

**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 SAGE TELECOM COMMUNICATIONS, LLC
D/B/A TRUCONNECT IN SUPPORT OF
Q LINK WIRELESS LLC’S EMERGENCY PETITION**

I. INTRODUCTION

Sage Telecom Communications, LLC d/b/a TruConnect (“TruConnect”), by counsel, pursuant to the Federal Communications Commission’s (“FCC” or the “Commission”) Public Notice released July 11, 2018,¹ hereby submits these comments in support of the Emergency Petition of Q Link Wireless LLC (“Q Link”) for an Order Directing the Universal Service Administrative Company (“USAC”) to Implement Machine-to-Machine Interfaces for the National Verifier,² and urges the Commission to expeditiously grant Q Link’s Petition and direct USAC to restore carrier application programming interfaces (“APIs”) prior to the National

¹ See *Wireline Competition Bureau Seeks Comment on Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier*, DA-18-718 (July 11, 2018).

² See Emergency Petition of Q Link Wireless LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018) (“Q Link Petition”).

Verifier's hard launch.

Like Q Link, TruConnect strongly supports the creation of the National Verifier to make USAC, rather than each Eligible Telecommunications Carrier ("ETC"), the entity that determines whether an individual customer is eligible for Lifeline. However, this objective can and should be accomplished while still permitting ETCs to exchange information with USAC, including information necessary to establish eligibility, on a machine-to-machine basis when consumers seek to enroll in Lifeline. Without APIs, the roadblocks posed by the National Verifier to online enrollment will prevent deeper penetration of Lifeline wireless broadband services, particularly in rural America—the exact opposite of the Commission's goals for the Lifeline program.

II. THE Q LINK PETITION CORRECTLY EXPLAINS WHY THE LACK OF CARRIER API IN THE NATIONAL VERIFIER IS PROBLEMATIC

TruConnect supports Q Link's Petition, which correctly and thoroughly explains why failing to include carrier APIs in the National Verifier is problematic, and why inclusion of such APIs is reasonable and in the best interest of carriers, consumers, and program administration alike.

A. Without Carrier APIs, a Subset of Lifeline Applicants Will be Unfairly and Significantly Disadvantaged

A National Verifier without carrier APIs prevents Lifeline consumers from being able to subscribe to Lifeline online in a single step, because the consumer cannot be linked from the Lifeline provider's site to the National Verifier website and then return as part of a simple online process, and cannot receive any assistance from the Lifeline provider as the consumer navigates USAC's online eligibility verification process. As part of an in-person enrollment process, however, Lifeline ETC employees and agents are able to assist consumers with navigating USAC's eligibility verification process via a specialized web portal.

This incongruous approach unfairly disenfranchises those consumers dependent on online enrollment—a common method of enrollment in rural America or for homebound consumers

such as elderly or disabled Americans—who would be forced to discover and complete two (2) separate application processes; (1) apply for proof of eligibility verification with the National Verifier without any assistance from a carrier (*though the consumer’s successful completion of eligibility verification through the National Verifier’s consumer portal cannot, by itself, result in the consumer receiving Lifeline service*), and (2) then contact a Lifeline provider within ninety (90) days to start a separate, largely duplicative³ process to actually sign up for service.

Many Lifeline applicants are frustrated even by the existing one-step application process; it is reasonable to expect that a fragmented, redundant two-step (at minimum) process will be more burdensome and confusing to consumers in general, and much more so to rural Americans who are less likely to have easy access to brick-and-mortar locations or the assistance of agents in mobile event locations, or even easy access to the Internet (hence the FCC’s legitimate concern to modernize the program to expand broadband, especially to rural America).⁴ The extra step(s) in conjunction with lack of assistance from ETCs during the National Verifier portion of the online application process will result in unnecessary delays in providing service to qualified consumers—service which the FCC has recognized as vital to full and meaningful participation in society.⁵

³ As stated in the Q Link Petition on page 11, the “Commission has reinforced the need for duplicative carrier information collection to verify enrollment because it has made clear that use of the National Verifier is not a ‘safe harbor’ with respect to eligibility: carriers retain an independent duty to ensure that subscribers are eligible;” *See Wireline Competition Bureau Reminds Eligible Telecommunications Carriers of Their Ongoing Responsibility To Claim Lifeline Support Only for Eligible Low-Income Consumers*, Public Notice, DA 17-636, 32 FCC Rcd. 5129 (rel. June 29, 2017).

