

PUBLIC UTILITIES COMMISSION

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February 17, 2015

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communication, *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training (LifeLine Reform Order)*; WC Docket Nos. 03-109, 12-23 and 11-42; CC Docket No. 96-45

Dear Ms. Dortch:

On February 13, 2015, Catherine Sandoval, Commissioner, California Public Utilities Commission (CPUC), had five separate meetings at the Federal Communications Commission (FCC) regarding the CPUC's petition to allow the State of California to use government-issued identification to verify Lifeline eligibility for otherwise eligible Californians who cannot supply the last four digits of a Social Security Number (SSN4). Pursuant to an FCC waiver, California administers Lifeline through its state Lifeline duplicate database in lieu of the National Lifeline Accountability Database (NLAD), and requests approval of this petition consistent with the FCC waiver that recognizes California's extensive Lifeline eligibility verification process. The attendees at the meetings were as follows:

- 1) Meeting # 1: FCC Commissioner Clyburn, Rebekah Goodheart, Louis Peraertz, and one other member of Commissioner Clyburn's staff
- 2) Meeting # 2: FCC Commissioner Rosenworcel and Travis Litman
- 3) Meeting # 3: From FCC Chairman Wheeler's Office: Ruth Milkman and Gigi Sohn
- 4) Meeting # 4: From the FCC Common Carrier Bureau: Ryan Palmer, Michelle Schaefer, Jonathan Lechter and Melanie Tiano
- 5) Meeting # 5: From the FCC Enforcement Bureau: Travis LeBlanc, Paula Blizzard, David Strickland, and Natalie Martinez

At each meeting, CPUC Commissioner Sandoval discussed the CPUC's petition to allow California to use alternatives to the SSN4 such as the California's driver's license, Taxpayer Identification Number (TIN), a passport, or other government-issued identification, to verify Lifeline applicant identity and eligibility, consistent with the FCC's previously granted waiver that allows California to use its state Lifeline database in lieu of the NLAD. California's Lifeline

database predates the FCC's NLAD and is in large part a model for the NLAD. California verifies eligibility for 100% of federal and state Lifeline applicants. For each Lifeline applicant, identity and income or program eligibility documentation is reviewed, and the application is checked against the state Lifeline database to determine whether the applicant's household already has a Lifeline phone. The CPUC's third-party administrator determines eligibility under the auspices of the CPUC, and carriers are not allowed to certify eligibility. California is committed to administering the federal and its state Lifeline program with integrity, and to preventing fraud, waste, and abuse.

The CPUC supervises its third-party administrator who conducts the Lifeline eligibility verification process using primarily electronic means, and mail as needed, to upload and review Lifeline applications submitted by state-designated eligible telecommunications carriers (ETCs). The CPUC third-party administrator approves, denies, or gives more extensive review to each Lifeline application, consistent with FCC and state rules, and under CPUC supervision. State stewardship of the Lifeline program includes CPUC coordination with California's third-party administrator to resolve questions about Lifeline eligibility and pending applications to ensure compliance with federal and state Lifeline rules.

As highlighted in California's petition, neither federal nor California state statute require use of the SSN4 to verify Lifeline eligibility, or limit Lifeline to those with or eligible for a Social Security Number. The FCC adopted the SSN4 requirement in 2012 as part of its efforts to combat fraud, waste, and abuse. The SSN4 is used by Lifeline administrators as one factor among many to verify the applicant's identity and program eligibility. California's extensive experience with administration of federal and state Lifeline indicates that documents other than the SSN4, such as the California driver's license, TIN, passport, or other government-issued identification, could be used to verify the identity and eligibility of a Lifeline applicant. California began issuing driver's licenses in January 2015 to eligible drivers without a Social Security Number who have other government-issued identification such as a passport.

In the CPUC's January 2014 Decision that modernized the state's Lifeline program to include wireless phone service, the CPUC Decision recognized that the FCC requirement for the SSN4 makes Lifeline inaccessible for many Californians who are income or program eligible, do not have a Lifeline phone in their household, and would be eligible for Lifeline support, but for the lack of a SSN4. Making Lifeline accessible to Californians otherwise eligible for federal and state Lifeline, but for the FCC's requirement for an SSN4, would enhance public safety, promote universal service, and safeguard program integrity in light of California's extensive and thorough Lifeline eligibility verification process and existing state database administration waiver. As discussed in each of the meetings listed above, California's petition to use alternative means other than the SSN4 to verify Lifeline applicant identity, is consistent with the FCC's recognition of California's extensive and thorough Lifeline eligibility verification process. As a facet of the FCC's waiver for California to use the state Lifeline database in lieu of the NLAD database, California requests that it be allowed to use other government-issued identification, in lieu of the SSN4, to establish Lifeline applicant identity, protect Lifeline program integrity, achieve the goals of public safety, universal service, and prevent fraud, waste, and abuse.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Page 3

If you have any questions regarding this letter, please contact Valerie Malliett at (415) 703-1721 or vm1@cpuc.ca.gov.

Respectfully submitted,

/s/ Catherine J.K. Sandoval

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Commissioner
California Public Utilities Commission

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