



N A R U C  
National Association of Regulatory Utility Commissioners

**NOTICE VIA ELECTRONIC FILING**

October 17, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 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***

Secretary Dortch:

On Friday October 16, 2015, **Catherine Sandoval**, Commissioner, California Public Utilities Commission, **Greg Sayre**, Commissioner, New York Public Service Commission, **Cary Hinton**, Assistant to D.C. Public Service Commission Chair Kane, and Brad Ramsay, NARUC General Counsel met with FCC Commissioner **Jessica Rosenworcel**, and **Travis Litman**, Wireline Legal Advisor to FCC Commissioner Rosenworcel.

During the meeting, Commissioner Sandoval, took a few minutes to offer some specific arguments favoring a filed California Public Utilities Commission petition.

*Note - to date - no one else present at the meeting has taken any position (either pro or con) on the referenced CPUC petition at the FCC.*

According to Commissioner Sandoval, the CPUC's petition asks the FCC to grant a waiver 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). 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.

For additional detail on the CPUC petition, you can examine the February 6, 2015 filed *Petition of the California Public Utilities Commission for waiver of 47 C.F.R. §§ 54.410(d)(2)(vi) and 54.410(f)(3)(iii)*, available online at: <http://apps.fcc.gov/ecfs/comment/view?id=60001014815> or the February 17, 2015 Ex Parte Notice to FCC Secretary Dortch outlining Commissioner Sandoval's previous advocacy on this topic, available online at: <http://apps.fcc.gov/ecfs/comment/view?id=60001017561>.

*Even though, as noted earlier, NARUC has not taken any position on the CPUC Petition, the undersigned offered to take care of this ex parte requirement for Commissioner Sandoval. I have attempted to cover all the key advocacy points raised by Commissioner Sandoval during the meeting. I am copying Mr. Litman with this notice. If he indicates I have inadvertently left out some advocacy, I will immediately refile a corrected notice that includes the omitted discussions. If you have further questions regarding this letter and the CPUC's advocacy on this petition, please contact CPUC's Valerie Malliett at (415) 703-1721 or [vm1@cpuc.ca.gov](mailto:vm1@cpuc.ca.gov).*

Respectfully Submitted,

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cc: *Travis Litman, Wireline Legal Advisor to FCC Commissioner Rosenworcel*