

December 5, 2013

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Attn: Wireline Competition Bureau**

**Re: WC Docket 11-42**

*Comments – National Lifeline Accountability Database / Protection for Victims Enrolled in the  
Address Confidentiality Program*

The Pennsylvania Coalition Against Domestic Violence (“PCADV”) is a private, non-profit organization that provides services and advocacy on behalf of victims of domestic violence and their minor children. PCADV was the first domestic violence coalition in the country and, in its 35 years of operation, PCADV has grown to a membership of 60 domestic violence programs that provide services to every county in Pennsylvania. PCADV member programs provide a range of life-saving services, including emergency hotlines, shelters, counseling programs, systems advocacy, safe home networks, legal and medical advocacy, and transitional housing for victims of abuse and their children. A key component of our work, and the work of member programs, is to ensure that all victims of domestic violence have unencumbered access to life-saving critical services – such as stable housing, basic telephone service, and utilities - that enable survivors to become economically self-sufficient and independent from the abuser.

The Pennsylvania Office of Victim Advocate, which administers the Address Confidentiality Program, and the Pennsylvania Utility Law Project join in these comments. Attached are statements of interest from each program.

PCADV, its member programs, and its allies who join in these comments are grateful to the Federal Communications Commission, and in particular the Wireline Competition Bureau, for identifying Lifeline accessibility for individuals enrolled in state-administered Address Confidentiality Programs (ACPs). In Pennsylvania, there are 191 active ACP participants. Since the program’s inception, it has assisted 321 participants and their families to remain safe and keep their physical address confidential. In recognizing that the requirements in the Lifeline program are contrary to the goals of address confidentiality programs, the Bureau is ensuring that these individuals will continue to remain safe from their abuser.

- **The Bureau must waive the rule limiting the use of P.O. Box residential addresses to allow qualifying, low-income customers who participate in state-administered Address Confidentiality Programs to receive Lifeline service.**

Both the Lifeline Program and state-administered ACPs are essential to protecting victims of domestic violence and their children. To reach the most vulnerable populations who are at the highest risk of severe physical harm or homicide, however, the two programs must work congruently.

When a victim separates from an abuser, she or he often struggles to establish economic stability. At the same time, a victim who separates is at an increased risk of severe physical violence or homicide by an intimate partner. In a 2004 study commissioned by the United States Department of Justice, 85% of victims who suffered severe physical violence by an intimate partner and 75% of intimate partner homicide victims had left or tried to leave the relationship in the previous year.<sup>1</sup>

Lifeline and ACPs provide critical services to assist a victim – and their family – overcome the significant barriers to separating from an abuser. Basic telephone service through the Lifeline Program enables victims to establish economic independence from an abuser while ensuring the victim's continued ability to access emergency assistance and services, connect with supportive networks, and secure employment, childcare, and other basic necessities. State-administered ACPs provide victims with the ability to maintain confidentiality and anonymity when separating from an abuser, which is sometimes essential to the victim's ability to stay safe.

Therefore, an exemption to the address requirement for individuals in a state-administered ACP who apply for Lifeline services is essential to the proper functioning of each program, and will assist victims to overcome the unique and significant barriers they face.

- **Individuals seeking exemption from the residential address requirement should be allowed to verify their enrollment in the program by faxing or sending a copy of their ACP enrollment card, or suitable alternative evidence of enrollment such as a letter from the state's ACP administrator or a copy of mail received at the ACP address.**

In Pennsylvania, individuals enrolled in the ACP receive a card verifying their participation in the program. This card could easily be used to verify the participant's enrollment. However, not all state-administered ACPs use this verification method. Therefore, it is important for the Bureau to also accept suitable alternatives, such as a letter from the ACP administrator or a copy of mail received at the alternative address.

As with any documentation collected by a telecommunication carrier, it is important for the FCC stress the importance of its regulation prohibiting Lifeline providers from retaining documentation about an applicant's eligibility.<sup>2</sup> Likewise, we note that further restrictions on the collection of eligibility documents for individuals enrolled in an ACP may be necessary, as proof of income may contain address information that – if inadvertently disclosed – could place victims at extreme risk of harm.

- **It is not absolutely necessary to exempt ACP participants from filling out the “one per household” worksheet; however, steps must be taken to ensure that the information requested on the worksheet would not inadvertently disclose the victim's location or reject the participant's application.**

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<sup>1</sup> Block, C. R., U.S. Dep't of Justice, Nat'l Inst. of Justice *Risk Factors for Death or Life-Threatening Injury for Abused Women in Chicago* (2004), available at <http://www.ncjrs.gov/pdffiles1/nij/199732.pdf>.

