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October 16, 2015

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

Re: Notice of Lifeline Connects Coalition Oral *Ex Parte* Presentation; WC Docket Nos. 11-42, 09-197, 10-90

Dear Ms. Dortch:

On October 15, 2015, Brian Lisle and Susan Berlin of Telrite Corporation; Jeni Kues of i-wireless LLC; Melissa Slawson of Blue Jay Wireless, LLC; Chuck Campbell of CGM, LLC; and John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP met on behalf of the Lifeline Connects Coalition (Coalition)[1] with Nicholas Degani, Wireline Legal Advisor to Commissioner Ajit Pai, to discuss the Lifeline program and the Second Further Notice of Proposed Rulemaking (FNPRM).[2] In the meeting, we discussed the membership and role of the Coalition, which formed to protect and preserve the integrity of the Lifeline program by educating and separating myths from facts about the program, sharing best practices on compliance and industry self-regulation, and by proposing additional reforms dubbed "Lifeline Reform 2.0" to the FCC in a petition for rulemaking filed in 2013 and updated in April 2014.[3]

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[1] The members of the Lifeline Connects Coalition are i-wireless LLC, Telrite Corporation and Blue Jay Wireless, LLC.

[2] *See In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (Second FNPRM).

[3] *See* Lifeline Reform 2.0 *Ex Parte*, WC Docket No. 11-42 at 5-9 (Apr. 14, 2014).

We also discussed the Coalition's positions on the Second FNPRM, which are consistent with the attached presentation (Exhibit A) and positions summary (Exhibit B) and the comments filed by the Coalition members along with several other Lifeline eligible telecommunications carriers (ETCs) on the Second FNPRM.[4] We focused in particular on the improvements that have been made since 2012 to Lifeline service plans, devices and customer service,[5] and the additional improvements that will come from increased competition and greater consumer choice from a range of options in the marketplace, including those that are no cost to the consumer. Further, streamlined regulation, regulatory certainty and extending the National Lifeline Accountability Database benefit port freeze from 60 days to 12 months[6] will allow Lifeline providers to offer more to consumers.

In addition, we discussed the low level of improper payments currently in the Lifeline program (0.32 percent)[7] and the low level of administrative costs borne by the Lifeline program (1 percent). We explained the Coalition's proposal for a national third party eligibility verification framework that leverages existing state databases, encourages the development of more databases and fills the gaps with a marketplace of third party eligibility verification options, including USAC-certified verifiers and independent audits of ETC eligibility verifications. Finally, we discussed TracFone's anticompetitive proposals to ban in-person handset distribution and commission payments to agents. Those proposals are purely designed to remove TracFone's competition from the market to the detriment of consumers who benefit from the outreach efforts commissions enable[8] and who should be treated just like non-Lifeline customers who expect to receive a handset when they sign up for service.

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[4] *See* Comments of the Lifeline Joint Commenters, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 31, 2015) and Reply Comments of the Lifeline Joint Commenters (filed Sept. 30, 2015). The Joint Commenters include the Lifeline Connects Coalition (Blue Jay Wireless, LLC, i-wireless LLC and Telrite Corporation) as well as American Broadband & Telecommunications Company, Assist Wireless, LLC, Easy Telephone Services Company d/b/a Easy Wireless, Prepaid Wireless Group LLC, TAG Mobile, LLC, Telscape Communications, Inc./Sage Telecom Communications, LLC (d/b/a TruConnect) and Total Call Mobile, Inc.

[5] These improvements include offerings of 250 minutes plus 250 texts, 500 minutes, 250 minutes and unlimited text messages and smartphones (including in areas outside of California and Tribal lands), which are Wi-Fi capable and hotspot enabled.

[6] While still allowing subscribers to de-enroll with an ETC at any time.

[7] *See* Exhibit C regarding the improper payments rate for Lifeline versus other government programs.

