

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
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

**COMMENTS OF THE PUBLIC UTILITY DIVISION OF THE OKLAHOMA
CORPORATION COMMISSION**

The Public Utility Division of the Oklahoma Corporation Commission (“PUD”) hereby submits its comments in response to the Notice of Proposed Rulemaking (“2017 NPRM”) and Notice of Inquiry (“2017 NOI”) contained in the Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry released by the Federal Communication Commission (“FCC”) on December 1, 2017. (FCC 17-155). Comments in this proceeding are due February 21, 2018.¹

Summary

PUD believes that re-establishing the state commissions as the entities primarily responsible for designating all Eligible Telecommunications Carriers (“ETC”) under 214(e) of the Telecommunications Act is lawful, appropriate and consistent with the idea of partnering with the states to manage the program and enforce applicable rules. PUD does not support the elimination of wireless resellers as Lifeline providers and raises questions with regard to using all Lifeline support as incentive for network deployment. PUD suggests that additional efforts to

¹ Wireline Competition Bureau, *Order*, WC Docket No. 17-287, released January 23, 2018, DA 18-62 extended the filing dates from January 24, 2018 for comments and February 23, 2018 for reply comments to February 21, 2018 and March 23, 2018 respectively.

minimize waste, fraud and abuse in the program could improve any decisions to be made with regard to balancing the interests of those that fund the program and those that are supported by it.

PUD provides comments on some but not all of the issues contained within the NPRM and NOI and may cover additional areas during the reply comment cycle.

Notice of Proposed Rulemaking

Section A – Respecting the States’ Role in Program Administration

1. Reauthorizing State Commissions to Designate Lifeline ETCs

PUD concurs with the FCC’s stated belief that “the Commission erred in preempting state commissions from their primary responsibility to designate ETCs under section 214(e) of the Act...”² PUD also believes that the legal arguments advanced by the National Association of Regulatory Utility Commissioners (“NARUC”) in its challenge³ of the *2016 Lifeline Order*’s⁴ preemption of state designation of Lifeline Broadband Providers (“LBP”) clearly articulate the legal issues and fully support reversing the preemption of states’ authority to designate LBPs. PUD believes that a return to the traditional, lawful process where states take a primary role in designating Eligible Telecommunications Carriers (“ETCs”), will still allow for the appropriate introduction of new ETCs. As PUD observed in its comments⁵ filed in response to the FCC’s Public Notice released March 2, 2017,⁶ broadband internet access service (“BIAS”) has been

² *Telecommunications Carriers Eligible for Universal Service Support et al.*, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, WC Docket Nos. 17-287, 11-42, 09-197, FCC 17-155, rel. December 1, 2017, ¶ 55

³ *See NARUC v. FCC*, Case No. 16-1170 (D.C. Cir., filed June 3, 2016)

⁴ *Telecommunications Carriers Eligible for Universal Service Support et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, WC Docket Nos. 11-42, 09-197, 10-90, FCC 16-38, rel. April 27, 2016 (*2016 Lifeline Order*)

⁵ Comments of the Public Utility Division of the Oklahoma Corporation Commission filed March 16, 2017 in *Telecommunications Carriers Eligible for Universal Service Support et al.*, WC Docket Nos. 09-197, WC Docket No. 11-42

⁶ *Public Notice* DA 17-213, rel. March 2, 2017

added to the definition of Lifeline and, most importantly, already exists in the marketplace without any provider holding a designation as an LBP ETC. This is prima facie evidence that there is no need for a separate LBP ETC designation and the states' existing ETC designation processes should be relied upon to marshal in any new, qualified entities that are interested in providing services supported by the Lifeline program.⁷

By eliminating the stand alone LBP designation process and returning to the traditional (and legal) ETC designation process for all services supported by the Lifeline program, the FCC and the states will understand their roles in monitoring and enforcing the activities of all ETCs. The states can then continue their efforts to identify and minimize any associated waste, fraud and abuse in the Lifeline program by any ETCs operating in their state. Further, states will be able to ensure that the ETC designation process is carried out in a manner consistent with all the applicable rules and requirements (with which the stand alone LBP ETC designation process was woefully lacking).

