



State of Utah

GARY R. HERBERT  
Governor

GREG BELL  
Lieutenant Governor

## Public Service Commission

TED BOYER  
*Chairman*

RIC CAMPBELL  
*Commissioner*

RON ALLEN  
*Commissioner*

November 21, 2012

Ms. Kimberly Scardino  
Deputy Chief, TAPD  
Federal Communications Commission  
445 12th Street, SW, Rm. 5-B448  
Washington, DC 20554

*Re: Request for Extension of Waiver, expiring December 1, 2012*

Dear Ms. Scardino:

On May 31, 2012, the Federal Communications Commission issued a Waiver Order granting several states, including Utah, a waiver until December 1, 2012 to provide the eligible telecommunications carriers with required participant information. See FCC Waiver Order, released May 31, 2012 (DA 12-863).

Currently for wireline ETCs, the State of Utah processes all Lifeline applications and certifies eligibility or non-eligibility status. The Utah Public Service Commission ("PSC") is in the process of developing a system which will include wireless ETCs in the State's certification process. In order to complete development of this process, the PSC is requesting an extension of the waiver previously granted. The PSC anticipates this process will take an additional 6-12 months, and therefore we request an extension from December 1, 2012 to December 1, 2013.

Presently, wireless carriers are not covered by the PSC's eligibility certification process. As a result, these carriers are responsible for certifying their own Lifeline participants. By extending the current waiver, the same safeguards will be in place for both wireline and wireless carriers. Therefore, the potential for harm to be caused by fraud, waste, and abuse while we are transitioning to a more complete system would be minimal.

Inasmuch as all the Lifeline applications are currently contained in one central location, and the PSC's future system anticipates a central location for these documents as well, granting an extension will avoid undue time and expense of sending these documents out to the individual ETCs. The PSC anticipates filing for a waiver from the individual carrier mandate because we anticipate our eligibility verification system will operate with one central database containing all customer eligibility information. We note that these documents are available for audit at the request of the FCC.

Beginning December 2010, the PSC has been involved in an effort to include the wireless carriers in the comprehensive certification process. Then, starting in October 2011, the PSC has been negotiating with another governmental agency which has the necessary information to determine eligibility according to the FCC's guidelines contained in the Lifeline Reform Order ("Transformation Order"). The timeline of the PSC's efforts are detailed in Attachment #1. The results of this process have been the requirements document (i.e., the "Lifeline (UTAP) Program") that the PSC is using to negotiate a contract with another government agency to perform the necessary work. This document is included as Attachment #2.

Thank you for your consideration of the foregoing.

If you have any questions, please contact me at 801-530-6716 or by e-mail at [gwiderburg@utah.gov](mailto:gwiderburg@utah.gov).

Sincerely,

/s/ Gary L. Widerburg  
Commission Secretary

D#239162

## Attachment #1

The Utah Public Service writes to request a waiver of the December 1, 2012 filing deadline.

December 2, 2010 - As part of the follow-up on several on-going federal wireless ETC applications which had been heard by the Utah PSC the PSC opens a docket to decide the following issues.

- The process for verification of continuing eligibility (i.e. annual certification) of Lifeline customers;
- The determination of entities that may verify the continuing eligibility of Lifeline customers;
- The method of calculation and recovery of costs for verifying continuing eligibility of Lifeline customers, particularly for ETCs not paying to the state USF fund;
- The role of the “responsible agency”, *see Utah Admin. Code R.746-341-2.B.*, in verifying continuing eligibility of Lifeline customers;
- The determination and implementation of a process to prevent customers from receiving duplicate service from multiple providers (double-dipping);
- The process for avoiding unauthorized changes of a Lifeline carrier, and preventing slamming;
- Whether the findings, conclusions, and orders made in this proceedings apply equally to all ETCs in the state, regardless of technology or business model used;
- Whether additional rulemaking proceedings/and or additional reporting requirements are necessary to implement the determinations made in these proceedings.

2011 Legislative Session (January to March) – The Utah Legislature incorporates the agency which the PSC uses to do landline lifeline eligibility certification (responsible agency) into the Division of Workforce Services, change to be effective in July 2011.

