
MEMORANDUM IN SUPPORT

1. The Process Applicable to the Remaining Seven Post-Transition Lifeline Customers

AT&T urged the Commission not to experiment with a “mini-ETC” concept, but it chose to do so. Finding and Order, ¶¶ 30 and 46. Its approach may have unintended consequences. AT&T will not seek rehearing on this point, however, but simply asks for clarification.

As to the seven customers that the Staff identified in its investigation, AT&T understands that its obligation to continue to provide them with Lifeline service will end on the earlier of either (a) the date that another ETC is available to provide a Lifeline discount to that customer or (b) the date that the FCC Lifeline discount is no longer in effect. Finding and Order, ¶ 48. The pertinent Lifeline discount is scheduled to end on December 1, 2022. Entry, November 17, 2021, ¶ 8. AT&T requests clarification of its obligations upon the occurrence of either condition.

As to the first condition, AT&T may not be aware that another ETC is available at the customer’s location. At some point, AT&T would be notified that its customer has chosen another ETC if they have done so. As to the second condition, AT&T will monitor the status of the FCC’s action and can report to the Commission as it directs.

2. The Second Customer Notice

Among other requirements, paragraph 28 of the Finding and Order requires that AT&T “send a second letter and a bill message 15 days prior to the relinquishment effective date.”

Consistent with its petition, AT&T understands this to mean “*at least* 15 days prior to the relinquishment effective date.” Because of the variation in billing cycles, some customers will receive a bill page message much earlier, as much as 45 days prior to the relinquishment effective date. However, all customers will receive it *at least* 15 days prior to that date. Clarification on this issue is requested.

3. “Releasing” Numbers

Lastly, AT&T also seeks clarification of the suggestion that it will be “releasing” numbers in this process. Paragraph 52 of the Finding and Order provides as follows: “Upon the Commission-approved relinquishment date, AT&T Ohio should promptly de-enroll any remaining relinquishment area subscribers in the National Lifeline Accountability Database and release the phone numbers of those remaining customers.” Customers obtaining service from another ETC might still retain their AT&T landline service, albeit without a Lifeline discount. In this setting, no numbers would be “released.” AT&T seeks clarification of the Commission’s intent here.

Conclusion

AT&T requests timely clarification of the three items set forth above.

**21-0917-TP-UNC
CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served on June 27, 2022 by U.S. Mail and/or electronic mail on the parties shown below.

/s/ Jon F. Kelly

Jon F. Kelly

Michelle Green
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
michelle.green@puco.ohio.gov

Ellis Jacobs
Advocates for Basic Legal Equality, Inc.
130 West Second Street, Suite 700
East Dayton, OH 45402
ejacobs@ablelaw.org

Jason Well
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Jason.Well@puco.ohio.gov

Peggy P. Lee
Southeastern Ohio Legal Services
964 East State Street
Athens, OH 45701
plee@seols.org

James Hughes
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
James.hughes@puco.ohio.gov

Anne M. Reese
Legal Aid Society of Cleveland
Ashtabula County Office
121 East Walnut Street
Jefferson, Ohio 44047
amreese@laslev.org

John Jones
Ohio Attorney General's Office
30 East Broad Street, 16th Floor
Columbus, OH 43215
John.Jones@ohioattorneygeneral.gov

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
lsteinhart@telecomcounsel.com

Stephen Athanson
TracFone Wireless Inc.
9700 NW 112th Avenue
Miami, FL 33178
sathanson@tracfone.com

Alex Valencia
Tempo Telecom LLC
9330 LBJ Freeway, Suite 944
Dallas, TX 75243
alex.valencia@lingo.com

Susan J. Berlin
FRIEND HUDAK & HARRIS LLP
Three Ravinia Drive, Suite 1700
Atlanta, GA 30346
sberlin@fh2.com

Bruce Weston
Angela D. O'Brien
Ambrosia E. Wilson
Ohio Consumers' Counsel
65 East State Street, Suite 700
Columbus, Ohio 43215-4213
Angela.obrien@occ.ohio.gov
Ambrosia.wilson@occ.ohio.gov

John J. Heitmann
Joshua Guyan
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, NW, Suite 900
Washington, D.C. 20001
john.heitmann@nelsonmullins.com
Joshua.Guyan@nelsonmullins.com

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Summary: Motion AT&T OHIO'S MOTION FOR CLARIFICATION AND
MEMORANDUM IN SUPPORT electronically filed by Jon F. Kelly on behalf of
AT&T Ohio