2. Partnering with States for the Successful Implementation of the National Verifier

PUD has worked with USAC to identify and have discussions with state agencies in Oklahoma that maintain databases to which USAC seeks access for the purpose of implementing the National Verifier. PUD recognizes that the creation of the underlying infrastructure (the actual database as well access to supporting databases across the states) for the National Verifier is a significant undertaking. PUD is aware that the launch of the beta version of the National Verifier has been delayed and believes that the current situation dictates that all stakeholders should plan for additional delays of launch dates. The FCC's inquiry as to whether "new

⁷ PUD also believes that states should continue to designate ETCs in those instances where the applicant is seeking designation for purposes of participation in the high-cost program as well.

Lifeline enrollments should be halted” when the launch is “unnecessarily” delayed, presumably by a state, seems problematic. PUD wonders how and who will decide what constitutes an unnecessary delay by a state? If a state, for whatever reason, is ultimately unable to accommodate a scheduled launch date, PUD does not believe the proper incentive is to withhold Lifeline services from the eligible consumers in a state.

In Oklahoma all enrollment and eligibility determination is performed by the enrolling ETC. There is no state database currently used in Oklahoma for eligibility determinations. PUD believes that, in the event of a delayed launch of the National Verifier, ETCs should continue to have the responsibility to verify eligibility with their existing processes until such time as the National Verifier does actually launch. If an ETC dismantles its eligibility determination processes before the National Verifier is operational in their designated territory(ies) and is unable to perform the eligibility verification function, that specific ETC should halt its enrollment of Lifeline eligible consumers. While maintaining the status quo is not ideal, PUD believes consumers would be best served in this manner, until the National Verifier can be implemented properly.

Section B- Improving Lifeline’s Effectiveness for Consumers

1. Focusing Lifeline Support to Encourage Investment in Broadband-Capable Networks

Review of current data shows that ninety-four percent (94%) of the federal Lifeline support in Oklahoma is distributed to wireless resellers, leaving just eight percent (8%) being distributed to facilities based providers. Accordingly, given the potential to negatively impact a significant number of low income Lifeline subscribers, PUD does not believe that removal of funding from resellers would be in the public interest.

At the heart of the idea to direct Lifeline funding exclusively to facilities based providers is the assumption that re-routing such funding will result in the deployment of new voice and broadband capable facilities. PUD questions the soundness of that assumption. In Oklahoma, from 2012 through 2017, the top five (5) Lifeline providers have received \$528,499,288⁸ in federal Lifeline support. All top five (5) providers were and are wireless resellers. The top five (5) facilities based providers, including both wireline and wireless providers, received \$68,475,675⁹ in federal Lifeline support over the same time period. Further, all of these providers have had the vast majority of their subscribers residing on Tribal lands and, therefore, received the additional enhanced support.¹⁰

PUD is unaware of any evidence showing that wireless resale providers in Oklahoma have utilized their relatively significant amount of Lifeline funding to deploy network facilities or that such support has been an exclusive or even fundamental factor in network build business decisions. In fact, those wireless resale providers that had established nominal facilities (e.g., directory assistance call centers) in order to meet the facilities requirement, after the grant of forbearance from the facilities requirement, changed their status to reseller and abandoned even their nominal efforts to establish and maintain a level of facilities. Likewise, PUD is unaware of any direct evidence that the facilities based providers (wireless or wireline), even with the enhanced support amount, have expanded network deployment based on or even given significant weight to the availability of Lifeline support in their network build decisions.

⁸ This includes \$52,097,633 that was received by ICON Telecom, Inc.

⁹ Of this, twenty-seven percent (27%) was received by Southwestern Bell Telephone Company which has subsequently relinquished its ETC designation in Oklahoma and ceased being a Lifeline provider.

¹⁰ The number of subscribers residing on Tribal lands decreased on June 8, 2016, when the FCC altered the definition of Tribal lands and excluded significant areas of Oklahoma (e.g., Oklahoma City) which, for many, particularly wireless resellers, resulted in a reduction in the number of subscriber's qualifying for enhanced support.

