

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
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	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	

**COMMENTS OF THE UNIVERSAL  
SERVICE ADMINISTRATIVE COMPANY**

The Universal Service Administrative Company (USAC) submits these comments in response to the Public Notice released by the Federal-State Joint Board on Universal Service (Joint Board) in the above-captioned proceeding on October 12, 2001.<sup>1</sup> In the *Joint Board PN*, the Joint Board sought comment on issues related to its review of Lifeline and Link Up, such as the effectiveness of the existing Federal Communications Commission (Commission) rules, potential modifications of those rules, and outreach.<sup>2</sup> The Joint Board will use the information it gathers as it reviews the Lifeline and Link Up support mechanisms and prepares a recommendation to present to the Commission.

USAC is the private not-for-profit corporation that administers the universal service support mechanisms pursuant to the Commission's Part 54 regulations.<sup>3</sup> USAC administers the universal service support mechanisms to provide discounted service with respect to high-cost areas, low-income consumers, rural health care providers, and schools and libraries, as well as the billing, collecting, and disbursing of all universal

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<sup>1</sup> See *Federal-State Joint Board on Universal Service Seeks Comment on Review of Lifeline and Link-Up Service for All Low-Income Consumers*, CC Docket No. 96-45, Public Notice, FCC 01J-2 (rel. October 12, 2001) (*Joint Board PN*).

<sup>2</sup> *Id.*

<sup>3</sup> See generally 47 C.F.R. Part 54.

service support. USAC is governed by a board of directors which includes a broad representation of both industry and non-industry interests.<sup>4</sup> Commission regulations provide that USAC “may advocate positions before the Commission and its staff only on administrative matters relating to the universal service support mechanisms.”<sup>5</sup> In its role as universal service Administrator, USAC has conducted a study of state participation rates in the Lifeline support mechanism, the results of which are reported in these comments. USAC submits the results of its study in response to the Joint Board’s request for information regarding Lifeline enrollment in each state.<sup>6</sup> This information is solely administrative in nature. As the neutral administrator of the universal service support mechanisms, USAC has no opinion on and does not comment regarding the policy choices confronted by the Joint Board.

### **BACKGROUND**

Since 1984, the Commission, in conjunction with the states and local telephone companies, has administered a Lifeline program designed to promote universal service by providing low-income individuals with monthly discounts on the cost of receiving telephone service.<sup>7</sup> The Commission also established the Link Up program to help low-income individuals pay the initial costs of commencing telephone service.<sup>8</sup>

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<sup>4</sup> See 47 C.F.R. § 54.703.

<sup>5</sup> 47 C.F.R. § 54.702(d).

<sup>6</sup> *Joint Board PN* at 3.

<sup>7</sup> See *MTS and WATS Market Structure, and Amendment of Part 67 of the Commission’s Rules and Establishment of a Joint Board*, CC Docket Nos. 78-72 and 80-286, Recommended Decision, 49 Fed. Reg. 48325 (1984) (recommending the adoption of federal lifeline assistance measures); *MTS and WATS Market Structure, and Amendment of Part 67 of the Commission’s Rules and Establishment of a Joint Board*, CC Docket Nos. 78-72 and 80-286, Decision and Order, 50 Fed. Reg. 939 (1984) (adopting the Joint Board’s recommendation).

<sup>8</sup> See *MTS and WATS Market Structure, and Amendment of Part 67 of the Commission’s Rules and Establishment of a Joint Board*, CC Docket Nos. 78-72 and 80-286, Report and Order, 2 FCC Rcd 2953 (1987), Memorandum Opinion and Order on Reconsideration, 3 FCC Rcd 4543 (1988).

