Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
	)	
	)	
Lifeline and Link Up Reform	)	WC Docket No. 11-42
and Modernization	)	

COMMENTS OF AT&T

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December 13, 2013

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I. INTRODUCTION

The Commission substantially modified its Lifeline program in 2012. Among other changes, the Commission required Lifeline applicants to provide more information to Lifeline providers and Lifeline subscribers to recertify their continued eligibility for the Lifeline benefit on an annual basis.[1] In order to evaluate the areas of greatest risk once the Commission implemented these new rules, the Commission also directed eligible telecommunication carriers (ETCs) that obtain more than $5 million/year in Lifeline reimbursements at a holding company level to retain an independent auditor to audit biennially the company's corporate-wide compliance with the Commission's new Lifeline requirements.[2] The Commission directed the Wireline Competition Bureau (Bureau) and the Office of Managing Director (OMD) to finalize an audit plan to be used by these independent auditors. Several months ago, the Bureau and OMD released their draft audit plan and requested public comment on it.[3] AT&T Services, Inc., on behalf of its operating affiliates that are ETCs (collectively, AT&T) is pleased to submit these comments on the Draft Lifeline Biennial Audit Plan.

We thank the Bureau and OMD for giving carriers the opportunity to review and comment on the proposed plan before finalizing it. Requesting comment on other universal service reporting documents, such as the FCC Form 499 and accompanying instructions which carriers use to report telecommunications revenues, has proven beneficial to the industry and the Commission alike and we expect that the final Lifeline Biennial Audit Plan similarly will improve from public input. The Bureau and OMD have compiled a thoughtful and

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[1] *See generally Lifeline and Link Up Reform and Modernization et al.*, WC Docket Nos. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012) (*2012 Lifeline Reform Order*).

[2] *Id.* at ¶¶ 291-95.

[3] *Wireline Competition Bureau Seeks Comment on the Lifeline Biennial Audit Plan*, WC Docket No. 11-42, DA 13-2016 (rel. Sept. 30, 2013) (attaching the Draft Lifeline Biennial Audit Plan).

comprehensive proposed audit plan. However, AT&T does have several concerns with the draft, which we discuss in detail below.

As an initial matter, AT&T urges the Commission to address two pending petitions for reconsideration of the independent audit requirement. Petitioners raise significant concerns with this requirement and if the Commission agrees with them, an audit plan would be altogether unnecessary because there would no longer be an independent audit requirement. AT&T also has concerns with the scope of the Draft Lifeline Biennial Audit Plan. The stated purpose of the independent audit requirement is to "focus[] on the corporate-wide compliance program, rather than carrier activity in a particular study area."[4] Unfortunately, based on several of the proposed data requests, it appears that the Draft Lifeline Biennial Audit Plan lost this focus. AT&T also recommends that the Bureau provide additional detail around the ground rules that will apply to communications between the independent auditor, the Commission, and the Universal Service Administrative Company (USAC). Finally, AT&T suggests numerous clarifications and modifications to specific proposed information requests.

II. DISCUSSION

A. The Commission Should Address Pending Petitions for Reconsideration of the Independent Audit Requirement before Finalizing the Lifeline Biennial Audit Plan.

Before the Bureau finalizes the Lifeline Biennial Audit Plan, the Commission should address the pending petitions for reconsideration of the Commission's independent audit requirements.[5] It makes little sense for the Commission to expend the resources to finalize the Lifeline Biennial Audit Plan and, worse, for carriers to retain independent audit firms, if the

[4] *2012 Lifeline Reform Order* at ¶ 295.

[5] General Communication, Inc. Petition for Reconsideration and Clarification, WC Docket Nos. 11-42 et al. (filed April 2, 2012) (GCI Petition); United States Telecom Association Petition for Reconsideration and Clarification, WC Docket Nos. 11-42 et al. (filed April 2, 2012) (USTelecom Petition).