March 14, 2011 – The Commission issues an Order reflecting additional areas to be addressed in the Docket. These are:

- The role of the “responsible agency,” *see Utah Admin. Code R746-341-2(B), -3(C)*, in the initial certification of Lifeline customers;
- Initial certification process and requirements; and the method of calculation and recovery of any costs of initially certifying Lifeline customers, particularly of certifications for Eligible Telecommunications Carriers not paying into the State Universal Service Fund.
- The establishment of oversight and guidelines for Lifeline outreach and advertising to ensure that customers are receiving necessary and accurate eligibility, terms of service and provider information, and to expand outreach activities to reach a larger percentage of the population eligible for Lifeline services;
- The establishment of Lifeline outreach and advertising requirements to incorporate eligibility verification and duplicate service prevention.

April 14, 2011 – The PSC sets out a schedule for public comments and suggested solutions.

May 2, 2011 – The PSC issues amended Scheduling Order for Comments

October 2011 – The PSC begins discussions with the Division of Workforce Services to determine if, and how, it could both continue to do the landline eligibility certification and add in wireless certification. (These talks/negotiations continue to the present.)

January 31, 2012 FCC Transformation Order adopted

April 25, 2012 - United States Telecom Association applies for a waiver of certain requirements of the Lifeline Reform (Transformation) Order on behalf of states which currently provide some initial certification themselves. Utah is included in the listed of states for which a waiver is requested.

May 31, 2012 – The FCC grants USTA’s waiver request. The waiver expires on December 1, 2012

July 31, 2012 – The PSC requests interested parties to file questions and comments about or on the ability of the Department of Workforce Services eRep system to handle the Lifeline eligibility certification process (all aspects). The eRep system is the interface and database the State of Utah uses to administer (nearly0 all of its aid type programs. Adding Lifeline to this system makes sense from an efficiency standpoint, the issue is whether the system is capable of meeting all of the FCC’s requirements.

October 16, 2012 – The PSC issues an Order with its final requirements document specifying all criteria which must be met by the eRep system to fulfill the state’s responsibilities regarding determining Lifeline eligibility of participants. The Department of Workforce Services is preparing a bid and work description in response to this Order.

The Utah Commission intends to continue to utilize a centralized eligibility and verification system as it has found that doing so reduces costs. Further it improves the ability of the system to stop potential “double dippers” as the database will completely integrated into the State’s general aid verification system. This will improve the ability of the program administrators to define households and ensure all relevant guidelines an rules are followed. Additionally it has the advantage that local telephone companies will no longer have any need to receive, review, verify, and store income or program participation information from their customers.

Attachment #2

**State of Utah**  
**Lifeline (UTAP) Program**

**Division of Public Utilities**

**160 E 300 S**

**Salt Lake City UT 84111**

**Contact: Shauna Benvegna-Springer**

**801-530-6433**

**sbenvegn@utah.gov**

**[www.publicutilities.utah.gov](http://www.publicutilities.utah.gov)**

**Table of Contents**

**Program Vision ..... 8**

**Requirements of the Proposal ..... 8**

**Transition of Current Lifeline Participants ..... 4**

**De-enrollment ..... 5**

<b>Resolution Process for Lifeline Participants .....</b>	<b>5</b>
<b>New Applicants .....</b>	<b>6</b>
<b>Definitions .....</b>	<b>7</b>
<b>Determining a “Household”.....</b>	<b>9</b>
<b>Communication with Telecommunications Carriers.....</b>	<b>16</b>
<b>National Lifeline Accountability Database (NLAD).....</b>	<b>17</b>
<b>Communication with Consumers and Telecommunications Carriers.....</b>	<b>18</b>
<b>Costs of the Program .....</b>	<b>18</b>
<b>DWS Lifeline Database .....</b>	<b>19</b>
<b>Annual Recertification Program .....</b>	<b>13</b>
<b>Lifeline Application Certification Form .....</b>	<b>13</b>
<b>Expansion of the Lifeline Program .....</b>	<b>15</b>
<b>Lifeline Household Worksheet .....</b>	<b>16</b>

## **Program Vision**

The mission of the Lifeline (UTAP) Program is to provide low income consumers with a federal and/or state discount for telecommunication services. Currently, there are 20,000 wire line customers receiving both a \$9.25 federal discount and a \$3.50 state discount for landline phone service. As of July 1, 2012 there are 24,000 residents receiving a \$9.25 federal discount for their cell phone service. The Utah Public Service Commission (“PSC”) contract with the Department of Workforce Services (“DWS”) provides initial eligibility and annual certification for wire line customers. Wireless customers certify with their telecommunications provider.

