



AT&T Florida  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301 1561

T: 850.577.5553  
F: 850.222.8640  
Ms8675@att.com  
www.att.com

FILED FEB 26, 2015  
DOCUMENT NO. 01171-15  
FPSC - COMMISSION CLERK

February 27, 2015

Ms. Carlotta S. Stauffer  
Commission Clerk  
Division of Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Re: Undocketed - Initiation of Rulemaking to amend Rule 25-4.0665, Florida Administrative Code, Lifeline service, and to repeal Rule 25-4.113, Florida Administrative Code, refusal or discontinuance of service by company

Dear Ms. Stauffer:

BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") appreciates the opportunity to submit these comments subsequent to the Florida Public Service Commission (Commission) staff development workshop held on January 21, 2015. As discussed at the workshop, changes to the Commission's rules for the Lifeline program are necessary to conform with changes in the federal Lifeline program. AT&T Florida therefore respectfully submits the following comments and mark-up (Exhibit 1) on the proposed revisions to Rule 25-4.0665, Florida Administrative Code.

## Section 1 and 2

Section (1) defines the individuals who are eligible to participate in the Lifeline program and lists various eligibility criteria. To be consistent with who is eligible to participate in Lifeline, Section 2 should be included to Section 1 as paragraph (d). Including this in Section 1 would more accurately capture the universe of lifeline eligible customers in a single provision. As a result, the subsequent paragraphs should be renumbered as subparagraphs under the new paragraph (d).

A new Section (2) should be added to provide consistency with the FCC rules and clarify that only one Lifeline discount per household is allowed. The new section would read:

(2) In addition to meeting the eligibility criteria in paragraph (1) of this section, an eligible low-income consumer must not already be receiving Lifeline assistance and there must not be anyone else in the subscriber's household receiving Lifeline assistance.



## **Section 7**

Section 7 (a) describes how information should be transmitted to the ETC for processing. The word "applications" should be changed to "data" as it relates to the e-mail notification sent to the ETC. The information retrieved from the Commission's secure data base is not the actual Lifeline application, it is end user data required by the ETC to complete the enrollment process.

Section 7 (b) describes the effective date that ETCs should enroll lifeline eligible customers. The effective date of the Lifeline discount should be revised from when the ETC received the email notification from the Commission, to the date that the customer is actually deemed eligible for a Lifeline credit which is when the customer is confirmed as eligible by the National Lifeline Accountability Database ("NLAD") and subsequently enrolled.

Section 7 (e) describes the time frame that the ETC should provide a response to the Commission identifying customer information regarding 1) misdirected lifeline applications; 2) duplicate applications; and 3) rejected applications (including the reason for rejection.) The time allowed to inform the Commission as to those subscribers that cannot be enrolled in the Lifeline program should be revised. The implementation of the NLAD screening process has made it difficult if not impossible to comply with the current 20-day time limit for notification to the Commission of failed applications for Lifeline. The extension of the time to 40 business days, as shown in Exhibit 2, will allow for the NLAD process to take place.

Additionally, at the workshop the staff asked how long it takes AT&T to send a customer's information through the NLAD process. AT&T has set up a mechanized process through an internal IT group (APRIMO) that identifies which customers in the FPSC and OPC files are AT&T Residential customers and of those, it then identifies existing Lifeline customers. AT&T's service level agreement with APRIMO is 12 business days. This process is used across AT&T's regions and eliminates the need for manual look-up for each customer account by HGS (AT&T's Lifeline vendor), and must take place prior to HGS sending customer data through the NLAD process.

## **Section 9**

Section 9 regarding the Office of Public Counsel certification should be deleted. This provision is already in the FCC's Lifeline Rules which are included by reference



in section 8. The FCC's rules prohibit imposition of additional certification requirements. Inclusion of this new language is redundant.

### **Section 10**

Section 10 describes when the ETC must provide notice to the eligible lifeline customer regarding their Lifeline application. AT&T requests that a change be made to the time required for notification to a customer. The time for notification to rejected Lifeline applicants should be changed from 30 days to 40 business days, which is consistent with the treatment of a subscriber that applies through the Lifeline Coordinated Enrollment Process (40 business days) as proposed in Section 7 (e).

### **Section 12**

Section 12 describes how a customer's Lifeline is reinstated subsequent to termination. This section currently states that the ETC has 60 days following proof of eligibility to reinstate the Lifeline customer. However, this Section requires a change to clarify that Lifeline subscribers whose discounts are terminated due to failure to maintain eligibility and subsequently demonstrate eligibility are treated as new applicants. Such applications will be treated consistent with the provisions already established for new applications.

### **Section 13**

Section 13 describes Lifeline advertising requirements by the ETC. This section should be deleted since it confuses the general ETC advertising obligation identified in 214(e) with the Lifeline advertising obligations set forth in 54.405(b). They are not the same. At best, section 13 is redundant with section 14. At worst it includes advertising obligations not required for Lifeline and which may exceed the Commission's authority to impose under Section 364.10, Florida Statutes, which is limited to Lifeline. [Note: if subsection 13 is deleted, subsequent sections must be renumbered; however, this is not done here to avoid confusion.]

### **Section 16**

Section 16 describes record retention requirements. This section should be revised to make it clear that the Florida Lifeline record keeping requirements conform to the FCC's Lifeline record keeping requirements set forth in Rule 54.417.



**Lifeline Applications - Forms 157 and 158**

The proposed rules also contain a draft of the Lifeline Application to be incorporated in the new revised Lifeline rules. AT&T Florida has suggested certain changes to the Lifeline Application to update and conform to the FCC's Lifeline Rules. AT&T Florida included comments embedded with the proposed changes in the draft Lifeline Applications document.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5553.

Sincerely,

A handwritten signature in blue ink that reads "MaryRose Sirianni".