Commission ultimately agrees with GCI that the independent audit requirement is unnecessary.[6] AT&T agrees with GCI that "the outside-audit requirement is pure administrative overkill" given the numerous reviewers that Lifeline providers have today of their "overall compliance" with the Commission's Lifeline requirements.[7] Even if the Commission denies this GCI request, both GCI and USTelecom sought reconsideration or clarification of other aspects of the audit program that the Commission should nonetheless address before permitting the Bureau to issue its final Lifeline Biennial Audit Plan.

For example, GCI and USTelecom asked the Commission to reconsider its requirement that the independent auditors submit draft audit reports to the Commission and USAC.[8] If the Commission upholds its decision to require independent auditors to file draft reports with it and USAC, which it should not, it should direct auditors to file these drafts on a confidential basis. As both GCI and USTelecom explained in their Petitions, a draft is by definition tentative, incomplete, and subject to further review and revision. Moreover, subsequent revisions could be significant as the auditor's tentative views may be based on an incomplete or incorrect understanding of the facts, processes, or law.[9] Given that these drafts are subject to change, AT&T believes it is appropriate to keep such documents confidential.[10] Additionally, to the extent the Commission or USAC has any communication with the auditor about the auditor's draft report, out of fairness, AT&T recommends that any such communication include the

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[6] GCI Petition at 9.

[7] *Id.* (citing reviews performed by the carrier's own personnel, their external auditors, outside auditors hired by USAC, and the Commission's enforcement officials).

[8] *Id.* at 11 (citing *Lifeline Reform Order* at App. A, Rule 54.420(a)(4)); USTelecom Petition at 9.

[9] GCI Petition at 11; USTelecom Petition at 9.

[10] Such a ruling would be consistent with the Commission's rules, which deems information submitted in connection with an audit confidential. *See* USTelecom Petition at 9 (citing 47 C.F.R. §§ 0.457(d)(1)(iii), 0.459(a)(1)).

audited carrier. AT&T asks that the Bureau clarify both of these points in the final Lifeline Biennial Audit Plan if the Commission denies USTelecom's and GCI's Petitions.

USTelecom also requests the Commission to reconsider its finding that the independent audit does not replace USAC's existing oversight activities.[11] Instead, USTelecom urges the Commission to declare that any carrier that undergoes an independent audit will not be subject to the Commission's and USAC's existing audit regime.[12] USTelecom explains that USAC's current Lifeline audit regime is largely redundant with the independent audit requirement and if a carrier is able to demonstrate program compliance through an independent audit, it stands to reason that it would similarly be able to demonstrate compliance through USAC's audit regime.[13] We agree and note that such a conclusion is analogous to the Commission's determination that the Bureau should have the authority to relieve a carrier from having to undergo an independent audit in the next biennial audit cycle if that carrier had no material findings in its first independent audit report.[14] Furthermore, despite its assertion that the independent audit requirement is "focused on [a carrier's] corporate-wide compliance program, rather than carrier activity in a particular study area,"[15] as proposed, the Lifeline Biennial Audit Plan would indeed require auditors to focus on the carrier's activity in each and every study area in which it operates.[16] If the Bureau is going to require independent auditors to perform such

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[11] *Id.* at 10; *2012 Lifeline Reform Order* at ¶ 295.

[12] USTelecom Petition at 10. In the alternative, USTelecom suggests that the Commission modify its rules to impose the independent audit requirement only on a carrier that has USAC Lifeline audit monetary findings that exceed a given percentage of the carrier's annual Lifeline reimbursements. *Id.*

[13] *Id.*

[14] *2012 Lifeline Reform Order* at ¶ 295. We discuss below the need for the Bureau to define materiality in this context in the Lifeline Biennial Audit Plan.

[15] *2012 Lifeline Reform Order* at ¶ 295.

[16] *See infra* at Section II.B (discussing the overly-broad proposed data requests).

granular reviews, AT&T asks the Commission to conclude that carriers subject to the independent audit requirement should not also be subject to USAC's existing audit regime.

AT&T supports these two Petitions and asks the Commission to grant them. At a minimum, AT&T urges the Commission to act on these Petitions before the Bureau finalizes its Lifeline Biennial Audit Plan to reduce uncertainty among the affected parties.

