



March 4, 2016

Ex Parte

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

RE: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support,
WC Docket No. 09-197; Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

The United States Telecom association (USTelecom) strongly supports Lifeline reform that is designed to modernize and improve the Lifeline program. The Federal Communications Commission (Commission) is appropriately considering broader reforms that will not only make the Lifeline program more effective, but also more administratively streamlined. USTelecom urges the Commission to restructure the Lifeline program in a way that encourages more providers to participate in the program. The Commission can facilitate such participation by removing barriers to entry – such as the requirement for an eligible telecommunications carrier designation to provide Lifeline service – while still ensuring sufficient safeguards to protect against fraud, waste and abuse.

There are several key areas where the Commission can institute meaningful reforms to the Lifeline program to make it both more effective and efficient. Specifically, the Commission should: 1) remove providers from their current Lifeline eligibility role; 2) begin processing Lifeline applications from consumers at the soonest possible date; 3) address state-to-state variations in Lifeline requirements; 4) establish clear compliance and audit standards; 5) eliminate or modify outdated voice-centric rules that do not make sense in a modernized program; and 6) address the unique needs of tribal lands. Each of these issues is discussed in greater detail below.

The Commission Should Remove Providers From Their Lifeline Eligibility Role.

One of the most important changes to the Lifeline program under consideration is removing service providers from all program administrative functions, including enrollment and eligibility verification, delivering benefits to Lifeline consumers, performing the annual recertification and de-enrolling customers from the program. USTelecom joins countless other

commenters who believe that taking service providers out of these roles will reduce administrative burdens for applicants and carriers; improve Lifeline program controls by ensuring that only eligible consumers receive Lifeline benefits; and address security and privacy concerns.¹ USTelecom supports the Commission's proposal to establish a third party verifier and eligibility database. Adopting a database-centric verification system is a step the Commission must take to strengthen the Lifeline program but we recognize that it will take time to develop and implement an efficient system.

The Commission Should Begin Processing Lifeline Applications from Consumers as Soon as Possible.

We urge the Commission to require the Universal Service Administrative Company (USAC) or its agent to begin processing Lifeline applications from consumers at the soonest possible date. We recognize that it could take one or two years from adoption before a new database-centric verification system is fully operational. While the development of a new third-party verification process is underway, the Commission should on an interim basis require USAC to engage one of the multiple vendors who specialize in processing Lifeline applications today. This entity could accept and process applications and documentation forwarded by state agencies or sent directly from consumers. Consumers would be assured of having their applications considered based on consistent standards set by the Commission, not a private company. A third-party verifier will always need to have the capability to accept applications from consumers so it makes sense to launch this process first. Doing so could also inform the development of a database solution and help ensure that any process issues are resolved before the fully functional verification database goes live. Most importantly it will guarantee that Lifeline consumers benefit from a more efficient and fair program as soon as possible.

The Commission Should Eliminate State-to-State Variations in the Lifeline Program.

USTelecom also urges the Commission to make clear that, because broadband is an interstate service, states may not impose broadband-related Lifeline obligations. There should be no state-to-state variation in Lifeline broadband discounts; eligibility criteria; or other obligations. In fact, USTelecom believes that the entire Lifeline program would be better for consumers, providers, and the FCC and USAC if rules and processes across states were

¹ See e.g., Comments of AT&T, WC Docket No. 10-90, p. 3 (stating that the Commission should “[r]emove service providers from Lifeline program administration functions, including enrollment, eligibility verification, and de-enrollment.” (August 31, 2015); see also, Comments of Frontier Communications, WC Docket No. 10-90, pp. 6 – 8 (stating that “[c]entralizing eligibility determinations in a single disinterested entity, with uniform standards, practices and procedures, will help to standardize and streamline the eligibility process and reduce waste, fraud and abuse in the Lifeline program.”) (August 31, 2015).

consistent. Today, consumers can be eligible for Lifeline in one state but not in another. This can be confusing for consumers and administratively complicated for carriers. Additionally, unless the Commission sets firm national eligibility standards for the Lifeline program it will not be able to manage to a budget if one is set. Lifeline service providers are subject to many state specific requirements, even in states without their own Lifeline program, that go beyond the federal Lifeline program and substantially increase the burden of participation by making it impossible to adopt efficient systems and processes. The panoply of differing rules also increases cost for USAC because audit and enforcement activities must be customized by state.

For example, in some states, the Lifeline service provider is required to back bill the Lifeline benefit, or provide a credit, to the date of the consumer's inquiry or application, instead of upon completion of the application process. The provider cannot seek reimbursement for these retroactive credits because FCC rules prohibit reimbursement for discounts provided before a customer is deemed eligible. Other states require providers to collect and retain documentation during the annual recertification process even though the FCC rules do not while still others require quarterly reporting of monthly Lifeline subscribership data that is more detailed than what the Commission requires annually. The attached "Compendium of State Lifeline Requirements" describes the types of requirements that apply in the states. While this is not an exhaustive survey, it demonstrates the variety of state-to-state requirements that burden the Lifeline program today. Eliminating these varying requirements would reduce the burdens of participating in Lifeline and create a more efficient and consistent program.

The Commission Should Establish Clear Compliance and Audit Standards.

Of equal importance, USTelecom strongly encourages the Commission to establish clear compliance and audit standards. These standards should include a safe harbor, de minimis thresholds, and clear rules for what constitutes compliance and non-compliance for audit purposes. Given the high volume of consumer transactions, the Commission cannot hope to attract more Lifeline service providers to the program without such known and reasonable standards. Errors made despite good faith efforts to comply are not an indication of fraud or abuse of the program. A Lifeline service provider that makes an error, corrects it, and returns any associated funding, if applicable, should be allowed a safe harbor and immunity from further enforcement action. The Commission should require coordination and collaboration with all stakeholders to develop clear compliance standards so that there is no ambiguity for what actions/practices would be considered within and out of the scope of the new rules. Establishing clear standards would not only prevent waste, it would also encourage more service providers to participate in the Lifeline program by establishing trust and reducing significant risk.