MaryRose Sirianni  
External Affairs Manager  
AT&T Florida

Enclosure

Exhibit 1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

NOTICE OF DEVELOPMENT OF RULEMAKING

TO

ALL INTERESTED PERSONS

UNDOCKETED

IN RE: INITIATION OF RULEMAKING TO AMEND RULE 25-4.0665, FLORIDA ADMINISTRATIVE CODE, LIFELINE SERVICE, AND TO REPEAL RULE 25-4.113, FLORIDA ADMINISTRATIVE CODE, REFUSAL OR DISCONTINUANCE OF SERVICE BY COMPANY

ISSUED: September 18, 2014

NOTICE is hereby given pursuant to Section 120.54, Florida Statutes, that the Florida Public Service Commission staff has initiated rulemaking to amend Rule 25-4.0665, Florida Administrative Code, to require eligible telecommunications carriers to comply with subscriber eligibility determinations and certifications as contained in CFR §§54.407, 54.409, 54.410, and 54.416, except as to obtaining and providing valid certification and re-certification forms, to eliminate Link-Up, to update Forms PSC/TEL 157 and 158, to require that a subscriber's Lifeline local service may not be discontinued because of nonpayment of charges for non-basic services and toll charges, to eliminate quarterly reporting requirements, and to clarify telecommunications carrier responsibilities regarding record retention, resale of Lifeline lines, and advertising, including developing outreach materials for specific consumer groups and outreach strategies. Consistent with the 2011 changes made to Ch. 364 FS, Rule 25-4.113 would be repealed.

The attached Notice of Development of Rulemaking appeared in the September 18, 2014, edition of the Florida Administrative Register. If requested in writing and not deemed unnecessary by the agency head, a rule development workshop will be scheduled and noticed in the next available Florida Administrative Register. Written requests for a rule development workshop must be submitted to Rosanne Gervasi, Office of the General Counsel, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850 at (850) 413-6224 by October 2, 2014. Copies of the preliminary draft rules are attached.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 2

By DIRECTION of the Florida Public Service Commission this 18th day of September,  
2014.

/s/ Carlotta S. Stauffer  
CARLOTTA S. STAUFFER  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
(850) 413-6770  
[www.floridapsc.com](http://www.floridapsc.com)

Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

RG

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 3

**PUBLIC SERVICE COMMISSION**

RULE NOS.:     RULE TITLES:

25-4.0665     Lifeline Service

25-4.113     Refusal or Discontinuance of Service by Company

PURPOSE AND EFFECT: Rule 25-4.0665, F.A.C., would be amended to require eligible telecommunications carriers to comply with subscriber eligibility determinations and certifications as contained in CFR §§54.407, 54.409, 54.410, and 54.416, except as to obtaining and providing valid certification and re-certification forms, to eliminate Link-Up, to update Forms PSC/TEL 157 and 158, to require that a subscriber's Lifeline local service may not be discontinued because of nonpayment of charges for non-basic services and toll charges, to eliminate quarterly reporting requirements, and to clarify telecommunications carrier responsibilities regarding record retention, resale of Lifeline lines, and advertising, including developing outreach materials for specific consumer groups and outreach strategies. Consistent with the 2011 changes made to Ch. 364, F.S., Rule 25-4.113, F.A.C., would be repealed.

Undocketed.

SUBJECT AREA TO BE ADDRESSED: Telecommunications utility regulation.

RULEMAKING AUTHORITY: 350.127(2), 364.10(2)(j) FS.

LAW IMPLEMENTED: 364.10, 364.105, 364.183(1) FS.

IF REQUESTED IN WRITING AND NOT DEEMED UNNECESSARY BY THE AGENCY HEAD, A RULE DEVELOPMENT WORKSHOP WILL BE NOTICED IN THE NEXT AVAILABLE FLORIDA ADMINISTRATIVE REGISTER.

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE DEVELOPMENT AND A COPY OF THE PRELIMINARY DRAFT, IF AVAILABLE, IS: Rosanne Gervasi, Florida Public Service Commission, Office of the General Counsel, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, (850)413-6224, [rgervasi@psc.state.fl.us](mailto:rgervasi@psc.state.fl.us)

THE PRELIMINARY TEXT OF THE PROPOSED RULE DEVELOPMENT IS AVAILABLE AT NO CHARGE FROM THE CONTACT PERSON LISTED ABOVE.

1 25-4.0665 Lifeline Assistance Plan ~~Service~~.

Formatted: Highlight

2 (1) A subscriber is eligible for Lifeline assistance ~~service~~ if:

3 (a) The subscriber is a participant in one of the following federal assistance programs:

4 1. Medicaid;

5 2. Supplemental Nutrition Assistance Program (SNAP)/Food Stamps;

6 3. Supplemental Security Income (SSI);

7 4. Temporary Assistance for Needy Families/Temporary Cash Assistance (Florida program);

8 5. "Section 8" Federal Public Housing Assistance;

9 6. Low-Income Home Energy Assistance Program; or

10 7. The National School Lunch Program – Free Lunch; or

11 (b) The subscriber's Local Exchange Company eligible telecommunications carrier has more  
12 than one million access lines and the subscriber's household income is at or below 150 percent  
13 of the federal poverty income guidelines.

14 (c) The subscriber's Local Exchange Company eligible telecommunications carrier has less  
15 than one million access lines and, pursuant to Title 47, Code of Federal Regulations, Part 54,  
16 Subpart E, Section 54.409 Consumer qualification for Lifeline, paragraph (a)(1), as amended  
17 June 28, 2012, the subscriber's household income is at or below 135 percent of the federal  
18 poverty income guidelines.