B. The Scope of the Proposed Lifeline Biennial Audit Plan Is Inconsistent with the Commission's Stated Purpose in Establishing the Independent Audit Requirement.

According to the Commission, "[r]ather than performing an audit at the individual study area level, we expect these [independent] audits to focus on the company's overall compliance program and internal controls regarding Commission requirements as implemented on a nationwide basis."[17] Aspects of the proposed Lifeline Biennial Audit Plan comply with this Commission objective (e.g., where auditors are directed to review a carrier's policies and procedures and determine whether those documents are consistent with the Commission's program requirements).[18] On the other hand, elsewhere in the draft, the Bureau directs auditors to obtain detailed subscriber information for all of a holding company's affiliates' Lifeline customers in order to examine, among other things, duplicate addresses, unusual notations, and blank or missing fields.[19]

There is no difference between the data that USAC auditors seek in a Lifeline audit of a carrier "at the individual study area level" and what the Bureau has proposed independent

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[17] *2012 Lifeline Reform Order* at ¶ 292.

[18] *See, e.g.,* Draft Lifeline Biennial Audit Plan, Attachment 2 at 13 (directing auditors to inspect the carrier's policies and procedures on de-enrollment).

[19] *Id.* at 15; App. A, Request 1 (requesting detailed subscriber data for all of a holding company's affiliates to create the National Subscriber List), 9 (requesting detailed subscriber information for all of a holding company's affiliates' Lifeline customers reported on FCC Forms 555).

auditors review for *all* study areas associated with a holding company. Attached to these comments is a request for documentation that one of AT&T's affiliates recently received as part of a USAC Lifeline audit.[20] The detailed data that USAC requests for one of AT&T's study areas is identical to what AT&T would have to provide for all 40 of its study areas if the Bureau adopts its Lifeline Biennial Audit Plan as proposed. With such detailed data requests, the Bureau has strayed from the Commission's purpose in establishing the independent audit requirement, which is to evaluate a company's overall compliance and not to supplant USAC's oversight program.[21] AT&T recommends the Bureau refocus the Draft Lifeline Biennial Audit Plan by limiting its scope to information requests designed to evaluate a company's "corporate-wide compliance program." In so doing, it should delete overly-broad data requests that are better suited to evaluating a carrier's "activity in a particular study area," which, according to the Commission, is the purpose of USAC's oversight program and not the independent audit.[22]

At a minimum, the Bureau should limit any subscriber data requests to a sample of the carrier's study areas as opposed to requiring independent auditors to obtain subscriber information from all of the carrier's study areas. From that sample of study areas, the auditors could, in turn, select a sample of subscribers for further testing. When selecting the sample study areas, the Bureau should direct the auditor to exclude study areas where a state Lifeline administrator or other state entity makes the eligibility determination and/or performs the annual recertification on behalf of ETCs in the state. This is particularly true for those states that continue to receive waivers of the Commission's rules that require state Lifeline administrators

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[20] *See* Attachment.

[21] *Compare 2012 Lifeline Reform Order* at ¶ 292 (explaining the purpose of the independent audit requirement) *with id.* at ¶ 287 (explaining the purpose of USAC's Lifeline oversight program).

[22] *Id.* at ¶ 295.

or other state entities to provide copies subscriber certification forms to ETCs before the ETCs may seek reimbursement for those subscribers.[23]

C. Additional Structure and Details on Relationship between the Independent Auditor, Carrier, USAC, and the Commission Are Needed.

The Draft Lifeline Biennial Audit Plan proposes several contacts between the independent auditor and the Commission and USAC. For example, independent auditors are to seek guidance from the Commission and USAC about any ambiguous Commission requirements as well as to report any situation that indicates waste, fraud, and abuse.[24] Also, as discussed above, auditors are required to submit draft audit reports with USAC and the Commission. AT&T recommends that the Bureau address in the final Lifeline Biennial Audit Plan some structure or ground rules for these contacts.