The Commission Should Eliminate or Modify Outdated Voice-Centric Rules.

As part of its modernization of the Lifeline program, the Commission should eliminate or modify outdated voice-centric rules that do not make sense in a modernized program. For example, as USTelecom stated in its comments,² USTelecom urges the Commission to make clear that Lifeline service providers may collect service deposits for eligible voice and broadband services. If the Commission extends Lifeline support to eligible broadband services, it should clarify that the current rule that prohibits service deposits “for plans that . . . [d]o not charge subscribers additional fees for toll calls,”³ applies only to standalone local voice service that is not bundled with long-distance calling, and does not preclude a Lifeline service provider from requiring a service deposit from an Internet access service subscriber in order to protect against a customer’s credit risk and/or bad debt. This is just one example of voice-centric rules that would need to be modified should the Commission expand the Lifeline program to include broadband.

The Commission Should Address the Unique Needs of Tribal Land Lifeline Subscribers.

Finally, USTelecom also urges the Commission to retain the enhanced Lifeline and Link-Up amounts available to support subscribers living on Tribal Lands. As the Commission is aware, poverty is particularly acute among consumers living on Tribal lands, making these support payments even more vital to efforts to establish and maintain voice and broadband connections. We believe that limiting enhanced support to services offered by facilities based providers is a more appropriate way to achieve the program goals.

USTelecom applauds the Commission reform effort and urges the consideration of additional steps to modernize the Lifeline program as described herein.

Sincerely yours,



Kevin G. Rupy
Vice President, Law & Policy

² See, Comments of USTelecom, WC Docket No. 10-90, pp. 6 – 7 (August 31, 2015).

³ See, 47 C.F.R. § 54.401(c)(1).

Compendium of State-specific Lifeline Requirements

Explanatory notes:

What is included: The table below includes information on state-specific Lifeline requirements that apply in each state *over and above* the Federal Lifeline eligibility and program requirements. The Federal requirements are not included in this table. The information is not intended to be exhaustive and other requirements may apply, but to the best of USTelecom’s knowledge the information is correct at the time of filing. In instances where no text/commentary appears in the below matrix, such information was not available or could not be confirmed.