[8] Incentives can be managed through reasonable controls. For example, the agents in the field for the Coalition members never make an eligibility determination or verification. Those decisions are always made by personnel who are not paid on a commission basis back at each company's operations center, supported by a real-time Internet-connected interface and enrollment application.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,

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Counsel for Lifeline Connects Coalition

cc: Nicholas Degani

EXHIBIT A

LIFELINE CONNECTS

FCC Meetings on Lifeline Second FNPRM

October 14-15, 2015

life wireless

bluejay wireless

i wireless

KELLEY DRYE

Second FNPRM – Our Key Themes

CONSUMER CHOICE WIRELESS RESELLERS
HOMEWORK GAP NATIONAL THIRD PARTY ELIGIBILITY VERIFIER FRAMEWORK
WI-FI ADOPTION STREAMLINED REGULATION
BROADBAND VOICE-ONLY DIGITAL LITERACY JOBS GAP
SMARTPHONES COMPETITION SHOT-CLOCK MOBILE
PARTNERSHIPS ACCOUNTABILITY CUSTOMER SERVICE
ZERO ENTRY EDUCATION VETERANS INNOVATION
INVESTMENT MARKET-BASED SOLUTIONS DIGNITY
IN-PERSON ENROLLMENT AND HANDSET DISTRIBUTION
WOMEN, INFANTS AND CHILDREN

Second FNPRM – Our Core Positions

1. The Commission should **enhance competition** to drive service-level innovation, rather than impose minimum service standards that could threaten no cost to consumer offerings
2. The Commission should **focus on streamlining regulations** rather than adding new, unnecessary ones
3. The Commission should **adopt a national third-party eligibility verification framework** that leverages existing state eligibility databases, encourages more, and fills the gaps with market-based solutions, such as multiple, USAC-certified third-party eligibility verifiers that offer real-time enrollment options
4. The Commission should **reject TracFone's proposals** to ban in-person handset distribution and commission-based agents, which are anticompetitive and harm core program goals

1. Competition, not regulation, is the key to driving innovation and consumer value

- The existing Lifeline market is **competitive** and has driven service-level **innovation** and **consumer value**
  - ✓ Increased minutes of service (from 68 to 350 and more)
  - ✓ Text messages, data and other services
  - ✓ Advanced handsets (including smartphones)
  - ✓ Better customer service and partnerships
- Federal and state **regulatory costs** have **inhibited** additional competition and innovation
  - ✗ Burdensome and duplicative regulatory requirements, audits and investigations
  - ✗ Significant delays in ETC and compliance plan approvals, including 54 federal compliance plans and 38 federal ETC petitions that have been pending for years
- The Commission should take steps to **promote competition** and **reduce regulatory overhang**
  - ✓ Adopt a 90-day shot clock for review and action on compliance plans, federal ETC petitions, audits and related transactions
  - ✓ Streamline state regulation of the federal Lifeline program
  - ✓ Reject calls to impose any budget that functions as a cap on the Lifeline program

The record supports Joint Commenters' position on minimum service standards

- The evidence shows that **healthy competition** in the Lifeline market has led to service-level improvements
  - "[O]ver the last several years, competitive forces have brought forth a wide variety of Lifeline service packages, features and innovations . . . ."
    – COMPTEL Comments at 10
  - "Lifeline service offers have improved substantially, even in the face of high, regulation-induced churn, a stagnant support level, higher risk, and increases in other costs of doing business, all of which have a direct impact on the ability and willingness of service providers to offer richer Lifeline service packages."
    – Sprint Comments at 6
- Commenters agree that **more competition** is the best way to drive service-level innovation and consumer value
  - The FCC should "maintain as much competitive choice as possible by not restricting the product offerings available to low income customers via the imposition of minimum standards."
    – New York Public Service Commission Comments at 7
- Commenters strongly support preserving a **zero entry/no cost to consumer option**. *See* CTIA Comments at 12
- Those that support minimum standards fail to consider that such standards are unnecessary, are administratively infeasible, and would hinder competition and consumer choice, including critical zero entry offerings

The record supports streamlining the ETC designation process

- Commenters support **streamlining** the ETC designation process, including through the establishment of shot-clocks
  - Proposing that the Commission should "set[] a time-frame for completing compliance plans (e.g., 60 days from submission, etc.)."
    – Michigan Public Service Commission Comments at 13-14
  - Calling for a six-month shot-clock for ETC and Lifeline-only ETC petitions, after which they should be deemed granted.
    – WTA – Advocates for Rural Broadband Comments at 15
  - "At minimum, the Commission should streamline the ETC designation process, for example by imposing a time limit on the consideration of ETC designation petitions . . . ."
    – T-Mobile Reply Comments at 9 (citing TracFone Comments at 45-46)
- Commenters that oppose efforts to streamline the ETC designation process fail to provide a compelling reason or evidence for their position