19  
20 ~~(2)~~ (d) A subscriber living on federally recognized Tribal lands who does not satisfy the  
21 eligibility requirements for Lifeline assistance ~~service~~ in subsection (1) of this rule is  
22 nevertheless eligible for Lifeline assistance ~~service~~ if the subscriber receives benefits from one  
23 of the following Bureau of Indian Affairs programs:

Formatted: Highlight

24 ~~(a)~~ 1. Tribal temporary assistance for needy families (TANF);

Formatted: Highlight

25 ~~(b)~~ 2. National School Lunch ~~NSL~~ Program – Free Lunch; or

Formatted: Highlight

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 ~~(e)3.~~ Head Start.

2 (2) In addition to meeting the eligibility criteria in paragraph (1) of this section, an eligible  
3 low-income consumer must not already be receiving Lifeline assistance and there must not be  
4 anyone else in the subscriber's household receiving Lifeline assistance.

Formatted: Highlight

5 (3) When enrolling customers in the Lifeline assistance plan under paragraph (1)(a) of this  
6 rule, eligible telecommunications carriers shall accept Form PSC/TEL 157 (2/13), entitled  
7 “Application for Lifeline Assistance,” which is incorporated into this rule by reference and is  
8 available at: [hyperlink]. This form can also be accessed from the Commission’s website at:  
9 <http://www.floridapsc.com/utilities/telecomm/lifeline/LifelinePDFs/ApplicationEnglish.pdf>.  
10 ~~Eligible telecommunications carriers with less than one million access lines are not required to~~  
11 ~~enroll Lifeline applicants through the income eligibility test of 150 percent or less of the~~  
12 ~~federal poverty income guidelines, but may do so voluntarily.~~

13 (4) Eligible telecommunications carriers shall enroll customers for Lifeline assistance who  
14 electronically submit Form PSC/TEL 158 (6/10), entitled “Lifeline Florida On-line  
15 Application for Recipients of Medicaid, Supplemental Nutrition Assistance Program  
16 (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA),” which is incorporated into this  
17 rule by reference and is available at: [hyperlink]. This form can also be accessed from the  
18 Commission’s website at:  
19 [https://secure.floridapsc.com/\(S\(15p1gzjr11b5swvfi2c30tyd\)\)/public/lifeline/lifelineapplicatio](https://secure.floridapsc.com/(S(15p1gzjr11b5swvfi2c30tyd))/public/lifeline/lifelineapplicatio)  
20 n2.aspx. Applicants who presently participate in Medicaid, Supplemental Nutrition  
21 Assistance Program (SNAP)/Food Stamps, or Temporary Assistance for Needy  
22 Families/Temporary Cash Assistance programs can complete Form PSC/TEL 158  
23 electronically on-line. ~~Eligible telecommunications carriers that charge an initial connection~~  
24 ~~charge must offer Link Up service to subscribers who are eligible for Lifeline service pursuant~~  
25 ~~to this rule.~~

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 (5) Eligible telecommunications carriers must allow customers the option to submit Lifeline  
2 applications and supporting documentation via U.S. Mail or facsimile, and may allow  
3 applications and supporting documentation to be submitted electronically. ~~When enrolling~~  
4 customers in the Lifeline service program under paragraph (1)(a) of this rule, eligible  
5 telecommunications carriers shall accept Form PSC/RAD 157 (6/10), entitled “Application for  
6 Link Up Florida and Lifeline Assistance,” which is incorporated into this rule by reference  
7 and can be accessed from the Commission’s website at [www.floridapsc.com](http://www.floridapsc.com), by selecting  
8 “Link Up Florida and Lifeline,” then selecting “Need Discounted Phone Service?,” and then  
9 selecting “English Link Up and Lifeline Certification Form” (also available in Spanish and  
10 Creole).

11 (6) Except as otherwise set forth in paragraph (6)(a)-(d) of this rule, eligible  
12 telecommunications carriers shall comply with subscriber eligibility determination and  
13 certification requirements contained in Title 47, Code of Federal Regulations, Part 54, Subpart  
14 E, Sections 54.407 Reimbursement for offering Lifeline, 54.409 Consumer qualification for  
15 Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual  
16 certifications by eligible telecommunications carriers, as amended June 28, 2012, which are  
17 incorporated into this rule by reference and are available at: [\[hyperlink\]](#). These rules can also  
18 be accessed from the U.S. Government Printing Office’s website at: [21 l. A copy of the annual certification provided to the administrator shall be filed with the  
22 Commission. Exceptions to these requirements are as follow:](http://www.ecfr.gov/cgi-bin/text-idx?SID=fadabe77a9cbedc6ba1d63b6a946ea0a&tpl=/ecfrbrowse/Title47/47cfr54_main_02.tp</a></u></p></div><div data-bbox=)

23 (a) Section 54.407(d), regarding obtaining valid certification and re-certification forms for  
24 subscribers;

25 (b) Section 54.410(b)(2)(ii), regarding receipt of subscriber certification forms in compliance

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 7

1 with Section 54.410(d);  
2 (c) Section 54.410(c)(2)(ii), regarding receipt of subscriber certification forms in compliance  
3 with Section 54.410(d); and  
4 (d) Section 54.410(e), regarding providing copies of subscriber certification forms.  
5 Eligible telecommunications carriers shall enroll customers for Lifeline service who  
6 electronically submit Form PSC/RAD 158 (6/10), entitled “Lifeline and Link Up Florida On-  
7 line Self Certification Form,” which is incorporated into this rule by reference and can be  
8 accessed from the Commission’s website at [www.floridapsc.com](http://www.floridapsc.com), by selecting “Link Up  
9 Florida and Lifeline,” then selecting “Apply On line.”  
10 (7) All eligible telecommunications carriers shall participate in the Lifeline assistance plan  
11 Coordinated Enrollment Process. For purposes of this rule, the Lifeline assistance plan  
12 Coordinated Enrollment Process is an electronic interface between the Department of Children  
13 and Families, the Commission, and the eligible telecommunications carrier that allows low-  
14 income individuals to enroll in Lifeline following enrollment in a qualifying public assistance  
15 program.  
16 (a) The Commission shall send an e-mail to the eligible telecommunications carrier informing  
17 the eligible telecommunications carrier that Lifeline assistance plan ~~applications- data~~ are  
18 available for retrieval for processing.  
19 (b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline  
20 assistance plan as soon as practicable, but no later than 60 days from the receipt of the e-mail  
21 notification. Upon completion of initial enrollment, eligible telecommunications carriers that  
22 invoice their subscribers shall credit the subscriber’s bill for Lifeline assistance ~~no later than~~  
23 ~~as of the subscriber’s enrollment date. the eligible telecommunications carrier received the~~  
24 ~~email notification from the Commission.~~  
25