First, AT&T recommends that any communication between the independent auditor and USAC and/or the Commission be in writing, copying the audited carrier and giving the carrier the opportunity to respond. Second, the Bureau should direct independent auditors to give the auditees at least 15 business days to review and respond to a draft audit report before the independent auditor files a copy of the draft with the Commission and USAC. Third, the Bureau should define how long USAC or the Commission has to review draft audit reports before the independent auditor may finalize the document. This seems particularly necessary given that an auditor must submit its final Attestation Report to the Commission and USAC within one year after release of the final Lifeline Biennial Audit Plan.[25] Additionally, the Bureau should explain

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[23] *See, e.g.*, *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, DA 13-1853 (rel. Aug. 30, 2013).

[24] *See* Draft Lifeline Biennial Audit Plan, Attachment 2 at 6, ¶ 7.

[25] *Id.* at 7, ¶ 14.c.

what ability the audited carrier has to respond to USAC or Commission comments on the auditor's draft. Fourth, the Bureau should indicate whether the audited carrier has the ability to appeal the independent auditor's final report to USAC or the Commission. If the answer is no, the Bureau should describe how information in the final audit report will be used and what recourse the audited carrier has if it disagrees with any finding. Fifth, AT&T does not believe that it is appropriate for an independent auditor to provide the Commission or USAC with its audit work papers.[26] If the Bureau disagrees, then the Bureau should clarify that the auditor's work papers are confidential, a copy of which should be provided simultaneously to the audited carrier.

D. Miscellaneous Issues to be Clarified or Changed Prior to Finalizing the Lifeline Biennial Audit Plan.

There are a variety of discrete issues that AT&T recommends the Bureau either clarify or reject before it finalizes the Lifeline Biennial Audit Plan.

Define Materiality: In its *2012 Lifeline Reform Order*, the Commission gives the Bureau the discretion to "relieve" a carrier of its next biennial audit if there are "no material findings" in the carrier's first independent audit report. It is essential that the Bureau clearly define the parameters around how and who will define "materiality" before the independent audits commence. For example, will it be determined on a case-by-case basis by the independent auditor in accordance with Generally Accepted Government Auditing Standards? Will materiality be determined by the Bureau based on a monetary value that exceeds some percentage of the carrier's annual Lifeline reimbursements? If so, what is that percentage?

[26] *Id.* at 7, ¶ 15.

Instruct Auditors on State-Specific Requirements: The Commission permits states to impose state-specific requirements on Lifeline providers. These state requirements generally involve additional Lifeline eligibility criteria (e.g., consumers may qualify for Lifeline based on their participation in a particular state public assistance program that is not listed in the Commission's rules), which are expressly permitted under the Commission's rules.[27] However, some jurisdictions impose other requirements on Lifeline providers that are not explicitly addressed in the Commission's orders. For example, AT&T is aware of at least one jurisdiction that uses a definition of "household" that is different from that used by the Commission and mandates that Lifeline providers *retain* Lifeline subscriber documentation (i.e., proof of program-based eligibility). AT&T requests that the Bureau explain in its final Lifeline Biennial Audit Plan that states are permitted to impose state-specific requirements on Lifeline providers and independent auditors should not issue findings against carriers when those carriers comply with a state Lifeline requirement, even if it differs from the Commission's requirements.

Address Newly Acquired ETCs: The Bureau should anticipate that at least some audited carriers will have recently acquired other carriers that are ETCs. Clearly, separate legal entities will have different procedures and controls to ensure compliance with the Commission's Lifeline requirements and it may take months for the purchaser to integrate fully the acquired entity. As such, the Bureau should indicate in its Lifeline Biennial Audit Plan that it is acceptable for the acquiring entity to take up to six months to complete the acquired ETC's integration and the independent auditor should not issue a finding simply because these formerly separate legal entities continue to have different procedures and controls during that six month integration period.

[27] *See* 47 C.F.R. § 54.409(a)(3).