In the 1996 *Joint Board Recommended Decision*, the Joint Board determined that Congress's intent would be best served if all low-income consumers had access to Lifeline and Link Up assistance.<sup>9</sup> Accordingly, the Joint Board recommended,<sup>10</sup> and the Commission ultimately adopted,<sup>11</sup> rules that maintained the basic framework for administering Lifeline and Link Up in states that provide matching support from the intrastate jurisdiction, with eligibility to be based solely on income or factors directly related to income.<sup>12</sup> The Commission also adopted rules, consistent with the Joint Board recommendation, that identify specific default means-tested eligibility standards for states choosing not to provide intrastate matching support.<sup>13</sup>

In the *Universal Service Order*, the Commission stated that it would monitor the effect of welfare reform on the federal default Lifeline eligibility criteria and make further changes in eligibility standards if changes in other programs limited Lifeline eligibility.<sup>14</sup> On December 21, 2000, the Commission referred low-income universal

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<sup>9</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 12 FCC Rcd 87 (1996) (*Recommended Decision*).

<sup>10</sup> *Id.* at 303.

<sup>11</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, as corrected by Errata, CC Docket No. 96-45 (1997) (*Universal Service Order*).

<sup>12</sup> See 47 C.F.R. section 54.409(a).

<sup>13</sup> See 47 C.F.R. section 54.409(b). The federal default eligibility criteria for low income individuals not living on reservations require participation in one of the following federal assistance programs: Medicaid, food stamps, Supplemental Security Income, federal public housing assistance, or the Low-Income Home Energy Assistance Program. In addition, low-income individuals living on reservations may also qualify for Lifeline and Link Up, regardless of whether the state provides intrastate matching support, by participation in one of the following federal assistance programs: Bureau of Indian Affairs general assistance, Tribally administered Temporary Assistance for Needy Families, Head Start (only those meeting its income qualifying standard), or the National School Lunch Program's free lunch program. 47 C.F.R. section 54.409(c). See also *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscriberhip in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, FCC 00-208 (2000) (*Tribal Order*).

<sup>14</sup> *Universal Service Order*, 12 FCC Rcd 8776, 8974.

service support issues to the Joint Board, specifically asking the Joint Board to review the income eligibility criteria.<sup>15</sup>

On October 12, 2001, the Joint Board released a Public Notice in which it sought comment regarding its review of Lifeline and Link Up. Specifically, the Joint Board sought comment in three general areas: the effectiveness of the current Lifeline and Link Up rules; modification of the existing Lifeline and Link Up rules; and outreach. With regard to the effectiveness of the current rules, the Joint Board sought comment on the following issues: (1) Lifeline and Link Up enrollment in each state; (2) reasons that low-income individuals may not be receiving Lifeline and Link Up assistance; (3) the impact of welfare reform on the number of low-income households participating in Lifeline and Link Up; (4) other reasons that low-income individuals may have for not enrolling in qualifying programs or for not participating in Lifeline or Link Up; (5) special concerns with regard to recent immigrants, low-income individuals living on reservations, and other groups that may need to be considered; and (6) innovative ways in which states are implementing their respective Lifeline and Link Up programs.<sup>16</sup> USAC's comments are limited to providing state-by-state enrollment data and anecdotal information gathered regarding state Lifeline and Link Up rules and practices.

## **DISCUSSION**

Under Section 54.405 of the FCC's rules, eligible telecommunications carriers (ETCs) are required to make Lifeline service available to qualifying low-income consumers and to advertise the availability of Lifeline service "in a manner reasonably

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<sup>15</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, 15 FCC Rcd 25257 (2000) (*Low Income Referral Order*).

<sup>16</sup> *Joint Board PN* at 3-4.

designed to reach those likely to qualify for the service.”<sup>17</sup> In an effort to evaluate the scope of advertising and to target outreach efforts, USAC undertook a review of statewide levels of participation in Lifeline. USAC’s comments include the results of its data collection and a discussion of anecdotal observations related to that data collection.

## **A. Lifeline Participation Data**

### **1. Methodology**

USAC calculated the percentages by state of participation in Lifeline by determining the number of Lifeline participants in each state compared to the number of persons in that state assumed to be eligible to receive Lifeline. USAC followed the following steps to arrive at the state-by-state results that appear in Attachments 1 and 2.<sup>18</sup>

*Number of Lifeline Recipients per State.* For purposes of the analysis presented here, the number of Lifeline participants per state for the year 2000 is provided in the USAC fourth quarter 2001 filing with the FCC.<sup>19</sup> In that filing, the participants in each state are divided into tribal and non-tribal categories, so the total number of Lifeline participants per state is determined by adding the tribal and non-tribal categories together. State-by-state data can be found in column 4 of Attachments 1 and 2.