2. The Commission should focus on streamlining, not adding, regulations

- ✓ Expand the benefit port freeze from 60 days to 12 months
- ✓ Eliminate the 60-day non-usage rule
- ✓ Permit, but not require, collection of photo ID, and fix the NLAD's existing identity verification process
- ✓ Adopt OMB-approved Lifeline forms through a collaborative process that respects the dignity of low-income consumers and avoids adding unnecessary costs
- ✓ Limit electronic signature requirements to those set forth in E-SIGN – no additional hoops for low-income consumers
- ✓ Not impose burdensome de-enrollment requirements
- ✓ End USAC's unlawful funding hold practices
- ✓ Improve the NLAD's current functioning before expanding it to additional roles and responsibilities
- ✓ Reject officer training certification requirements

The Commission should extend the benefit port freeze from 60 days to 12 months

- The Commission should extend the benefit port freeze from 60 days to 12 months, which will protect against "flippers" and:
  - ✓ Encourage greater upfront investments in subscribers and more beneficial value-added services (e.g., partnerships)
  - ✓ Reduce real and perceived waste, fraud and abuse of the program and ETC resources (e.g., multiple handsets and re-enrollment costs)
  - ✓ Ensure comparability of Lifeline and non-Lifeline consumer experience
  - ✓ Enhance consumer accountability (answering those who call for "skin in the game")
- This proposal still would permit well-meaning consumers to de-enroll and re-enroll at any time

The Commission should eliminate the non-usage rule

- The Commission should eliminate the non-usage rule, which
  - ✘ Undermines consumer choice and disrespects one of the core purposes of the Lifeline program (availability in an emergency)
  - ✘ Is not technology neutral, favoring wireline over wireless services
  - ✘ Imposes substantial costs on ETCs and the Lifeline program without meaningful benefit
- Commenters support eliminating the non-usage requirement
  - ➢ Conservative or emergency-only usage is entirely rational for low-income consumers and should trigger training rather than disconnection.
    – *See* Professor David Super Comments at 20
  - ➢ The non-usage rule "is confusing to consumers, causes substantial administrative costs for Lifeline providers with only minimal benefit, and unfairly penalizes customers who do not often use their phone."
    – Budget Reply Comments at 12
  - ➢ A substantial number of subscribers de-enrolled for non-usage are likely to re-enroll in the program immediately after disconnection, demonstrating a continuing interest in receiving the service.
    – *See* Missouri PSC Comments at 6; Sprint Comments at 30-31; TracFone Comments at 50

3. The Commission should adopt Joint Commenters' national third-party eligibility verifier framework

- The Commission should not adopt a single-source national eligibility verifier framework
- Instead, the Commission should adopt Joint Commenters' proposed national third-party eligibility verifier framework, which would
  - ✓ Leverage existing state eligibility databases
  - ✓ Encourage more state databases
  - ✓ Fill the gaps with market-based solutions (i.e., multiple, USAC-certified third-party verifiers)
- In addition to adopting Joint Commenters' proposed national eligibility verifier framework, the addition Commission should
  - ✓ Ensure that coordinated Lifeline eligibility education and outreach are technology neutral, carrier neutral and nonexclusive
  - ✓ Retain all existing eligibility programs and add programs targeted toward veterans and Women, Infants and Children (WIC)
  - ✓ Reject calls for a Lifeline direct benefit ("voucher") program, which is unnecessary, costly, and would harm the program

Joint Commenters' national third-party verifier framework is efficient and achievable

- Joint Commenters' proposal meets the three threshold criteria for a successful national verifier framework
  - ✓ It is simple, cost-effective and leverages existing state-level eligibility databases
  - ✓ It utilizes the customer-facing Lifeline application collection infrastructure that ETCs already have built
  - ✓ It fills in the gaps with a market-based mechanism that provides a real-time verification option for those that want it, while supporting the development of innovation solutions to limit waste, fraud and abuse through competitive dynamics