The first objective of this proposal is expanding the contract with DWS to process initial eligibility and annual certification for all telecommunications services (wire line and wireless) offered under the Lifeline Program.

The second objective is to have the contract with DWS meet the requirements of the Federal Communications Commission (“FCC”) Lifeline Reform Order issued February 6, 2012.

The third objective is to continue to have the Lifeline Program be as efficient and streamlined as possible, eliminating redundancy of information storage, reducing on-going costs and providing maximum protection of confidential consumer information.

The fourth objective is to offer potential participants the opportunity to enroll in the Lifeline Program when they enroll in other qualifying programs - similar to what is currently done with the HEAT program. .

## **Requirements of the Proposal**

To date, the PSC has approved 19 wire line and 4 wireless telecommunications carriers. Many more wireless providers have applied for approval to operate as an ETC for Lifeline customers in the state of Utah. A household is not permitted to receive Lifeline assistance from multiple telephone providers. This includes both wireless and wireline providers. Currently some Lifeline providers participate only in the federal program and hence only offer their customers the federal discount. In order to meet the new FCC requirement of Title 47, Part 54, Subpart E, the PSC and

DWS will move the Lifeline application and recertification processes into the DWS eREP system. The requirements set forth herein address the current participants' transition into eREP, new applicants, de-enrollment of participants, FCC definitions, telecommunication company communication, annual recertification process, and interaction with the National Lifeline Accountability Database.

## Transition of Current Lifeline Participants

The FCC requires that all current participants receiving Lifeline as of June 1, 2012 be recertified for eligibility by December 31, 2012. Verification of continued eligibility must be determined by accessing the DWS database. Those participants who cannot be verified as eligible because they are not in the database must be notified and given an opportunity to re-apply by completing an application and certification form if they believe they are eligible. The Division of Public Utilities (“DPU”) has received from most telecommunications carriers a file with the information regarding each participant. Some of the information is incomplete. The information provided by the telecommunications carriers to the DPU must contain the following:

- Participant’s full name
- Participant’s residential address
- Participant’s billing address
- Participant’s date of birth
- Participant’s full social security number
- Participant’s telecommunications carrier
- Participant’s telephone number for discount

**Participants with Incomplete Information:** For those participants whose information is incomplete, DWS will send a letter with the application and certification form to the participant. The DWS and the participant will then follow the Resolution Process set forth below.

**Participants with Complete Information:** For those participants whose information is complete, the DPU will format files to run against the DWS eligibility information to determine if the participants are participating in a public assistance program. After the match process, a file will be provided by DWS to the telecommunications carrier and the DPU denoting which participants are eligible or ineligible. This information will also be used, and stored, internally within DWS. The eligible participants will be loaded into the DWS Lifeline file and connected to eREP. DWS will note in the file that the participant was enrolled prior to June 1, 2012 and does not require a certification form.

**Eligible Participants:** For those participants who are eligible, a letter from DWS will be mailed to the participant stating that the participant continues to meet the eligibility requirement for the Lifeline discount. Additional information will be provided, reminding participants that if their current information changes they must notify DWS immediately to determine continued

eligibility or they risk de-enrollment, and that they can access and edit their information in their MyCASE account on-line through the DWS. The letter will also include basic information regarding the program, including the requirement that only one discount is allowed per household.

**Ineligible Participants:** For those participants who are ineligible (from either a programmatic or an income perspective), DWS will send a letter to the participant notifying him or her that the current information shows they are not eligible for the Lifeline discount and providing information regarding the Lifeline appeals process and application and certification form for participants to reapply if the respective participant's information has changed. The participant must then follow the Resolution Process set forth below.

## **De-enrollment**

There are a number of reasons a participant can be de-enrolled. They include:

- a) a participant requests to de-enroll from one telecommunications carrier, so participant can apply the Lifeline discount to another telecommunications carrier's service;
- b) participant's discontinuance of eligibility from a public assistance program or income criteria;
- c) participant's duplicative Lifeline benefit from another carrier or another member of participant's household is receiving the Lifeline benefit;
- d) participant's discontinuance for non-usage of the telecommunications service;
- e) participant's failure to re-certify annually, or as required through participant's public assistance program;
- f) participant's service disconnection;
- g) participant's use of a temporary address.

The Resolution Process set forth below will be followed by notifying the participant of the situation and allowing the participant to respond within the allowed time frames.