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
AK	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> • Alaska Temporary Assistance Program • Alaska Adult Assistance Program <p>Carriers have also been permitted to request that participation in other programs make consumers eligible for Lifeline. For example, the ETC designation order obtained by AT&T’s predecessor in AK, requires it to qualify consumers for Lifeline on the basis of their participation in the following programs:</p> <ul style="list-style-type: none"> • Veterans Administration (VA) Disability Pension • Child Care Assistance Program • Women, Infants and Children’s Program • Alaska State Housing Corporation Programs: <ul style="list-style-type: none"> ○ Public Housing ○ Interest Rate Reduction for Low Income Borrowers ○ Home Investment Partnership “HOME” ○ Low Income Housing Tax Credit Program ○ Senior Citizen Housing Development Fund • State of Alaska Heating Assistance Program • Pioneer Home Payment Assistance • Denali Kid Care • Senior Care <p><i>See, e.g., U-06-51</i></p>	Federal threshold.	<p><u>State discount:</u> \$3.50/month</p> <p><u>State-funded reimbursement:</u> Most wireless and wireline ETCs in Alaska receive \$3.50/month per eligible Lifeline subscriber from the Alaska Universal Service Fund (“AUSF”).</p> <p>Provision of the state discount is voluntary. If a provider does not provide the state discount, the provider does not obtain the \$3.50/month reimbursement from the AUSF.</p> <p><u>Combined discount:</u> For most carriers, \$9.25/month federal Lifeline + up to \$25/month federal Tribal enhanced Lifeline discount + \$3.50/month state = maximum \$37.75/month</p> <p><u>Combined reimbursement:</u> For most carriers: \$9.25/month federal Lifeline + up to \$25 month federal Tribal enhanced Lifeline + \$3.50/month AUSF = maximum \$37.75/month Note: All of Alaska is considered Tribal lands. <i>See 47 CFR 54.400(e).</i></p>	
AL	<p>None.</p> <p><i>See, e.g., U-06-51</i></p>	State statute authorizes	None.	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
AZ	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> State Children's Health Insurance Plan (CHIP) or Kids Care Telephone Assistance Program for the Medically Needy The Low-Income Telephone Assistance Program (for qualifying individuals 65 or older) 	<p>AL commission to establish income eligibility test. (AL Code § 37-2A-7(b)(1)). Current income eligibility threshold is same as federal threshold.</p> <p>Total household income ≤ 150% FPG.</p>	<p>Senior Telephone Discount Program (AKA Arizona Low income Telephone Assistance Plan ALITAP) provides a 17% discount for customers 65 years of age or older whose income is at or below 100% of the Federal poverty level.</p> <p>Arizona Medically Needy Program for low income handicapped customers: Provides full discount on voice line.</p>	
AR	<p>In addition to federal program-based eligibility criteria, at least one carrier also required to apply Transitional Employment Assistance (TEA) as an eligibility criterion.</p>	<p>Federal threshold.</p>	<p><u>State discount:</u> ILECs: May vary by carrier. See below re state-funded reimbursement. Wireless ETCs: \$0</p> <p><u>State-funded reimbursement:</u> ILECs: May vary by carrier. Reason: AR Code § 23-17-404(a)(4) specifies that ILECs receiving AR High Cost Fund (AHCF) support may use AHCF support to "accelerate and promote the incremental extension and expansion of broadband services and other advanced services in rural or high-cost areas of the state beyond what would normally occur and support the Lifeline Assistance Program to eligible low-income customers." Wireless ETCs: \$0</p>	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
CA	<p>Note: CA's version of Medicaid is known as Medi-Cal</p> <p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> Women, Infants and Children Program (WIC) California Work Opportunity and Responsibility to Kids (CalWORKs) Stanislaus County Work Opportunity and Responsibility to Kids (StanWORKs) Welfare-to-Work (WTW) Greater Avenues for Independence (GAIN) 	<p>Total household income ≤ amount determined by CA Public Utilities Commission. Effective June 1, 2015-May 31, 2016, the following household size/annual income limits apply:</p> <ul style="list-style-type: none"> 1-2 members: \$25,700 3 members: \$29,900 4 members: \$36,200 For each additional member: Add \$6,300 <p>These income threshold limits are the equivalent of approximately 150% FPG.</p>	<p><u>State discount:</u> Effective January 1, 2016:</p> <p><u>LECs:</u></p> <ul style="list-style-type: none"> <i>Flat-rate local telephone service:</i> Lifeline rate must be no more than ½ of the carrier's residential flat-rate local telephone service. Discount amount varies by carrier, up to \$13.20/month. <i>Measured local telephone service:</i> Lifeline rate must be no more than ½ of the carrier's measured rate for local telephone service. Discount amount varies by carrier, up to \$13.20/month <i>Non-recurring service connection or conversion charges:</i> Varies by carrier; the lesser of \$10 or ½ the carrier's connection charge for residential phone service, but no more than \$39.00. <p><u>Wireless ETCs:</u></p> <ul style="list-style-type: none"> \$5.75/month CA Lifeline for calling plans that include 501-999 voice minutes of use/month; \$13.20/month CA Lifeline for calling plans that include at least 1,000 voice minutes of use/month Non-recurring charges: Up to \$39.00 <p><u>State-funded reimbursement:</u> Effective January 1, 2016:</p> <p><u>LECs:</u></p> <ul style="list-style-type: none"> <i>LECs monthly flat rate service:</i> Reimbursement of up to \$13.20/month, depending on rate; reimbursement varies by carrier. <i>LECs monthly measured rate service:</i> up to \$13.20/month, depending on rate; discounts vary by carrier. 	<p>CA has third party administrator (TPA) that handles all consumer eligibility determinations and recertification (which CA refers to as "renewals"). CA has opted out of NLAD. Two enrollment processes are used: the Regular Enrollment Process (using FTP or web-based process) and the Direct Application Process (DAP) (web service-based API solution pilot program limited to wireless providers). Customers may complete Renewal process online, via regular mail, and Interactive Voice Response (IVR); in addition, a pilot program allows consumers to Renew via text message.</p> <p>Once customer approved for Lifeline, discount must be applied retroactively to date consumer established service or requested Lifeline, whichever is later.</p> <p>Monthly true-up and claim for reimbursement filing required for providers with 100+ Lifeline customers; biannual may be permitted for providers with fewer than 100 Lifeline customers.</p> <p>All Lifeline advertisements must be preapproved by PUC staff.</p> <p>Wireline CA Lifeline providers:</p> <ul style="list-style-type: none"> Must provide for free, one directory listing per year and white pages telephone directory to Lifeline participants Must include Lifeline participant's listing for free in local white pages telephone directory as a default unless participant affirmatively requests unlisted. Must provide participant's option of receiving free printed paper copy of white pages directory instead of electronic copy covering the local community where the participants resides in both printed and

