to all customers within the specific exchange.
- Extended Local Calling Service is restricted to customer-dialed, station-to-station, sent paid calls to the extended exchange(s) and does not apply to operator-assisted calls.

\$7.1.2 Rates

- A. Implementation of Extended Local Calling Service in an exchange will not affect the monthly rate, as indicated in other sections of this tariff, for access line service.
- B. Extended Local Calling Service is provided at the following rates:

Initial and additional Minute Rate

 Monday through Sunday and Holidays all day:

\$.05

Filed under authority of Order No. 11-1010-TP-ORD Issued by the Public Utilities Commission of Ohio

Issued By: Vice President Little Rock, Arkansas

S7. LOCAL ACCESS LINE SERVICE

S7.1 EXTENDED LOCAL CALLING SERVICE (ELCS)

S7.1.2 Rates (cont'd)

- C. Charges for calls made where Extended Local Calling Service has been implemented, whether between exchanges of the Company or to exchanges of other telephone companies, are based upon the duration of each call as explained below:
 - Duration
 - a. Initial minute rates are for connections of one minute, or any fraction thereof.
 - b. Additional minute rates are for each additional minute, or any fraction thereof, that the connection continues beyond the initial minute.
 - Chargeable time is started when the called party answers or when the caller is connected to automatic answering recording equipment.
 - d. Chargeable time ends when the calling station "hangs up" thereby releasing the network connection. If the called station "hangs up" but the calling station does not, chargeable time ends when the network connection is released by automatic timing equipment in the telephone network.
 - e. Chargeable time does not include time lost because of faults or defects in the service.

S7.1.3 Availability

A. Extended Local Calling Service is provided in the following exchanges:

Exchanges In Which Service is Offered	Exchange(s) Which <u>Can Be Called</u>
**Hinckley	Medina
**Hiram	Kent
**Hiram	Ravenna
**Little Hocking	Barlow
**Madison	Painesville
**Mesopotamia	Bristolville
**Mesopotamia	Warren
**Montville	Painesville

** Two-Way Service

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S7. LOCAL ACCESS LINE SERVICE

S7.2 MODIFIED EXTENDED LOCAL CALLING SERVICE (MELCS)

S7.2.1 Description

- A. Modified Extended Local Calling Service (MELCS) provides measured rate calling between specific exchanges of the Company and to exchanges of other telephone companies, when ordered by the Public Utilities Commission of Ohio (PUCO) in an Extended Area Service complaint case.
- B. MELCS is a local service offering; therefore, any stimulation to calling volumes between exchanges that occur after its implementation may not be used as a basis for any flat rate alternative besides the flat rate additives as listed in this section.
- C. MELCS is included in residence and business service in the exchanges and routes as listed in Section S7.2.3.
- MELCS is restricted to customer dialed, station to station calls, and does not include operator assisted calls.

\$7.2.2. Rates

- Implementation of MELCS in an exchange will not affect the monthly rate as indicated in other sections of this tariff.
- B. Rate per minute

All measured MELCS calls are charged at \$.05 per minute for initial and additional minutes. No time of day, day of week, or holiday discounts apply to the MELCS measured rate.

S7.2.3 Availability

A. MELCS is provided in the following exchanges:

Exchanges in which service is offered	Exchanges which can be called	
Ashtabula	Andover, Conneaut, Dorset, Rock Creek, Trumbull	
Austinburg	Jefferson	
Dorset	Ashtabula, Kingsville, New Lyme	
Geneva	Jefferson, Rock Creek	
Kingsville	Dorset, Jefferson, Pierpont	
Регту	Cleveland Metropolitan Area, Leroy, Mentor and Thompson	
Pierpont	Andover, Kingsville	
Richfield	Akron, Montrose (Summit County)	
Rock Creek	Ashtabula, Colebrook, Geneva, New Lyme, Windsor	
Trumbull	Ashtabula, Jefferson	

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Issued: May 3, 2011

Effective: May 19, 2011

S7. LOCAL ACCESS LINE SERVICE

S7.3 MODIFIED EXTENDED LOCAL CALLING SERVICE II (MELCS II)