*Number of Medicaid Recipients per State.* USAC used participation in Medicaid assistance as a proxy for Lifeline eligibility because participation in Medicaid is one of the states’ most commonly used eligibility requirements for Lifeline. That is, state residents who qualify for Medicaid also generally qualify for Lifeline. USAC used 1998

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<sup>17</sup> See 47 C.F.R. section 54.405(a)(b).

<sup>18</sup> Attachment 1 contains data for all 50 states and the District of Columbia. Attachment 2 contains data for the 10 states with the highest and the 12 states with the lowest Lifeline participation rates.

Medicaid data<sup>20</sup> in its analysis. State-by-state data can be found in column 5 of Attachments 1 and 2.

*Number of Medicaid Households per State.* Because Lifeline is available for a low-income consumer's primary residential line,<sup>21</sup> it was important to determine the number of *households* potentially eligible for Lifeline in order to arrive at an accurate measure of state-by-state Lifeline eligibility. The Medicaid data discussed above represented the total number of individuals receiving Medicaid per state; therefore, adjustments were made to those figures to derive a more accurate count of how many households per state were eligible for Lifeline. USAC used 2000 United States Census data to measure the average number of persons per household per state.<sup>22</sup> That data can be found in column 3 of Attachments 1 and 2. For each state, USAC then divided the number of Medicaid recipients by the U.S. Census data on number of persons per household to arrive at the number of Medicaid households per state. State-by-state data can be found in column 6 of Attachments 1 and 2.

*Percentage of Eligible Households Participating in Lifeline per State.* To determine the percentage of eligible households per state actually receiving Lifeline, USAC compared the number of Lifeline recipients with the number of households receiving Medicaid. That is, on a state-by-state basis, the number of Lifeline recipients divided by the number of Medicaid households yields a percentage of the eligible state

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<sup>19</sup> See *Federal Universal Service Support Mechanisms Fund Size Projections for the Fourth Quarter 2001* (filed Aug. 2, 2001), appendix LI7 (listing Lifeline subscribers by state or jurisdiction). The most current Lifeline and Link Up subscribership data that USAC has collected is contained in appendices LI7 (Lifeline) and LI8 (Link Up) from USAC's November 2, 2001 filing. Those appendices are included in these comments as Attachment 3.

<sup>20</sup> See [www.hcfa.gov/medicaid/MCD98T02.pdf](http://www.hcfa.gov/medicaid/MCD98T02.pdf) (1998 data).

<sup>21</sup> See *Universal Service Order*, 12 FCC Rcd 8776,8958.

<sup>22</sup> See [www.census.gov/Press-Release/www/2001/demoprofile.html](http://www.census.gov/Press-Release/www/2001/demoprofile.html).

population participating in Lifeline. State-by-state data can be found in column 7 of Attachments 1 and 2.

## 2. Results

Results and supporting data for all 50 states and the District of Columbia are set forth in Attachment 1. The same data for the 10 states with the highest Lifeline participation rates and the 12 states with the lowest Lifeline participation rates<sup>23</sup> are set forth in Attachment 2. A summary of the findings for the 10 states with the highest and the 12 states with the lowest participation rates appears below.