<sup>2</sup> 47 C.F.R. Sec. 54.410.

The foremost concern with requiring a "one per household" worksheet for ACP participants is that their location may inadvertently be disclosed. If the Bureau does not waive the requirement, steps must be taken to ensure that the location of ACP participants is not disclosed on any forms or worksheets that are required for participation in the Lifeline Program.

Similarly, if the Bureau requires a "one per household" worksheet, it is important that it take steps to ensure that ACP participants are not rejected from the Lifeline program for duplicative services. In Pennsylvania, individuals enrolled in ACP may have the same PO Box, which could cause the program to reject an application based on multiple service requests. However, each individual enrolled in the program also has a unique identifying number that is part of his or her alternative address. Ensuring that a space is created for this type of unique identifier may be key to ensuring that an ACP participant is not unduly denied access to the Lifeline Program.

PCADV, its member programs, and its allies are thankful for the opportunity to provide the Bureau with commentary on this very important issue. Please do not hesitate to contact me, or any one of our allies, with further questions about this topic. We stand ready to provide continued input in the development of this and other procedures that may impact the ability for victims of domestic violence to establish and maintain a safe and stable home.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth R. Marx". The signature is fluid and cursive, with the first name being the most prominent.

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December 4, 2013

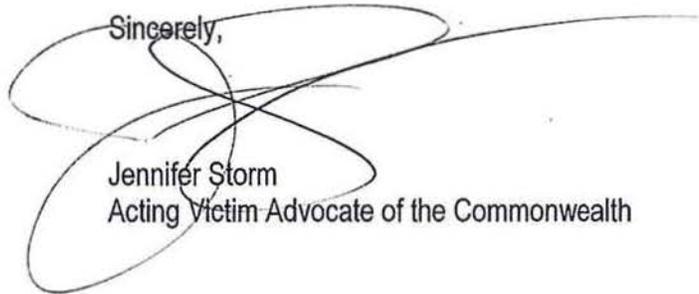
RE: Statement of Interest

The Pennsylvania Office of the Victim Advocate (OVA) is a state office dedicated to representing, protecting and advancing the individual and collective rights and interests of crime victims. The Pennsylvania Address Confidentiality Program (ACP) is administered by OVA. Beginning in 2004, the ACP provides an important service to victims of domestic violence, sexual assault or stalking. The ACP provides a substitute address for victims who have moved to a new location unknown to their perpetrator. Today, Pennsylvania's ACP has assisted over 321 participants and their families to keep their physical address confidential.

We join the Pennsylvania Coalition Against Domestic Violence (PCADV) in their efforts to ensure that participants in ACPs continue to remain safe from their abusers. We echo PCADV's request: the Bureau must waive the rule limiting the use of P.O. Box residential addresses to allow qualifying, low-income customers who participate in state-administered Address Confidentiality Programs to receive Lifeline service.

Please do not hesitate to contact our office with any questions about our program or our interest in this topic.

Sincerely,



Jennifer Storm  
Acting Victim Advocate of the Commonwealth



**PULP**

**PENNSYLVANIA  
UTILITY LAW PROJECT**

December 4, 2013

**Statement of Interest**

The Pennsylvania Utility Law Project (PULP) is a specialized project of the Pennsylvania Legal Aid Network that provides information, assistance, and advice on low income residential utility and energy matters. PULP acts in coordination with the Pennsylvania Legal Aid Network of Programs and other non-profit agencies and community groups. Our mission is to assist Pennsylvania's low-income residential utility and energy consumers connect to and maintain affordable utility and energy services within their homes.

The Lifeline program is a vital link in the safety net that assists low-income consumers connect to and maintain essential telecommunications service. It is key to helping low-income consumers find work, housing, maintain contact with health care professionals and education providers, accessing emergency services, as well as remaining connected to support networks such as family and friends and community services.

We fully support and join the comments of the Pennsylvania Coalition Against Domestic Violence (PCADV) concerning the National Lifeline Accountability Database / Protection for Victims Enrolled in the Address Confidentiality Program. It is essential that both the Address Confidentiality Program and the Lifeline program work in coordination with each other to ensure that victims of domestic violence eligible for Lifeline can participate without jeopardizing their health and safety. PCADV's approach reasonably ensures that this will occur.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick M. Cicero". The signature is written in a cursive, slightly slanted style.

Patrick M. Cicero  
Co-Director