

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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

WC Docket No. 11-42

WC Docket No. 03-109

CC Docket No. 96-45

WC Docket No. 12-23

**SUPPLEMENT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA'S
PETITION TO OPT OUT OF NATIONAL LIFELINE
ACCOUNTABILITY DATABASE**

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I. INTRODUCTION

The California Public Utilities Commission and the People of the State of California (CPUC or California) hereby files this Supplement to the CPUC's Petition to Opt Out (Petition) of the National Lifeline Accountability Database (NLAD), which was filed with the Federal Communications Commission (Commission) on December 3, 2012. The purpose of this filing is to provide additional information in support of the CPUC's Petition including how the California LifeLine Administrator (Administrator): 1) receives and processes subscriber information provided by service providers¹ to identify whether a subscriber is receiving or is in the process of receiving a California LifeLine benefit from another service provider; 2) handles descriptive addresses; 3) performs monthly scrubs to detect duplicative Lifeline support²; and 4) administers the Lifeline household worksheet. This Supplement also includes data on the number of LifeLine appeals that the CPUC processed in 2012.

II. DISCUSSION

A. Duplicates Prevention and Matching Processes

The California LifeLine Program (California LifeLine) has validation checks in place to prevent duplication of both new and existing subscribers when processing data transactions from the service providers. These validation checks occur on a real-time, daily, and monthly basis. Each transaction undergoes a duplicates check using a

¹ In California, both eligible telecommunications carriers (ETCs) and non-ETCs (carriers that have not been certified as an ETC) participate in the California LifeLine Program. ETCs and non-ETCs are collectively referred to as "service providers" in this Supplement.

² The Administrator also performs data scrubs on a daily and on a real-time basis, in addition to the monthly scrubs.

matching logic consisting of four main elements: 1) operating carrier number (OCN); 2) subscriber's name; 3) subscriber's telephone number; and 4) subscriber's service address. This process will result in a match if the subscriber's name, along with either the telephone number or the service address, already exists in the database. The Administrator sends specific error codes to the service provider when the check for duplicates shows a match for the same subscriber.

If the matching process determines that there are different subscribers residing at the same service address, the subscribers are flagged to receive a LifeLine household worksheet and they are required to self-certify that they are separate household units in order to qualify. If a subscriber is flagged to receive a household worksheet, it will be included as a part of the application or renewal packet. Once the household worksheets are returned to the Administrator, with any other required supporting forms or documentation, they are reviewed for eligibility and stored in the California LifeLine database.

In the near future, the CPUC intends to incorporate the last four digits of the Social Security Number (SSN) and the date of birth into both its matching logic and duplicates check process. The CPUC also plans to verify the identity of a subscriber through a third-party identity verification service.

B. Duplicates Check for Descriptive Addresses

The California LifeLine Administrator attempts to standardize a subscriber's service address and billing address with a Coding Accuracy Support System (CASS) - certified address standardization software. If the software is able to match the service

address against its database of United States Postal Service addresses, the address is standardized and is stored in the California LifeLine database. In California, approximately 95% to 97% of all service addresses service providers submit can be standardized. The Administrator uses the standardized addresses for its duplicates checks and matching logic.

The CASS certified software is unable to standardize the other 3% to 5% of the service addresses. These can include descriptive addresses of subscribers living in rural areas or on Tribal Lands. These addresses are accepted as they are submitted and are used to check for duplicates and matching using the four elements discussed above. If the duplicates' check does not result in a match with the service address associated with a subscriber's name, it will also try to match the telephone number with the subscriber's name. These addresses are not modified by the CASS certified software and are stored exactly as the service provider provided them.

C. Real-Time and Daily Duplicates Check

The California LifeLine Administrator offers service providers with three different methods to transmit customer data: 1) File-Transfer Protocol (FTP-based); 2) Web-based Interface (Web-based); and 3) Direct Application Process (DAP).³ All three of these methods or communications protocols provide the interface for the service providers to communicate with the California LifeLine master database and use the same validation

³ Attached to this Supplement is a specifications document for California's direct application process. We note that this is a working document, which will be updated as we progress.

procedures before processing any type of transaction from the service providers on a real-time or daily basis.

1. FTP-based communications protocol

An FTP daily upload file is composed of all activities that occur in a subscriber's account for a given period within the service provider's system; the period is usually a day, but it could include up to a few days, depending on the volume of transactions a service provider may encounter. The feed may contain several transactions for a given subscriber. Once a day, the Administrator downloads, stages, and processes all of the files in the following transactional order: D (Disconnect), R (Remove), N (New Customer), U (Update), and T (Transfer). The Administrator then performs the validation logic against each record in the master database. If a record passes validation, it is processed. If a record fails validation, an error message is written to an activity file and returned to the service provider once a day.

2. Web-based communications protocol

Service providers can also use a Web-based method to access their subscribers' data through a secure Web portal called the Private Website. The Private Website allows service providers to search for subscriber data and to perform all of the same transactions as the FTP-based service providers. The Administrator stages the Web-based service providers' transactions along with the FTP-based service providers' transactions in the master database. The Administrator processes the files from both the FTP-based and Web-based service providers at the same time on a daily basis. Then the Administrator performs the validation logic against each record in the master database.

3. DAP communications protocol

The DAP offers service providers the option of submitting transactions through a Web service application program interface in order to receive near-real-time feedback in the form of a pre-populated PDF version of the initial application or an error message.