PUD believes that, if the assumption (i.e., network deployment decisions can be impacted or otherwise encouraged by directing more Lifeline support and customers to facilities-based Lifeline providers) were accurate, the market would likely have already exhibited some of the network deployment characteristics of other areas of the telecommunications market, such as long distance resale. At the introduction of competition into the long distance market, many companies entered the market as resellers, relying on their underlying facilities based carriers for the network capacity they sold to their customers. As these companies matured and grew their market share, many began to build or acquire their own transport networks in the routes over which they had adequate traffic levels to justify the investment in facilities. With adequate traffic (i.e., customers and minutes) and the associated revenue, it made economic sense to invest in the facilities which, in turn, reduced their cost of transport and improved their margins.

If these characteristics (i.e., adequate customer numbers and revenue) were impacting the Lifeline market similarly, one could have reasonably expected that, as a Lifeline reseller increased market share and revenues, it too would have reached a point where investing in its own network (at least in those areas where customers and revenues were most significant) would have made financial sense (i.e., owning facilities reduced costs and improved margins). One could reasonably expect that Oklahoma, with a high density (large urban areas) of eligible subscribers at the highest support level, would have been ground zero for such a transition from wireless resale to facilities based provision of Lifeline service. If that is the case, the question must be, at what level of customer concentration and revenue would a wireless reseller have the adequate economic signals to deploy a network. That information is important as facilities-based Lifeline providers would be considering similar economic signals in deciding whether to expand their network deployment based on a potential increase in customers and associated support.

PUD does not advocate that there should be additional Lifeline funding made available, but believes the question of what economic factors would need to be present for a company, wireless reseller or facilities based Lifeline provider, to deploy network should be answered before the elimination of Lifeline support for wireless resellers and directing all such funding to facilities based providers with ETC designation.

Notwithstanding the above, PUD does recognize that the FCC has previously, after investigation, found that the additional enhanced Lifeline support amount (\$25.00) was established not only to increase subscribership on Tribal lands but also with the expectation that such enhanced support would “create incentives for eligible telecommunications carriers to deploy telecommunications facilities in areas that previously may have been regarded as high risk and unprofitable.”¹¹ Given that the FCC implemented the enhanced support on Tribal lands with a specific expectation that it would facilitate deployment of networks, combined with the fact that wireless resellers have taken no measurable steps toward becoming facilities-based and engaging in such network deployment, PUD believes there could be merit in limiting the enhanced support component of the Lifeline benefit associated with providing Lifeline services on Tribal lands to those ETCs that are facilities-based.¹² This would continue the availability of the “base” Lifeline support amount (currently \$9.25) for wireless resellers’ provision of Lifeline services on Tribal lands but limit the enhanced support to facilities-based ETCs, which are capable of deploying network facilities.

While PUD does not support the wholesale elimination of non-facilities based ETCs (e.g., wireless resellers) from the Lifeline program, it does believe that adoption of specific,

¹¹ See *Federal-State Joint Board on Universal Service et al.*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, released June 30, 2000, (2000 Tribal Order) para 53

¹² In this circumstance, PUD supports the idea that the definition of “facilities-based” should be altered to require that such facilities are used to provide the “last mile” component of the service to the supported customers.

additional deterrents to protect against waste, fraud and abuse would be warranted. PUD believes that the “conduct-based requirements” advanced by TracFone provide a reasonable framework for identifying procedures that could improve accuracy and accountability. As with any attempt to measure performance, the key is to determine what metrics best correlate with the desired outcome.