S7.3.1 General

- A. Modified Extended Local Calling Service II (MELCS II) allows mandatory one-way customer dialed calling to another exchange without the application of message toll rates. A customer receives measured rate calling between the specified exchange areas. Routes applicable to MELCS II are shown in S1D.1F(2) below.
- B. The MELCS II is a local service offering, therefore, any stimulation to calling volumes between exchanges that occur after its implementation may not be used as a basis for any flat rate alternative.
- C. Calls may be placed only from the customer's access line bearing the telephone number for which the customer is billed for the MELCS II Plan. Such calls shall be customer dialed, station-to-station calls. If a call is operator handled, the applicable message toll rate will apply.
- D. The MELCS II Plan will not be furnished with Foreign Exchange Service.
- E. The Company's "General Regulations", as published in its General Customer Services Tariff, apply to the extent pertinent to the MELCS II Plan.
- F. Application of Rates -
 - (1) Implementation of the MELCS II Plan in an exchange will not affect the monthly rate as indicated in other sections of this tariff.
 - (2) Routes and per minute rates for calling provided under the MELCS II Plan are as follows:

	MELCS II	
	Local	Rate
Originating	Calling	Per
Exchange	<u>Point</u>	<u>Minute</u>
Aurora	Akron	\$.07
Northfield	Akron	\$.07
Twinsburg	Akron	\$.07

S7. LOCAL ACCESS LINE SERVICE

S7.4 PILOT SERVICE PLANS

S7.4.1 General

- A. Pilot Service Plans provides one-way customer dialed calling to specified exchange areas within Ohio, without the application of message toll rates. A customer receives measured rate calling between the specified exchange areas.
- B. These Pilot Service Plans are local service offerings; therefore, any stimulation to calling volumes between exchanges that occur after its implementation may not be used as a basis for any flat rate alternative besides the flat rate additives as listed in this section, or as this paragraph may be amended in the future.
- C. Application of Rates
 - (2) All measured minutes are charged at a specified rate per minute for initial and additional minutes.

Exchanges to which

S7.4.2 Pilot Service Plans Available:

The Pilot Service Plans are included in residence and business service in the exchanges and routes as listed below:

Pilot Service Plan Name	Offered In	Calls may be made
Complete Countywide Calling Plan	Chardon	Bainbridge, Burton, Middlefield, Parkman and Russell
County Community Plan	Bainbridge East Claridon Middlefield Parkman Russell	Chardon Chesterland Chardon Chardon Chardon
Expanded Community Calling Plan	Chardon	Mentor, Painesville, and Kirtland
Metropolitan Calling Plan	East Claridon Huntsburg Middlefield Montville Newbury Parkman Thompson	Cleveland Metro ¹

¹ The Cleveland Metro includes Bedford, Berea, Brecksville, Chagrin Falls, Cleveland, Gates Mills, Hillcrest, Independence, Montrose, North Royalton, Olmsted Falls, Strongsville, Terrace, Trinity, Victory, Wickliffe, and Willoughby.

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S7. LOCAL ACCESS LINE SERVICE

S7.4 PILOT SERVICE PLANS (Continued)

S7.4.2 Pilot Service Plans Available (Continued):

Pilot Service Plan Name

Exchanges to which Offered In

Calls may be made

Contiguous Community Calling Plan

Bloomingdale

Amsterdam, Jewett, Richmond,

and Smithfield

Centerville

Cumberland

Beallsville

Byesville, Caldwell, Cambridge, McConnelsville, New Concord,

Norwich, Philo, Reinersville Hackney and Zanesville

Fairview

Cambridge, Flushing, Freeport,

and St. Clairsville

Hopedale

Adena, Jewett, Smithfield, and

Steubenville

Morristown

Flushing

Old Washington

Byesville, Freeport, New

Comerstown and Quaker City Beallsville, Clarington, and

Powhatan Point

St. Clairsville

Quaker City

Byesville, Caldwell, Cambridge, Lewisville, Old Washington, St. Clairsville, Somerton, Summerfield and Woodsfield.