The Administrator stages the new subscriber transactions in the master database and uses the same validation procedure utilized for FTP and Web-based service providers.

However, the validation is executed against the subscriber record in real-time. An error code can be sent immediately to the service provider via a Web-service response if a subscriber record fails validation. If a record passes validation, then it is loaded and processed into the master database in real time.

FTP-based, Web-based, and DAP communications protocols also enable the Administrator to detect duplicates when a subscriber attempts to enroll in Lifeline with two different service providers. For example, if a subscriber signs up for LifeLine service with two different carriers on the same day, causing both of the carriers to each submit a request for the subscriber to the Administrator, the Administrator will inactivate the data transaction that was submitted by the first carrier and accept the data transaction from the second carrier as the active record. The subscriber's application will continue to be processed, but the subscriber will only be eligible for one LifeLine subscription.

D. Monthly Duplicates Check and Dispute Resolution Process

In addition to performing duplicate checks on a real-time and daily basis, the Administrator scrubs the database at the end of each month to check and eliminate any duplicates. The majority of these duplicates are associated with the overturn of denials

that are processed by the CPUC's Consumer Affairs Branch (CAB). CAB receives and processes California LifeLine appeals. In 2012, CAB received 2,899 appeals and complaints⁴ and closed 2,421 of them. The Administrator processed 438 appeals of eligibility denials that CAB overturned from June to December, 2012, which constitutes about 0.028% of the households enrolled in the California LifeLine program⁵. When CAB overturns a subscriber's eligibility denial, the Administrator changes the eligibility status from "denied" to "approved" for the subscriber. However, because it is possible for the subscriber and/or service provider to have initiated another application process while the denial was pending, a duplicate can still be created in the master database.

There are two generic scenarios in which duplicate records can be created *after* CAB overturns a subscriber's eligibility denial by the Administrator:

1. A service provider has already created a new subscriber record for the same subscriber during the pendency of the appeal or
2. A service provider has already transmitted a new subscriber record for a different subscriber with the same telephone number and/or service address during the pendency of the appeal.

In either case, the new subscriber record would pass validation because the Administrator has already inactivated the previously denied record. Once CAB overturns the previously denied record, the Administrator will activate the record being overturned, which then creates a duplicate record in the master database.

⁴ A complaint is a statement of dispute regarding billing, service quality, and terms and conditions, etc. An appeal is a statement of dispute regarding a denial of eligibility for LifeLine service.

⁵ As of the end of December 2012, there were about 1.54 million households enrolled.

On a monthly basis, at a minimum, the Administrator runs a check to identify and eliminate these types of duplicate records that result from the appeals process. The Administrator manually corrects these duplicates and in most cases, the Administrator inactivates the newer of the two records in the database when there are duplicate records for the same subscriber. It is a more complex process when the duplicate records are for two different persons in which case the Administrator coordinates the resolution with the service provider(s) involved.

Although the Administrator does not resolve these types of duplicates on a daily or instantaneous basis, the duplicates that are created from the overturning of denial appeals will typically remain as a duplicate, at most, up to 30 days in the database. This is so because, at the end of each month, the Administrator will inactivate the appropriate records to maintain the integrity of the database through its monthly data scrubbing process.

E. Error Codes Associated with the Duplicates Check Process

Error codes exist in the duplicates check process to prevent a subscriber from receiving more than one discount by communicating to the service providers when the duplicates check finds a match for the same subscriber. These error codes are standard across all three of the communication protocols (Web-based, FTP-based, and DAP) established by the Administrator. Additionally, these error codes can be triggered with all types of transactions. The two primary error codes used in the duplicates' check process are 40070 and 40079, to indicate that the subscriber exists and is active in the

database and to indicate that the telephone number already exists with an active subscriber in the database, respectively. The following is a list of error codes associated with duplicate checks:

- 40070 – Customer already exists
- 40078 – Cannot update telephone number as it is already active
- 40079 – Telephone number already active
- 40084 – Same name and address cannot have multiple teletypewriter lines
- 40085 – Same name and address (different TNs) cannot have multiple primary discount lines.

Once the appropriate error codes are communicated to the service providers depending on the type of match found, the Administrator will await further information from the service providers to resolve or clear out the error codes. If the service provider does not clear out the error code, then the transaction requested will remain unprocessed.

FTP-based service providers receive a daily activity file to inform them of any errors in processing their daily feed, including the error codes associated with duplicates. Each unprocessed record due to an error code is given to the service provider as a row in the activity file with the appropriate error code indicating the reason the record could not be processed.

For the Web-based service providers, the Administrator communicates the errors in an error queue on the Private Website and notifies the service providers of the problem via a daily email. The Web-based service providers log in to the Private Website and select their error queue to view a list of records that failed validation. The Web-based service providers can then respond via the Web interface to correct the error.

For the DAP service providers, the Administrator communicates the errors in real time via the Web service response. The Web service response includes the error code to indicate the reason the record was rejected and could not be processed.

III. CONCLUSION

The CPUC's LifeLine database system adequately meets the requirements of the Commission to opt out the National Lifeline Accountability Database. The CPUC's system is able to adequately detect and eliminate duplicative Lifeline supports, process both standard and descriptive addresses, and process data from all service providers operating in California. In the near future, the CPUC also plans to verify a subscriber's identity through a third-party identity verification service. For reasons stated in this Supplement and in the Petition, the CPUC requests that the Commission authorize the CPUC to opt out of the National Lifeline Accountability Database.

Respectfully submitted,

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