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
CO	None		<p><i>Wireless ETCs:</i></p> <ul style="list-style-type: none"> • \$5.75/month for calling plans that include between 501-999 voice minutes of use/month; • \$13.20/month for calling plans that include at least 1,000 voice minutes of use/month • <i>Non-recurring charges:</i> Up to \$39.00 <p><i>All carriers - support for administrative costs associated with CA Lifeline: up to \$0.50 per Lifeline subscriber</i></p>	electronic forms.
CT	<p>None</p> <p>In addition to federal program-based eligibility criteria:</p> <p><u>State-specific program-based criteria:</u></p> <ul style="list-style-type: none"> • Care 4 Kids (Frontier only) • “Child Care Certificate” (providers other than Frontier only) • “Transitional Child Care” (providers other than Frontier only) • Connecticut Energy Assistance Program • Medicare Savings Program (formerly CONNPAGE) • Contingency Heating Assistance Program • Personal Care Assistance • Refugee Program • Rental Assistance • State Administered General Assistance • State Supplement to the Aged, Blind, or Disabled • Title 19 Medicaid (including Husky and Healthy Start): <ul style="list-style-type: none"> ○ Husky: Medicaid; Children’s Health 	Federal threshold	<p>None</p> <p><u>State discount:</u> LECs: \$1.17/month <i>Wireless ETCs:</i> \$0</p> <p><u>State-funded reimbursement:</u> LECs: may obtain reimbursement from Connecticut Service Fund, which provides support for the Connecticut Lifeline and Telecommunications Relay Service (TRS) programs; reimbursements vary by LEC. See Chapter 238 CT general statutes Sec. 16-247e</p> <p><i>Wireless ETCs:</i> \$0</p>	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
	Insurance Program <ul style="list-style-type: none"> o Healthy Start (health insurance program for uninsured pregnant women and children up to age 36 months) 			
DC	In addition to federal program-based eligibility criteria: Additional Discount is available to qualified seniors age 65+			
DE				
FL	None	Total household income ≤ 150% FPG – Verizon & AT&T 135% FPG Small LECs	<p><u>State discount</u>: \$0; some ETCs voluntarily provide additional \$3.50/month state discount</p> <p>State-funded reimbursement: \$0; some ETCs voluntarily self-fund \$3.50/month additional state Lifeline discount</p> <p><u>Statutorily-mandated “Transitional” Lifeline discount</u>: LECs: Must offer discounted residential basic local telecommunications service (BLES) at 70% of the residential rate for any Lifeline subscriber who no longer qualifies for Lifeline, for 1 year after the subscriber ceases to be qualified for Lifeline. See FL Stats. § 364.105. Discount amounts vary depending on BLES rate: AT&T FL Transitional Lifeline rate: \$17.50/month (RGs 3-12) CenturyLink Transitional Lifeline rate: \$14.32/month Verizon Transitional Lifeline rate: \$16.44/month Frontier Transitional Lifeline Rate: \$9.00/month <u>Wireless ETCs</u>: Not required to offer Transitional Lifeline discount</p> <p>State-funded reimbursement for “Transitional” Lifeline discount: \$0</p>	<p>FL Dept. of Children & Families (DCF) and the FL Public Service Commission (FPSC) have a Lifeline coordinated enrollment process that allows consumers to apply for Lifeline online when they apply for other benefits administered by DCF: Medicaid, SNAP, and TANF. Consumers already participating in one of those programs apply online to the FPSC. The FPSC notifies ETCs of approved applications, which ETCs can then retrieve on the FPSC’s secure website.</p> <p>FL Office of Public Counsel administers income-based eligibility. OPC provides a carrier with a spreadsheet that lists new consumers it has found to be eligible; the carrier returns the spreadsheet via email to OPC confirming Lifeline status for each of the customers on the list.</p> <p>In all of the foregoing cases, the ETC must confirm that the customers are current customers within their ETC-designated areas before applying the Lifeline benefit.</p> <p>Lifeline providers are required to handle application process if consumer seeks to qualify for Lifeline via SSI, Federal Public Housing Assistance, LIHEAP, National School Lunch program, or Bureau of Indian Affairs programs.</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
GA	In addition to federal program-based eligibility criteria: Senior citizen low income discount plan offered by the local gas or power company	Federal threshold	<p><u>State discount:</u> \$0; some wireless ETCs are required to provide \$3.50/month discount</p> <p><u>State-funded reimbursement:</u> \$0</p>	<p>DCF has also established a secure computer portal that ETCs may access to confirm consumers' eligibility for purposes of Lifeline certification/recertification.</p> <p>Wireline Lifeline providers must file quarterly reports with the Commission including for each month: number of Lifeline subscribers, excluding resold Lifeline subscribers, number of Link-up subscribers; number of new Lifeline subscribers added; number of transitional Lifeline subscribers who received discounted service; and number of residential access lines with Lifeline service that were resold to other carriers.</p> <p>Lifeline materials, including ads, applications, and verification forms must include specific language: "Unresolved complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit [local and toll free number for the Consumer Affairs Unit.]"</p> <p>ETCs must file number of Lifeline subscribers served as of 6/30 and 12/31 within 15 days of close of period.</p>
HI				
IA ID	Federal Lifeline program: federal program-based criteria only ID Telephone Service Assistance Program (ITSAP): no eligibility for Lifeline based on program participation; income-based eligibility only	Federal Lifeline program: Federal threshold ITSAP: same as federal threshold	<p><u>State discount:</u> \$2.50/month (ID Telephone Service Assistance Program (ITSAP))</p> <p><u>State-funded reimbursement:</u> \$2.50/month</p>	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
IL	None	Federal threshold	<p><u>State discount:</u> <i>Monthly recurring charges:</i> None <i>Non-recurring installation charges:</i> <i>LECs:</i> maximum benefit of \$35 of carrier's total connection charge <i>Wireless ETCs:</i> \$0</p> <p><u>State-funded reimbursement:</u> <i>Monthly recurring charges:</i> \$0 <i>Installation charges:</i> <i>LECs:</i> \$35 maximum <i>Wireless ETCs:</i> \$0</p>	<p>ETCs handle eligibility determinations, but may verify online if customer is eligible based on SNAP program participation through IL Dept. of Family & Health Care Services database. The ETC must enter consumer identifying data; database return eligible/not eligible message. If consumer is not listed in SNAP database, ETC sends consumer a certification form, to all the consumers to demonstrate eligibility under other criteria.</p> <p>Quarterly report required including: total Federal Lifeline customers; total applies; total added; total lost; and total Federal support received in addition to data on states connection waiver program (UTSAP).</p>
IN	None	Federal threshold	None	<p>Both wireline and wireless ETCs must file proposed Lifeline tariff prior to offering Lifeline. 30 days' notice of changes to rates, terms, and conditions, or included MOUs, must be given. Other documentation may not be submitted in lieu of a tariff.</p> <p>In addition to the FCC's § 54.405(e)(3) de-enrollment for non-usage requirements, Lifeline customers must also have 30-day grace period from the deactivation date to reactivate the Lifeline account and restore the minutes accrued during the 60-day non-usage period and 30-day grace period. At the end of the 30-day period following notification of ineligibility, if the customer has not utilized the service, the customer will no longer receive a monthly allocation of free minutes and the provider will no longer report the customer on the Form 497.</p> <p>Quarterly Lifeline report w/monthly data required within 30 days of end of quarter: number of Lifeline customers, deactivated Lifeline customers; and reason for deactivation.</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
KS	In addition to federal program-based eligibility criteria: General Assistance Food Distribution Program	Total household income ≤ 150% FPG	<u>State discount:</u> \$7.77/month <u>State-funded reimbursement:</u> \$7.77/month	<p>ILECs providing residential local service that have been price-deregulated in KS may access KS Dept. of Children & Families (DCF) eligibility database for purposes of automatically enrolling existing and eligible customers in the KS Lifeline Service Program.</p> <p>Lifeline discount must be applied as soon as consumer's eligibility is verified; if ETC is not able to apply it immediately, must retroactively credit the customer's account.</p> <p>ETC must submit Carrier Remittance Worksheet monthly to receive KUSF Lifeline support.</p> <p>All ETCs must include KS commission's Office of Public Affairs and Consumer Protection contact information in advertisements.</p> <p>All ETCs must submit a report of the advertising of services using media of general distribution pursuant to 47 U.S.C. § 214(e)(1)(B), identifying the types of media used, geographic areas reached, and dates published.</p> <p>ILECs must file tariffs for Lifeline service, subject to 15 days' notice.</p> <p>ETCs receiving KY State USF support must submit monthly reports w/total Lifeline subscribers and KY USF support reimbursement requested.</p> <p>All ETCs must file tariffs for Lifeline service, subject to 30 days' notice.</p> <p>Wireless ETCs must file tariffs which identify and describe the rates, terms, and conditions of services offered and provided in LA.</p>
KY	None	Federal threshold	<u>State discount:</u> \$3.50/month Provision of the state discount is voluntary. <u>State-funded reimbursement</u> \$3.50/month If a provider does not provide the state discount, the provider does not obtain the \$3.50/month reimbursement from the KUSF. None	
LA	None	Federal threshold	None	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
MA	In addition to federal program-based eligibility criteria: Emergency Assistance to the Elderly, Disabled, and Children Transitional Aid to Families with Dependent Children	Federal threshold	<u>State discount:</u> \$6.00/month	
MD	In addition to federal program-based eligibility criteria: <ul style="list-style-type: none"> • Temporary Cash Assistance • Medical Assistance • Public Assistance to Adults • Temporary Disability Assistance Program • Electric Universal Service Program • Maryland Energy Assistance Program 	Federal threshold		
ME		Federal threshold	<u>State discount:</u> \$3.50 <u>State-funded reimbursement:</u> None	
MI	In addition to federal program-based eligibility criteria, at least one carrier required to apply Family Independence Program (FIP) as eligibility criterion.	Total household income ≤ 150% FPG	<u>Required discount:</u> <i>Providers of basic local exchange service:</i> <i>Lifeline:</i> \$2.00/month, and total Lifeline discount ≥ 20% of basic local exchange rate <i>Lifeline customers age 65+:</i> \$3.50/month, and total Lifeline discount ≥ \$25% <i>Wireless ETCs:</i> None <u>Reimbursement:</u> <i>For providers of basic local exchange service:</i> Self-recovery for state Lifeline discount requirement and administrative costs is authorized via \$0.05/access line charge, currently embedded in local rate; providers may recovery via separate line item on end-user bills. (MTA § 316(6)). MI commission approval required to adjust this amount.	Allowed charge may not fully recover Lifeline state discounts and administrative costs for all LECs.