Formatted: Highlight

Formatted: Highlight

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 (c) The eligible telecommunications carrier shall maintain a current e-mail address with the  
2 Commission, which the Commission will use to inform the eligible telecommunications  
3 carrier of the Commission's Lifeline secure website address and that new Lifeline assistance  
4 plan applications are available for retrieval for processing.

5 (d) The eligible telecommunications carrier shall maintain with the Commission the names, e-  
6 mail addresses and telephone numbers of one primary and one secondary company  
7 representative who will manage the user accounts on the Commission's Lifeline secure  
8 website.

9 (e) Within ~~20~~ 40 business calendar days of receiving the Commission's e-mail notification that  
10 the Lifeline assistance plan application is available for retrieval, the eligible  
11 telecommunications carrier shall provide a facsimile response to the Commission via the  
12 Commission's dedicated Lifeline assistance facsimile telephone line at (850)717-0108, or an  
13 electronic response via the Commission's Lifeline secure website, identifying the customer  
14 name, address, telephone number, and date of the application for:

15 1. Misdirected Lifeline assistance plan applications;

16 2. Applications for customers currently receiving Lifeline assistance; and

17 3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.

18 In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may  
19 file the information with the Office of Commission Clerk.

20 (f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications  
21 carrier in accordance with paragraph (8)(e) of this rule is confidential and exempt from  
22 Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such  
23 information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this  
24 rule, the information filed by the eligible telecommunications carrier will be presumed  
25

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)4.,

2 F.S.

3 ~~For Lifeline applicants who do not use On-line enrollment or simplified certification~~  
4 ~~enrollment, the eligible telecommunications carrier must accept Public Assistance eligibility~~  
5 ~~determination letters, including those provided for food stamps, Medicaid, and public housing~~  
6 ~~lease agreements, as proof of eligibility for Link Up and Lifeline enrollment.~~

7 (8) An eligible telecommunications carrier shall not impose additional certification  
8 requirements on subscribers beyond those which are required by this rule or by Title 47, Code  
9 of Federal Regulations, Part 54, Subpart E, Sections 54.409 Consumer qualification for  
10 Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual  
11 certifications by eligible telecommunications carriers, as amended June 28, 2012. Eligible  
12 telecommunications carriers must allow customers the option to submit Link Up or Lifeline  
13 applications via U.S. Mail or facsimile, and may allow applications to be submitted  
14 electronically. Eligible telecommunications carriers must also allow customers the option to  
15 submit copies of supporting documents via U.S. Mail or facsimile.

16 ~~(9) If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline assistance~~  
17 ~~under the income test set forth in Section 364.10(3)(a), F.S., an eligible telecommunications~~  
18 ~~carrier shall not impose any additional certification requirements on the subscriber. Eligible~~  
19 ~~telecommunications carriers shall only require a customer to provide the last four digits of the~~  
20 ~~customer's social security number for application for Lifeline and Link Up service and to~~  
21 ~~verify continued eligibility for the programs as part of the annual verification process.~~

22 (10) An eligible telecommunications carrier must provide written notice to a customer who  
23 applied for Lifeline assistance directly with the eligible telecommunications carrier within 30  
24 40 business days of receipt of the application providing the reason for a rejected Lifeline  
25 application and the contact information for the customer to obtain information regarding the

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 10

1 application denial. All eligible telecommunications carriers shall participate in the Lifeline  
2 service Automatic Enrollment Process. For purposes of this rule, the Lifeline service  
3 Automatic Enrollment Process is an electronic interface between the Department of Children  
4 and Family Services, the Commission, and the eligible telecommunications carrier that allows  
5 low income individuals to automatically enroll in Lifeline following enrollment in a  
6 qualifying public assistance program.

7 (a) The Commission shall send an e-mail to the eligible telecommunications carrier informing  
8 the eligible telecommunications carrier that Lifeline service applications are available for  
9 retrieval for processing.

10 (b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline service  
11 program as soon as practicable, but no later than 60 days from the receipt of the e-mail  
12 notification. Upon completion of initial enrollment, the eligible telecommunications carrier  
13 shall credit the subscriber's bill for Lifeline service as of the date the eligible  
14 telecommunications carrier received the e-mail notification from the Commission.

15 (c) The eligible telecommunications carrier shall maintain a current e-mail address with the  
16 Commission, which the Commission will use to inform the eligible telecommunications  
17 carrier of the Commission's Lifeline secure website address and that new Lifeline service  
18 applications are available for retrieval for processing.

19 (d) The eligible telecommunications carrier shall maintain with the Commission the names, e-  
20 mail addresses and telephone numbers of one primary and one secondary company  
21 representative who will manage the user accounts on the Commission's Lifeline secure  
22 website.