4. The Commission should reject TracFone's anticompetitive and harmful proposals

- The Commission should reject TracFone's proposals to ban in-person handset distribution because
  - ✘ The proposal is **anticompetitive**
  - ✘ The proposal would **harm proven and effective efforts that benefit low-income consumers** because in-person enrollment and handset distribution drives adoption, provides consumer education, promotes dignity, and proactively curbs waste, fraud and abuse at the point of enrollment
- The Commission should similarly reject TracFone's proposal to ban commission-based agents
  - ✘ The proposal is **anticompetitive**
  - ✘ The proposal would **harm proven and effective strategies that benefit low-income consumers** and the Lifeline program as a whole
  - ✘ The Commission and ETCs already have adopted effective strategies to address isolated bad acts of agents
- Rather than adopt TracFone's proposals, the Commission should **require ETCs to conduct a non-commission-based review and approval** of all enrollments before activating the service or seeking reimbursement from the Lifeline program
- Several commenters vigorously oppose TracFone's proposals

EXHIBIT B

Lifeline Connects Coalition

Positions on the FCC's Lifeline Modernization Rulemaking

Minimum Service Standards Will Not Deliver Maximum Value

- Lifeline subscribers should be free to choose wireless or wireline plans that include voice-only, text and broadband options. The FCC should not set minimum service levels, but should instead promote market conditions that will produce maximum value for Lifeline subscribers.
- As a result of competition, zero entry (no barrier to adoption, no cost to consumer) service offerings have improved over time from 68 to 350 or more anytime minutes of use. Lifeline providers also have added popular text messaging features, improved the quality of handsets, and improved the availability and quality of customer service for Lifeline subscribers. These improvements were achieved notwithstanding the FCC's elimination of Link Up support and imposition of substantial new regulatory burdens on Lifeline providers. While some (not all) of these regulatory requirements have been beneficial, all impose costs on Lifeline providers with no additional reimbursement. These requirements include:
    - building an interface with the National Lifeline Accountability Database (NLAD)
    - substantial marketing and marketing disclosure requirements
    - review and retention of proof of eligibility for all applicants
    - implementation of the wireless-only 60-day non-usage rule
    - annual recertification of eligibility for all customers
    - numerous audits and investigations often involving redundant inquiries from different FCC bureaus and USAC
    - substantially increased state licensing and regulatory requirements
- If the FCC sets minimum voice and/or broadband levels too high, Lifeline providers will be unable to offer the zero entry (no cost to consumer) services that consumers want, and that have driven adoption and participation in the Lifeline program since the mid-2000s. Elimination of the zero entry wireless Lifeline model would drastically reduce participation in the Lifeline program in contravention of the Communications Act's universal service mandate.

Increasing Competition Will Deliver Maximum Value

- Competition, not regulation of minimum service standards, is the best way to add value for consumers. Shifting the FCC's focus to promoting competition and minimizing regulation will result in better service offerings and more innovation for consumers. Regulatory uncertainty and inaction deter innovation and investment.
- The FCC and certain state commissions inhibit competition by failing to act promptly on applications from would-be competitors and by imposing onerous regulatory burdens with no cost benefit analysis and, in some cases, no authority.
- The FCC's eligible telecommunications carrier (ETC) designation process is too protracted (years) and subjective. The FCC should impose a 90-day shot clock for review and action on compliance plans and federal ETC petitions after which they are "deemed granted." The FCC should encourage states to adopt their own "deemed granted" deadlines and clarify that any additional Lifeline-specific requirements at the state level must be limited to state Lifeline programs.
- No service provider should be forced to provide Lifeline service. The FCC can attract competitors and drive innovation by providing a more rational regulatory environment that affords providers an opportunity for a reasonable profit.

