

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 17, 2012

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: California Public Utilities Commission's Notice of Ex Parte Communications, In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training (LifeLine Reform Order); WC Docket Nos. 03-109, 12-23 and 11-42; CC Docket No. 96-45

Dear Ms. Dortch:

On May 15, 2012, Jonathan Lakritz, Roxanne Scott, Cherrie Conner, Michaela Pangilinan, and Benjamin Schein of the California Public Utilities Commission's (CPUC) Communications Division, Sindy Yun of the CPUC's Legal Division, and Kristine Kowalewski of Mission Consulting spoke with Jonathan Lechter and Kimberly Scardino of the Federal Communications Commission's (FCC) Wireline Competition Bureau for about 30 minutes.

During the conference call, the FCC staff asked the CPUC staff questions about California's Petition for Waiver that the CPUC filed with the FCC on April 26, 2012. The FCC staff asked the CPUC staff to provide more details about its Petition requests and in response, the CPUC provided the following additional information:

1. CPUC's request for an extension of time to collect the last four digits of the social security number (SSN) and date of birth (DOB):

California currently does not collect the last four digits of the SSN or DOB from the California LifeLine participants. We are in the process of revising the certification forms and plan to begin collecting the SSN and DOB from the new applicants starting on June 1, 2012. As to the re-certification forms, California plans to have the revised forms ready for use no later than October 31, 2012. Beginning in January, 2013, any new applicants and existing subscribers that do not provide this data will be rejected or removed from the program.

2. CPUC's request for an extension of time to collect temporary addresses:

California currently does not collect this information from the Lifeline applicants or subscribers. California plans to modify its forms and procedures and begin collecting this information from the new applicants and existing subscribers no later than October 31, 2012.

3. CPUC's request for an extension of time to verify temporary addresses every 90 days:

California plans make all of the necessary changes to the California LifeLine Program and begin this verification process no later than January 31, 2013.

4. One-time re-certification of all existing subscribers (also known as "the 2012 sweep"):

While the CPUC prefers to have a twelve-month extension of time to comply with this requirement as requested in our Petition for Waiver, the CPUC may be able to complete "the 2012 sweep" by June 30, 2013, if required to do so.

5. Comparison of the CPUC's and the FCC's re-certification (renewal) process:

The CPUC has conducted an annual renewal of its program participants for over five years. The annual renewal is a mandatory requirement for all subscribers which require them to renew their eligibility by attesting, under penalty of perjury, that they continue to meet the eligibility requirements. Any subscriber who fails to do so is removed from the program. California's renewal process contains many of the elements that the FCC adopted in the *Lifeline Reform Order*. Below is a comparison of the CPUC's and the FCC's recertification requirements.

FCC's Requirements – 47 U.S.C. 54.410(f)

CPUC's Requirements

a. Must re-certify every year

a. SAME

b. Must re-certify every subscriber

b. SAME

c. One benefit per household

c. SAME

d. Must query eligibility or eligibility databases and document results OR obtain a signed form from customers that they comply with Section 54.410(d)

d. Obtains a signed form from customers that is in compliance with majority of the elements of Section 54.410(d)

(Comparison of the re-certification processes continued)

FCC's Requirements – 47 U.S.C. 54.410(f)

CPUC's Requirements

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| e. Definition of household | e. Functionally the same as the FCC's definition |
| f. Must obtain applicant's full name | f. SAME |
| g. Must obtain applicant's full address | g. SAME |
| h. Must obtain information as to whether address is temporary or permanent | h. Will comply by October 31, 2012 for re-certification forms; by January 31, 2013 for 90-day verification |
| i. Must obtain billing address, if not the same as residential address | i. SAME |
| j. Must collect SSN and DOB | j. Will comply by June 1, 2012 for certification forms; by October 31, 2012 for re-certification forms |

Additionally, when a consumer applies for the California LifeLine service, the CPUC checks its subscriber database to verify that the consumer is not already signed up and receiving discounts to prevent duplicate claims.

In accordance with Section 1.1206 of the Commission's rules, a copy of this letter and the accompanying attachment has been filed via ECFS and sent by email to the FCC staff members who participated in the meeting. If you have any questions, please contact the undersigned at (415) 703-1999 or sjy@cpuc.ca.gov.

Respectfully submitted,

/s/ Sindy J. Yun

Sindy J. Yun
Staff Counsel

cc (via e-mail): Jonathan Lechter – FCC (Jonathan.Lechter@fcc.gov)
 Kimberly Scardino – FCC – (Kimberly.Scardino@fcc.gov)