### *10 states with the highest Lifeline participation rates*

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|---------------------------|----------------------------|
| (1) California – 129.54%  | (6) New York – 49.83%      |
| (2) Maine – 105.42%       | (7) Massachusetts – 45.74% |
| (3) Rhode Island – 76.48% | (8) Idaho – 43.01%         |
| (4) Vermont – 58.52%      | (9) Connecticut – 42.97%   |
| (5) North Dakota – 51.06% | (10) South Dakota – 37.01% |

### *12 states with the lowest Lifeline participation rates*

- |                           |                             |
|---------------------------|-----------------------------|
| (1) Maryland – 1.84%      | (7) Missouri –6.41%         |
| (2) Delaware – 1.89%      | (8) Wyoming – 7.33%         |
| (3) West Virginia – 3.71% | (9) Pennsylvania – 7.92%    |
| (4) Tennessee – 5.22%     | (10) Indiana –8.11%         |
| (5) Arkansas – 5.41%      | (11) Virginia – 8.42%       |
| (6) Louisiana – 5.63%     | (12) South Carolina – 8.85% |

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<sup>23</sup> USAC decided to focus on the 12, rather than 10, states with the lowest participation rates because the percentages among the states with the lowest participation rates were so close. The participation rates among the states with the highest participation rates, on the other hand, decrease significantly after the top 10 states.

## **B. Anecdotal Observations**

Once USAC completed its data collection, it examined the types of advertising and outreach that exist in each state. USAC concentrated its efforts on the 10 states with the highest, and the 12 states with the lowest, Lifeline participation rates. USAC contacted state commissions and carriers directly and examined websites and promotional materials, among other things, in an effort to gather the information. The results of USAC's research appear below:

### ***States with the Highest Lifeline Participation Rates***

#### **California: 129.54%**

**State Matching Amount:** The amount varies by local telephone company and exchange.

**Eligibility Requirements:** Eligibility is based on income.

**ETC Advertising:** ETCs in California advertise in a number of ways, including direct mailings to customers, bill inserts, and television and radio advertisements.

**Other Outreach:** The California Public Utility Commission requires that ETCs advertise Lifeline.

**Miscellaneous:** California allows low-income customers to self-certify their eligibility; this self-certification must be renewed annually.

#### **Maine: 105.42%**

**State Matching Amount:** \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: Medicaid, food stamps, Aid to Families with Dependent Children (AFDC),

Supplemental Security Income (SSI), and Low-Income Housing and Energy Assistance Program (LIHEAP).

**ETC Advertising:** ETCs advertise through annual bill inserts and mass mailings to existing customers.

**Other Outreach:** The Maine State Housing Authority and the Maine Community Action Programs jointly carried out two major mass mailings to all eligible LIHEAP recipients in late 1999 notifying those consumers that they were also eligible for Lifeline. An estimated 134,000 letters and flyers were mailed, paid for by the Maine Telecommunications Education Fund. Other community action programs promote Lifeline in conjunction with their programs and through advertisements in newspapers and on television.

**Miscellaneous:** The Maine Public Utilities Commission (PUC) adopted a rule in March 1999 mandating that ETCs be accountable for the effectiveness of their outreach efforts and requiring ETCs to file outreach reports. The director of the Consumer Assistance Division of the PUC is responsible for reviewing the outreach efforts of the ETCs. In addition, each customer must be informed about Lifeline when initial service is requested, and each customer must receive information about the program and its guidelines at least once a year by mail.<sup>24</sup>

At least one ETC in Maine does not permit Lifeline customers to enroll in local service packages, which typically include local service and a choice of enhanced features. This ETC does not prohibit Lifeline customers from receiving enhanced services, but the enhanced services cannot be part of a local service package. Lifeline customers do,

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<sup>24</sup> See 65-407 Maine Public Utilities Commission Chapter 294: Lifeline and Link Up programs (section 6: Outreach Efforts; section 7: Reporting Requirements).

however, qualify for some other service packages, as long as the cost of local service is not included in the package.

**Rhode Island: 76.48%**

**State Matching Amount:** The amount varies by local telephone company.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, AFDC, Rhode Island Pharmaceutical Assistance to the Elderly (RIPAE), General Public Assistance, the Rhode Island Medical Assistance Program, or SSI.

**ETC Advertising:** ETCs advertise through the phone book, bill inserts, and direct consumer mailings.

**Other Outreach:** Consumer advocates hold annual forums and conferences, often consisting of panels in which local telephone company representatives speak about Lifeline and distribute brochures. Advocates for other programs, such as Rid Child Poverty and various senior citizen groups, promote Lifeline along with their assistance programs.

