

Salt Lake Community Action Program Issues List
Docket No. 10-2528-01
July 26, 2012

Salt Lake Community Action Program (SLCAP) is responding to the Notice of Deadline to File List of Issues and Notice of Technical Conference (Notice). The Notice requested that interested parties file a list of Issues related to the FCC Lifeline requirements within the Public Service Commission's purview.

SLCAP entered an Appearance in Docket No. 10-2528-01 on December 30, 2010. While that Appearance was made by Sonya L. Martinez, SLCAP currently requests that the Public Service Commission (PSC or Commission) and parties provide copies of all filings made and notices given in this docket to:

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SLCAP appreciates the opportunity to file a list of issues to be considered in this docket. While we are not fully conversant with the legal technicalities and relevant dates required by the Federal Communications Commission (FCC), we are certain that other parties, particularly those who provide Lifeline services, will supply those dates and specific procedures. Rather, SLCAP offers a more general list of issues to be considered, some of which were presented in Comments submitted by SLCAP previously in this docket, as follows:

1. *Institute a Public Process within this Docket to Deal with the Issues Necessary to Conform with the FCC Transformation Order*

SLCAP respectfully requests that the PSC ensure that the issues necessary to conform to the FCC Transformation Order are addressed in a public process as contemplated initially by this docket. SLCAP believes that a process wherein all interested parties are able to participate will provide a more robust discussion and ultimately a more efficient and effective process both for the state agencies involved as well as the customers of the Lifeline program.

2. *Establish a Centralized System for Certification and Verification of Lifeline Eligibility*

SLCAP recommends that the issue of a centralized system for initial certification and ongoing verification be explored as part of this docket. Currently, the State of Utah employs a few methods of certifying eligibility for the Lifeline program. SLCAP believes it would be helpful to develop an eligibility process that is consistent both for landline and wireless Lifeline customers and allows verification of that eligibility by the state. A centralized system would protect consumer privacy and improve efficiency and could be

administered by an appropriate state agency or other third party. A centralized system would also help deal with some of the other new requirements emerging from the FCC Order such as:

- A. the necessity for the Eligible Telecommunications Carrier to have its own copy of each Lifeline customer's application; and
- B. the requirement for annual recertification of each Lifeline customer described in more detail below.

3. Annual Recertification of all Lifeline customers

Similar to the issue described above, SLCAP believes it would be helpful to establish a consistent process both for landline and wireless companies to comply with the FCC's new requirement that all Lifeline customers be recertified for eligibility on an annual basis. If the state were to develop both a consistent application and an eligibility verification system, it would eliminate confusion for potential Lifeline customers and help provide the data necessary to accomplish the goal of ensuring that Lifeline customers receive the Lifeline discount on only one phone per eligible household. These issues should be explored as part of the ongoing discussions in this docket.

4. Develop a Statewide Data Base or a Method to Provide Information for a National Database

One of the issues that should be explored is how to provide the necessary information to develop a statewide data base or to provide the necessary information for a national database. A statewide data base could be created by an appropriate state agency or contracted to a third party provider as has been done in other states.

5. Continue to Provide for and Expand Coordinated Enrollment

Any reform to the Lifeline program in Utah should include an expansion of coordinated enrollment. Coordinated enrollment is simply the process by which determination of initial eligibility is made. Coordinated enrollment is not necessarily synonymous with automatic enrollment. While some states do practice a form of automatic enrollment, SLCAP is not necessarily advocating for that process in Utah. While automatic enrollment can greatly increase Lifeline participation, it is not likely feasible due to the complications presented with the advent of choices for Lifeline customers between a single landline provider and several wireless options.

Utah's current coordinated enrollment method with HEAT increases the number of participants, reduces the barriers experienced by low-income customers, increases efficiencies, and protects the integrity of the program. The premise of coordinated enrollment with the HEAT program should be maintained and expanded, if possible, within the processes that are established to conform to the FCC Transformation Order.

6. *Miscellaneous Issues*

There are several issues that were raised earlier in this docket that still need to be addressed, including but not limited to:

- A. a process to ensure that while a single customer does not have more than one Lifeline account, the process neither prohibits them from having a second telephone service for which they pay nor automatically disconnects their original telephone service;
- B. a process to ensure that there is appropriate and updated information available to customers describing not only the Lifeline procedures but an up to date list and links to all currently designated Lifeline providers on public information sites, including the Public Service Commission and / or the Division of Public Utilities;
- C. continued discussion as to appropriate outreach activities to promote the Lifeline program; and
- D. creation of a Lifeline advisory group as previously requested earlier in this docket