Further Reforms Should Promote Efficient Administration and Limit Regulatory Burdens

- The FCC should extend the benefit port freeze from 60 days to 12 months to encourage greater upfront investments in subscriber relationships, curb abusive "flippers," ensure parity of consumer experience and promote consumer accountability.
- The FCC should eliminate complicated rules that impede consumer choice, impose burdens that outweigh any benefit, or that are not technology neutral. The wireless-only, voice-only 60-day non-usage rule should be eliminated rather than shortened. The current rule imposes substantial costs (that outweigh any perceived benefit) on consumers (e.g., disabled consumers having service denied because they choose to communicate by text rather than voice), carriers (e.g., developing government-mandated usage monitoring and contending with differing interpretations of the FCC's rule), USAC (e.g., attempting to audit

compliance with the FCC's convoluted rule), the FCC (e.g., countless hours reviewing consumer call detail records to determine how and when consumers use their Lifeline service) and the Lifeline program (e.g., administrative costs associated with subscriber churn).

- If the FCC retains the non-usage rule, it should recognize the importance of text messaging for low-income consumers—especially those with disabilities—who should not be de-enrolled because they communicate by text rather than voice.
- The FCC should adopt and adhere to deadlines for the review of and action on transactions involving Lifeline providers. Expedited review processes will serve the public interest by helping Lifeline providers attract new investment and achieve economies of scale in the provision of Lifeline service.
- Ever-evolving, over-prescriptive and duplicative application form requirements confuse and demean Lifeline subscribers, impose substantial costs on ETCs, and result in no meaningful benefit to the program.
- The FCC should reject TracFone's anticompetitive and misguided proposals to ban in-person handset distribution and incentive-based compensation, two effective business models that together drive Lifeline adoption, provide essential educational opportunities, promote consumer dignity and enable ETCs to proactively curb waste, fraud and abuse.

Lifeline Budget

- Any budget must take into account FCC decisions about supported services and program administration, while recognizing that the program currently has a participation rate of approximately one-third of eligible households.
- The FCC currently restricts the size of the Lifeline program by restraining competition through inaction on compliance plans and federal ETC petitions. This is not the right approach to managing the size of the Lifeline program.
- The FCC should incentivize states to increase their own funding for Lifeline (e.g., through federal matching funds) without dictating how states should do so. Enhanced subsidies allow ETCs to offer more innovative and robust service offerings.

Third Party Eligibility Verification Should Incorporate Market-Driven Solutions

- In almost all Lifeline enrollments, ETCs verify eligibility rather than determine it. Participation in a Lifeline-qualifying program (e.g., SNAP or Medicaid) determines eligibility and Lifeline providers verify a consumer's eligibility either by reviewing proof of participation (e.g., SNAP card or Medicaid card) or by dipping an eligibility database. Using this process, which will now require providers to retain the proof of eligibility for auditing, the Lifeline program has achieved a very low rate of improper payments (0.32%), which is much lower than the government average (4.5%).
- Any decision to "take the eligibility determination away from the Lifeline providers" should embrace a practical approach that does not impose burdensome costs on the Lifeline program and service providers. If the FCC's promised national eligibility database is not possible, the FCC should adopt a national third-party eligibility framework that takes advantage of existing state eligibility databases (with certain minimum standards), encourages states to build more eligibility databases, and fills the gaps with market-based solutions—i.e., multiple, USAC-certified independent third-party eligibility verifiers that ETCs can choose based on their needs (e.g., real-time or not). A one-size-fits-all national verifier would be too inflexible and expensive.
- Any third-party eligibility verification framework must preserve a real-time enrollment option, which is essential for equality of consumer experience between low-income and non-low-income consumers. Low-income consumers should not receive a second-class activation process in which they are forced to wait days for enrollment approval, a phone or service, because the FCC has not provided a real-time eligibility verification option.
- ETCs should have the option, but not the obligation, to use USAC or a verifier for recertification. Most ETCs are far more successful than USAC at recertifying their subscribers.
- We favor leveraging efficiencies from the Lifeline eligibility programs, such as SNAP and Medicaid, to improve customer awareness of Lifeline benefits, but any such efforts should be technology neutral, carrier neutral and nonexclusive.
- The FCC should retain all existing eligibility programs and add programs for veterans and Women, Infants and Children (WIC).
- Lifeline vouchers are unnecessary to provide consumer choice, would balloon program administration costs (especially if they involve setting up an automated payments process), and would harm the program by adding new potential for fraud and abuse not present in today's Lifeline program.