⁴ *See, i.e., Lifeline & Link Up Reform & Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962 (2016) (“2016 Lifeline Modernization Order”) ¶ 1.

⁵ *See id.*

Realistically, some low-income households will be delayed or prevented access to advanced telecommunications and information services altogether. The lack of carrier API will restrict the ability of ETCs to effectually outreach to all types of consumers across the United States. Indeed, ETCs and their employees and agents make it their responsibility to educate low-income households on the availability of the Lifeline program and its benefits, and to assist these eligible households in taking advantage of the opportunities provided by essential telephone services and broadband connectivity. Holding ETCs responsible for awareness of the program (the beginning) as well as the results of approved enrollments (the end), but then preventing ETCs from assisting with a critical step in the online enrollment process in between, at best delays the application process, and has the potential to undermine both the ETC's efforts and the FCC's goals for the program.

B. Without Carrier APIs, ETCs will Face Greater Difficulty in Expanding Lifeline to Rural Areas

The low-density population of rural areas combined with the costs associated with maintaining an in-person presence generally renders such areas cost-prohibitive for in-person enrollment, the only method of enrollment under the currently-proposed National Verifier in which an ETC would be able to provide meaningful assistance during the National Verifier eligibility verification process. The Q Link Petition explained how Q Link has been successful in reaching rural customers due to its ability to make customers aware of the program by its online presence, followed by providing robust assistance and support to the customer during online enrollment (such as helping the consumer understand what documentation must be provided, or ensuring that the documentation provided is the correct type of document and clearly photocopied or scanned—which the online ETC will not be able to do under the currently-proposed National Verifier).

It is already more difficult and more costly to ensure that rural Americans are even aware of the Lifeline program. With APIs, ETCs are more incented to invest in these rural or hard-to-reach consumers, because the ETC can ensure that a customer interested in signing up for the ETCs service can submit his or her information and documentation online through the carrier, proceed through the carrier's screens for coverage and identity, and then, as part of the same process, determine eligibility with the National Verifier before being enrolled by the carrier in Lifeline service. Without the streamlined API process, the ETC does not have the same expectation that a consumer will ultimately make it back to the ETC to apply for service.

Finally, while the FCC may not be concerned with the financial and logistical burdens to ETCs, the lack of carrier APIs will require ETCs like Q Link and TruConnect to abandon or drastically alter their current business models—models that have been successful in effectively and efficiently enrolling Lifeline customers while preventing waste, fraud and abuse of the program—which in reality means that instead of focusing time and financial resources on more effectively expanding Lifeline service to those not already aware of the program, these ETCs will be forced to allocate their resources to combat the risks and burdens of the proposed National Verifier process.

C. Without Carrier APIs, Program Costs and Burdens on the USF Will Increase

In addition to the detrimental effect on consumer interface and speed of Lifeline service activation, the removal of APIs from the National Verifier will most assuredly increase program administration costs and thus increase the burden on ratepayers and the USF. The significantly more cumbersome, two-step and uncoordinated approach planned by USAC will result in consumer confusion and undoubtedly a high volume of customer service calls, resulting in recurring operating costs for customer support.

Because USAC's National Verifier consumer portal blocks the ETC from being able to assist the customer with online enrollment, TruConnect and other ETCs will no longer be able to

assist online applicants through the already confusing process of verifying their eligibility; the customer service calls now shouldered by the ETCs must instead be directed to USAC, and instead of ETCs being able to help ensure that applicants provide clear and correct documents to the National Verifier, the National Verifier will be required to shoulder the cost burden of screening and re-screening incomplete or ineligible applications.⁶

Furthermore, due to the disjointed application process, even if a customer successfully navigates the National Verifier consumer portal and receives confirmation of eligibility, that consumer may not ultimately be approved by the ETC—whether due to more stringent eligibility standards or simply an ETC’s service area confinements—which will result in a consumer having to take yet additional steps to apply with other ETCs, and/or drive customer complaints or support calls back to USAC.

