National Association of State Utility Consumer Advocates Discussion of Lifeline and Link-Up Database Administration June 13, 2011 -- FCC

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Points of Reference

- NASUCA Resolution 2010-02, June 2010
- NASUCA Comments July 15, 2010
  - Urged a significant rethinking of the fundamentals of the Lifeline and Link-Up program, in light of potential growth of Low Income portion of USF
  - Support for federal minimum standards - from eligibility and enrollment, through marketing, to recertification and removal from the program
  - Incentives/grants for state agencies to foster automatic enrollment

Points of Reference (cont.)

- NASUCA Reply Comments, July 30, 2010
  - Overall, support a national database
  - Privacy issues must be resolved first
  - Implementation challenges
  - Facilitate verification, reduce duplication
- Consumer Groups Comments, April 21, 2011
- NASUCA Comments, April 21, 2011
  - concentrate on automatic enrollment and electronic databases to confirm eligibility and eliminate duplicate support
  - National database coordinate, receive data from state agencies
  - Concern for ETC obligations, minimize cost shifting
  - Lifeline customer privacy a high priority

Points of Reference (cont.)

- NASUCA Reply Comments, May 10, 2011
  - ETC obligation: effective Lifeline program
  - Concern for cost and complexity of implementing a national database
  - If implemented, database use should be required
  - Costs to be paid by ETCs or, alternatively, USAC as part of management expense
  - Working group to address implementation
- New Jersey Div. of Rate Counsel Reply Comments, May 10, 2011

Observations re Growth of the Low Income Fund

- Customers who have been eligible are now receiving support to make telecom service more affordable
- The per-customer cost may be increasing
- Each Low Income USF dollar should provide most connectivity, most value, for the most Lifeline eligible customers

Database Goals

- Facilitate enrollment
- Shorten time to identify eligible consumers
- Shorten time between customer qualifying as low income and receiving telecom service with Lifeline support
- Promote confidence that Low Income support is only going to eligible consumers

What Are The Alternatives

- Vouchers – personal control, portability
  - Mark Cooper, Consumer Federation of America – Rural Broadband Workshop, June 2010
  - Verizon July 2010 comments
  - NASUCA July 2010 Reply Comments expressed reservations
  - New Jersey Div. of Rate Counsel, Reply Comments, May 10, 2011 – propose mirror Supplemental Nutrition Assistance Program(SNAP)