## **Resolution Process for Lifeline Participants**

The FCC Reform Order has a de-enrollment process under § 54.405 (e) which allows the participant 30 days to demonstrate eligibility. The FCC requires that if a state has a dispute resolution process to terminate Lifeline, it must comply with the state requirements. The Utah rule

allows for a resolution period with a 60-day notification period and an appeals process where the participant will continue to receive a discount until eligibility or ineligibility is determined.

When information is received from a participant, the telecommunications carrier, DWS or another source that eligibility is in question, DWS will notify the participant, through email and letter sent via U.S. Mail, that the participant has 40 days to demonstrate his or her eligibility. The notification shall include an application, certification form to reapply, and information regarding the appeals process.

If an appeal request is not received from a participant within 10 days of the notification letter date, or a response demonstrating eligibility is not received from the participant within 40 days, another letter will be sent via U.S. Mail notifying the participant of de-enrollment effective 20 days from the date of the letter, if the application and certification form and required documentation are not received within 10 days from the date of the letter.

If an applicant appeals within 10 days of the date of the first or second letter, the DPU will review the appeal and contact the participant for resolution. If no resolution is made and it is determined that the participant is not eligible, notification will be made to the participant, DWS and the telecommunications carrier to terminate the discount immediately.

If no appeal is made, the DPU will notify the telephone carrier, the participant, and the National Lifeline Accountability Database within one business day of the eligibility determination date to remove the discount effective immediately for that month and going forward.

## **New Applicants**

New applicants can apply through a paper application or on-line through the DWS MyCASE login.

**Paper Application:** A paper application and certification form can be obtained from the [www.publicutilities.utah.gov](http://www.publicutilities.utah.gov) website link, or by calling the DPU, DWS, or a telephone carrier who will mail a paper application and certification form to the consumer. The applicant must complete the application and certification form and return it to DWS for processing. The application information will be manually entered into the eREP system and scanned as a pdf document for view by authorized individuals. Authorized individuals include the telephone carrier and/or its designee, PSC, DPU, DWS, USAC auditors, state auditors, and the applicant.

**Approved applications:** If the application is approved, notification will be provided to the applicant, the telephone carrier, and the National Lifeline Accountability database within 10 days.

**Denied applications:** If the application is denied, DWS will send a letter via U.S. Mail notifying the applicant that the applicant is ineligible, together with information regarding the requirements of the program and the appeals process.

**MyCASE:** Consumers who have a MyCASE account with DWS may apply on-line in the same manner provided for in other public assistance programs. Questions asking the information on the application certification form will be prompted to the applicant and an electronic acknowledgement is required for each certification statement. A document similar to the paper application will be generated with all the completed information for storage in the DWS database.

DWS must recertify applicants with a temporary residential address every 90 days.

The system must be capable of allowing applicants to qualify whether or not they currently have telecommunications service. DWS will maintain copies of completed and verified forms. After the applicant obtains telephone service, the applicant will notify DWS that they have obtained service, and identify their chosen carrier. DWS will then notify the carrier that the applicant qualifies for the Lifeline discount through the normal carrier notification process.

## **Definitions**

The following are definitions issued by the FCC in the Lifeline Reform Order, which apply to the Lifeline Program:

(a) *Qualifying low-income consumer.* A “qualifying low-income consumer” is a consumer, who meets the qualifications for Lifeline,

(1) A consumer’s household income, as defined below, must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or

(2) The consumer, one or more of the consumer’s dependents, or the consumer’s household must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program; Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program’s free lunch program; or Temporary Assistance for Needy Families; or

(3) The consumer meets additional eligibility criteria established by a state for its residents, provided that such-state specific criteria are based solely on income or other factors directly related to income.

(4) A consumer who lives on Tribal lands is eligible for Lifeline service as a “qualifying low-income consumer” as defined below and as an “eligible resident of Tribal lands” as defined by § 54.400(e) if that consumer meets the qualifications for Lifeline specified in paragraph (a) of this section or if the consumer, one or more of the consumer’s dependents, or the consumer’s household participates in one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs general assistance; Tribally administered Temporary Assistance for Needy Families; Head Start (only those households meeting its income qualifying standard); or the Food Distribution Program on Indian Reservations.

(5) In addition to meeting the qualifications provided in paragraph (1) or (2) of this section, in order to constitute a qualifying low-income consumer, a consumer must not already be receiving a Lifeline service, and there must not be anyone else in the subscriber’s household subscribed to a Lifeline service.

