



State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
<http://publicservice.vermont.gov>

[phone] 802-828-2811
[fax] 802-828-2342
[tdd] 800-734-8390

October 10, 2019

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325

Re: WC Docket No. 11-42 – Lifeline and Link Up Reform and Modernization – Petition of Vermont Public Utilities Commission and Department of Public Service for a Waiver of National Verifier Hard-Launch

Dear Secretary Dortch:

Enclosed, please find the joint petition of the Vermont Public Utility Commission and the Vermont Department of Public service (collectively “Vermont”) for a six-month waiver of the implementation of the National Verifier in Vermont. Vermont respectfully submits this request in response to the Federal Communications Commission (“FCC”) Public Notice announcing the hard launch of the National Lifeline Eligibility Verifier (“National Verifier”) for all new Lifeline enrollments in Vermont on October 23, 2019.¹ For the reasons outlined in the petition, Vermont seeks a six-month waiver of the timeframe for implementation of the National Verifier in Vermont.

As part of the Lifeline and Link-Up Reform and Modernization proceeding, the FCC directed the Universal Service Administrative Company (“USAC”) to establish a nationwide system for determining lifeline applicants’ eligibility.² USAC and Vermont’s Department of Children and Families (“DCF”) have been working diligently on a data-sharing agreement that would provide the National Verifier with access to state databases for low-income programs through an Application Programming Interface (“API”). While work on these agreements has been productive, none of the systems will be in place by October 23, 2019, leaving USAC to qualify Vermont applicants manually. Manual verification is labor-intensive and prone to error.

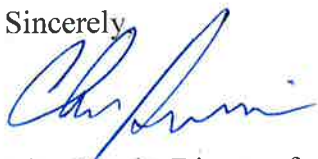
¹ Public Notice DA 19-936, Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier for All New Enrollments in Eleven States, WC Docket 11-42

² WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4021-4040, pp. 167-216 (issued April 27, 2016)



A six-month extension would give USAC and DCF the opportunity to implement a data sharing agreement before Vermont is hard launched into the National Verifier. For the reasons outlined in its petition, Vermont respectfully requests the FCC to grant Vermont a waiver to the hard launch of the National Verifier for six months or until data sharing agreements can be implemented.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clay Purvis", is written over the word "Sincerely,".

Clay Purvis, Director for Telecommunications
Vermont Department of Public Service

Encl.