**Miscellaneous:** Rhode Island has a “do not disconnect” policy for non-payment of toll charges for Lifeline customers. At least one ETC does not permit Lifeline customers with outstanding balances to receive either enhanced services, such as caller ID or call waiting, or long distance service until the outstanding balance is paid.

**Vermont: 58.52%**

**State Matching Amount:** \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, AFDC, Fuel Assistance (Vermont PATH), Medicaid, or SSI.

Consumers may also qualify based on income.

**ETC Advertising:** ETCs advertise through bill inserts.

**Other Outreach:** Employees of the Vermont Department of Prevention, Assistance, Transition, and Health Access (Vermont PATH) assist subscribers with the application process.

**North Dakota: 51.06%**

**State Matching Amount:** The amount varies by local telephone company.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: LIHEAP, Medicaid, Temporary Assistance for Needy Families (TANF), or food stamps. In addition, low-income consumers living on reservations may qualify if their income is equal to or less than 195% of the federal poverty guidelines or if they participate in one of the following programs: Bureau of Indian Affairs (BIA) General Assistance, Food Distribution Program, Food Stamps, Head Start or Early Start (only if income-eligible), Heating Assistance, National School Lunch Program (free lunch only), Women, Infants, and Children (WIC) program, and North Dakota Healthy Steps – Children’s Health Insurance Plan (CHIP).

**ETC Advertising:** At least one ETC sends brochures to Tribal Social Services, the Department of Public Health, and social service agencies offering assistance to children and the elderly. That ETC also publishes Lifeline information in the newspaper and posts information on the doors of its local offices.

**Other Outreach:** The state Human Services Division distributes brochures and newsletters promoting Lifeline to community action and senior citizen groups. In 2000, the North Dakota Public Service Commission (PSC) funded tribal radio station advertisements when new Lifeline eligibility options were introduced. Tribal representatives also advertise Lifeline and compile lists of eligible low-income consumers that they forward to the ETCs serving their local service areas.

**Miscellaneous:** North Dakota has a “do not disconnect” policy for Lifeline customers.

**New York: 49.83%**

**State Matching Amount:** The amount varies by local telephone company.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: Food Stamps, Home Energy Assistance Programs, Family Assistance Programs, SSI, Medicaid, Safety Net Assistance, Veteran’s Disability Pension, or Veteran’s Surviving Spouse Pension. Low-income consumers may also qualify for Lifeline if they furnish proof that, though not presently receiving benefits from an income assistance program, they are eligible to do so based on income.

**ETC Advertising:** ETCs advertise through the phone book, bill inserts, and newsletters.

**Other Outreach:** The Public Utility Law Project of New York sends annual personalized letters to all persons eligible for Lifeline, informing them about the program.

**Miscellaneous:** At least one ETC does not permit Lifeline customers to enroll in local service packages, which typically include local service and a choice of enhanced features. This ETC does not prohibit Lifeline customers from receiving enhanced services, but the enhanced services cannot be part of a local service package. Lifeline customers do,

however, qualify for some other service packages, as long as the cost of local service is not included in the package.

**Massachusetts: 45.74%**

**State Matching Amount:** \$6.00.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, Temporary Assistance for Needy Families (TAFDC), Fuel Assistance, Mass Health, SSI, or Emergency Aid to the Elderly, Disabled, and Children (EAEDC).

**ETC Advertising:** ETCs advertise through annual bill inserts, the phone book, and newsletters.

**Other Outreach:** None.

**Miscellaneous:** At least one ETC does not permit Lifeline customers to enroll in local service packages, which typically include local service and a choice of enhanced features. This ETC does not prohibit Lifeline customers from receiving enhanced services, but the enhanced services cannot be part of a local service package. Lifeline customers do, however, qualify for some other service packages, as long as the cost of local service is not included in the package.

**Idaho: 43.01%**

**State Matching Amount:** \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, AFDC, Emergency Work Program, Medical Assistance, or Aid to the Aged, Blind, and Disabled. Consumers whose income is at or below 133% of the federal poverty guidelines may also qualify for Lifeline.

