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Division of Public Utilities

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**-== MEMORANDUM ==-**

**TO:** Public Service Commission of Utah

**FROM:** Division of Public Utilities  
Chris Parker, Director  
William Duncan, Manager, Telecommunication & Water Section  
Shauna Benvegna-Springer, Utility Analyst

**SUBJECT:** In the Matter of the Lifeline Rulemaking Docket

**RE:** Docket No. 14-999-06

**DATE:** March 20, 2014

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The Division comments on the draft proposed rule amendment to Utah Admin. Code R746-341 issued on February 13, 2014 and recommends the Commission adopt the following in addition to the proposed amendments:

**APPLICATIONS & RECERTIFICATION FORMS:**

All re-certification and application forms must be approved by the Commission to meet both federal and state requirements for eligibility verification, processing and re-certification. The responsible agency will maintain the standard Utah Lifeline application and re-certification form. If an ETC wishes to utilize another application or re-certification form, the form must be approved by the Commission.

Application and re-certification forms must include a statement that the applicant acknowledges that confidential personal information regarding income, public assistance participation, date of birth and full social security number may be shared with state and federal government agencies for purposes of participating in the program.

**APPLICANTS / PARTICIPANTS:**

Applicants and participants receiving the Lifeline state benefit for the program must reside within Utah and only receive the benefit for one residence or household. A participant may not receive a benefit for more than one household or residence within or outside the state of Utah.

The Lifeline participant receiving the discount must also be the individual named on the account as the “account holder” for the communication service. In cases where a Lifeline participant requires assistance to manage the participant’s affairs, an authorized person may assist and be named in the application for mailing and billing purposes.

If the qualifying household member is a minor, the parent or legal guardian must be the Lifeline applicant and account holder for the communications service and reside with the qualifying household member. If a qualifying household member, other than the applicant or account holder of the communication service, is used to obtain eligibility for the Lifeline benefit, the qualifying household member’s full name and full social security number are required to verify eligibility for the Lifeline program.

Lifeline participants must possess a valid social security number or a valid Tribal identification number. Documentation of the social security number or tribal identification number may be required for eligibility purposes.

**ELIGIBILITY CERTIFICATION:**

Initial eligibility will be verified by the responsible agency for federal ETC participants after an approved, signed application by applicant/participant is obtained, and processed for self-eligibility by the federal ETC.

**RECORD KEEPING REQUIREMENTS:**

To comply with general state GRAMA and archive requirements, and federal requirements, applications and re-certification forms must be retained by the responsible agency and federal ETCs for 3 years for non-current participants. Current participant documentation must be retained by the responsible agency and federal ETCs for as long the participant is participating and receiving the Lifeline discount and three years thereafter.

**cc:** Justin Jetter, Assistant Attorney General