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
MIN			For wireless ETCs: \$0	
MO	None.	Federal threshold	<u>State required discount:</u> LECs: \$6.50/month Wireless ETCs: \$0/month <u>State-funded reimbursement:</u> LECs: \$6.50/month Wireless ETCs: \$0/month	An ETC shall annually recertify a subscriber's continued eligibility for participation in the Lifeline program. A subscriber shall submit proof of eligibility at least once every two (2) years unless an ETC has an automated means of verifying subscriber eligibility or alternatively a carrier's annual recertification process is administered by the FUSFA. The customer obligations, provisions, and acknowledgements contained on an ETC's Lifeline application form must be in a font that is at least as large as the font used in the majority of the form.
MS	None	Federal threshold	None	
MT	None	Federal threshold	<u>State discount:</u> \$3.50/month <u>State-funded reimbursement:</u> None.	
NC	None	Federal threshold	None	NC DHHS has mechanized database that Lifeline providers can check access to check Lifeline eligibility based on DHHS client files regarding consumers' participation in certain programs administered by DHHS. Wireline ETCs* only: Lifeline tariffs required; tariff changes take effect 14 days after filing. Biannual reports of number of Lifeline subscribers.

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
ND				
NE	In addition to federal program-based eligibility criteria: Children's Health Insurance Programs	Federal threshold		NE PSC handles Lifeline eligibility; consumers apply via the NE PSC website or using paper applications. NE PSC notifies ETC of consumers to enroll via Excel spreadsheet containing private information delivered at unscheduled intervals via unencrypted e-mail. Requires manual review and reconciliation process to confirm, for example, that consumer is in providers' ETC service area.
NH				
NJ	In addition to federal program-based eligibility criteria: <ul style="list-style-type: none"> Lifeline Utility Credit/Tenants Lifeline Pharmaceutical Assist to Aged & Disabled General Assistance 	Total household income ≤ 150% FPG		Additional incremental discount for eligible customers that are 65 or older and qualify at or below 150% FPG
NM	None	Federal threshold	<u>State discount:</u> \$3.50/month <u>State-funded reimbursement:</u> None	Commission requires Lifeline providers to submit copy of any Lifeline advertisement within 30 days of execution.
NV	None	Total household income ≤ 175% FPG	<u>State discount:</u> \$3.50/month, subject to requirement that non-Tribal customers pay at least \$3.50/month <u>State-funded reimbursement:</u> \$3.50/month	In 2013, a law was enacted that requires the NV Commission to engage an independent administrator to handle consumer eligibility certifications (including querying NLAD) and recertification so that ETCs will not be required to do so. Use of the administrator is mandatory beginning 3/31/2016. ETCs seeking reimbursement of the state discount must submit quarterly reports with Lifeline subscriber data by month and annual reimbursement forecasts. At least once every 3 months, all ETCs must advertise throughout the ETC designated area the availability of eligible voice telephony