**ETC Advertising:** ETCs advertise on websites.

**Other Outreach:** The state of Idaho sends flyers and brochures printed by the Idaho Public Utilities Commission to eligible state residents. Consumers enrolling for Heating Assistance are also provided information about Lifeline.

**Connecticut: 42.97%**

**State Matching Amount:** \$1.17.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, Connecticut Energy Assistance Program, Medicaid/Title 19, Child Care Certificate, CONNPAGE, Personal Care Assistance Program, Refugee Program, Rental Assistance Program, Transitional Child Care, State-Appropriated Fuel Assistance (SAFA), State Supplement to the Aged, Blind, or Disabled (AABD), AFDC, SSI, Federal Public Housing Assistance (Section 8), and State Administered Assistance Program (SAGA).

**ETC Advertising:** ETCs advertise through brochures distributed at senior citizen centers. They also advertise through the phone book and annual bill inserts.

**Other Outreach:** The Connecticut Department of Social Services works in conjunction with ETCs to target eligible low-income consumers through the mail.

**South Dakota: 37.01%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: LIHEAP, Medicaid, food stamps, Federal Public Housing Assistance (Section 8), or SSI.

**ETC Advertising:** One ETC mails letters to all new customers informing them about Lifeline. Another ETC advertises Lifeline on its web site and e-mails all of its existing customers informing them about Lifeline and encouraging them to tell others about the program. One tribal carrier has advertised on tribal radio and television stations.

**Other Outreach:** The American Association of Retired Persons (AARP) held a Community Assistance Day in August 2001 and invited a tribal carrier to attend and provide information on enhanced Lifeline. BIA Social Services and the Tribal Support Services Office advertise Lifeline to eligible tribal members.

*States with the Lowest Lifeline Participation Rates*

**Maryland: 1.84%**

**State Matching Amount:** \$3.50 (Verizon only).

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: SSI, state-funded public assistance, or any of the programs outlined in Article 88A, Sections 44A through 53 of the Maryland Code.

**ETC Advertising:** ETCs advertise in the phone book.

**Other Outreach:** Lifeline in Maryland is called Tel-Life. The Maryland Department of Human Resources has a Tel-Life division that prints informational materials about the program. The materials are distributed as requested by social service agencies, homes for the elderly, and homeless shelters.

**Miscellaneous:** At least one ETC will not permit Lifeline customers to subscribe to any enhanced services, such as caller ID or call waiting. Customers eligible for Lifeline who have enhanced features on their phone lines prior to applying for Lifeline have the option of discontinuing those features in order to receive assistance. The same ETC will not

enroll customers in Lifeline if they have outstanding balances on their accounts at the time they apply for assistance.

**Delaware: 1.89%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, LIHEAP, Federal Public Housing Assistance (Section 8), Delaware Welfare to Work, or SSI.

**ETC Advertising:** ETCs advertise through the phone book and inserts. The Delaware PUC requires annual advertisements in the *News Journal*, a statewide newspaper. In addition, one ETC provides Lifeline information via a telephone recording that customers hear as they wait to speak to customer service representatives.

**Other Outreach:** The Delaware Department of Health and Human Services advertises Lifeline to its eligible clients.

**Miscellaneous:** At least one ETC will not permit Lifeline customers to subscribe to any enhanced services, such as caller ID or call waiting. Customers eligible for Lifeline who have enhanced features on their phone lines prior to applying for Lifeline have the option of discontinuing those features in order to receive assistance.

**West Virginia: 3.71%**

**State Matching Amount:** This amount varies by local telephone company.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: AFDC, food stamps, Medicaid, SSI, and AFDC-Unemployed.

**ETC Advertising:** ETCs advertise via a website.

**Other Outreach:** Social service agencies and the Department of Health and Human Resources advertise Lifeline with brochures and information for new recipients of their assistance programs.

**Miscellaneous:** Customers with outstanding balances at the time they apply for Lifeline must pay those balances before receiving assistance.

**Tennessee: 5.22%**

**State Matching Amount:** \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, Medicaid, SSI, AFDC, Home Energy Assistance, and Federal Public Housing (Section 8).

