

**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

**AMENDMENT TO PETITION OF CALIFORNIA PUBLIC UTILITIES
COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA FOR
EXTENSION OF TIME TO IMPLEMENT
THIRD-PARTY IDENTIFICATION CHECK**

The California Public Utilities Commission and the People of the State of California (CPUC or California) hereby amend its Petition for Extension of Time filed on December 17, 2013 (Petition)¹ regarding implementation of a third-party identification check (ID Check) into the California LifeLine Program. This amendment follows the below series of events:

¹ See Petition of California Public Utilities Commission and the People of the State of California for Extension of Time to Implement Third-Party Identification Verification System, WC Docket No. 11-42 et al., (filed Dec. 17, 2013).

1. On December 3, 2012, the CPUC filed a petition to opt out of the National Lifeline Accountability Database (NLAD).²
2. On March 4, 2013, the FCC issued an Order granting the CPUC's petition to opt out of NLAD on the condition that the CPUC implements a third-party ID Check into its Lifeline program by August 1, 2013.³
3. On May 31, 2013, the CPUC filed a petition for an extension of time to implement the ID Check. The CPUC requested additional four months, until December 31, 2013, to implement the ID Check.⁴
4. On August 1, 2013, the FCC issued an Order and granted the CPUC's request for extension of time to comply by December 31, 2013.⁵
5. On December 17, 2013, the CPUC filed a petition for an extension of time to extend the compliance due date to May 1, 2014.⁶
6. The FCC has not yet ruled on the CPUC's petition for an extension of time filed on December 17, 2013.

On May 1, 2014, the CPUC rolled out its ID Check and since then each applicant or renewing participant approved for the California LifeLine Program has undergone an ID Check in order to receive the discounted telephone services. Since the rollout, 97% of the consumer records that have been submitted for the ID verification have passed

² See Petition of the California Public Utilities Commission and the People of the State of California to Opt Out of National Lifeline Accountability Database, WC Docket No. 11-42 et al., (Dec. 3, 2012); *see also* 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, WC Docket No. 11-42 et al., (Feb. 13, 2013).

³ See Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Order, (March 4, 2013).

⁴ See Petition for Waiver and Compliance Plan of California Public Utilities Commission and the People of the State of California to Opt Out of the National Lifeline Accountability Database, WC Docket No. 11-42 et al., (May 31, 2013).

⁵ See Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Order, (Aug. 1, 2013).

⁶ See Petition of California Public Utilities Commission and the People of the State of California for Extension of Time to Implement Third-Party Identification Verification System, WC Docket No. 11-42 et al., (Dec. 17, 2013).

authentication. The CPUC believes this high pass rate can be improved even more with a more accurate spelling of the consumers' names. The ID Check appears to be working well.

Given the newness of the ID Check process, the CPUC has not yet established rules on how the records that fail authentication should be handled. Our goal is to develop a process for those records by the end of this year. The process would include a procedure for the California LifeLine Administrator to issue a notice of denial to consumers who fail the ID Check. The process would also include a resolution process whereby those consumers can appeal the denial by submitting new or additional information for re-authentication.

Respectfully submitted,

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