Modify Certain Fieldwork Testing Procedures:

Objective I, Procedures: # 2: Instead of requiring independent auditors to review ten examples of carrier marketing materials describing the Lifeline service,[28] AT&T recommends that the Bureau direct auditors to review five such examples. The Commission has not discussed the number of different types of Lifeline marketing materials that a carrier should have, let alone mandated a particular number, and carriers may have difficulty in producing ten separate Lifeline marketing examples.[29] # 3: The Bureau proposes to require the independent auditor to monitor ten random incoming calls to telephone numbers used as customer care for Lifeline.[30] This procedure assumes that ETCs have Lifeline-only customer care telephone numbers as well as customer service representatives who are dedicated to supporting Lifeline service. However, that is not the case – at least it is not with many of AT&T's affiliates. In order to monitor ten Lifeline calls to customer care, an independent auditor may have to spend a significant amount of time at a carrier's customer call center. Additionally, some carriers' labor agreements may restrict who is permitted to monitor an employee covered by that agreement. For these reasons, AT&T recommends that the Bureau direct the auditor to obtain the requested information in writing and not via monitoring random incoming calls to customer care centers.

Objective II, Procedures: # 4.a: The Bureau proposes to require the independent auditor to request copies of one-per-household worksheets for 30 randomly selected duplicate addresses with different subscribers and verify that at least one subscriber from each of the duplicate

[28] Draft Lifeline Biennial Audit Plan, Attachment 2 at 12, ¶ 2.

[29] Moreover, directing the auditor to review five examples is consistent with Draft Lifeline Biennial Audit Plan, Appendix A # 6.

[30] *Id.* at 12, ¶ 3.

addresses completed the one-per-household worksheet.[31] The Bureau should clarify that this review only applies to duplicate addresses where at least one of the subscribers enrolled in Lifeline after June 1, 2012. Beginning June 1, 2012, the Commission ordered ETCs to provide "applicants" with the one-per-household worksheet when the ETC determined that "an individual at the *applicant's* residential address is currently receiving Lifeline-supported service. . . ."[32] The Commission did not order ETCs to obtain this worksheet from Lifeline customers who enrolled in the program prior to the effective date of this new requirement. Consequently, this proposed review is only valid if the auditor is selecting addresses where at least one of the residents enrolled in Lifeline after June 1, 2012.

Modify Aspects of the Proposed Appendices:

Appendix A: # 1: As noted above, AT&T recommends that the Bureau delete this document request as it is not consistent with the Commission's stated purpose of the independent audit requirement. At a minimum, the Bureau should limit this data request to a sample of the carrier's study areas and it should direct the auditor to exclude states that have a Lifeline administrator. Additionally, the Bureau should inform the auditor in the Lifeline Biennial Audit Plan that carriers will not have the requested data for Lifeline lines that are resold to other carriers and the lack of this data for resold lines should not result in a finding. As for the detailed requests themselves, AT&T recommends that the Bureau delete # 1.i (Service start date) since that information is not required by the Commission's rules and thus is irrelevant in evaluating a carrier's compliance with the Commission's Lifeline requirements. Also, the Bureau should instruct the auditors that carriers were not required to capture and retain a Lifeline customer's

[31] *Id.* at 15, ¶ 4.

[32] *2012 Lifeline Reform Order* at ¶ 78 (emphasis added).

start date (# 1.j) until June 1, 2012. For a carrier that has been offering Lifeline service since the 1980s, it should come as no surprise that the carrier may not be able to provide the Lifeline start dates for many of its Lifeline customers. We recommend that the Bureau inform the auditors that a carrier's inability to provide this information for subscribers enrolled in the Lifeline program prior to the effective date of this new requirement cannot result in a finding.

Appendix B: B.3: The Bureau should clarify that carriers should not provide a list of, perhaps, hundreds of names of individuals who review recertification forms; instead, carriers should list the name of the organization that reviews such forms. E.5: As drafted, this question is vague and not time-limited. Should a carrier report an investigation that may have occurred ten years ago, based on program requirements that the Commission subsequently eliminated, or should carriers only report investigations or legal proceedings after the *2012 Lifeline Reform Order* became effective, which is the basis for the independent auditor's review?