(b) *Toll blocking service.* “Toll blocking service” is a service provided by an eligible telecommunications carrier that lets subscribers elect not to allow the completion of outgoing toll calls from their telecommunications channel.

(c) *Toll control service.* “Toll control service” is a service provided by an eligible telecommunications carrier that allows subscribers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle.

(d) *Toll limitation service.* “Toll limitation service” denotes either toll blocking service or toll control service for eligible telecommunications carriers that are incapable of providing both services.

For eligible telecommunications carriers that are capable of providing both services, “toll limitation service” denotes both toll blocking service and toll control service.

(e) *Eligible resident of Tribal lands.* An “eligible resident of Tribal lands” is a “qualifying low-income consumer,” as defined in paragraph (a) of this section, living on Tribal lands. For purposes of this subpart, “Tribal lands” include any federally recognized Indian tribe’s reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688); Indian allotments; Hawaiian Home Lands—areas held in trust for Native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920 July 9, 1921, 42 Stat. 108, *et. seq.*, as amended; and any land designated as such by the FCC for purposes of this subpart pursuant to the designation process in § 54.412.

(f) *Income.* “Income” is all income actually received by all members of a household. This includes salary before deductions for taxes, public assistance benefits, social security payments, pensions, unemployment compensation, veteran’s benefits, inheritances, alimony, child support payments, worker’s compensation benefits, gifts, lottery winnings, and the like. The only exceptions are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

(g) *Duplicative support.* “Duplicative support” exists when a Lifeline subscriber is receiving two or more Lifeline services concurrently or two or more subscribers in a household are receiving Lifeline services or Tribal Link Up support concurrently.

(h) *Household.* A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians.

(i) *National Lifeline Accountability Database or Database.* The “National Lifeline Accountability Database” or “Database” is an electronic system, with associated functions, processes, policies and procedures, to facilitate the detection and elimination of duplicative support, as directed by the FCC.

(j) *Qualifying assistance program.* A “qualifying assistance program” means any of the federal, state, or Tribal assistance programs participation in which, pursuant to § 54.409(a) or (b), qualifies a consumer for Lifeline service, including Medicaid; Supplemental Nutrition Assistance Program; Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program’s free lunch program; Temporary Assistance for Needy Families; Bureau of Indian Affairs general assistance; Tribally administered Temporary Assistance for Needy Families (Tribal TANF); Head Start (only those households meeting its income qualifying standard); or the Food Distribution Program on Indian Reservations (FDPIR), and with respect to the residents of any particular state, any other program so designated by that state pursuant to § 54.409(a).

## **Determining a “Household”**

As required by paragraphs 78-79 of the Lifeline Modernization Order (located at <http://www.fcc.gov/document/fcc-reforms-modernizes-lifeline-program-low-income-americans-0%0A>), the Universal Service Administrative Company has developed the attached worksheet to assist carriers and consumers in determining whether more than one household exists at a single address. The worksheet must be completed any time there is more than one application per residential address. Upon receiving an application the DWS will check for address duplication. In the event of address duplication, the applicant must fill out the worksheet as part of the application process.

## **Communication with Telecommunications Carriers**

The PSC will need to receive a waiver of the requirement to provide a hard copy of the application and certification forms from the FCC with the understanding that the information will be safeguarded and maintained on behalf of the telecommunication carriers. The PSC will also need to receive a waiver of the requirement to provide a hard copy of any documentation related to the annual recertification of Lifeline customers.

In order to provide the telecommunication carriers with access to applicants’ and participants’ information, a portal, consistent with an agreement between DWS and the telecommunications carriers, will be established. This portal will provide the telecommunications carriers with access to their respective applicants’ or participants’

information and enable the carriers to view the applications and certification forms for reimbursement and all required audit purposes. The portal will be provided through the eSHARE program with DWS and be capable of providing archived information sufficient to satisfy the federal auditing requirements.

Once an applicant’s application and certification form are approved, notification via email will be provided to the telecommunication carrier, the applicant, and the National Lifeline Accountability Database within 10 days. This will allow the telecommunications carrier to apply the full amount of the discount to the applicant’s account for the month the applicant is approved. If the applicant is determined to be ineligible, DWS will provide notification to the applicant, the telecommunications carrier, and the National Lifeline Accountability Database within one business

day to remove and terminate the discount. Discontinuance of benefits of ineligible applicants will be effective the entire month in which the applicant is de-enrolled.