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
				<p>services (not limited to Lifeline) and the rates and charges applicable to those services through prominent presentation in one or more forms of media of general distribution, including newspapers, television or radio.</p> <p>ETCs seeking reimbursement for \$3.50 state Lifeline discount must report annually:</p> <ul style="list-style-type: none"> • Estimate of the amount of the reimbursement the ETC expects to request for the forecasted calendar year; • Expected number of Lifeline subscribers for each month of the forecasted calendar year; and • Expected number of Lifeline subscribers for each month of the forecasted calendar year; and • Amount of Lifeline discount per line per month. <p>Quarterly, not later than 30 days after the close of each calendar quarter, ETCs seeking reimbursement for \$3.50 state Lifeline discount must submit request for disbursement from NV USF, which includes</p> <ul style="list-style-type: none"> • Average number of subscribers to the Lifeline service provided by the ETC in each full month of the quarter; • Amount of the Lifeline discount per line per month; • Amount of the reimbursement per line per month that the ETC will seek, beginning with the quarter following the quarter for which the request was file

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
NY	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> Persons with a non-service related disability and receiving Veterans Disability Pension or Veterans Surviving Spouse Pension Persons who are Eligible to Receive Benefits from one or more of the Programs Listed Above but are not Currently Receiving Benefits from that Program Safety Net Assistance 	<p>Total household income ≤ amount determined by eligibility criteria for the applicable programs.</p>	<p><u>State discount:</u> Varies</p> <p><u>State-funded reimbursement:</u> Varies</p>	
OH	<p>Note: Temporary Assistance for Needy Families (TANF) is known as Ohio Works First</p> <p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> General Assistance Any State Medical Assistance Program that Might Supplant Medicaid Disability Assistance 	<p>Total household income ≤ 150% FPG</p>	<p><u>State discount:</u> <i>Monthly recurring charges:</i> None</p> <p><i>ILEC installation charges:</i> ILECs must waive installation charges once per Lifeline customer at a single address per 12-month period (ORC 4927.13(A)(1)(b)); amount varies by ILEC, but approximately \$35</p> <p><u>State-funded reimbursement:</u> <i>Monthly recurring charges:</i> None</p> <p><i>ILEC Installation charges:</i> ILECs are statutorily authorized to recover waived installation charges under ORC 4927.13(D): An incumbent local exchange carrier required to implement lifeline service under division (A) of this section may recover from end users of the carrier's telecommunications service other than lifeline service customers, by a method approved by the public utilities commission, any lifeline service discounts and any other lifeline service expenses that the public utilities commission prescribes by rule and that are not recovered through federal or state funding, except for expenses incurred under division (A)(3)(a) of this section. A carrier seeking recovery of discounts or expenses shall, in accordance with rules adopted by the public utilities</p>	<p>ILEC ETCs must offer payment arrangements to Lifeline customers that have past due bills for regulated local service charges, with the initial payment not to exceed \$25 before service is installed, and the balance for regulated local service charges to be paid over 6 equal monthly payments. OAC 4901:1-6-19(D)</p> <p>Following any continuous 60-day period of non-usage, Lifeline service providers providing nontraditional (wireless) Lifeline service must notify customer through any reasonable means that they are no longer eligible to receive Lifeline benefits and shall afford the customer a 30-day grace period during which the customer may demonstrate usage. At the conclusion of the 30-day grace period, the nontraditional Lifeline service provider may terminate the customer's Lifeline service if the customer has not demonstrated usage during that time. <i>Note: The corresponding federal rule only applies to prepaid wireless Lifeline services that do not bill or collect from end users a monthly charge (see 47 C.F.R. § 54.405(e)(2); the OH rule applies to all wireless ETCs.</i></p> <p>LEC ETCs must file tariff changes for changes to Lifeline service terms and conditions; tariffs</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
			<p>commission, apply to the public utilities recovery. If the method of recovery includes a customer billing surcharge, the public utilities commission shall prescribe by rule how the surcharge is to be identified on customer bills. Recovery varies by carrier but is generally \$0.</p>	<p>are effective 30 days after filing.</p> <p>Large ILEC ETCs must implement an annual marketing budget for promoting Lifeline and performing Lifeline outreach, and must work with an advisory board to reach consensus, where possible, regarding the appropriate budget and how it will be spent. All activities relating to the promotion of, marketing of, and outreach re Lifeline by the large ILECs shall be coordinated through an advisory board composed of staff of OH Commission, Office of Consumers' Counsel, consumer groups representing low income constituents, community action agencies, and large ILECs. Where consensus is not possible, OH Commission staff makes final decision. (O.A.C. 4901:1-6-19(E), (F))</p> <p>ILEC must file annually number of Lifeline customer</p>
<p>OK</p>	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> • OK Sales Tax Relief • Vocational Rehabilitation (including hearing impaired) 	<p>Federal threshold</p>	<p><u>State discount:</u> \$0.02/month</p> <p><u>State-funded reimbursement:</u> \$0.02/month</p>	<p>If there is no usage on the wireless provider's handset for 60 days, the ETC shall de-enroll the customer, according to federal guidelines. (165:55-23-15(q)) <i>Note: The corresponding federal requirement applies only to prepaid wireless Lifeline services that do not bill or collect from end users a monthly charge. See 47 CFR § 54.405(e)(3))</i></p> <p>Wireless ETCs must instruct a consumer applying for Lifeline to identify in his/her application all qualifying programs under which the consumer is eligible for or receives assistance or benefits. (OAC 165:55-23-15(f))</p> <p>ETC must retain copy of consumer's signed Lifeline application and any recertification information for 5 years. (OAC 165:59-9-3(o)) However, OAC 165:55-23-15(l) and 165:59-9-5 also state that the ETC must retain a copy of the signed application for Lifeline Service and</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
				<p>any recertification information for 3 years. <i>Note: Under 47 C.F.R. § 54.417(a), ETCs must maintain records to document compliance with all FCC and state Lifeline and Link Up requirements for the 3 full preceding calendar years or for as long as the subscriber receives Lifeline service from that eligible telecommunications carrier, whichever is longer.</i></p> <p>End-user customer must provide the ETC with documentary proof of program eligibility annually, unless Lifeline provider utilizes USAC to conduct its annual recertification (unless such documentation is required by USAC at the time of the annual recertification). (165:55-23-12(b))</p> <p>Each ETC must retain a listing of all exchanges within which the ETC has provided Lifeline Service during the preceding 12 months and the addresses of households who requested service and were denied Lifeline service for reasons other than the household did not meet eligibility requirements. (165:55-23-3(h))</p> <p>ETCs must retain information regarding past Lifeline outdoor mobile marketing events for a minimum of 6 months. (165:55-23-16(b)(9)).</p> <p>An approved Lifeline product may not be modified without submitting the modification to the OC Commission's PUD Director at least 15 days prior to the effective date of the proposed change for the purpose of receiving a determination whether the modification is in the public interest. Unless the ETC receives written notification that is modification is not in the public interest, it is deemed to be in the public interest and may be implemented. (165:55-23-15(j))</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
				<p>Unless approved by OK commission order, ETCs must offer at least one Lifeline plan containing unlimited anytime minutes of use for local service on Tribal Land (165:55-23-11(c)); ETCs may also offer additional Lifeline plans containing at least 1000 MOUs for local service on Tribal Land or 500 MOUs on non-Tribal Land (165:55-23-11(c)).</p> <p>Handsets. Any wireless handset provided in conjunction with the Lifeline Service must clearly and permanently identify the provider of the service. (165:55-23-15(h); 165:59-9-3(k))</p> <p>Detailed rules governing outdoor mobile marketing and door to door sales of Lifeline service.</p> <p><u>Wireless ETCs</u> may have no more than 8 trouble reports per 100 customers per month per service area averaged over a 3-month period; and must clear 85% of all trouble reports within 24 hours. (OAC 165:55-23-52)</p> <p>An ETC seeking Lifeline reimbursement from the OK USF must note on the certified written statement obtained from the customer the name of the employee or representative who verified the customer's eligibility for Lifeline service and the type of documentation reviewed. (165:59-9-3(t))</p>
OR	Received benefits from another Commission-approved low-income public assistance program for which eligibility requirements do not exceed 135% of applicable federal poverty guidelines	Federal threshold	<p><u>State discount</u>: \$3.50/month</p> <p><u>State-funded reimbursement</u>: \$3.50/month</p>	<p>OR PUC determines eligibility and informs ETCs of consumers to enroll in Lifeline via weekly Excel spreadsheet.</p> <p>Requires manual review and reconciliation process to confirm, for example, that consumer is in providers' ETC service area.</p> <p>OR PUC must be notified of Lifeline advertising</p>

