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September 18, 2013

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118

Re: Docket No. 13 – 4 -- Investigation by the Department on its Own Motion into the Implementation in Massachusetts of the Federal Communication Commission's Order Reforming the Lifeline Program

Dear Secretary Williams:

Enclosed for filing in the above-referenced proceeding are the Reply Comments of Verizon New England Inc.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Moore".

Alexander W. Moore

Enclosure

cc: Karlen Reed, Director
Ben Dobbs, Deputy Director
Service List (electronic distribution)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

_____)	
Investigation by the Department on its Own)	
Motion into the Implementation in Massachusetts)	D.T.C. 13-4
of the Federal Communication Commission's)	
Order Reforming the Lifeline Program)	
_____)	

REPLY COMMENTS OF VERIZON NEW ENGLAND INC.

Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) files these comments pursuant to the Notice of Proposed Requirements and Further Request for Comment issued by the Department in the above proceeding on August 21, 2013 (“Notice”).

Verizon MA continues to believe that the need to win and retain customers in the competitive market provides ample motivation for Eligible Telecommunications Carriers (“ETCs”) to treat their customers well, without the added costs imposed by government regulation. In the Notice, the Department reasonably declined to act on many of the potential ETC requirements listed in the Exhibit to the original Request for Comment and Notice of Public Hearing issued in April. In addition, the proposed requirements set forth in the Appendix to the Notice are, by and large, appropriately tailored to subsets of ETCs based on the nature of the services they offer and other circumstances.

That said, the Department should not promulgate proposed Rule 3 in part A of the Appendix. The FCC’s rules at 47 C.F.R. §§ 54.422(a)(1) and (a)(2) require all ETCs that receive low-income support to report the very same information as would be required by proposed Rules 3 (a) and (b), as those rules themselves reference. In addition, 47 C.F.R. § 54.422(c) requires

such ETCs to report that information to “the relevant state commissions.” Consequently, Proposed Rules 3(a) and (b) are unnecessary in light of the federal rules.

Finally, as explained in Verizon MA’s Reply Comments in May, the requirement in proposed Rule 3(c) that ETCs report the number of consumer complaints specifically concerning Lifeline service would impose additional compliance costs on ETCs with little resulting public benefit. The Department should not promulgate this proposed requirement.

Respectfully submitted,

VERIZON NEW ENGLAND INC.

By its attorney



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Dated: September 18, 2013