

Sonya L. Martinez
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
Telephone: 801 214-3148
Fax: 801 355-1798
Email: smartinez@slcap.org

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Resolution of Certain Issues Related to the Designation of a Common Carrier as an Eligible Telecommunications Carrier	Docket No. 10-2528-01 COMMENTS OF SALT LAKE COMMUNITY ACTION PROGRAM
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In accordance with the Amended Interim Scheduling Order issued by the Public Service Commission (PSC or Commission) May 2, 2011, Salt Lake Community Action Program (SLCAP) submits its comments on the issues enumerated in the Order.

I. OUTREACH

According to the FCC's Telephone Subscribership Report¹, as of 2010 approximately 96.4 percent of Utah households subscribe to telephone service. In contrast, the Lifeline participation rate in Utah is in the range of 10-20%². The relatively low Lifeline penetration rate in Utah can, in part, be attributed to lack of extensive outreach efforts. While Utah does conduct various outreach activities through its contract with the Department of Community and Culture (DCC), it is vital to consider further expansion of outreach efforts to ensure that eligible households are educated about and successfully accessing the Lifeline benefit.

¹ FCC, Telephone Subscribership in the United States 2010

² USAC, Lifeline Participation Rate Study 2010

A large impediment to Lifeline participation is a general lack of knowledge regarding the program by households that may not access traditional human services. Language and culture present additional barriers as a growing portion of Utah's population, and thus its low-income population, are immigrants and refugees from around the world.

Some states, such as California, have utilized varied methods of communication to increase their Lifeline penetration rates. Utah could benefit from closer examination of these efforts.

It should be noted that there is a difference between outreach and marketing and that both are important elements of this discussion. Outreach increases awareness and education about the Lifeline program to the public in general terms. In contrast, marketing involves selling a specific product to a specific customer base.

Where eligible Lifeline customers did not have choices for their Lifeline service prior to the authorization of TracFone as an ETC, outreach efforts were fairly simple – to let people know that such a program was available. Now that eligible customers will have access to Lifeline services through either a landline or multiple wireless service offerings, it becomes critical that accurate information is available both in general outreach terms and in the specific marketing of products. Ultimately, both issues will need to be addressed by the Commission.

Thus, in addition to disseminating information about program availability, Lifeline outreach should provide consumers with education about the variety of options available. Additionally, emphasis should be placed on the fact that a customer is only

eligible for the Lifeline discount from one provider and that the customer should be well aware of the options in order to be able to determine the service that best fits their needs.

A. Recommendations regarding who should provide outreach in the future

Currently, the Public Service Commission (PSC or Commission) contracts with the Department of Community and Culture (DCC) to administer Lifeline outreach. The Commission should continue to contract with a suitable designated agency in this regard. However, the Commission should consider effectiveness when determining outreach contracts. Additionally, the Commission should expand outreach activities to reach a larger percentage of the eligible population through provision of information in other languages and through varied modes of communication.

The DCC now produces brochures in English and Spanish that are distributed throughout the state to agencies and organizations that provide direct services to low income households. These include, but are not limited to the Department of Workforce Services, HEAT offices, faith based organizations and private providers of services such as Valley Mental Health. Brochures in other commonly spoken languages could be added to the mix and provided to the appropriate communities and their service providers.

While the State should not rely primarily on Internet outreach, it should improve its web based approach as it is an efficient and cost effective method. Examples of comprehensive internet sites that provide valuable and user friendly information include Relay Utah³ and the Illinois Lifeline⁴ websites.

³ www.relayutah.gov

⁴ www.linkupillinois.com

SLCAP proposes that the Commission develop a Utah Lifeline website to include the following elements:

- General program information - What is Lifeline?
- Instructions about how to enroll in the program.
- Updated list of ETCs providing Lifeline with contact information.
- Electronic copies of outreach materials and program application.
- State agency and other pertinent staff contact information.

Outreach should also include a comprehensive general Lifeline promotion campaign. In addition to traditional forms of media – i.e., print media and public service announcements - efforts should also include diverse and non-traditional outlets such as language media other than English, alternative media outlets, and social networking sites. Public Service Announcements (PSAs) should be available in other languages for use on Spanish language radio and television and where other non-English language programs exist such as KRCL Radio 90.0 FM.

The Commission should take greater advantage of available networks and support and increase the level of contacts and coordination with social service agencies, nonprofits and community based organizations. These groups have direct contact with and access to low-income consumers and are often the best suited to provide education and outreach to potentially qualifying families.

The Commission should actively participate in National Lifeline Awareness Week, either through the agency with which it contracts or through its own coordination with state agencies and other interested participants throughout Utah. Such participation

should include a major media campaign and presence at local community organizations and events.

Regarding the Relay Utah model, our understanding is that the PSC is responsible for program administration and outreach. The PSC does an excellent job of informing the public about that program through extensive radio and television advertising that is produced by public relations professionals. While an exploration of the costs and benefits of doing something similar for telephone Lifeline would be necessary, it certainly should be considered as a part of future outreach activities.

SLCAP further recommends the Commission institute a Lifeline Advisory Board. In Ohio, all activities related to outreach and marketing of Lifeline products are coordinated through a statewide advisory board.⁵ The advisory board consists of Commission staff, Office of Consumer Council staff, low-income advocates, and Lifeline service providers. A similar advisory group should be formed in Utah to develop and implement solutions and meet regularly to ensure outreach methods are successful and cost-effective.

