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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: WC Docket No. 11-42, et al. Lifeline and Link-Up Modernization- New York
Public Service Commission Comments on United States Telecom Waiver Request

Dear Secretary Dortch:

On November 2, 2017, Staff from the New York Department of Public Service (DPS) including Debra LaBelle, LuAnn Scherer, and Graham Jesmer, as well as Staff from the New York Office of Temporary and Disability Assistance, including Jeff Gaskell, Barbara Guinn and Kelly Welsh had an ex-parte meeting with Rashann Duvall and Jodie Griffin of the Wireline Competition Bureau regarding the New York State Public Service Commission's request for an extension of the waiver granted in 2016 regarding the implementation of the changes in Lifeline Eligibility criteria set forth in the Lifeline Modernization Order.¹ This letter represents a summary of the oral ex-parte presentation, required for submission by 47 C.F.R. §1.1206(b)(1), made during this meeting.

Based on conversations had between DPS and OTDA following this call, additional information for the Wireline Competition Bureau's consideration is provided here. The existing New York State match service provided by OTDA is used by eight phone carriers who rely on OTDA to verify a Lifeline applicant's participation in a qualifying program. The low-income individuals who qualify for Lifeline discounts through this method are a vulnerable population who may have difficulty documenting their eligibility in other ways. OTDA wishes to continue to offer a matching process so that the participating phone carriers can continue providing benefits under their existing agreement with OTDA and these vulnerable families can continue receiving these important services.

¹ See, WC Docket No. 11-42 et al., Lifeline and Link Up Reform and Modernization, Motion of the New York State Public Service Commission for a Further Waiver (filed October 27, 2017).

If an additional extension is not granted there will be a gap in time where OTDA's matching service may qualify individuals that do not qualify for Lifeline service under the FCC's new criteria. Additionally, based on numbers provided to DPS by USAC, it appears that during any extension, only a limited number of customers, likely fewer than 1,000 would receive Lifeline benefits by qualifying using the Low Income Home Energy Assistance Program (LIHEAP); National School Lunch Program (NSLP); or Temporary Assistance to Needy Families (TANF). Therefore, the impact to the Lifeline program would be small. OTDA is working diligently to conclude negotiations for the MOU involved with moving to a national verification system, but until that agreement is finalized OTDA cannot guarantee that its systems will operate correctly in verifying customers for Lifeline services.

If you have any additional questions, please contact me at (518) 473-4628. Thank you.

Respectfully submitted,

_____/s/_____

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