S7.4.3. Pilot Service Plans - Per Minute Use for Measured Service

The following rates will apply per minute of use, regardless of time of day or distance:

Rate per Minute
\$.05
\$.05
\$.07
\$.07
\$.05

S7. LOCAL ACCESS LINE SERVICE

S7.6. LOCAL CALLING SCOPE

The rates as shown in Section 7, Sheet No. 1 are monthly rates and entitle the customer to local calling to the following exchanges. Customers can call their own exchange and the Flat Rate EAS Exchanges with no per minute charge. Calling to the Measured Rate EAS Exchanges will result in a per minute local measured rate, as found in this tariff.

Customer Located in Exchange:	Flat Rate EAS Exchanges, including the Local Serving Exchange:	Measured Rate EAS (ELCS, MELCS, Pilot Plans) Exchanges
Ashtabula	Austinburg, Geneva, Kingsville, Pierpont, Jefferson	MELCS: Andover, Conneaut, Dorset, Rock Creek, Trumbull
Aurora	Bainbridge, Hudson, Twinsburg, Kent, Mantua, Cleveland Metro ¹	MELCS II: Akron
Austinburg	Ashtabula, Geneva, Madison, Perry, Rock Creek, Trumbull	MELCS: Jefferson
Bainbridge	Aurora, Newbury, Russell, Burton, Cleveland Metro ¹	County Community: Chardon
Bloomingdale	Hopedale, Steubenville	Contiguous Community Calling: Amsterdam, Jewett, Richmond, Smithfield
Centerville	Powhatan Point, Bellaire, Bethesda, St. Clairsville	Contiguous Community Calling: Beallsville
Chardon	Option 1) East Claridon, Huntsburg, Montville, Newbury, Thompson ²	Complete Countywide: Bainbridge, Burton, Middlefield, Parkman, Russell Extended Community Calling: Mentor,
	Option 2) East Claridon, Huntsburg, Montville, Newbury, Thompson, Cleveland Metro ¹ , Chesterland	Painesville, Kirtland
Chester	Coolville, Pomeroy	:
Coolville	Chester, Little Hocking, Guysville	
Cumberland		Contiguous Community Calling: Byesville, Caldwell, Cambridge, McConnelsville, New Concord, Norwich, Philo, Reinersville, Hackney, Zanesville

¹ The Cleveland Metro includes Bedford, Berea, Brecksville, Chagrin Falls, Cleveland, Gates Mills, Hillcrest, Independence, Montrose, North Royalton, Olmsted Falls, Strongsville, Terrace, Trinity, Victory, Wickliffe, and Willoughby.

² Option 1 is grandfathered and only available to existing customers at existing locations.

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S7. LOCAL ACCESS LINE SERVICE

S7.6 LOCAL CALLING SCOPE (Continued)

Customer Located in Exchange:	Flat Rate EAS Exchanges, including the Local Serving Exchange:	Measured Rate EAS (ELCS, MELCS, Pilot Plans) Exchanges
Dorset	Andover, Jefferson, Pierpont	MELCS: Ashtabula, Kingsville, New Lyme
East Claridon	Burton, Windsor, Chardon, East Claridon, Huntsburg, Mesopotamia, Middlefield, Parkman, Montville	County Community: Chesterland Metropolitan Calling: Cleveland Metro ¹
Fairview	Morristown, Old Washington, Quaker City, Barnesville	Contiguous Community Calling: Cambridge, Flushing, Freeport, St. Clairsville
Geneva	Ashtabula, Austinburg, Madison, Perry, Trumbull	MELCS: Jefferson, Rock Creek
Hinckley	Richfield, Brunswick, Cleveland Metro ¹	ELCS: Medina
Hiram	Garrettsville, Mantua	ELCS: Kent, Ravenna
Hopedale	Bloomingdale, Cadiz	Contiguous Community Calling: Adena, Jewett, Smithfield, Steubenville
Hudson	Option 1) (653 Central Office) Aurora, Northfield, Peninsula, Twinsburg, Kent	
	Option 2) (342, 650, 655 Central Office): Aurora, Northfield, Peninsula, Twinsburg, Kent, Akron	:
Huntsburg	Burton, Windsor, Chardon, East Claridon, Mesopotamia, Middlefield, Parkman, Montville	Metropolitan Calling: Cleveland Metro ¹
Kingsville	Ashtabula, Conneaut	MELCS: Dorset, Jefferson, Pierpont
Little Hocking	Coolville, Belpre	ELCS: Barlow
Madison	Austinburg, Geneva, Perry, Thompson, Trumbull	ELCS: Painesville

¹ The Cleveland Metro includes Bedford, Berea, Brecksville, Chagrin Falls, Cleveland, Gates Mills, Hillcrest, Independence, Montrose, North Royalton, Olmsted Falls, Strongsville, Terrace, Trinity, Victory, Wickliffe, and Willoughby.