B. Recommendations for Standards for Marketing by the Lifeline Providers:

SLCAP recommends that the PSC establish oversight and guidelines for Lifeline outreach and advertising provided by ETCs to ensure customers are receiving necessary and accurate eligibility, terms of service, and product information from providers. Standards for marketing by the Lifeline providers should include, but not be limited to, the following:

- ETCs should provide customers with access to information about all Lifeline service offerings without requiring them first to supply personal information

⁵ Ohio Admin Code 4901:1-6-19(F)

to the company. A customer should be able to call or visit the providers' websites and receive accurate information about the offerings available without submitting an application or any other personal information.

- ETCs should identify Lifeline products as a Lifeline program in all its advertising materials with uniform language and provide an explanation of the Lifeline program, including the fact that customers are only entitled to one Lifeline benefit per household.
- ETCs should provide a Utah-specific fact sheet to their Utah Lifeline customers.
- ETCs should be encouraged to provide information about the Lifeline program to their general customer base.
- ETCs should be required to provide easily identifiable web-based information, such as direct links from their homepage to their Lifeline program options.
- General Lifeline program outreach by the Commission and/or its designated contractors should be paid for from the state Universal Service Fund.

However, company specific advertising should not be reimbursed by the state.

II. INTERIM PROCEDURES

A. Short-term:

- It may not be possible to do anything different in the short term regarding self certification procedures for wireless Lifeline customers. All other ETCs should continue to utilize the DCC process for initial certification of Lifeline customers.

- Begin examining options for a statewide database and/or third party administered process for initial certification, verification of continuing eligibility, and prevention of potential duplicate service.
- Develop a Lifeline website to be posted on the Public Service Commission webpage. The website can be populated with information currently on the DCC website and updated to include wireless Lifeline providers. This information should be changed on a regular basis as additional providers are approved and ready to operate as ETCs in the state. Other state agencies and organizations can link to the site.
- Outreach materials, such as brochures printed and distributed by DCC, should be updated to reflect the changes above and disseminated.

B. Intermediate term:

- Organize a Lifeline Advisory Board to begin addressing the broader outreach issues addressed above.
- Determine procedures to develop a cost effective certification and verification system as well as a statewide database, if appropriate.
- Determine cost of providing the services in the bullets above and how costs can be paid for and allocated.

C. Longer term:

- Begin process to select the appropriate state agency and/or third party to implement the system(s) determined to be necessary and cost effective.

III. ISSUES NO LONGER RELEVANT

The issues published in the *Notice of Agency Action* and *Supplement to Notice of Agency Action* are still relevant today, with the exception of the “Role of the Responsible Agency” in the initial certification and verification of continuing eligibility. It appears that the parties have reached a consensus that the PSC is in fact the *Responsible Agency*.

IV. ISSUES TO BE DISCUSSED AT 6/1/11 TECHNICAL CONFERENCE

SLCAP recommends, for the June 1, 2011 technical conference, that the discussion focus around developing an outline of next steps and clarifying the positions of parties based on the comments filed today. As a non-profit organization with extremely limited resources, SLCAP respectfully requests that the Commission utilize at least part of this meeting to develop a timeline with agendas established far enough in advance that parties can engage in meaningful discussions.

DATED this 25th day of May 2011.

Sonya L. Martinez

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2011, a true and correct copy of the foregoing Comments of Salt Lake Community Action Program was served on the following by electronic mail:

Kathy Kinsman
Assistant Attorney General
Utah Department of Community &
Culture
160 East 300 South
P.O. Box 140857
Salt Lake City, Utah 84114-0857
kkinsman@utah.gov

Sherman Roquero
Department of Community and
Culture
324 South State Street, Suite 500
Salt Lake City, UT 84114-9302
Telephone (801) 538-8644
sroquero@utah.gov

Patricia Schmid
Assistant Attorney General
Division of Public Utilities
Heber M. Wells Building, 5th Floor
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov

Chris Parker
William Duncan
Casey Coleman
Division of Public Utilities
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
chrisparker@utah.gov
wduncan@utah.gov
ccoleman@utah.gov

Paul Proctor
Assistant Attorney General
Office of Consumer Services
Heber M. Wells Building, 5th Floor
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Cheryl Murray
Eric Orton
Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov
cmurray@utah.gov
eorton@utah.gov

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, Utah 84133
sfmecham@cnmlaw.com

Mitchell F. Brecher
Debra McGuire Mercer
GREENBERG TRAURIG, LLP
2101 L Street, NW
Suite 1000
Washington, D.C. 20037
brecherm@gtlaw.com
mercercdm@gtlaw.com

Gary A. Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
gdodge@hjdllaw.com

Tim Funk
Crossroads Urban Center
funk@crossroads-u-c.org

John M. Beahn
Skadden, Arps, Slate, Meagher & Flom
LLP
1440 New York Avenue, N.W.
Washington D.C. 20005
john.beahn@skadden.com

Peter Lurie
Elaine Divelbliss
Virgin Mobile USA, L.P.
10 Independence Blvd.
Warren, NJ 07059
Peter.Lurie@virginmobileusa.com
Elaine.Divelbliss@virginmobileusa.com

Sheila Stickel
President & Executive Director
Advocates for Universal Access,
LLC
P.O. Box 21914
Seattle, WA 98111
Sheila@advocatesua.com

Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005
lsteinhart@telecomcounsel.com

Torry R. Somers
CenturyLink
6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
torry.r.somers@centurylink.com

James Farr
Qwest
250 E. 200 South, Room 1603
Salt Lake City, Utah 84111-2003
James.Farr@qwest.com

Brett L. Tolman
RAY QUINNEY & NEBEKER P.C.
36 South State Street, Suite 1400
Salt Lake City, Utah 84111
BTolman@rqn.com

James Messenger
LECLAIRRYAN
One International Place, Eleventh Floor
Boston, Massachusetts 02110
James.Messenger@leclairryan.com

Eric Seguin
SOLIX, INC.
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ, 07054-0685
eseguina@solixinc.com

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