

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 13, 2017

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Ex Parte - *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up***; WC Docket No. 11-42

Dear Ms. Dortch:

The California Public Utilities Commission (CPUC) hereby provides an update and additional information in support of its Motion for Extension of Time (Motion) filed on September 5, 2017 in the above-captioned proceeding. In its Motion, the CPUC requested additional time, until the end of December, 2018, to implement changes to the federal Lifeline eligibility criteria that the Federal Communications Commission (Commission) adopted in the *2016 Lifeline Modernization Order*.<sup>1</sup> The due date for the CPUC to implement these changes is October 31, 2017.

As explained in its Motion, staffing constraints and other time-sensitive Lifeline projects have necessitated the CPUC's request for additional time. Specifically, the CPUC is working on transferring its printing and mailing services for the LifeLine Program from the California LifeLine Administrator to the California Office of State Publishing (OSP). The CPUC is also working on a Request for Proposal (RFP) to solicit a new California LifeLine Administrator.

Additionally, in the first half of the year, much of the CPUC's resources were devoted to implementing the Commission's benefit portability freeze, which had an earlier deadline

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<sup>1</sup> See *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Dkt. Nos. 11-42, 09-0197, *Third Report and Order*, *Further Report and Order*, and *Order on Reconsideration*, FCC 16-38 (rel. April 27, 2016).

of June 1, 2017. The CPUC also was daily managing the operations of its \$400 million+ LifeLine Program.

In this ex parte, the CPUC hereby provides the following update on the status of the printing/mailing transfer and the RFP:

1. Transfer of Printing and Mailing Services to OSP: The CPUC anticipates that the transfer will be completed by the end of this year; and
2. The RFP for a new California LifeLine Administrator: The CPUC issued the RFP<sup>2</sup> on October 5, 2017. Based on the current RFP schedule, the CPUC plans to issue a contract award in March, 2018. After the issuance of the award, the CPUC will spend the next 6 months to transfer the California LifeLine Administrator's functions from the current to the new LifeLine Administrator.

As to implementing the federal eligibility changes, the CPUC will need to perform the following work:

1. Revise the California LifeLine forms in different formats, including paper, Web and phone, in seven different languages;
2. Revise the mailing process including scanning form revisions, which will require reformatting and respacing bubbles and text on paper forms in seven different languages;
3. Modify direct application process used by service providers to submit applications on behalf of applicants;
4. Change carrier information exchange reporting formats. The CPUC is planning to work with service providers on the reporting changes in December, 2017 and January, 2018 so that the service providers can file accurate claims with the Universal Service Administrative Company (USAC) beginning with claims for February, 2018;
5. Perform user acceptance testing;
6. Revise training manuals;

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<sup>2</sup> Go to <https://caleprocure.ca.gov/pages/public-search.aspx> and click on "See Current Bids." It is RFP 15PS5020.

7. Update the California LifeLine Websites; and
8. Process advice letters that service providers will need to file to change service rates and plans.<sup>3</sup>

The CPUC's timeline for the eligibility change implementation is as follows:

October 2017 and November 2017	<ul style="list-style-type: none"><li><input type="checkbox"/> Transfer Printing/Mailing Services to the Office of State Publishing</li><li><input type="checkbox"/> Request for Proposal for New California LifeLine Administrator</li></ul>
December 2017	<ul style="list-style-type: none"><li><input type="checkbox"/> Transfer Printing/Mailing Services to the Office of State Publishing</li><li><input type="checkbox"/> Request for Proposal for New California LifeLine Administrator</li><li><input type="checkbox"/> Coordinate Reporting Changes with Stakeholders</li></ul>
January 2018	<ul style="list-style-type: none"><li><input type="checkbox"/> Coordinate Reporting Changes with Stakeholders</li><li><input type="checkbox"/> Coordinate Changes to Forms (Paper, Web, Phone) with Stakeholders</li><li><input type="checkbox"/> Coordinate Changes to Direct Application Process</li><li><input type="checkbox"/> California LifeLine Service Providers File Advice Letters to Change Service Rates and Plans</li></ul>
February 2018	<ul style="list-style-type: none"><li><input type="checkbox"/> Coordinate Changes to Forms (Paper, Web, Phone) with Stakeholders</li><li><input type="checkbox"/> Coordinate Changes to Direct Application Process</li><li><input type="checkbox"/> Perform User Acceptance Testing</li><li><input type="checkbox"/> Revise Training Manuals and Update Web Sites</li><li><input type="checkbox"/> Review Advice Letters Changing Service Rates and Plans</li></ul>
March 2018	<ul style="list-style-type: none"><li><input type="checkbox"/> Coordinate Changes to Forms (Paper, Web, Phone) with Stakeholders</li><li><input type="checkbox"/> Perform User Acceptance Testing</li></ul>

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<sup>3</sup> Additionally, some of the California LifeLine wireline telephone service providers informed the CPUC that they will need to modify their billing systems, which may take at least one year.

For the foregoing reasons, the CPUC requests until the end of December 31, 2018 to implement the eligibility changes. At minimum, the CPUC staff and the California LifeLine Administrator will need additional five months, from November 1, 2017 to March 31, 2018, to complete the implementation process. The CPUC respectfully requests that the Commission grant the request for extension of time. We appreciate our collaborative partnership with the Commission staff on Lifeline matters.

In accordance with Section 1.1206 of the Commission's rules, a copy of this letter has been filed via ECFS. If you have any questions, please contact Fe Lazaro at (415) 703-2627/[fnl@cpuc.ca.gov](mailto:fnl@cpuc.ca.gov) or Michaela Pangilinan at (415) 703-1890/[wow@cpuc.ca.gov](mailto:wow@cpuc.ca.gov).

Respectfully submitted,

/s/ Cynthia Walker

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