STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street Southwest
Room TW-A325
Washington, D.C. 20554

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Re: *Lifeline and Link Up Reform and Modernization, WC Docket no. 11-42. Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197, Connect America Fund, WC Docket No. 10-90.*

Dear Ms. Dortch:

The Washington Utilities and Transportation Commission (UTC), following the advice of Ryan Palmer of the Federal Communications Commission (FCC) Wireline Competition Bureau and Division Chief of the Telecommunication Access Policy Division, requests a delay of the December effective date for Lifeline verification so that the database currently required by the UTC for Eligible Telecommunication Carrier (ETC) lifeline-only wireless resellers will provide accurate eligibility determination and not provide "false positives".

On April 27, 2016, the FCC released a Third Report and Order, Further Report and Order and Order on Reconsideration in the above-captioned proceedings regarding the Federal Lifeline Program. *(April 27 Order).* In this order, among other things, the FCC standardized and streamlined eligibility criteria for the Federal Lifeline Program.

The UTC has concerns regarding the effective date of the new federal eligibility criteria. As a condition when granting ETC designation in Washington, lifeline-only wireless resellers are required to access the Department of Social and Health Services (DSHS) data base to determine customer eligibility. The data base provides a "Yes" or "No" response and does not identify the eligible program due to Washington state privacy laws. Because the current data base includes certain state specific eligibility programs that will no longer be qualifying programs pursuant to the April 27 order, responses from the data base in determining customer eligibility could result in "false positives" and will not be in compliance with revised rules 54.400(j) and 54.409(a). UTC staff are participating in the Lifeline Task Force organized by the National Association of Regulatory Utilities Commissioners and have also been working with Universal Service

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Administrative Company and DSHS in support of the National Verifier to comply with the April 27 Order. DSHS owns the database. The UTC has requested changes be made to include only Supplemental Nutrition Assistance Program Medicaid and Supplemental Security Income in determining Lifeline eligibility. DSHS has indicated verbally that the changes described above will be made by the end of second quarter in 2017. DSHS, however, will not be able to complete the modification by December 1, 2016. This change to the database will still require ETCs to obtain documentation or to use another database for Federal Public Housing (Section 8), Tribal, and Veteran & Survivors Pension Benefit and Income when identified as an eligible program.

Sincerely,

Steven V. King
Executive Director and Secretary