On the first business day of the month, DWS will provide a written report, or electronic file, to the telecommunications carriers, and the DPU, identifying the telecommunication carrier's participants who are eligible for the discount for the previous month. The information will include full name, telephone number, telephone carrier, street address, city, state, and zip code. It will also provide the total number of participants for whom the telecommunications carrier is eligible to request reimbursement for the federal and state discounts. DWS will also prepare and send a written report, or electronic file, to the telecommunications carriers identifying the same information mentioned above for added and de-enrolled participants for the previous month with participant counts. The telecommunication carrier will use this information to reconcile its information and use it to submit claims to USAC and the DPU for reimbursement. DWS will also provide a disclosure to the telecommunications carriers that application and certification forms are available for "read only" access through DWS' established portal.

Since the telecommunication carrier will be reimbursed for the full amount of the discount for the first month, regardless of the partial service costs for the month, the full amount of the discount must be applied to the participant's account, even if the participant's enrollment date is the last day of the month.

## **National Lifeline Accountability Database (NLAD)**

The DWS shall query the NLAD to determine if a Lifeline benefit is already being supplied to an applicant by another carrier. Likewise, DWS shall transmit information at least every 10 days to the NLAD for new participants, including the following:

- Participant's full name;
- Participant's residential address;
- Participant's date of birth;
- Participant's social security number (last four digits) or tribal identification number;
- Participant's telephone number;
- Date on which Lifeline service was initiated for participant;
- Date on which Lifeline service was terminated from prior carrier and the name of the carrier, if applicable;
- Dollar amount sought for the discount
- Means through which the consumer qualifies for Lifeline

For de-enrollment, the above information must be supplied to NLAD and the telecommunications carrier within one business day of the termination date.

When a customer disconnects service from the ETC, the ETC must notify DWS within one business day. DWS will then notify NLAD.

## **Communication with Consumers and Telecommunications Carriers**

Upon integration of the Lifeline Program into the eRep system, DWS will notify participants and prospective applicants and telecommunication carriers of its availability.

The PSC will review existing Utah Admin. Code R746-341 to determine changes to be submitted to rulemaking. Comments on the rule will be made through an open docket and the PSC will amend the rule as appropriate.

## **Costs of the Program**

Cost for the development of the system and ongoing costs of the system will be funded through the Universal Public Telecommunications Service Support Fund (Fund). The PSC will review the expenses and modify the contract with DWS to include one time and on-going costs. The PSC will review the status of the Fund to determine if a rate increase or an additional fee will be required to fund the on-going costs of the system.

The estimated costs for the program are as follows:

<b>One Time Billing/Cost</b>			
<b>Position</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
ESD Business Analyst	\$ 60.00	1065	\$ 63,900.00
eREP Programmer	\$100.00	550	\$ 55,000.00
eREP IA	\$ 70.00	375	\$ 26,250.00
myCase Programmer	\$100.00	350	\$ 35,000.00
myCase IA	\$ 70.00	475	\$ 33,250.00
Web interface Programmer	\$100.00	550	\$ 55,000.00
	\$ 70.00	420	\$ 29,400.00

Web interface IA

<b>Totals</b>	<b>3,785</b>	<b>\$ 297,800.00</b>
---------------	--------------	----------------------

### **Ongoing Billing/Cost**

- To be determined

Lifeline will be incorporated into the overall cost per case associated with DWS current programs. DWS will calculate the complete level of effort, based on operational costs for eligibility staff, as well as unknown technical costs for Web Service communications.

### **Time line**

To be determined

Estimated time to build is 3-6 months, excluding any unknown issues with Web Service communication with Federal Data Hub.

### **Team**

Business Analyst: Barbara Hollister

UAT Coordinator: Barbara Hollister

IA: TBD

Developer: TBD

### **DWS Lifeline Database**

The DWS Lifeline Database will retain all the application information in a relational database along with images of the application certification form and, if applicable, the Lifeline Household Worksheet. The information collected and maintained shall (at least) include:

- Full name
- Residential address
- Billing address
- Date of birth
- Full social security number or tribal identification number

- Telephone number, if provided
- Telephone carrier
- Date Lifeline service was initiated (first day of the approved month)
- Date Lifeline service was terminated (determination date)
- Dollar amount sought for the discount
- Means through which the consumer qualified

All residential address information shall be verified with the U.S. Postal Service. The DWS will add an ETC to the system upon the ETC's approval and direction by the PSC. Similarly, the DWS will delete an ETC from the system upon direction by the PSC.

