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PUBLIC SERVICE COMMISSION

Received & Inspected
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FCC Mail Room

November 22, 2016

Via Electronically and U.S. Mail

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Lifeline and Link-Up Reform and Modernization
WC Docket No. 11-42

Dear Ms. Dortch:

The Maryland Public Service Commission ("the Maryland Commission") supports USTelecom's petition for a limited waiver of the revised Lifeline eligibility rules. Revised Lifeline eligibility rules were adopted by the FCC in the Commission's *Lifeline Modernization Order*.[1] The Maryland Commission urges that the Commission grant the USTelecom petition with respect to Maryland, and extend such waiver for up to nine months or to the maximum extent allowed under the Commission's rules.

As explained in a letter from Verizon dated November 18, 2016, also urging that the Commission grant the USTelecom petition with respect to Maryland,[2] the Maryland Lifeline statute[3] expressly lists the Lifeline-qualifying programs in Maryland that allow telecommunications customers in Maryland to participate in the State's Lifeline telephone service program. At present, the eligibility criteria set forth in the Maryland Lifeline statute and the revised eligibility criteria provided in the *Lifeline Modernization Order* are not the same.[4] In order to implement the revised eligibility criteria as prescribed by the Commission, the Maryland Commission will take the necessary steps to seek amendment of the Maryland Lifeline statute during the 2017 Maryland General Assembly's Legislative Session.

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[1] *Lifeline and Link Up Reform and Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016).
[2] Verizon's letter to Ms. Marlene H. Dortch dated November 18, 2016.
[3] MD. CODE ANN., Public Utilities Article § 8-201.
[4] Strict compliance with the database required by the existing Maryland Lifeline statute could make some customers who qualify for Lifeline services under the *Lifeline Modernization Order's* revised eligibility criteria ineligible, which would be an unintended consequence of the Maryland Lifeline statute.

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Granting USTelecom's petition and extending the requested waiver for the Maryland Lifeline program will allow the Maryland Commission additional time to adjust (for consistency) the Maryland Lifeline eligibility database and the *Lifeline Modernization Order's* revised eligibility criteria.

If you have questions or need additional information, please do not hesitate to contact Juan C. Alvarado, the Commission's Director of Telecommunications, Gas and Water, at (410) 767-8044. This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Very Truly Yours,

David J. Collins
Executive Secretary

cc: Garnet Hanly
Trent Harkrader
Ryan Palmer