PUD has focused its review of ETCs in Oklahoma at the operational level. This has included review of subscriber bases and taking samples of enrollment documentation for the purpose of determining whether the rules were followed when enrolling each subscriber in the sample. PUD also periodically visits distribution locations (both mobile and brick and mortar) and tests the ETC’s compliance with the rules of the Oklahoma Corporation Commission (“OCC”) regarding marketing activities. PUD’s experience is that the more granular the level of information to be reviewed (e.g., subscriber record and copy of eligibility documentation vs. a procedures manual describing the enrollment process) the easier it is to identify specific problems that need to be addressed. Accordingly, in adopting “uniform standards,” whether they are based on Payment Quality Assurance reviews, funding return rates, rates of rejected enrollment attempts, consumer complaint rates, percentage of system overrides relative to total subscribers, or percentage of enrollments achieved through manual review of eligibility documentation¹³ (particularly with regard to programs for which database access is available) the selected metric should closely tie to an identifiable activity for which there can be corrective action taken. Further, any adopted “trigger,” the point at which performance is deemed unacceptable, should be set at a level that, while perhaps not seeking 100% compliance, establishes a high level of performance that allows ETCs that are serious about furthering the goals of the Lifeline program, including protecting the program against waste, fraud and abuse

¹³ Assumes an active and functioning National Verifier.

and that are ultimately willing to take responsibility for the continued availability and effectiveness of the program, to set themselves apart from those ETCs that are not willing to dedicate adequate resources, engage in self-policing, or establish effective processes and procedures.

PUD, in response to the question as to whether voice-only services should continue to be supported by the Lifeline program, believes that Lifeline consumers, just as any other consumers, should be allowed to decide what best suits their needs (and provides the best value to them) and that stand-alone voice-services should be an option from which consumers can choose. Accordingly, PUD supports an elimination of the current phase down of Lifeline support for voice-only services and believes the phase down should be eliminated for both rural and urban areas.

2. Enabling Consumer Choice

PUD can see that a “units” based service standard might provide flexibility to consumers and empower the individual consumer to get the best value from the service based on their own needs. However, the key to the acceptability of such a service standard mechanism is the value applied to each unit. The TracFone plan suggests that the value of one (1) minute of voice is equal to one (1) Mb of mobile broadband data. Is this assignment of value based on costs to provide each service or some other metric? PUD would note that, in terms of data usage, voice (converted to digital and compressed) may use between .5 MB to .75 MB of usage for a one (1) minute conversation.¹⁴ Additionally, setting aside the value of the units, is the suggested one thousand (1,000) units for a monthly benefit appropriate for the Lifeline support received? Should the benefit be different for those consumers on Tribal lands where the enhanced subsidy

¹⁴ See, <https://www.lifewire.com/megabytes-for-one-minute-conversations-3426705>

is applicable? Again, is this cost based or related to some other calculation? Finally, also key to any such units based service standard would be the ability for the consumer to understand, both at the initiation of service as well as during their ongoing service experience, exactly what they are getting and just how their benefit units will be decremented based on various uses of the service (to include any ancillary activities like texting).

C. Steps to Address Waste, Fraud, and Abuse

1. Improving Program Audits

PUD fully appreciates the resources and time that are required to perform thorough audits at a level of granularity that provides meaningful results. Accordingly, PUD believes that a move to a risk-based methodology with which to target audits would improve both the efficiency and effectiveness of the Commission's efforts to identify and address waste, fraud, and abuse. Such a risk-based methodology would also seem to offer a savings in both time and money to those ETCs that run quality operations that do not raise risk concerns and can avoid or otherwise minimize the audit process that would otherwise apply under the existing rules.

Some factors that could be considered when evaluating the potential for waste, fraud and abuse with regard to a particular ETC would be consumer complaint levels (and changes thereto), spikes in enrollment numbers (increases or decreases) month over month, investigations being performed by a state(s),¹⁵ frequency of errors or rejections in submitting information to the Lifeline databases, and rates of overrides (NLAD) or rates of need for manual review (National Verifier).

¹⁵ Due to protective orders that cover the actual subscriber records that are reviewed, the specific examples of errors or infractions are typically not able to be shared with other agencies but, a review of the public record in a case can identify the issues being considered. Such issues could inform the FCC's or USAC's investigation efforts.