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PA	In addition to federal program-based eligibility criteria: <ul style="list-style-type: none"> • General Assistance • State Blind Pension 	Federal threshold		five days prior to place and receive staff pre-approval of ad. ETCs required to access state database to confirm program-based eligibility for consumers qualifying via SNAP, SSI, Medicaid, TANF and LIHEAP. Process required manual call to IVR that limited eligibility checks to 5 SSNs per call. ETCs required to handle eligibility for consumers using any other program to qualify.
PR	None	Federal threshold	<u>State discount:</u> \$1.00/month <u>State-funded reimbursement:</u> \$1.00/month	
RI	In addition to federal program-based eligibility criteria: <ul style="list-style-type: none"> • General Assistance • Rhode Island Pharmaceutical Assistance to the Elderly 	Federal threshold		
SC	None	Federal threshold	<u>State discount:</u> \$3.50/month <u>State-funded reimbursement:</u> \$3.50/month	Each Lifeline-only ETC must submit 2-year plan that describes its plans for Lifeline advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in Lifeline and Link-Up. All ETCS designated after 1/1/2007 must annually submit the number of Lifeline customers and the number of customers who received Link Up assistance as of December 31 of the previous year;
SD				

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
TN	None	Federal threshold	None	
TX	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> Health Benefits Coverage under Child Health Plan (CHIP) Chapter 62 	<p>Total household income ≤ 150% FPG</p>	<p>State discount: <i>Discounts vary by LEC:</i> up to \$3.50/month state Lifeline discount + additional amount/month that varies by ILEC <i>Wireless ETCs:</i> \$0</p> <p><i>State-funded reimbursement:</i> <i>Varies by LEC:</i> up to \$3.50/month + additional amount/month that varies by ILEC <i>Wireless ETCs:</i> \$0</p>	<p>State Low Income Discount Administrator (LIDA) handles eligibility and recertification processes. TX has opted out of NLAD. All ETCs must transmit file containing of all residential telephone customers to the LIDA every month. LIDA compares the customer list to a list of all consumers LIDA has found to be eligible and returns to each ETC files identifying customers found to be eligible, together with copies of consumers' certification forms and a list of customers who were de-enrolled.</p> <p>All Lifeline providers must file Lifeline tariffs.</p> <p>Each month, every ETC must transmit to the LIDA certain files containing its entire TX consumer customer list identifying all customers in its ETC designated area.</p> <p>The list of eligible customers provided by the LIDA does not identify consumer address changes, such that ETCs must compare the addresses in the LIDA's list to the address identified in the ETC's customer records to determine if there are any discrepancies. This address reconciliation is necessary because, for example, a customer may have moved outside the carrier's ETC-designated area, in which case, the consumer would no longer be able to obtain Lifeline benefits from that ETC.</p> <p>For customers on the "eligibles" list that the ETC confirmed are within the ETC's ETC-designated area, the ETC must apply the Lifeline discount to those customers' accounts, if the customer consents to receive the discount.</p>

