



Ned Lamont
GOVERNOR
STATE OF CONNECTICUT

VIA ELECTRONIC FILING

October 18, 2019

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

Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197

Notice of Ex Parte Communication

Dear Ms. Dortch,

We write in support of the Petition, as filed by the Public Utilities Regulatory Authority on behalf of the State of Connecticut, to delay the hard launch of the National Verifier in Connecticut by nine months.

Our administration strongly supports the Lifeline program. The Lifeline program helps address the digital divide in our state and our nation. The need to address the digital divide has only become more important in recent years as more and more services move online. Important populations, including families with children, job seekers, rural residents, and veterans, rely on the Lifeline program for digital access.

Our administration also supports commonsense improvements to the administration of the Lifeline program. We support an accurate, efficient process to verify eligibility, and we believe the National Verifier will lead to improvements to the eligibility system. However, we believe that the eligibility system should leverage states' administrative data (as permitted by state and federal law)—by doing so, the eligibility process will be made simpler, faster, and more efficient and accurate. Moreover, as recent experience from other states has shown, a strikingly high percentage of otherwise eligible individuals are unable to manually verify their eligibility. This finding militates that states work with USAC in enabling that the National Verifier has automated eligibility processes accessing state databases.

The State of Connecticut is working with USAC to resolve legal and technical issues that have hindered the implementation of an automated eligibility processing system. We believe that

these issues are on track for resolution. The Department of Social Services, assisted by the Public Utilities Regulatory Authority, is diligently standing up this system with USAC, and our belief is that a nine month delay would be sufficient for our state and USAC to collaboratively establish this system. This delay would allow the State of Connecticut and USAC to: (1) ensure that appropriate consent is obtained from applicants; and (2) develop the application programming interface (API) that allows for a secure digital connection between USAC and the State. This digital connection must maintain our residents' data security and privacy.

The State of Connecticut has an existing API that supports automated eligibility determination by TracFone, which shows both the determination to and capacity for our state to set up a similar system with USAC. The State is committed to working with USAC to explore resolution to the outstanding issues to adoption of automated eligibility.

We believe that there is significant public benefit to an automated eligibility system, and we believe there would be palpable harm to CT residents if the national verifier is hard launched in CT on October 23. Further, we believe the risks posed by a nine month delay are minimal.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is filed in ECFS.

We thank the FCC for considering the waiver request from the State of Connecticut.

Yours,



Ned Lamont
Governor



Deidre Gifford, MD
Commissioner of Social Services