23 (e) Within 20 calendar days of receiving the Commission's e-mail notification that the Lifeline  
24 service application is available for retrieval, the eligible telecommunications carrier shall  
25 provide a facsimile response to the Commission via the Commission's dedicated Lifeline

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from  
existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 11

1 ~~service facsimile telephone line at (850)413-7142, or an electronic response via the~~  
2 ~~Commission's Lifeline secure website, identifying the customer name, address, telephone~~  
3 ~~number, and date of the application for:~~

4 ~~1. Misdirected Lifeline service applications;~~

5 ~~2. Applications for customers currently receiving Lifeline service; and~~

6 ~~3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.~~

7 ~~In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may~~  
8 ~~file the information with the Office of Commission Clerk.~~

9 ~~(f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications~~  
10 ~~carrier in accordance with paragraph (9)(e) of this rule is confidential and exempt from~~

11 ~~Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such~~

12 ~~information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this~~

13 ~~rule, the information filed by the eligible telecommunications carrier will be presumed~~

14 ~~necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)4.,~~

15 ~~F.S.~~

16 (11) When an eligible telecommunications carrier provides a subscriber with notice of

17 impending termination of Lifeline assistance pursuant to Section 364.10(1)(e), F.S., the notice

18 shall contain the telephone number the subscriber may call to obtain more information about

19 the subscriber's Lifeline assistance from the eligible telecommunications carrier. Notices of

20 impending termination of Lifeline assistance provided by local exchange companies shall also

21 inform the subscriber of the availability of discounted residential basic local

22 telecommunications service, as set forth in Section 364.105, F.S. An eligible

23 telecommunications carrier shall not impose additional verification requirements on

24 subscribers beyond those which are required by this rule.

25 (12) If a subscriber's Lifeline assistance is terminated and the subscriber subsequently

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 presents proof of Lifeline eligibility the subscriber shall be treated as making a new  
2 application for a Lifeline credit. the eligible telecommunications carrier shall reinstate the  
3 subscriber's Lifeline assistance as soon as practicable, but no later than 60 days following  
4 receipt of proof of eligibility. Irrespective of the date on which the eligible  
5 telecommunications carrier reinstates the subscriber's Lifeline assistance, the subscriber's bill  
6 shall be credited for Lifeline assistance as of the date the eligible telecommunications carrier  
7 received the proof of continued Lifeline eligibility. If the Office of Public Counsel certifies a  
8 subscriber eligible to receive Lifeline service under the income test set forth in Section  
9 364.10(3)(a), F.S., an eligible telecommunications carrier shall not impose any additional  
10 verification requirements on the subscriber.

11 ~~(13) Eligible telecommunications carriers must advertise the availability of Lifeline assistance~~  
12 ~~using media of general distribution, as required by Title 47, U.S. Code, Part I, Section~~  
13 ~~214(e)(1) Provision of universal service, Eligible telecommunications carriers, subparagraph~~  
14 ~~(B), 2011 edition of the Telecommunications Act of 1996, which is incorporated into this rule~~  
15 ~~by reference and which is available at: (hyperlink). An eligible telecommunications carrier~~  
16 ~~must provide written notice to a customer within 30 days of receipt of the application~~  
17 ~~providing the reason for a rejected Lifeline application, and providing contact information for~~  
18 ~~the customer to get information regarding the application denial.~~

19 (14) Eligible telecommunications carriers shall publicize the availability of Lifeline assistance  
20 in a manner reasonably designed to reach those likely to qualify for the assistance, as required  
21 by Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.405 Carrier  
22 obligation to offer Lifeline, paragraph (b), as amended March 2, 2012, which is incorporated  
23 into this rule by reference and which is available at: (hyperlink). An eligible  
24 telecommunications carrier must provide 60 days written notice prior to the termination of  
25 Lifeline service. The notice of pending termination shall contain the telephone number at  
CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from  
existing law.

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 13

1 ~~which the subscriber can obtain information about the subscriber's Lifeline service from the~~  
2 ~~eligible telecommunications carrier. The notice shall also inform the subscriber of the~~  
3 ~~availability, pursuant to Section 364.105, F.S., of discounted residential basic local~~  
4 ~~telecommunications service.~~

5 (15) If the eligible telecommunications carrier generates customer bills, the eligible  
6 telecommunications carrier must also place an insert in the subscriber's bill or a message on  
7 the subscriber's bill at least once each calendar year advising subscribers of the availability of  
8 Lifeline to those who qualify for the assistance. ~~If a subscriber's Lifeline service is terminated~~  
9 ~~and the subscriber subsequently presents proof of Lifeline eligibility, the eligible~~  
10 ~~telecommunications carrier shall reinstate the subscriber's Lifeline service as soon as~~  
11 ~~practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of~~  
12 ~~the date on which the eligible telecommunications carrier reinstates the subscriber's Lifeline~~  
13 ~~service, the subscriber's bill shall be credited for Lifeline service as of the date the eligible~~  
14 ~~telecommunications carrier received the proof of continued Lifeline eligibility.~~

15 (16) Each eligible telecommunications carrier shall maintain accurate records in accordance  
16 with the recordkeeping requirements identified in 47 C.F.R. § 54.417, detailing how the  
17 consumer demonstrated his or her eligibility for at least 3 years, and for as long as the  
18 subscriber receives Lifeline assistance from that eligible telecommunications carrier. ~~All~~  
19 ~~eligible telecommunications carriers shall provide current Lifeline service company~~  
20 ~~information to the Universal Service Administrative Company at [www.lifelinesupport.org](http://www.lifelinesupport.org) so~~  
21 ~~that the information can be posted on the Universal Service Administrative Company's~~  
22 ~~consumer website.~~

23 (17) ~~Eligible telecommunications carriers must advertise the availability of Lifeline service to~~  
24 ~~those who may be eligible for the service. At a minimum, if the eligible telecommunications~~  
25 ~~carrier publishes a directory, the eligible telecommunications carrier must include in the index~~  
CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from  
existing law.

Formatted: Highlight

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 14

1 of the directory a notice of the availability of Lifeline service. If the eligible  
2 telecommunications carrier generates customer bills, the eligible telecommunications carrier  
3 must also place an insert in the subscriber's bill or a message on the subscriber's bill at least  
4 once each calendar year advising subscribers of the availability of Lifeline service.