Appendix C: Many of the proposed questions in this appendix are vague and/or subjective (*see*, *e.g.*, ## 5, 6, 14-16), which are likely to result in inconsistent interpretations by responding carriers and, potentially, their independent auditors. Other questions are unclear: # 18 discusses the "accuracy of information" but it is unclear what information is the subject of the question; # 26 mentions "decision-makers" but it is not obvious who that term is supposed to cover; and # 35 discusses "actual losses" but it is unclear what is meant by that term (e.g., penalties?).

III. CONCLUSION

For the reasons provided above, we urge the Commission to address the two pending petitions for reconsideration of the independent audit requirement before the Bureau finalizes its Lifeline Biennial Audit Plan. If, on reconsideration, the Commission agrees with GCI that these

independent audits are unnecessary, which it should, there obviously would be no need for a Lifeline Biennial Audit Plan. If the Commission upholds its decision to impose the independent audit requirement on certain Lifeline providers, we recommend that the Bureau revise its draft Plan to better reflect the stated purpose of these audits, which is "focused on the corporate-wide compliance program, rather than carrier activity in a particular study area."[33] Additionally, all parties would benefit by clearer ground rules governing communication between the independent auditor, the Commission, and USAC. Finally, AT&T recommends that the Bureau clarify or modify the dozen or so discrete issues we have identified in Section II.D of these comments.

Respectfully Submitted,

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[33] *2012 Lifeline Reform Order* at ¶ 295.

ATTACHMENT

USAC
Universal Service Administrative Company

Attachment I: Requested Documentation

Please ensure the provided documentation is applicable and effective for the data reported on the Form 497 submitted for **January 2013** and the Form 555 due in **January 2013** for study area code [redacted].

Instructions: Please provide the requested documentation, or indicate if a requested item is not applicable. If you are unable to provide an item by the established due date, or are unclear about the requirements for a specific item, please contact the auditor as soon as you are aware of any delays or questions.

Please return the requested documentation on or before **October 11, 2013.**

Request #	Requested Documentation
1.	**Electronic** subscriber list of the subscribers claimed on the **January 2013** Form 497 for the selected study area, with the following data: a. Subscriber first and last name; b. Subscriber address (physical/service address); c. Subscriber apartment, unit, or lot number (as applicable); d. Subscriber city, state, and zip code; e. Subscriber telephone number; f. Subscriber date of birth; g. Last four digits of the subscriber's Social Security Number (SSN) or tribal identification number *(please do not provide full SSN or full tribal identification number);* h. Lifeline start date (i.e., when the subscriber first began receiving low-income discounts); i. Lifeline disconnect date (if applicable); and j. Dollar value of low-income discounts provided. The discounts should be categorized by Non-Tribal Lifeline, Tribal Lifeline, Tribal Link-Up, and/or Toll Limitation Services (TLS). **Note:** The data should be formatted so that one subscriber represents one record (i.e., row). Please use the suggested formatting in this template as a guide when preparing the subscriber list: Subscriber Listing Template.xlsx

Please return the requested documentation on or before **October 18, 2013.**

Request #	Requested Documentation
2.	Completed Background Questionnaire.

Request #	Requested Documentation
3.	Completed Internal Control Questionnaire.
4.	Written policies and procedures (if any) describing processes related to the Lifeline Program.
5.	[redacted] Organizational Chart, to include the owner/management of [redacted] and those individuals responsible for processing, reviewing, and approving the Form 497 and Form 555 (may be separate organizational charts). Please identify those individuals who are officers of the organization as listed in the article of incorporation, articles of formation, or other similar legal document.
6.	Local tariff (or price list if your company does not have a local tariff) effective during **January 2013** for the selected study area, describing the terms and conditions of any voice telephony service plans offered to non-Lifeline and Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each plan.
7.	Billing reports or summary schedules (if any) used to determine the number of subscribers claimed for Lifeline, Link Up, and TLS on the **January 2013** Form 497 for the selected study area.
8.	TLS cost study (if any) or other documentation to support the incremental cost of providing TLS effective during **January 2013** for the selected study area.
9.	Annual financial statements and related footnotes for **FY 2013**.
10.	All audit report(s) that include or relate to **January 2013**. This includes all financial, internal control, or other audits conducted by your internal audit department, external auditors, the FCC, state commission, or any other entities.
11.	Standard scripts (if any) used when enrolling new subscribers to receive Lifeline Program support.
12.	Evidence of Lifeline Program advertising (e.g., television advertisements, radio advertisements, newspaper advertisements, flyers, brochures, etc.).
13.	Advertising schedule and locations targeted for Lifeline Program advertising (e.g., television run schedule with targeted markets, mailing list for brochures, location list for distributing flyers, etc.).
14.	For any lines provisioned to competitive carrier(s) with Lifeline discounts included, certification obtained from the competitive carrier(s) that they complied with all applicable FCC rules.
15.	Agreement/contract with any wholesalers that provisioned lines that meet the following criteria: (1) the lines were claimed on the **January 2013** Form 497 for the selected study area **and** (2) the cost of the lines was reduced to include Lifeline discounts.

