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From: "Ron Binz" <rbinz@rbinz.com>
To: "Anita Cheng" <acheng@fcc.gov>, "Jack Zinman" <jzinman@fcc.gov>
Date: 7/6/01 11:37AM
Subject: Questions for Notice on Lifeline Eligibility

Anita and Jack,

When our informal coalition on Lifeline/Link Up eligibility met with you a few weeks ago, you expressed interest in our recommendations for issues and questions that might be included in the upcoming Notice on this issue. We prepared the list of issues and questions and hope that it assists you in putting together the notice.

Thanks for considering these suggestions. Please give me a call if you need anything additional at this point.

Ron Binz
On behalf of State Consumer Advocates in Maine, Maryland, Missouri, Ohio and Pennsylvania

Also attending the meetings with you were:

Charlie Acquard, National Association of State Utility Consumer Advocates (NASUCA)
Jeff Kramer, AARP
Lynne Montgomery, Civil Rights Forum on Communications Policy
Christopher Day, Georgetown University Law Center, Insitute for Public Representation

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**Issues and Questions Concerning Eligibility Requirements for Lifeline and Link Up
Recommended for Inclusion
In the Notice of the Federal-State Joint Board on Universal Service**

1. Whether the federal “default” Lifeline eligibility criteria prescribed in section 54.409(b) of the Commission’s rules are consistent with the goals and principles of Section 254(b)(3) to ensure that “low income consumers” have access to telecommunications services.
2. Whether section 54.409(b), by mandating participation in federal assistance programs as a condition of receiving Lifeline benefits, unduly limits the Commission’s ability to increase access to Lifeline and Link Up services.
3. Whether the eligibility standards in section 54.409(b) should be modified to include an income-based qualification requirement as an additional means to qualify for Lifeline service. If so, should this income-based qualification requirement should be based on the federal poverty guidelines or an alternate method of calculating household income?
4. If an income-based qualification option is added to section 54.409(b), should verification of eligibility by income be accomplished through self-certification or through some other verification procedure?
5. Whether some low-income persons are ineligible for participation in Lifeline and Link Up because they decline to participate in the federal assistance programs listed in section 54.409(b) due to such factors as unfamiliarity, concern about the stigma of welfare programs, etc.
6. How has the Welfare Reform Act of 1996 affected participation levels in the federal assistance programs listed in section 54.409(b)? Has welfare reform affected Lifeline and Link Up participation under this section of the Commission’s rules?
7. For the states that establish Lifeline eligibility criteria pursuant to section 54.409(a), which use eligibility criteria that differ from the “default” eligibility criteria contained in section 54.409(b)? Do any states use an income-based standard for determining eligibility (perhaps in conjunction with a standard that considers an applicant’s participation in other assistance programs)?
8. In what states are non-governmental social service agencies or not-for-profit organizations able to qualify or pre-qualify low-income persons to receive Lifeline, Link Up, or other discounted or subsidized utility services?
9. How would modification of the eligibility criteria to include an income-based criterion affect existing systems used to qualify or pre-qualify low-income individuals or households for Lifeline or Link Up assistance?

10. How would modification of the eligibility criteria to include an income-based criterion affect the ability of non-governmental social service agencies to assist the low-income persons by qualifying or referring them for Lifeline and Link Up assistance?
11. What are the "best practices" among state social service agencies, telecommunications carriers and non-governmental social service organizations with respect to verification of eligibility for Lifeline and Link Up benefits? How could those practices be used to verify eligibility for Lifeline and Link Up benefits under an income-based eligibility standard?
12. What is the experience of non-governmental social service organizations in qualifying or referring low-income applicants for assistance programs other than Lifeline or Link Up (e.g., energy assistance programs) on the basis of household income?
13. What factors explain the variation in Lifeline and Link Up participation from state to state?
14. Whether the Commission should collect, monitor and publish the rates at which eligible households in each state participate in Lifeline?