EXHIBIT C

Lifeline Connects Coalition
Fact Checker: Waste, Fraud and Abuse in Lifeline
and in Comparison to other Federal Benefit Programs

Recently and over the past four years, some have called the Lifeline Program "one of the government's most fraud-infested programs." ***This wasn't a true statement four years ago and it's not true today.*** **The latest statistics from the Federal Communications Commission (FCC) show that the Lifeline Program in 2014 had an improper payment rate of 0.32% which is significantly lower than the federal government average.**

The Improper Payments Elimination and Recovery Act (IPERA) requires federal agencies such as the FCC to develop an oversight process to identify and address improper payments from government disbursement programs such as the federal Universal Service Fund (USF).

The IPERA defines an "improper payment" as any payment that should not have been made or that was made in an incorrect amount under statutory, contractual or administrative requirements. An improper payment includes, but does not necessarily involve, fraud. "Significant improper payments" are improper payments exceeding 1.5% of program outlays and $10 million or $100 million.

- **Lifeline has a very low improper payment rate.** According to the FCC's Fiscal Year 2014 Agency Financial Report, "the estimated improper payment rate for [Lifeline] was **0.32%** for fiscal year 2014." The total extrapolated amount of improper payments was $5.9 million (out of a $1.6 billion program). Lifeline is far from "fraud-infested." Rather, the program is the victim of sensational "gotcha" media pieces and political rhetoric that feed a perception of fraud not borne out by the facts. *See* http://www.fcc.gov/document/fiscal-year-2014-agency-financial-report.

- **Lifeline has an improper payment rate that is much lower than the government average.** According to a March 2015 Government Accountability Office (GAO) study, the estimated federal government-wide improper payments rate for fiscal year 2014 was **4.5%** of program outlays and totaled $124.7 billion. The error rate was up from 4% in fiscal year 2013. *See* http://www.gao.gov/assets/670/669026.pdf.

- **Lifeline has an improper payment rate that is much lower than that of the E-rate Program.** The FCC FY 2014 report found that the estimated improper payment rate for the Schools and Libraries Program (known as E-rate) was **3.47%** (or 3.81% including the Equipment Inventory Pilot), which is up from 2.21% in 2013. E-rate is certainly not fraud-invested either (its error rate is below the government average), however, its rate of improper payments is nearly **11 times** higher than Lifeline.

Improper Payments: Lifeline in Comparison to other Programs

Lifeline is not "one of the government's most fraud-infested programs." Based on GAO studies of fiscal years 2013 and 2014, a comparison of Lifeline to other government programs shows that Lifeline has a comparatively low level of improper payments.

Program	Program Size	Percentage Improper Payments	Comparison of Improper Payments in Program vs. Lifeline
Earned Income Tax Credit	$17.7 billion (FY 2014)	27.2% (FY 2014)	85 times higher than Lifeline
Small Business Administration Disaster Loan Disbursements	$121 million (FY 2013)	18.4% (FY 2013)	57.5 times higher than Lifeline
Department of Veterans Affairs State Home Per Diem Grants	$135 million (FY 2013)	15.94% (FY 2013)	nearly 50 times higher than Lifeline
Medicare Fee-for-Service	$45 billion (FY 2014)	12.7% (FY 2014)	nearly 40 times higher than Lifeline
Department of Labor Unemployment Insurance	$5.6 billion (FY 2014)	11.6% (FY 2014)	36.25 times higher than Lifeline
Lifeline	$1.6 billion (2014)	0.32% (FY 2014)	-

See 2014 http://www.gao.gov/assets/670/669026.pdf and 2013 http://www.gao.gov/assets/670/667332.pdf.

Improper Payments: Lifeline Historical

Lifeline is not today and has not been "one of the government's most fraud-infested programs." Over the past four years, Lifeline's potential for significant improper payments has remained low. A 2014 FCC study found that the rate of improper payments in the Lifeline Program was extremely low.

Year	IPERA Threshold	Notes	Lifeline Improper Payments
2011	2.5%	Lifeline not at risk	(less than 2.5%)
2012	2.5%	Lifeline not at risk	(less than 2.5%)
2013	2.5%	Lifeline designated as susceptible to significant improper payments	2.5% threshold met
2014	1.5%	Study of actual calendar year 2013 transactions	**0.32%**