

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

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

**COMMENTS OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTelecom)¹ is pleased to submit these comments on the request of TracFone Wireless, Inc. (TracFone) to include the Children’s Health Insurance Program (CHIP) in the list of programs which qualify households for Lifeline under the Commission’s uniform eligibility criteria.² The Wireline Competition Bureau released a Public Notice³ requesting comments on TracFone’s request on August 7, 2012.

USTelecom takes no position on the request to include CHIP on the list of qualifying programs, but requests that any changes to Lifeline eligibility criteria, whether such

¹ USTelecom is the premier trade association representing service providers and suppliers for the telecommunications industry. USTelecom members provide a full array of services, including broadband, voice, data and video over wireline and wireless networks.

² See *Lifeline and Link Up Reform and Modernization et al.*, Request of TracFone, Inc. To Include The Children’s Health Insurance Program In The List Of Qualifying Assistance Programs, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45 (filed July 13, 2012) (*Request*); 47 C.F.R. Sec. 54.409(a)(2) (listing qualifying programs under the uniform eligibility criteria.

³ See Public Notice, Wireline Competition Bureau Seeks Comment on TracFone’s Request to Include the Children’s Health Assistance Program as a Qualifying Lifeline Program, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, DA 12-1269, (rel. August 7, 2012).

modifications are to the program or income-based standards, or any other program modifications that require changes to the initial application forms or re-certification forms provided to customers, be implemented no more frequently than once per year, and that they be done concurrently on a date certain. The date should be tied to the annual update of the Federal Poverty Guidelines which are used to establish the 135% income threshold for eligibility. This approach would be similar to that of the E-rate program which annually establishes a list of services qualifying for universal service fund reimbursement.

Efficient administration by states and eligible telecommunications carriers (ETCs) of the Lifeline eligibility and certification process would be facilitated by adoption of an annual date certain for all changes in eligibility standards. Changes to those standards require development of new certification forms, modifications to automated processing of certification forms, changes to systems that must store information related to eligibility, additional training for personnel determining or certifying eligibility, potentially changes to tariff language regarding Lifeline service, and potentially new processes for states or ETCs to interact with databases containing the relevant information. The process of making such changes, and the associated expense and burden, would be ameliorated by having changes made no more than once a year on a date certain.

Additionally, limiting changes to the application forms and re-certification forms provided to customers to at most once a year should reduce customer confusion regarding eligibility criteria and other requirements of the program. Many customers are already confused by the myriad of changes occurring in the Lifeline program. Continually making modifications to the program that must be implemented by service providers and communicated to the customers will not improve this situation and may well render Lifeline service less appealing to those who

most need it. Doing so at irregular times exacerbates that problem. The Commission should limit implementation of any such changes to not more often than once a year.

The Commission has properly placed great importance on the Lifeline eligibility and certification process. An efficient and effective process ensures that only eligible households participate, there is no duplication, and thus the Low Income Fund is no larger than necessary. Making changes to eligibility standards or other program requirements no more than annually and on a date certain would support those goals.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION



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