

## CenturyLink Comments

Docket No. 10-2528-01

July 26, 2012

On July 19, 2012, the Utah Public Service Commission (PSC) issued a Notice of Deadline to File List of Issues and Notice Technical Conference (the Notice). The Notice requested interested parties to file a list of issues, ranked by priority and noting applicable deadlines related to the FCC Lifeline requirements within the PSC's purview.

CenturyLink submits the following list of issues ranked by priority and applicable deadlines.

### **1. Lifeline eligibility requirements for adding new Lifeline customers**

Starting on June 1, 2012, the FCC required that certain eligibility requirements be in place for new customers to receive federal Lifeline benefits. Some states, including Utah, were covered by a waiver of some of the requirements until December 1, 2012. In Utah the state agency<sup>1</sup> is responsible for verifying initial Lifeline eligibility. As such, and consistent with the FCC Lifeline Order, the state agency needs to collect the required information and obtain signed customer affirmations. However, the state agency does not need to provide a copy of this documentation to the Eligible Telecommunications Carrier (ETC) during the waiver period; nevertheless, a process must be in place for the state agency to provide the application and affirmation once the waiver expires.

Starting December 1, 2012, there must be a process in place for the state agency to provide to each ETC a copy of each customer application and affirmation. If this process is not in place by December 1, 2012, federal lifeline funds for Utah consumers could be in jeopardy.

The state must immediately implement a Utah Lifeline application and process compliant with the FCC requirements. The state recently posted a new lifeline application on its website<sup>2</sup> that CenturyLink believes is FCC compliant. CenturyLink also understands that the state agency is now collecting the necessary documentation compliant with the FCC waiver. CenturyLink's website<sup>3</sup> now links to the state website where customers can download a Lifeline application and get more information about the program. As set forth in this section, the most pressing item to address is for the PSC and the state agency to have a process in place beginning December 1, 2012, wherein the state provides the application and affirmation to the appropriate ETC.

### **2. Annual eligibility verification of all Lifeline customers (Recertification)**

The FCC requires that the eligibility of all Lifeline subscribers as of June 1, 2012, be verified in order for them to continue receiving federal Lifeline benefits. In Utah the state agency is responsible for completing the annual eligibility verification.

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<sup>1</sup> Department of Community and Culture (DCC) is the current state agency with a MOU with the PSC and that is changing to the Department of Workforce Services (DWS).

<sup>2</sup> <http://housing.utah.gov/seal/applications.html>

<sup>3</sup> <http://qwest.centurylink.com/TAP/index.html?rid=TAP>

Recently the DPU requested from CenturyLink and other ETCs a complete list of all Lifeline customers along with information relevant to the annual recertification process. CenturyLink provided the DPU a list of all its Utah Lifeline customers as of June 1, 2012. CenturyLink understands that the state agency will match these customers with the state databases to verify that the customers continue to qualify based upon their participation in a qualifying program. Those who are not found in the databases will be sent a letter by the state agency informing them of the need to recertify for Lifeline. The state agency needs to make sure that the recertification process and the information received from customers is compliant with the FCC requirements. Otherwise, ETCs will either have to drop customers from Lifeline or request that the customer send in additional documentation to the ETC. For example, the FCC process requires that customers be given 30 days notice to recertify for Lifeline. The initial annual eligibility verification needs to be completed by December 31, 2012.

### **3. Information necessary to support the national Lifeline database or the State develops its own database**

ETC's do not have all of the information about existing Lifeline customers that is required to be provided to the FCC for the proposed national database<sup>4</sup>. Since the state agency has access to this information, a process will need to be developed to provide the existing Lifeline customer information to the ETCs so that they have sufficient time to meet the FCC's deadline<sup>5</sup>. The initial Lifeline application contains this information, and as long as the application is provided to the ETC, the ETC can get the required information from the application. However, since the state has a waiver from providing copies of those forms to ETCs until December 1, CenturyLink's preference would be to receive this information towards the end of 2012 in an electronic file. Another option is for the state to get approval from the FCC to opt out of the National database and to provide its own duplicates check.<sup>6</sup> If the state decides to go that route, the need to provide to ETCs the additional customer information needed to populate the national database goes away.

### **4. PSC Lifeline Rule R746-341 changes**

When appropriate, these rules must be modified to make them fully consistent with the FCC Lifeline requirements. For example, the FCC provides a 30 day timeframe for customers to respond to eligibility recertification.

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<sup>4</sup> The main purpose of the National database is to avoid duplication and fraud.

<sup>5</sup> FCC target date of February 2013. ETC's will need at least 60 days after notification by USAC that the database is operational to provide the customer information.

<sup>6</sup> It is CenturyLink's understanding that both Nebraska and Texas will be seeking to opt out of the national database as these states have their own databases and processes for checking for duplicate benefits.