5 (18) Eligible telecommunications carriers may not charge a service deposit in order to initiate  
6 Lifeline service if the subscriber voluntarily elects toll blocking or toll control. If the  
7 subscriber elects not to place toll blocking or toll control on the line, an eligible  
8 telecommunications carrier may charge a service deposit.

9 (19) Eligible telecommunications carriers may not charge Lifeline subscribers a monthly  
10 number portability charge.

11 (20) Eligible telecommunications carriers offering Link Up and Lifeline service must submit  
12 quarterly reports to the Commission no later than 30 days following the ending of each quarter  
13 as follows: First Quarter (January 1 through March 31); Second Quarter (April 1 through June  
14 30); Third Quarter (July 1 through September 30); Fourth Quarter (October 1 through  
15 December 31). The quarterly reports shall include the following data:

16 (a) The number of Lifeline subscribers, excluding resold Lifeline subscribers, for each month  
17 during the quarter;

18 (b) The number of subscribers who received Link Up for each month during the quarter;

19 (c) The number of new Lifeline subscribers added each month during the quarter;

20 (d) The number of transitional Lifeline subscribers who received discounted service for each  
21 month during the quarter; and

22 (e) The number of residential access lines with Lifeline service that were resold to other  
23 carriers each month during the quarter.

24 *Rulemaking Authority ~~120.80(13)(d)~~, 350.127(2), ~~364.0252~~, 364.10(2)(3)(j) FS. Law*

25 *Implemented ~~364.0252~~, 364.10, 364.105, 364.183(1) FS. History—New 1-2-07, Amended 12-6-*

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 15

1 | 07, 6-23-10, \_\_\_\_\_.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 16

1 25-4.113 Refusal or Discontinuance of Service by Company.

2 ~~(1) As applicable, the company may refuse or discontinue telephone service under the~~  
3 ~~following conditions provided that, unless otherwise stated, the customer shall be given notice~~  
4 ~~and allowed a reasonable time to comply with any rule or remedy any deficiency:~~

5 ~~(a) For non-compliance with or violation of any state or municipal law, ordinance, or~~  
6 ~~regulation pertaining to telephone service.~~

7 ~~(b) For the use of telephone service for any other property or purpose than that described in~~  
8 ~~the application.~~

9 ~~(c) For failure or refusal to provide the company with a deposit to insure payment of bills in~~  
10 ~~accordance with the company's regulations.~~

11 ~~(d) For neglect or refusal to provide reasonable access to the company for the purpose of~~  
12 ~~inspection and maintenance of equipment owned by the company.~~

13 ~~(e) For noncompliance with or violation of the Commission's regulations or the company's~~  
14 ~~rules and regulations on file with the Commission, provided 5 working days' written notice is~~  
15 ~~given before termination.~~

16 ~~(f) For nonpayment of bills for telephone service, including the telecommunications access~~  
17 ~~system surcharge referred to in subsection 25-4.160(3), F.A.C., provided that suspension or~~  
18 ~~termination of service shall not be made without 5 working days' written notice to the~~  
19 ~~customer, except in extreme cases. The written notice shall be separate and apart from the~~  
20 ~~regular monthly bill for service. A company shall not, however, refuse or discontinue service~~  
21 ~~for nonpayment of a dishonored check service charge imposed by the company, nor~~  
22 ~~discontinue a customer's Lifeline local service if the charges, taxes, and fees applicable to dial~~  
23 ~~tone, local usage, dual-tone multifrequency dialing, emergency services such as "911," and~~  
24 ~~relay service are paid. No company shall discontinue service to any customer for the initial~~  
25 ~~nonpayment of the current bill on a day the company's business office is closed or on a day~~  
CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from  
existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 17

- 1 ~~preceding a day the business office is closed.~~
- 2 ~~(g) For purposes of paragraphs (e) and (f), “working day” means any day on which the~~  
3 ~~company’s business office is open and the U.S. Mail is delivered.~~
- 4 ~~(h) Without notice in the event of customer use of equipment in such manner as to adversely~~  
5 ~~affect the company’s equipment or the company’s service to others.~~
- 6 ~~(i) Without notice in the event of hazardous conditions or tampering with the equipment~~  
7 ~~furnished and owned by the company.~~
- 8 ~~(j) Without notice in the event of unauthorized or fraudulent use of service. Whenever service~~  
9 ~~is discontinued for fraudulent use of service, the company may, before restoring service,~~  
10 ~~require the customer to make, at his own expense, all changes in facilities or equipment~~  
11 ~~necessary to eliminate illegal use and to pay an amount reasonably estimated as the loss in~~  
12 ~~revenues resulting from such fraudulent use.~~
- 13 ~~(2) In case of refusal to establish service, or whenever service is discontinued, the company~~  
14 ~~shall notify the applicant or customer in writing of the reason for such refusal or~~  
15 ~~discontinuance.~~
- 16 ~~(3) Service shall be initiated or restored when the cause for refusal or discontinuance has been~~  
17 ~~satisfactorily adjusted.~~
- 18 ~~(4) The following shall not constitute sufficient cause for refusal or discontinuance of service~~  
19 ~~to an applicant or customer:~~
- 20 ~~(a) Delinquency in payment for service by a previous occupant of the premises, unless the~~  
21 ~~current applicant or customer occupied the premises at the time the delinquency occurred and~~  
22 ~~the previous customer continues to occupy the premises and such previous customer shall~~  
23 ~~benefit from such new service.~~
- 24 ~~(b) Delinquency in payment for service by a present occupant who was delinquent at another~~  
25 ~~address and subsequently joined the household of the customer in good standing.~~