PUD's enforcement group performs random on-site audits of mobile marketing locations where ETCs enroll consumers.¹⁶ The basic purpose of these audits is to determine compliance with the OCC's mobile marketing rules. While PUD does not utilize the "mystery shopper" methodology employed by the Generally Accountability Office ("GAO"), PUD does believe review of an ETC's operations at this level provides valuable insight into a company's commitment to compliance, employee or agent knowledge of applicable rules and ability to serve eligible consumers. PUD believes this direct operational contact provides for more "holistic" observations as well. For instance, PUD has observed that, in most instances, those consumers enrolling in Lifeline from a wireless provider at a mobile marketing location do so with a cell phone already in their possession (i.e., they will have a cell phone in their hand as they go through the enrollment process. There is no way to know whether the phone is actually theirs or is one they have borrowed). This circumstance is not limited to any particular ETC and is consistent across the observed mobile enrollments. PUD believes the FCC, by performing audits, whether operational, such as those performed by PUD, or more extensive "undercover" audits would provide valuable insight to an ETC's compliance with rules and serve to collect evidence of issues that must be corrected and / or for which penalties are appropriate.

2. Improving Program Integrity in Eligibility Verification

PUD agrees that ETC's use of agents for the Lifeline enrollment process, particularly if per enrollment commissions are used in the compensation mechanism, creates incentives that are inconsistent with the goal of eliminating waste, fraud, and abuse. PUD has observed that the use of agents adds a level of complexity to an ETC's management of their operations that is challenging, with some being more successful than others. PUD is aware of at least two wireless

¹⁶ From 2016 through 2017, PUD performed 450 such audits.

ETCs in Oklahoma that have stopped utilizing agents all together. With that said, PUD is unsure that establishing a registration process and creating a mechanism through which to affect enforcement actions against agents is the most efficient means of curtailing any agent based misbehavior. PUD's experience is that virtually all ETCs, once made aware of an agent engaging in non-compliant activities, will terminate or otherwise discipline the agent(s) in question. Further, through continued efforts directly with the ETCs to require compliance, including the actions of agents, PUD has found that the ETCs themselves, at least in some instances, will determine that agents are not helpful to their business.

PUD supports the proposal that USAC directly review supporting documentation for manual NLAD dispute resolutions. Without review of the actual documentation by a party that is singularly focused on compliance and deterring waste, fraud and abuse, there really is no check on the process. An ETC's certification of documentation is not an acceptable substitute for direct review. Even if USAC reviewed documentation for samples of resolutions, it would be an improvement over relying on carrier certification exclusively. Additionally, USAC should absolutely establish a list of acceptable documentation for NLAD resolutions, initial eligibility, as well as re-certification. The FCC should formally adopt such a list so as to avoid ETCs suggesting that a USAC list might be considered "guidance" as opposed to a requirement. Such a list would significantly improve the ability for USAC, as well as the states, to conduct meaningful audits.

The FCC suggests prohibiting subscribers from self-certifying their continued eligibility during the annual re-certification process if they have changed eligibility programs. PUD would strongly urge the FCC to prohibit self-certification for ANY annual re-certifications, not just those associated with program changes. The FCC has previously found problems with self-

certification in the context of subscriber eligibility and, in so doing, established the original requirement to review documentation to determine eligibility in its 2012 Lifeline Reform Order.¹⁷ The FCC, in support of the requirement to review eligibility documentation instead of relying on self-certification for determining eligibility, said:

Requiring consumers to present documentation demonstrating their participation in a qualifying program prior to enrollment in Lifeline will go a long way towards ensuring that only qualified consumers benefit from the program, thereby reducing waste, and possibly fraud and abuse in the program. As we noted in the NPRM, self-certification does little to guard against those persons who wish to intentionally defraud the Lifeline program by enrolling in the program despite their ineligibility. Similarly, self-certification does not exclude consumers who are ineligible to participate in the program but mistakenly enroll due to misunderstanding the eligibility requirements. (footnotes omitted)¹⁸

The problems and risks associated with self-certification, as already identified by the FCC, are not eliminated simply because original documentation was review as some point in the past which, in many cases, can be years ago. PUD, in reviewing subscriber records for the month of July 2016 for several of the largest ETCs in Oklahoma, found that just over thirty-five percent (35%) of those subscribers were relying on re-certification to maintain their eligibility. Of these, just over forty-eight percent (48%) were originally enrolled over two years prior. If this percentage is applied to the total number of Lifeline subscribers, 10,034,756 as of the end of the 4th Quarter 2017 (based on USAC information at LI08 Lifeline Subscribers by State or Jurisdiction – January 2017 through December 2017), then approximately 3,620,314 subscribers received support based on the subscriber's self-certification of continued eligibility. This

