Thomas F. Dixon Assistant General Counsel - Northwest Region



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November 15, 2010

Mr. David Danner
Secretary and Executive Director
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Notice to Lifeline Customers Pursuant to WAC 480-120-083(4)

Dear Mr. Danner:

As of January 1, 2011, MCImetro Access Transmission Services LLC (MCI) will no longer offer Lifeline service to customers in Washington. MCI is not an eligible telecommunications carrier in Washington and not required to offer Lifeline services, but has done so voluntarily in the past. MCI has fewer than 300 Lifeline customers located throughout the state. Attached is a confidential listing of the location of MCI's Lifeline customers as of the October 2010.

Each Lifeline customer will continue to receive Lifeline benefits in 2011 through the anniversary month in which the customer became eligible for Lifeline service. Each customer will be advised of the relevant anniversary month. The Lifeline discount or benefit will stop in the billing cycle following the customer's anniversary month. Since the Lifeline discount will stop after each customer's anniversary date, customers will not have any unused service. Therefore, MCI has not inserted in the customer notice a statement as to how customers may receive a refund for unused service. Such language will create confusion and unwarranted expectations that customers may receive refunds. MCI has included in the notice how a customer may obtain further information or question any charges on a bill.

Also attached is a redacted copy of an actual notice that was sent to all affected customers within the State of Washington on November 15, 2010. This customer has a June anniversary date. Other customers may have a different anniversary date in their notices. In addition, affected customers will receive a bill message beginning in December 2010 and continuing for each month thereafter as a reminder of the cessation of service. Finally, between ten and thirty days before cessation of Lifeline service, affected customers will also receive a direct call advising the customer of the cessation of Lifeline service as required by WAC 480-120-083(4)(d).

This cessation Lifeline service will not affect 911 service, incumbent local exchange carriers, or the national number administrator. Further no telecommunications company can be a Lifeline customer. Therefore, notice to the state 911 program, incumbent local exchange carriers, the national number administrator or any telecommunications company is unnecessary because MCI will continue to provide local exchange service without the Lifeline discount.

If you have any questions, please contact me or Milt Doumit at 360-789-6747.

Sincerely,

Thomas F. Dixon