

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Advanced Broadband Availability Through 109	)	WC Docket No. 03- 109
Digital Literacy Training	)	

COMMENTS OF THE ALABAMA PUBLIC SERVICE COMMISSION

Comments

The Alabama Public Service Commission (the “APSC”) thanks the Federal Communications Commission (the “FCC”) for this opportunity to submit comments to the Order entered in the above-captioned matters on January 31, 2012. The APSC is particularly concerned with offering a position relative to the issues of Lifeline eligibility verification and duplication avoidance.

Comments Regarding Paragraphs 408 through 410

The APSC believes the Lifeline eligibility database will be more practical if maintained at the state level where the database will be more closely connected to the source of the data. Alabama has the capability of capturing data from all the public assistance programs that qualify Lifeline applicants to receive the service. A national eligibility database that encompasses only the three most popular Lifeline qualifying public assistance programs is a hybrid approach eliminating the documentation and record keeping requirements for some Lifeline applicants, but requiring it to be maintained for those programs not supported by the national database.

In the experience of the APSC, data maintained by the state agencies administering Lifeline qualifying public assistance programs may include spelling errors and other data entry mistakes due in large part to human error. Conflicting information regarding name, address, date of birth, and social security number are sometimes identified when searching for potential duplicate entries from the data of multiple state agencies administering Lifeline qualifying programs. Lifeline Accountability System reliability begins with accurate eligibility data. Maintaining the eligibility database close to the source of the data makes the process of correcting erroneous data entries more manageable. Additionally, adding information to the database for Lifeline applicants with gross household income at or below 135% of the federal poverty level that choose not to participate in other Lifeline qualifying programs is manageable for state eligibility database administrators, but would likely prove impractical at the national level. The APSC concedes that maintaining the eligibility database at the national level is

potentially more economical, but contends that such centralization sacrifices data reliability and database manageability, and should only be attempted when the underlying data is certified as accurate.

In order to maximize efficiency and conserve limited resources, the APSC urges the FCC to maintain Lifeline eligibility data at either the state level or the federal level, but not at both levels. Some states already possess the capability for verifying eligibility and others, including Alabama, have expended great effort to pursue that capability. The APSC has established formal data sharing agreements with state agencies that administer Lifeline qualifying programs and has an active Lifeline “working group” with the objective of implementing a state eligibility database. Working group members include APSC staff, ETC representatives, and private sector data consultants. Maintaining Lifeline eligibility databases at the state level takes advantage of progress already made in the states. Establishing a limited federal eligibility database to coexist with more extensive state databases seems unnecessarily redundant.

Some ETCs base their preference for establishment of a national eligibility database on the contention that maintaining individual databases at the state level increases the training costs necessary for their personnel to navigate multiple user interfaces. The APSC asserts that an alternative solution to the problem of multiple interfaces is standardization rather than centralization, which in either case is an improvement from today’s largely manual process. If their costs are comparable and the user interfaces uniform across all jurisdictions in their service area, ETCs should otherwise be indifferent to the eligibility database location. The APSC believes that a uniform Lifeline accountability system can be achieved by adopting a standardized user interface for state eligibility databases and integrating it with the functionality for seamlessly “dipping” into the national duplication avoidance database. The APSC urges the FCC to not sacrifice the advantages of maintaining Lifeline eligibility data at the state level for the assumed cost savings of centralization. The APSC recommends that national standards for state eligibility database user interfaces be adopted by the FCC for purposes of achieving a uniform Lifeline accountability system.

#### Comments Regarding Paragraphs 404 and 405

For purposes of encouraging state development of eligibility databases, the APSC recommends the FCC definitively assign jurisdictional responsibility for the Lifeline eligibility database. ETCs and states are currently discouraged from expending the resources necessary to pursue state eligibility databases based on the FCC’s assertion in the Lifeline Reform Order that it will establish a national eligibility database by no later than year-end 2013. Given such FCC assurances regarding the availability of an alternative to state eligibility databases, ETCs and states will predictably respond by ending their pursuit of such a capability. Since publication of the FCC’s Order, the APSC has been strongly encouraged by a leading national carrier to suspend efforts aimed at the creation of Alabama’s Lifeline eligibility database predicated on the carrier’s conclusion that the FCC will instead provide that capability. The APSC requests, as soon as possible, a definitive FCC statement on jurisdictional responsibility for the Lifeline eligibility database. The FCC should not expect that states will make

progress toward the development of their eligibility database when faced with the possibility of a competing national alternative.

Alabama's General Fund is in proration and the APSC's budget has been cut substantially. Funds to support the creation of a state eligibility database are unavailable. The APSC believes that many states are experiencing similar budgetary constraints. Absent an immediate mandate for the creation of a national eligibility database, the FCC could assist states in creating their Lifeline eligibility databases by offering one-time federal grants for database development.

One of the major obstacles facing states pursuing the creation of a Lifeline eligibility database is reluctance on the part of state agencies administering Lifeline qualifying programs to provide the data necessary for populating the database. The agencies often cite their fear of repercussions from federal counterparts for sharing sensitive data. Additionally, the agencies do not view the Lifeline program as a matter that is within their purview and often demonstrate limited enthusiasm for supporting it. Barriers to the development of state Lifeline eligibility databases could be reduced if federal agencies that administer the Lifeline qualifying public assistance programs affirmed in writing to their state counterparts the importance of supporting the Lifeline program and encouraged the agencies to fully cooperate with state Lifeline eligibility database establishment and management efforts. The APSC urges the FCC to seek such support and assistance from the federal agencies that administer Lifeline qualifying public assistance programs.

#### Comments Regarding Paragraph 451

The APSC supports the FCC proposal that ETCs receive Lifeline support only when they provide Lifeline service directly to subscribers. For accountability purposes, ETCs should not receive Lifeline support from services provided to Non-ETC resellers. Unless resellers are certified as ETCs, state commissions have no reliable means of determining the identity of resellers providing Lifeline service to end users and whether the annual Lifeline eligibility re-verification is being performed by the non-ETC reseller. USAC does not maintain a list that includes non-ETC resellers serving end users with Lifeline service. Only the ETCs receiving Lifeline support are identified and are obligated to report the results of end user re-verification to state commissions. No such obligation exists for non-ETC resellers.

Thank you for your consideration of the APSC's comments in these joint dockets.

Respectfully submitted

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Alabama Public Service Commission

Filed electronically on April 2, 2012