**ETC Advertising:** ETCs advertise Lifeline through annual bill inserts and letters.

**Other Outreach:** The Tennessee Regulatory Authority has partnered with the Department of Human Services and other state social service agencies to promote Lifeline through brochures. The Tennessee Regulatory Authority also sends Lifeline information to food stamp recipients and monitors effective outreach programs in other states for implementation in Tennessee.

**Miscellaneous:** Tennessee has a “do not disconnect” policy for Lifeline customers.

**Arkansas: 5.41%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: AFDC, food stamps, Medicaid, SSI, Home Energy Assistance, or Federal Public Housing Assistance (Section 8).

**ETC Advertising:** ETCs advertise through the newspaper, occasional television promotions, and bill inserts. In addition, one ETC provides Lifeline information via a telephone recording that customers hear as they wait to speak to customer service representatives.

**Other Outreach:** The Arkansas Department of Human Resources informs caseworkers and their clients about Lifeline.

**Louisiana: 5.63%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: SSI, food stamps, LIHEAP, Medicaid, or Federal Public Housing Assistance (Section 8).

**ETC Advertising:** ETCs advertise Lifeline through bill inserts.

**Other Outreach:** None.

**Missouri: 6.41%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: LIHEAP, SSI, food stamps, Federal Public Housing Assistance, or Medicaid.

Consumers may also qualify for Lifeline based on total income.

**ETC Advertising:** ETCs advertise via a website.

**Other Outreach:** None.

**Wyoming: 7.33%**

**State Matching Amount:** \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: food stamps, SSI, LIHEAP, Medicaid, AFDC, POWER, or Federal Public Housing Assistance (Section 8).

**ETC Advertising:** ETCs provide Lifeline information via a website.

**Other Outreach:** None.

**Pennsylvania: 7.92%**

**State Matching Amount:** \$2.50 (Verizon only).

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: TANF, food stamps, LIHEAP, Medicaid, Federal Public Housing Assistance (Section 8), SSI, or General Assistance. Consumers may also qualify based on income. At least one ETC offers varying amounts of assistance based on a consumer's income level.

**ETC Advertising:** ETCs advertise via a website.

**Other Outreach:** None.

**Indiana: 8.11%**

**State Matching Amount:** None.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: LIHEAP, food stamps, Medicaid, SSI, Federal Public Housing Assistance (Section 8), or TANF.

**ETC Advertising:** ETCs advertise Lifeline through the phone book, bill inserts, and annual messages to customers.

**Other Outreach:** The Office of Utility Consumer Counselor (OUCC) publishes brochures to distribute to low-income residents. The agency also posts Lifeline

information on its website and has Consumer Services staff members that answer Lifeline questions. The OUCC also distributes Lifeline brochures and applications at widely attended gatherings, such as the state fair, and holds Lifeline information sessions before and after events such as Indiana Regulatory Commission field hearings.

**Virginia – 8.42%**

**State Matching Amount:** The amount ranges from \$1.75 to \$3.50.

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: TANF, food stamps, LIHEAP, Medicaid, SSI, and Federal Public Housing Assistance.

**ETC Advertising:** ETCs advertise through bill inserts and targeted mailings.

**Other Outreach:** Social service agencies advertise Lifeline with brochures and information for new recipients of assistance.

**Miscellaneous:** At least one ETC will not permit Lifeline customers to subscribe to any enhanced services, such as caller ID or call waiting. The same ETC will not enroll customers in Lifeline if they have outstanding balances on their accounts at the time they apply for assistance. In Virginia, consumers requesting Lifeline are eligible even if they are not receiving Medicaid, provided that their children are recipients. Virginia also has a “do not disconnect” policy for Lifeline customers.

**South Carolina: 8.85%**

**State Matching Amount:** \$3.50 (BellSouth only).

**Eligibility Requirements:** Eligibility is based on participation in one of the following programs: TANF, food stamps, Medicaid, LIHEAP, SSI, or Federal Public Housing Assistance (Section 8).