III. THE Q LINK PETITION CORRECTLY IDENTIFIES HOW A COST-BENEFIT ANALYSIS CLEARLY FAVORS CARRIER APIS

There is no drawback to implementing the APIs necessary to permit the real-time exchange of enrollment and eligibility information between ETCs and the National Verifier during an ETC’s online enrollment process; if the consumer does not wish to apply online through the ETC or feels they have been unfairly denied Lifeline service by an ETC, they still have the option to apply directly via the National Verifier’s consumer portal. Q Link already noted that existing, off-the-shelf tools are available to ensure that USAC can control and record the customer certifications and attestations that would be collected during any online enrollment process, without ETCs being able to modify the presentation or content, and that FISMA-

⁶ As the Q Link Petition noted on p. 19, Q Link collects an average of 4.5 documents for every successful enrollment, because consumers often send wrong documents, or copies with crucial information cutoff or that is illegible, and this is the point in the process where assistance is vital.

compliant network security systems already in place and in use today by the National Lifeline Accountability Database (“NLAD”) can be applied to authenticate authorized carrier uses that seek to exchange data with the National Verifier via an API.⁷

Q Link also explicitly outlined how allowing carrier APIs for online enrollment would result in willing ETCs, not USAC, bearing the bulk of the customer support burden, while at the same time retaining USAC’s core role as the final arbiter of subscriber identity and eligibility verification, and still ensuring that consumers see and utilize USAC’s prescribed enrollment forms, with the customer’s signature even occurring on USAC’s server or on the server of a USAC-trusted third party to ensure that ETCs cannot alter the certification language or its presentation.⁸ Restoring APIs would allow ETCs not only to lessen the customer support burden on the USF, but also to lower the cost burden of processing applications by permitting ETCs to continue to conduct the initial screening, and submit to the National Verifier only application packages that are complete and thus likely to result in eligibility determination without repeated back-and-forth with the consumer.

IV. CONCLUSION

The current trajectory of the National Verifier, as Q Link correctly explains, will harm rural Americans and constituencies such as disabled veterans, seniors, and other individuals who depend extensively on online enrollment, who will have their access to Lifeline disproportionately frustrated by USAC’s planned implementation, directly undermining efforts to promote broadband Internet access service.

With APIs, the National Verifier would still provide the ultimate eligibility decision, and would apply its same controls necessary to prevent waste, fraud, and abuse, such as requiring

⁷ Q Link Petition, p. 5.

⁸ Q Link Petition, pp. 18-19.

customer certifications and attestations and using the USAC-prescribed forms and language. The carrier APIs in question are currently used by USAC today (and have been used for over four years), in FISMA-compliant systems, to ensure that Lifeline ETCs can interact with the NLAD, which will ultimately be integrated with the National Verifier. Failure to implement carrier APIs is wasteful; the incremental cost of adding these APIs is low, as Q Link explained, especially compared to the substantial effect it will have on reducing the recurring costs of administering the program. As Q Link concluded, the modest investment required to restore carrier APIs “would pay dividends throughout the life of the project by substantially decreasing the customer support burden on USAC, resulting in savings of tens of millions of dollars per year.”⁹

USAC has taken the National Verifier down a path which markedly diverges from the FCC’s mandated intent, which was to “implement the National Verifier and to make administrative and efficiency improvements consistent with the core elements” established in the 2016 Lifeline Modernization Order (emphasis added).¹⁰ The FCC should therefore take action, without delay (and before it is too late), to put USAC’s initial implementation plan—with carrier APIs—back on track, thus preserving the efficient advancement of broadband participation, especially in rural America, while simultaneously furthering program integrity and ensuring efficient fiscal governance of the program.

⁹ Q Link Petition, p.27.

¹⁰ See 2016 Lifeline Modernization Order ¶ 128.

Respectfully submitted,

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