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 18

- 1 ~~(c) Delinquency in payment for separate telephone service of another customer in the same~~  
2 ~~residence.~~
- 3 ~~(d) Failure to pay for business service at a different location and a different telephone number~~  
4 ~~shall not constitute sufficient cause for refusal of residence service or vice versa.~~
- 5 ~~(e) Failure to pay for a service rendered by the company which is not regulated by the~~  
6 ~~Commission.~~
- 7 ~~(f) Failure to pay the bill of another customer as guarantor thereof.~~
- 8 ~~(g) Failure to pay a dishonored check service charge imposed by the company.~~
- 9 ~~(5) When service has been discontinued for proper cause, the company may charge a~~  
10 ~~reasonable fee to defray the cost of restoring service, provided such charge is set out in its~~  
11 ~~approved tariff on file with the Commission.~~
- 12 *Rulemaking Authority 350.127, 427.704(8) FS. Law Implemented 364.03, 364.19, 364.604,*  
13 *427.704 FS. History—Revised 12-1-68, Amended 3-31-76, 10-25-84, 10-30-86, 1-1-91, 9-16-*  
14 *92, 1-7-93, 1-25-95, 7-5-00, Repealed.*

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.



Application for Lifeline Assistance

Billing name \_\_\_\_\_  
Service Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Last Four Digits of Social Security Number \_\_\_\_\_ Date of Birth \_\_\_\_\_  
Billing Address (if different from Service Address) \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Telephone Number (\_\_\_\_) \_\_\_\_\_ **(NOTE: If you do not currently have local phone service, please contact a local phone provider in your area to establish service.)**

Applicants who presently participate in the Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA) programs can complete an on-line electronic Lifeline application (available on the PSC Web site).

Is the residential address listed on this application  permanent  temporary? (Check one.)

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 benefit is available per household. A household is defined, for purposes of 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 the Lifeline rules and will result in the subscriber's de-enrollment from the program.**

Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

I hereby certify that I participate in the following assistance program(s): **(Check all that apply)**

- Temporary Cash Assistance
- Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
- Medicaid
- Low-Income Home Energy Assistance Program (LIHEAP)
- Supplemental Social Security (SSI)
- Federal Public Housing Assistance (Section 8)
- National School Lunch Program (NSLP) – Free lunch
- Bureau of Indian Affairs Program (Tribal Temporary Assistance for Needy Families, Head Start Subsidy, NSLP) – Tribal Land Residents Only

(OVER)

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 20

I certify and agree to the following:

I will notify my Lifeline provider within 30 days if I no longer participate in a qualifying DCF assistance program, if I receive more than one Lifeline benefit, or if another member of my household is receiving a Lifeline benefit;

If I move to a new address, I will provide that new address to my lifeline provider within 30 days;

~~If I provided a temporary residential address in this application, I will be required to verify my temporary residential address every 90 days with my Lifeline provider;~~

My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not already receiving a Lifeline benefit;

The information contained in this application is true and correct to the best of my knowledge;

I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and,

I acknowledge that I may be required by my Lifeline provider to recertify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility will result in disenrollment and the termination of my Lifeline benefits.

I understand that my name, address, date of birth, last four digits of my Social Security Number or Tribal Identification Number, telephone number, ~~and address and other information~~ may be provided to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for purpose of verifying that my household does not receive more than one Lifeline benefit.

I agree to allow exchange of any necessary information between the local telephone company, the appropriate federal or state agency, or fund administrator, to verify my eligibility to participate in the Lifeline discount program. I give this permission on the condition that the information in this form and any information about my participation in the above public assistance program provided by officials be maintained as confidential customer account information.

\_\_\_\_\_  
**Customer's signature**

\_\_\_\_\_  
**Date**

Customers of AT&T Florida, CenturyLink, or Verizon who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, do qualify for Lifeline service. Those customers may demonstrate their eligibility for Lifeline service to the Florida Office of Public Counsel. Please contact the Florida Office of Public Counsel at **1-800-540-7039**. Customers of other telephone companies who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, should contact their telephone company to see if their telephone company is voluntarily enrolling Lifeline applicants through the income eligibility test of 150% or less of the federal poverty income guidelines.

**Comment [AT&T1]:** The FCC rule requiring verification of temporary addresses every 90 days never took effect because the Office of Management and Budget rejected the rule (47 CFR § 54.410(d)(3)(v)), so this should be deleted here to mirror the federal rules, and to refrain from imposing a burden on Lifeline providers beyond the federal rules.

**Comment [AT&T2]:** The FCC rule 47 CFR § 54.404(b)(6) requires ETCs to transmit the following information to NLAD:

(6) Eligible telecommunications carriers must transmit to the Database in a format prescribed by the Administrator each new and existing Lifeline subscriber's full name; full residential address; date of birth and the last four digits of the subscriber's Social Security number or Tribal Identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number; the telephone number associated with the Lifeline service; the date on which the Lifeline service was initiated; the date on which the Lifeline service was terminated, if it has been terminated; the amount of support being sought for that subscriber; and the means through which the subscriber qualified for Lifeline.

So the purpose of the proposed edits are to include other data points ETCs are required to transmit to NLAD to ensure that ETCs have consumers' permission to transmit the required information

NOTICE OF DEVELOPMENT OF RULEMAKING  
UNDOCKETED  
PAGE 21

~~Applicants who presently participate in the Medicaid Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA) programs can complete an on-line electronic Lifeline application (available on the PSC Web site).~~

PSC/RADTEL 157 (REV 6/12)

Rule 25-4.0665, F.A.C

## Florida Public Service Commission



### Lifeline Florida On-line Application for Recipients of Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA)

- English
- Español
- Creole



**ABOUT SSL  
CERTIFICATES**

**Section 364.107(1), Florida Statutes provides that personal identifying information concerning a participant in a telecommunications carrier's Lifeline Assistance Plan held by the Public Service Commission is confidential.**

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 the Lifeline rules and will result in the subscriber's de-enrollment from the program. Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

Customers of AT&T Florida, CenturyLink, or Verizon who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, do qualify for Lifeline service. Those customers may demonstrate their eligibility for Lifeline service to the [Florida Office of Public Counsel](#). Please contact the Florida Office of Public Counsel at 1-800-540-7039. Customers of other telephone companies who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, should contact their telephone company to see if their telephone company is voluntarily enrolling Lifeline applicants through the income eligibility test of 150% or

NOTICE OF DEVELOPMENT OF RULEMAKING  
 UNDOCKETED  
 PAGE 23

less of the federal poverty income guidelines.

