



Via Email

December 5, 2018

Javier Rosado  
Senior Officer, Business Development and Government Services  
TracFone Wireless, Inc.  
9700 NW 112<sup>th</sup> Avenue  
Miami, FL 33178

Re: November 20, 2018 Letter to USAC on Lifeline Acceptable Documentation Guidelines

Dear Mr. Rosado:

The Universal Service Administrative Company (USAC) has reviewed your November 20, 2018 letter requesting that USAC delay the implementation of recently communicated acceptable documentation guidelines for the Lifeline National Eligibility Verifier (National Verifier). For the reasons described below, USAC will not delay the implementation of these guidelines.

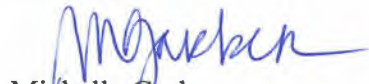
On November 14, 2018, during a National Verifier update for carriers, USAC communicated that, beginning on December 4, 2018, (1) all documentation must be issued or dated within the past 12 months or have a future expiration date and (2) documents without an issued date or expiration date will not be accepted (e.g. undated SNAP or Medicaid cards). USAC is unable to find TracFone's reference to SNAP or Medicaid cards in the current FCC rules as it relates to initial program-based eligibility determinations. Specifically, section 54.410(c)(i)(B) of the FCC rules provides that: "Acceptable documentation of program eligibility includes the current or prior year's statement of benefits from a qualifying assistance program, a notice or letter of participation in a qualifying assistance program, program participation documents, or another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program." This FCC rule must be applied to all document types, including qualifying program benefit cards.

Possessing a benefit card does not necessarily demonstrate that a subscriber's household currently receives benefits from a qualifying program when there is no date that represents the period of the benefit eligibility. Benefit cards for programs such as the Supplemental Nutrition Assistance Program (SNAP) often have a date that represents when the Electronic Benefits Transfer (EBT) card itself will expire similar to a credit card, but that doesn't necessarily correspond to the eligibility period. One could still be in possession of an unexpired SNAP card that has no benefits associated with it because the consumer is no longer eligible for the

qualifying program. If a card meets the criteria and includes dates demonstrating that a household currently receives benefits, it would certainly be accepted.

USAC recognizes that it is convenient for consumers when a benefit card can be used to demonstrate eligibility, however, USAC must adhere to the FCC's standard for eligibility proof. As you know, the National Verifier aims to leverage automated eligibility checking through Computer Matching Agreements with state and federal agencies to avoid the consumer and administrative burden of providing and reviewing eligibility documents.

Sincerely,



Michelle Garber  
Vice President, Lifeline Program  
Universal Service Administrative Company

Cc:

Ms. Radha Sekar  
Mr. Ernesto Beckford  
Mr. Trent Harkrader  
Mr. Ryan Palmer  
Ms. Jodie Griffin