S7. LOCAL ACCESS LINE SERVICE

S7.6 LOCAL CALLING SCOPE (Continued)

Customer Located in Exchange:	Flat Rate EAS Exchanges, including the Local Serving Exchange:	Measured Rate EAS (ELCS, MELCS, Pilot Plans) Exchanges
Mesopotamia	North Bloomfield, Windsor, East Claridon, Huntsburg, Middlefield, Parkman	ELCS: Bristolville, Warren
Middlefield	Burton, North Bloomfield, Windsor, East Claridon, Huntsburg, Mesopotamia, Middlefield, Parkman	County Community: Chardon Metropolitan Calling: Cleveland Metro ¹
Montville	Chardon, East Claridon, Huntsburg, Montville, Thompson, Trumbull	ELCS: Painesville Metropolitan Calling: Cleveland Metro ¹
Morristown	Fairview, Barnesville, Bethesda, St. Clairsville	Contiguous Community Calling: Flushing
Newbury	Bainbridge, Chardon, Newbury, Russell, Burton, Chagrin Falls, Chesterland	Metropolitan Calling: Cleveland Metro ¹
Northfield	Hudson, Peninsula, Twinsburg, Cleveland Metro ¹	MELCS II: Akron
Old Washington	Fairview, Cambridge	Contiguous Community Calling: Byesville, Freeport, New Comerstown, Quaker City
Parkman	Burton, Garrettsville, East Claridon, Huntsburg, Mesopotamia, Middlefield	County Community: Chardon Metropolitan Calling: Cleveland Metro ¹
Peninsula	Hudson, Northfield, Richfield, Akron	
Perry	Austinburg, Geneva, Madison, Trumbull, Painesville	Contiguous Community Calling: Lerby, Mentor, Thompson, Wickliffe, Willoughby Metropolitan Calling: Cleveland Metro ¹
Pierpont	Dorset, Ashtabula, Conneaut, Jefferson	MELCS: Andover, Kingsville
Powhatan Point	Centerville, Bellaire	Contiguous Community Calling: Beallsville, Clarington, St. Clairsville

¹ The Cleveland Metro includes Bedford, Berea, Brecksville, Chagrin Falls, Cleveland, Gates Mills, Hillcrest, Independence, Montrose, North Royalton, Olmsted Falls, Strongsville, Terrace, Trinity, Victory, Wickliffe, and Willoughby.

S7. LOCAL ACCESS LINE SERVICE

S7.6 LOCAL CALLING SCOPE (Continued)

Customer Located in Exchange:	Flat Rate EAS Exchanges, Including the Local Serving Exchange:	Measured Rate EAS (ELCS, MELCS, Pilot Plans) Exchanges
Quaker City	Fairview, Barnesville	Contiguous Community Calling: Byesville, Caldwell, Cambridge, Lewisville, Old Washington, St. Clairsville, Somerton, Summerfield, Woodsfield
Richfield	Hinckley, Peninsula, Cleveland Metro ¹	MELCS: Akron, Montrose (Summit County)
Rock Creek	Austinburg, Trumbull, Jefferson, Orwell	MELCS: Ashtabula, Colebrook, Geneva, New Lyme, Windsor
Russell	Bainbridge, Newbury, Russell, Burton, Chesterland, Cleveland Metro ¹	County Community: Chardon
Thompson	Montville, Chardon, Trumbull, Madison	Metropolitan Calling: Cleveland Metro ¹
Trumbull	Austinburg, Geneva, Madison, Montville, Perry, Rock Creek, Thompson, Windsor, Orwell	MELCS: Ashtabula, Jefferson
Twinsburg	Aurora, Hudson, Northfield, Cleveland Metro ¹	MELCS II: Akron

¹ The Cleveland Metro includes Bedford, Berea, Brecksville, Chagrin Falls, Cleveland, Gates Mills, Hillcrest, Independence, Montrose, North Royalton, Olmsted Falls, Strongsville, Terrace, Trinity, Victory, Wickliffe, and Willoughby.

