

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

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

**STATE OF INDIANA’S COMMENTS IN SUPPORT OF WAIVING THE RULE
LIMITING THE USE OF P.O. BOX RESIDENTIAL ADDRESSES, TO ALLOW
QUALIFYING, LOW INCOME CONSUMERS WHO PARTICIATE IN STATE
ADMINISTERED ADDRESS CONFIDENTIALITY PROGRAMS TO RECEIVE
LIFELINE SERVICE**

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Comments:

The Office of the Indiana Attorney General supports the proposed waiver of the rule limiting the use of P.O. Box residential addresses to allow qualifying, low income consumers who participate in state administered address confidentiality programs to receive Lifeline service.

Individuals in the Address Confidentiality Program (ACP) are already legitimately concerned for their safety and scared that someone may one day show up on their doorstep to victimize them further. Requiring them to submit their physical address for verification through the National Lifeline Accountability Database is unnecessary and contrary to the purpose of the ACP. For example, an individual in the ACP program could receive a phone call from the individual they have the protective order against posing as a Lifeline representative. If the ACP participant has already submitted a physical address to Lifeline, they would be more likely to divulge that information again, thereby opening themselves up to the dangerous situation they were seeking to escape initially.

The Office of the Indiana Attorney General works to assist victims of domestic violence, sexual assault, and stalking by helping them return to normal, safe lives. One of the ways the Attorney

General's Office does this is through the ACP. The ACP is a free program that allows victims of domestic violence, sexual assault, or stalking with protective orders to maintain a confidential address through the Attorney General's Office. All ACP applications have a section that must be completed by a trained victim's advocate. It is not a witness protection program - or an absolute guarantee of safety. It is one more tool that victims can use to give them peace of mind and to take back their lives. Even after they've taken the initial steps to escape a dangerous situation, many survivors of domestic abuse, sexual assault, or stalking continue to live in fear.

When an individual signs up for ACP, his or her first class mail is sent to a secure substitute address and then forwarded to his or her new home. The substitute address is also used for most state and local government services, such as driver's license, vehicle, voter, and school registrations and legal process. *See* Ind. Code § 5-26.5-5-3; 5-26.5-2-5.

ACP applications are verified by participants under penalty of perjury, and participants who knowingly provide false or incorrect information may face felony charges (IC 35-44-2-1). Additionally, participants must keep the Attorney General's Office updated with any changes in name, address or phone number and participants who fail to do so are removed from the program without automatic reinstatement. With participant consent, the Attorney General's Office would be able to confirm an individual's participation in the ACP. The risk of fraud being perpetrated by ACP participants is far outweighed by the risk of asking ACP participants to choose between their physical safety and their eligibility for the Lifeline program.

Victims of domestic violence, sexual assault or stalking who participate in an Address Confidentiality Program should not be required to submit their physical address for verification through the National Lifeline Accountability Database. The Indiana Attorney General's Office requests that Lifeline Consumers that enroll in Indiana's address confidentiality program be granted waivers and allowed to use their substitute address.