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
UT	In addition to federal program-based eligibility criteria: <ul style="list-style-type: none"> • Refugee Assistance • General Assistance 	Federal threshold		DWS handles Lifeline eligibility; consumers apply via the UT Lifeline website or using paper applications. DWS notifies ETC of consumers to enroll via Excel spreadsheet containing private information delivered at unscheduled intervals via unencrypted e-mail Requires manual review and reconciliation process to confirm, for example, that consumer is in providers' ETC service area.
VA				
VT		Individual 65 or older on June 15, 2016 with 2015 household income less than \$27,878; or individual under 65 on June 15, 2016 with 2015 household income less than \$23,895.	<u>State discount:</u> Difference between \$7 and the residual federal support after SLC offset <u>State-funded reimbursement:</u> Difference between \$7 and the residual federal support after SLC offset.	
WA	None.	Federal threshold	<u>State discount:</u> None <u>State-funded reimbursement:</u> None	Wireless Lifeline-only ETCs historically have been required to check DSHS database to confirm eligibility. Database only available during business hours. Wireless ETCs receiving state High-Cost support and ILEC ETCs must handle all eligibility functions.
WI	Note: Temporary Assistance for Needy Families (TANF) in WI is known as Wisconsin Works (W2) In addition to federal program-based eligibility criteria:	Federal threshold	<u>State discount:</u> If "Lifeline Base Rate" (i.e., charges and fees for single party residential service with touch tone; 911 charges; federal SLC; and 120 local calls, excluding extended community calling calls; and other charges approved by WI	All ETCs are required to check WI database to confirm consumer eligibility based on participation in all programs except Federal Public Housing Assistance (Section 8) and the National School Lunch Program's Free Lunch Program. There is a \$500 annual fee for each

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
	<ul style="list-style-type: none"> Medical Assistance (MA) WI Works WI Homestead Tax Credit (Schedule H) 		<p>commission) is –</p> <ul style="list-style-type: none"> ≤ \$25/month: Lifeline adjustment = \$10/month > \$25/month: Lifeline adjustment = lesser of the amount necessary to reduce the Lifeline monthly rate to \$15; or the amount available under the federal Lifeline program + \$9.25 <p>WI PSC 160.062(2g)(a).</p> <p><i>Prepaid wireless ETCs:</i> Lifeline Adjustment shall be the greater of – the number of minutes that, when calculated using the lowest per minute rate the ETC offers to its prepaid wireless customers, equals or exceeds the value of the adjustment above that would otherwise apply; or the number of minutes recognized by the FCC as an acceptable compliance plan for that provider. WI PSC 160.062(2g)(b).</p> <p>Automatic adjustments to the Lifeline Adjustment apply under circumstances identified in commission rules. WI PSC 160.062(2g)(c).</p>	<p>access login to access the WI CARES database.</p> <p>In cases where a customer's eligibility date as found in the records of the WI Dept. of Workforce Development, the WI Dept., of Revenue, or other state agencies precedes the last bill date prior to application, credit shall also be given for one month's prior bill. (Id.) PSC 160.062(3))</p> <p>ETCs other than federal-only ETCs (ETCs who are both state ETCs and federal ETCs) must waive, subject to reasonable reimbursement from the WI USF –</p> <ul style="list-style-type: none"> Charge for operator assistance to place calls for a customer with a disability that is certified under s. PSC 160.071 (1) and that, in the customer's opinion, requires the custom calling service in order for the customer to receive service that is comparable to the essential service provided to other customers. (PSC 160.071(5)) charge for a custom calling service for a customer with a disability that is certified under s. PSC 160.071 (1) and that, in the customer's opinion, requires the custom calling service in order for the customer to receive service that is comparable to the essential service provided to other customers. (PSC 160.071(6)) any intrastate nonrecurring charge or monthly rate for a second line for all of the following: A hearing impaired customer who is able and chooses to use 2 line voice carryover; a speech impaired customer who is able and chooses to use 2 line hearing carryover. (PSC 160.071(6m))
WV	<p>In addition to federal program-based eligibility criteria:</p> <ul style="list-style-type: none"> Other income-related state or federal 	Federal threshold	<p><u>State discount required:</u> Lifeline providers in WV are not permitted to charge more than \$7.50/month for Lifeline</p>	

State	State-specific program-based eligibility criteria	State income threshold if higher than Federal 135%	State discount or reimbursement in addition to Federal (non-Tribal only, except as noted)	Examples of other State requirements
	<p>programs</p> <p>At least one carrier is required to apply School Clothing Allowance as an eligibility criterion</p>		<p>service, so the required discount varies depending on the pre-discount rate.</p> <p>State usage allowance of up to \$2.00 per month on basic calling plan.</p> <p><u>State-funded reimbursement</u>: State reimbursement available; may not fully reimburse all carriers.</p>	
WY				