S10. BASIC TELEPHONE ASSISTANCE

S10.1. Lifeline Assistance

A. General

- Lifeline shall be a flat-rate, monthly, primary access line service with touch-tone service or any other packages/bundles of service, if available to customers, less the lifeline discount and shall provide all of the following:
 - a. A recurring discount to the monthly basic local exchange service rate that provides for the maximum contribution of federally available assistance;
 - Not more than once per customer at a single address in a twelve-month period, a waiver of all nonrecurring service order charges for establishing service;
 - c. Free blocking of toll service, 900 service and 976 service;
 - d. A waiver of the federal universal service fund end user charge;
 - e. A waiver of the telephone company's service deposit requirement.

B. Regulations

- Lifeline Assistance is available to residential customers who are currently participating in one of the following federal or state low-income assistance programs that limit assistance based on household income:
 - Medical Assistance under Chapter 5111 of the Ohio Revised Code (Medicald) or any state program that might supplant Medicaid;
 - Supplemental Nutritional Assistance Program (SNAP/food Stamps);
 - Supplemental Security Income (SSI) under Title XVI of the Social Security Act;
 - d. Supplemental Security Insurance blind and disabled (SSDI)
 - e. Federal public housing assistance, or Section 8;
 - f. Home Energy Assistance Programs (HEAP, LIHEAP, E-HEAP);
 - g. National School Lunch Program's Free Lunch Program (NSL);
 - h. Temporary Assistance for Needy Families (TANF/Ohio Works); or
 - i. General Assistance (including disability assistance (DA)
- Lifeline Assistance is available to residential customers whose total household income is at or below one-hundred fifty percent (150%) of the federal poverty level.

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S10. BASIC TELEPHONE ASSISTANCE

\$10.1. LIFELINE ASSISTANCE (Continued)

- B. Regulations (Continued)
 - 3. The Company shall require, as proof of eligibility for Lifeline Assistance, a document signed by the customer, certifying under penalty of perjury that the customer is receiving benefits from one of the programs identified in Section S10.1.B.1 above; identify the specific program or programs from which the customer receives benefits and agree to notify the carrier if the customer ceases to participate in such program or programs. If a customer is applying for Lifeline based on income see Section S10.1. B.5.a-g for examples of income documentation.
 - The Company must verify Lifeline service eligibility for customers who qualify through household income-based requirements consistent with the FCC requirements in 47 C.F.R. 54.
 - Consistent with federal law, examples of acceptable income documentation includes the following:
 - a. State or federal income tax return;
 - b. Current income statement or W-2 from an employer;
 - c. Three consecutive months of current pay stubs;
 - d. Social security statement of benefits;
 - e. Retirement/Pension statement of benefits;
 - f. Unemployment/Workmen's Compensation statement of benefits;
 - g. Any other legal document that would show current income (such as a divorce decree or child support document).
 - 6. Customers qualifying for Lifeline with past due bills for regulated local service charges shall be offered special payment arrangements with the initial payment not to exceed \$25.00 before service is installed, with the balance for regulated local charges to be paid over six equal monthly payments. Lifeline service customers with past due bills for toll service charges shall have toll restricted service until such past due toll service charges have been paid or until the customer establishes service with a subsequent toll provider.
 - 7. All other aspects of the state-specific lifeline service shall be consistent with the federal requirements. The rates, terms, and conditions for lifeline service shall be tariffed in accordance with Rule 4901:1-6-11 of the Administrative Code.
 - 8. The Telephone Company shall provide written notification to the customer applying for Lifeline service that is determined ineligible for Lifeline service and shall provide an additional 30 days to prove eligibility.