Request #	Requested Documentation
16.	**<u>Electronic</u>** subscriber list of the subscribers claimed on the **May 2012** Form 497 that were reported in the re-certification results on the Form 555 due in **January 2013** for the selected study area, with the following data: a. Subscriber first and last name; b. Subscriber address (physical/service address); c. Subscriber apartment, unit, or lot number (as applicable); d. Subscriber city, state, and zip code; e. Subscriber telephone number; On the subscriber list, please identify each subscriber as follows: f. Lines provided to wireline resellers (Form 555 Column B); g. Subscribers contacted directly to re-certify eligibility (Form 555 Column C); h. Subscribers who responded to direct contact to re-certify eligibility (Form 555 Column D); i. Subscribers who responded to direct contact that they are no longer eligible (Form 555 Column F); j. Subscribers who de-enrolled prior to the direct contact to re-certify eligibility (Form 555 Column H); k. Subscribers whose eligibility was reviewed by a state administrator or via access to eligibility data (Form 555 Column I); l. Subscribers whose eligibility was reviewed by a state administrator or via access to eligibility data who were found to be ineligible (Form 555 Column J); and m. Subscribers who de-enrolled prior to state administrator re-certification attempt or review of eligibility data (Form 555 Column L). **<u>Note:</u>** The data should be formatted so that one subscriber represents one record (i.e., row). Please use the suggested formatting in this template as a guide when preparing the re-certification results: Re-certification Results.xlsx
17.	**<u>Electronic</u>** list of the subscribers reported as de-enrolled for non-usage on the Form 555 due in **January 2013** for the selected study area noted above, with the following data (**<u>Note:</u>** This request is applicable for all ETC that do not assess/collect a monthly fee from Lifeline subscribers): a. Subscriber first and last name; b. Subscriber address (physical/service address); c. Subscriber apartment, unit, or lot number (as applicable); d. Subscriber city, state, and zip code; e. Subscriber telephone number; and f. De-enrollment month for non-usage. **<u>Note:</u>** The data should be formatted so that one subscriber represents one record (i.e.,

Request #	Requested Documentation
	row). Please use the suggested formatting in this template as a guide when preparing the non-usage results: Non-Usage Results.xlsx
18.	Example copies of all types of notifications (e.g., mailed letters, voice recordings, text messages, etc.) sent to subscribers during the annual re-certification performed for the Form 555 due in **January 2013** for the selected study area.
19.	Example copies of all types of notifications (e.g., mailed letters, voice recordings, text messages, etc.) sent to subscribers identified in the non-usage results reported on the Form 555 due in **January 2013** for the selected study area.
20.	Example copies of all types of notifications (e.g., mailed letters, voice recordings, text messages, etc.) sent to subscribers for which your company had a reasonable basis to believe the subscriber was no longer a Lifeline-qualifying subscriber during the twelve months prior to **January 2013** for the selected study area.

After reviewing the above documentation, we may request additional items to assist us with this audit, including documentation for a sample of individual subscribers. As always, your cooperation is greatly appreciated.

Please send all electronic or hard copy documentation to:

USAC
Attn: [redacted]
Email: [redacted]@usac.org
2000 L Street, NW
Suite 200
Washington, DC 20036