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**Via Electronic Filing: PUC.FilingCenter@state.or.us**

October 29, 2019

Ms. Malia Brock  
Oregon Public Utility Commission  
P.O. Box 1088  
Salem, OR 97308-1088

Re: *Nehalem Telecommunications, Inc. Tariff Advice*  
Revisions to Lifeline Service in PUC Or. No. 5

Dear Ms. Brock:

I am submitting this Tariff Advice Letter on behalf of Nehalem Telecommunications, Inc. pursuant to Commission Rules 132 and 143. The proposed revisions reference the Code of Federal Regulations Lifeline section (47 CFR § 54.403) establishing a transitional phase-out of Lifeline support for voice-only service beginning December 1, 2019. This transition complies with federal regulations implemented in the FCC's Lifeline Modernization Order.

Transmitted herewith is a searchable Adobe Acrobat pdf showing the changes as they will appear in the proposed new tariff. We respectfully request that the proposed changes become effective December 1, 2019.

Please call me at 509.777.0137 or email [Tym.Rutkowski@mossadams.com](mailto:Tym.Rutkowski@mossadams.com) if you have any questions about the content or questions on the PDF filing.

Sincerely,

Tym Rutkowski  
Senior Manager for Moss Adams LLP

Email: [tym.rutkowski@mossadams.com](mailto:tym.rutkowski@mossadams.com)  
Phone: 509-777-0137  
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Attachments

cc: Jim Martell (via email)  
Theresa Wilson (via email)  
Beverly Arrington (via email)

Nehalem Telecommunications, Inc.

LOCAL ACCESS LINE SERVICE

OREGON TELEPHONE ASSISTANCE PROGRAM (LIFELINE OR OTAP)

Description

- a. Pursuant to Chapter 290, Oregon Laws 1987, and Oregon Administrative Rule (OAR) Chapter 800, Division 33, the Oregon Telephone Assistance Program (OTAP) is the state counterpart to the federal Lifeline program and is governed by Federal Communication Commission 47 Code of Federal Regulations Subpart E, 54. This state and federal government assistance program provides qualifying low-income consumers with reduced monthly charges for any local residential service plan that includes voice telephony service. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent, access to emergency services and toll limitation services.
- b. Customers must meet the eligibility requirements for OTAP/Lifeline defined in OAR 860-033-0030.

Terms and Conditions

	<u>Support Amount</u>	
Basic federal Lifeline support amount: (Credit first applies to the \$6.50 Federal End User Common Line Charge. Additional credit above \$6.50, if applicable, applies to basic service.)	47 CFR § 54.403	(C) — (C)
OTAP support amount:	\$3.50	
<ul style="list-style-type: none"> <li>a. The basic federal Lifeline support amount is applied to the End User Common Line charges or equivalent. The remaining basic federal and OTAP support amount is applied to the qualifying low-income customer’s intrastate rate.</li> <li>b. Billing will reflect that the OTAP/Lifeline credit became effective on the date specified by the Public Utility Commission of Oregon for each approved customer.</li> <li>c. Partial payments from OTAP/Lifeline customers are first applied to the allocated price of the voice telephony service component and then to toll charges or the cost of other services.</li> <li>d. OTAP/Lifeline customers may voluntarily elect toll limitation service at no charge. OTAP/Lifeline customers who subscribe to toll limitation service will not be required to pay a service deposit in order to initiate OTAP/Lifeline service.</li> <li>e. OTAP/Lifeline customers may <u>not</u> be charged the federal universal service fund fee or the monthly number-portability charge as part of their local residential service plan that includes voice telephony service.</li> <li>f. The Residential Service Protection Fund surcharge must be charged to OTAP/Lifeline customers.</li> </ul>		