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\$10. BASIC TELEPHONE ASSISTANCE

S10.1. LIFELINE ASSISTANCE (Continued)

B. Regulations (Continued)

- 9. The Telephone Company shall provide written customer notification if a customer's Lifeline service benefits are to be terminated due to failure to submit acceptable documentation for continued eligibility for that assistance. The lifeline customer shallhave an additional sixty (60) days to submit acceptable documentation of continued eligibility or dispute the findings regarding termination of benefits.
- 10. The Telephone Company shall establish procedures to verify an individual's continuing Lifeline eligibility for both program and income based criteria consistent with the FCC's requirements in 47 C.F.R. 54.409-54410.

C. Enrollment Process

- New and existing customers will receive Lifeline Assistance when the application is processed and the customer's account is reviewed to determine that the service location is not already receiving the lifeline assistance. The effective date of credits for new customers is the date of service establishment as long as the application is received by the Company within 60 days of service establishment. The effective date of credits for existing customers is the date that lifeline service was requested, as long as the application is received by the Company within 60 days of the requested lifeline service. If the application is received after 60 days, the Lifeline Assistance will begin on the date the application is received by the Company. The Company shall have a maximum of 60 days to verify the application and documentation.
- 2. Should the Company determine that a customer does not qualify for Lifeline Assistance, or if the customer fails to submit the necessary documentation, the Company will provide written notification to the customer and give the customer an additional 30 days to prove eligibility. The written notification will include contact information for the Company in the event of a dispute and if the customer disagrees with the Company's findings regarding Lifeline Assistance eligibility, the notice will inform the customer that the Public Utilities Commission of Ohio may be contacted, in order that an informal/formal complaint may be filed. If the corrected application is received within 30 days, credits will applied to the account on the date that service was established by a new customer or on the date that Lifeline Service was requested by an existing customer. If the corrected application is received after 30 days, the Lifeline Assistance will begin on the date the corrected application is received by the Company.

D. Income Eligibility

- The Company must verify through acceptable documentation that a customer qualifies
 for Lifeline Assistance. Such verification must be performed within 60 days of a
 customer's service establishment. Examples of income documentation are identified in
 Section S10.1.1. B.5.a-g.
- 2. Regardless of when the Company completes the verification process Lifeline benefits shall go back to the date the qualified customer established lifeline
- 3. The Company shall provide written notification to customers that do not qualify for Lifeline Assistance. The notice shall give the customer an additional 30-day opportunity to prove eligibility or dispute the company's determination.

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S10. BASIC TELEPHONE ASSISTANCE

S10.1. LIFELINE ASSISTANCE (Continued)

- D. Income Eligibility (Continued)
 - 4. Written notification must include:
 - a) the earliest date termination of lifeline benefits will occur if the customer has been receiving the benefits or the last date the customer has to provide documentation to prove eligibility to receive the benefits;
 - b) the reason(s) for termination of lifeline benefits and any actions which the customer must take to demonstrate continued eligibility;
 - c) contact information for the Company; and
 - d) a statement explaining who customers may contact in the event of a dispute.
 - If a customer disagrees with a company's findings regarding eligibility for Lifeline Assistance, the customer may file an informal/formal complaint with the Public Utilities Commission of Ohio.
- E. Verification for Continued Eligibility
 - The Company must notify customers at least 60 days prior to the company's pending termination of the customer's Lifeline Assistance if the customer fails to submit acceptable documentation for continued eligibility for benefits. Such notice will be separate from the bill and will include:
 - a) the earliest date termination of lifeline benefits would occur;
 - b) the reason(s) for termination of lifeline benefits and any actions which the customer must take to demonstrate continued eligibility;
 - c) contact information for the Company and
 - d) a statement explaining who the customer should contact in the event of dispute.
 - Should the customer fail to submit proper documentation within the 60 day period, the Company will remove Lifeline Assistance benefits from the customer's account. The customer would then be required to re-apply for the benefits as explained in S10.1.C above.
 - The Company will perform an annual verification of customers receiving Lifeline
 Assistance using the random sampling methodology, in compliance with federal
 requirements, to verify customer's continued eligibility via programs and/or incomebased criteria.
 - If a customer disagrees with the Company's findings regarding eligibility, the customer may file a formal/informal complaint with the Public Utilities Commission of Ohio.

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