## **Annual Recertification Program**

Each year, each participant will be required to recertify eligibility either with the participant's public assistance recertification or on the approved enrollment date. The DWS shall:

- confirm the participant's public assistance or income eligibility;
- notify, as required, participants of the need to complete the certification form and return it to DWS;
- notify the respective telecommunications carrier that the annual recertification has been completed and provide to the carrier the results of those efforts in a format adequate for the carrier to provide FCC reporting in accordance with § 54.410(f);
- maintain the results of the recertification in eSHARE for the telecommunications carrier to access and review for the period the carrier has the participant as its customer. DWS will also need to archive information and make it available to the telecommunications carriers, consistent with FCC audit guidelines, in case of an audit.

## **Lifeline Application Certification Form**

The certification form shall provide the following notifications:

- Lifeline is a federal benefit. Willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program;
- Only one Lifeline service is available per household;
- A "household" is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses;
- A household is not permitted to receive Lifeline benefits from multiple providers;

- Violation of the one-per-household limitation constitutes a violation of FCC rules and will result in the subscriber's de-enrollment from the program; and
- Lifeline is a non-transferable benefit. Subscriber may not transfer his or her benefit to any other person.

The certification form must require each participant to provide the following information:

- Full name;
- Full residential address;
- Whether the residential address is permanent or temporary;
  
- Full billing address if different than the residential address;
- Date of birth;
- Full social security number or tribal identification number;
- Name of the public assistance program, if qualifying under this criteria, and name of his or her dependents;
- Number of individuals in his or her household, if qualifying under the income-based criteria; and
- Participant's permission for his/her information to be provided to the Universal Service Administrative Company.

The form must require each participant to certify under penalty of perjury that:

1. The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
2. The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline, including if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support; the subscriber is receiving more than one Lifeline benefit; or another member of the subscriber's household is receiving a Lifeline benefit;
3. If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in § 54.400(e);
4. If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
5. If the subscriber provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every 90 days, otherwise the Resolution Process will be followed;

6. The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
7. The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge;
8. The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
9. The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

The applicant shall provide electronic initials/acknowledgement or paper initials for each of the nine statements above.

## **Expansion of the Lifeline Program**

With the Lifeline Program becoming part of the intake program at DWS, low income applicants will have the opportunity to apply each time they qualify for one of the eleven public assistance programs. A pop-up question will appear after the consumer has qualified for a program leading the participant to complete the necessary requirements for a new Lifeline applicant.

In addition, an annual process will be initiated where the Lifeline participant file will be matched against those individuals who have qualified for one of the eleven public assistance programs. A file will be generated of those individuals who have a phone service and qualify for another program. A letter with the certification form will be sent to each individual who qualifies, along with the pop-up question added to their MyCASE profile.

**[Company/Agency Letterhead]**  
**Lifeline Household Worksheet**

Name	
Address	
Telephone Number	

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income** includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

***You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.***

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner) \_\_\_\_YES \_\_\_\_NO
  - If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
  - If you checked **NO**, please answer question #2.
  
2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?
  - A. A parent \_\_\_\_YES \_\_\_\_NO
  - D. An adult roommate \_\_\_\_YES \_\_\_\_NO

B. An adult son or daughter \_\_\_\_\_ **YES** \_\_\_\_\_ **NO** E. Other \_\_\_\_\_ \_\_\_\_\_ **YES** \_\_\_\_\_ **NO**

C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.) \_\_\_\_\_ **YES** \_\_\_\_\_ **NO**

➤ If you checked **NO** for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.

➤ If you checked **YES**, please answer question #3.

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2? \_\_\_\_\_ **YES** \_\_\_\_\_ **NO**

➤ If you checked **NO**, then your address includes **more than one household**. Please initial lines A and B below, and sign and date the worksheet.

➤ If you checked **YES**, then your address includes only **one household**. You may not sign up for Lifeline because someone in your household already receives Lifeline.

### **CERTIFICATION**

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to \_\_\_\_\_ [insert company or agency name] along with your Lifeline application.

A. \_\_\_\_\_ I certify that I live at an address occupied by multiple households.

B. \_\_\_\_\_ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature \_\_\_\_\_ Date \_\_\_\_\_