¹⁷ *Lifeline Reform Order*, WC Docket Nos. 11-42, 03-109, 96-45, 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 ¶99

¹⁸ *Id.*, ¶104

translates to over \$33,000,000 per month (without accounting for enhanced support) being paid in Lifeline support that is ultimately tied to self-certification.

PUD supports the implementation of a limitation on the use of the Independent Economic Household (“IEH”) worksheet to those instances where there are actually multiple independent economic units residing at a specific address. PUD would also suggest that in those instances where people claiming they are independent economic units but have the same last name, the worksheet should be amended to require a specific description of the relationship rather than the default status of “adult roommate.” PUD has observed a significant number of IEH worksheets provided by individuals with the same last name, with the vast majority claiming they are adult roommates. Of course, it is possible for adult roommates to have the same last name, however the frequency of this observed by PUD is beyond what would be expected in the normal course. Any steps to improve the effectiveness and accuracy of the IEH worksheet, to include the ability to audit such forms, would be a valuable improvement to the process to reduce waste, fraud and abuse.

With regard to the question as to whether USAC should be required to perform risk-based audits of eligibility and dispute resolution documentation, PUD would suggest this would be a positive step toward identifying not just specific failures but to gain a more complete sense of an ETC’s operations and how those operations support the goal of avoiding waste, fraud and abuse.

3. Transparency and State Partnerships

PUD supports the idea of USAC providing states with information about suspicious activity or trends that are of concern or that otherwise raise questions. This would further facilitate the sharing of information and comparing of notes among agencies with the common

goal of minimizing waste, fraud and abuse. PUD has a working relationship with the FCC's Enforcement Bureau as well as contacts within USAC and fully supports all efforts to collaborate.

E. Improving Provider Incentives for Lifeline Service

PUD believes that the establishment of a maximum discount level and the subsequent result of having the consumer contribute financially to the Lifeline service they receive would help to ensure that the consumer, who is best positioned to make such a determination, is a participant in determining what constitutes maximum value for the service. Additionally, requiring some level of financial participation by the Lifeline recipient would assist in directing the support to those subscribers that have the highest level of need for the service as opposed to those that are eligible but would, absent the support, meet their service needs through other means.

VI. Notice of Inquiry

B. Benefit Limits

PUD would suggest that, prior to establishing a limit to the amount of benefit or the time over which a household can participate in the program, there should be a focus on the re-certification process. As described above, allowing self-certification for purposes of re-certifying eligibility most certainly extends the time for which a subscriber can maintain their eligibility. In some cases such eligibility is warranted and can be demonstrated, however, PUD believes that there are many instances where such continued eligibility is not warranted. Further, while requiring the production and review of documentation for purposes of establishing on-

going eligibility creates an administrative burden, for both the program and the consumer, the requirement for such “effort” from the consumer would seem to also assist with directing the funding to those truly in need. Once the re-certification process is revised to allow for audits and to align continued eligibility with the production of eligibility documentation, then a decision on benefit limits could be made based on more accurate information, particularly with regard to average length of enrollment.

Conclusion

PUD continues to appreciate the FCC's efforts to further reform and refine the Lifeline program with a focus on minimizing any waste, fraud and abuse within the program. PUD recognizes that the FCC, in balancing the need to protect those that contribute to the universal service fund with the goals of the Lifeline program and those that it serves, can find itself in the position of picking winners and losers. PUD's suggestions go to the idea that undertaking further efforts to reduce waste, fraud and abuse, could have the same impact as increasing the funding available for Lifeline service without actually directing additional funds. Having an understanding of the actual funding available would make some of the "balancing" decisions, perhaps not easier, but at least based on an accurate assessment of the actual and appropriate demand and needs for Lifeline support.

Respectfully submitted,

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