Applicants wishing to qualify for Lifeline using Supplemental Security Income (SSI), Federal Public Housing Assistance (Section 8), Low-Income Home Energy Assistance Program (LIHEAP), National School Lunch Free Lunch Program, or Bureau of Indian Affairs Programs (Tribal Temporary Assistance for Needy Families, Head Start Subsidy, NSLP) can complete a hard-copy Lifeline application (available on the PSC Web site), and submit it to their telephone provider along with verification that they are currently participating in one of these programs.

**Contact Information**

*Last Name	<input type="text"/>	*First Name	<input type="text"/>
*Address Line 1	<input type="text"/>		
Address Line 2	<input type="text"/>		
*City	<input type="text"/>	*State	<input type="text" value="FL"/> *Zip Code <input type="text"/>
The residential address listed on this application is:	<input checked="" type="radio"/> Permanent <input checked="" type="radio"/> Temporary		<input type="checkbox"/> Check if different Billing address

*Telephone (###-###-####)	<input type="text"/>	Date (mm/dd/yyyy)	<input type="text" value="08/21/2012"/>
		* Date of Birth (mm/dd/yyyy)	<input type="text" value="08/21/2012"/> *

\* Last 4 digits of Social Security Number  The last four digits of your Social Security Number are required to complete this application. If you do not wish to provide this information here, please apply for Lifeline directly through your Service Provider.

Service Provider <input type="text" value="Select Provider"/> *	I hereby certify that I participate in the following public assistance program(s): <input type="checkbox"/> Medicaid <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)/Food Stamps <input type="checkbox"/> Temporary Cash Assistance (TCA)
--	--

**I certify, that:**

**I will notify my Lifeline provider within 30 days if I no longer participate in a qualifying DCF assistance program, if I receive more than one Lifeline benefit, or if another member of my household is receiving a Lifeline benefit;**

**If I move to a new address, I will provide that new address to my Lifeline provider within 30 days;**

~~If I provided a temporary residential address in this application, I will be required to verify my temporary residential address every 90 days with my Lifeline provider.~~

My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service;

The information contained in this application is true and correct to the best of my knowledge;

I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and,

I acknowledge that I may be required by my Lifeline provider to recertify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility will result in disenrollment and the termination of my Lifeline benefits.

I understand that my name, address, date of birth, last four digits of my Social Security Number or Tribal Identification Number, telephone number, and ~~address~~ other information may be provided to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that my household does not receive more than one Lifeline benefit.

I agree to allow exchange of any necessary information between the local telephone company, the appropriate federal or state agency, or fund administrator, to verify my eligibility to participate in the Lifeline discount program. I give this permission on the condition that the information in this form and any information about my participation in the above public assistance programs provided by officials be maintained as confidential customer account information.

I agree to these terms and conditions:

- Yes  
 No

CLEAR

SUBMIT

**Comment [AT&T3]:** The FCC rule requiring verification of temporary addresses every 90 days never took effect because the Office of Management and Budget rejected the rule (47 CFR § 54.410(d)(3)(v)), so this should be deleted here to mirror the federal rules, and to refrain from imposing a burden on Lifeline providers beyond the federal rules.

**Comment [AT&T4]:** Same explanation as Comment 2 to insure consistency with the FCC's rules.

### **AT&T Lifeline Enrollment Timeline**

1. Product retrieve file(s) from PSC/OPC    Once per Business Day
2. Product sends retrieved PSC/OPC file(s) to APRIMO to identify AT&T Active Residential Customers w/o Lifeline    Once per Business Day
  - a. Receive & review PSC/OPC APRIMO Results (2 week turnaround is BAU commitment)
 

12<sup>th</sup> Business Day
3. Product sends PSC/OPC APRIMO Results to vendor, HGS    13<sup>th</sup> Business Day
4. HGS creates PSC/OPC NLAD Enrollment activity for each account    14<sup>th</sup> Business Day
5. HGS sends PSC/OPC Enrollment activity to NLAD    15<sup>th</sup> Business Day
6. HGS receives PSC/OPC NLAD Error Report    16<sup>th</sup> Business Day
  - a. HGS Reviews PSC/OPC Error report & identifies PSC/OPC NLAD enrolled accounts
 

17<sup>th</sup> Business Day

    - i. HGS identifies PSC/OPC accounts with Fatal Errors sends Denial Letter within 5 business days
    - ii. HGS identifies PSC/OPC accounts with correctable errors sends notice to customer within 5 business days
  - b. HGS creates PSC/OPC Discount order activity for AT&T Billing System (ROAR)
 

22<sup>nd</sup> Business Day
  - c. HGS submits PSC/OPC Discount order activity to AT&T Billing System (ROAR)
 

23<sup>rd</sup> Business Day
7. HGS receives AT&T Billing system (ROAR) error report    33<sup>rd</sup> Business Day
  - a. HGS determines PSC/OPC Successful Discounts Added sends new enrollment letter
 

34<sup>th</sup> Business Day

    - i. HGS tracks PSC/OPC error records to enrollment and sends new enrollment letter Ongoing
8. HGS updates PSC/OPC spreadsheets with Enrollment results    35<sup>th</sup> Business Day
9. Product receives and reviews PSC/OPC spreadsheet(s)    36<sup>th</sup> Business Day
10. Product delivers to PSC/OPC spreadsheet(s) with enrollment results    37<sup>th</sup> Business Day