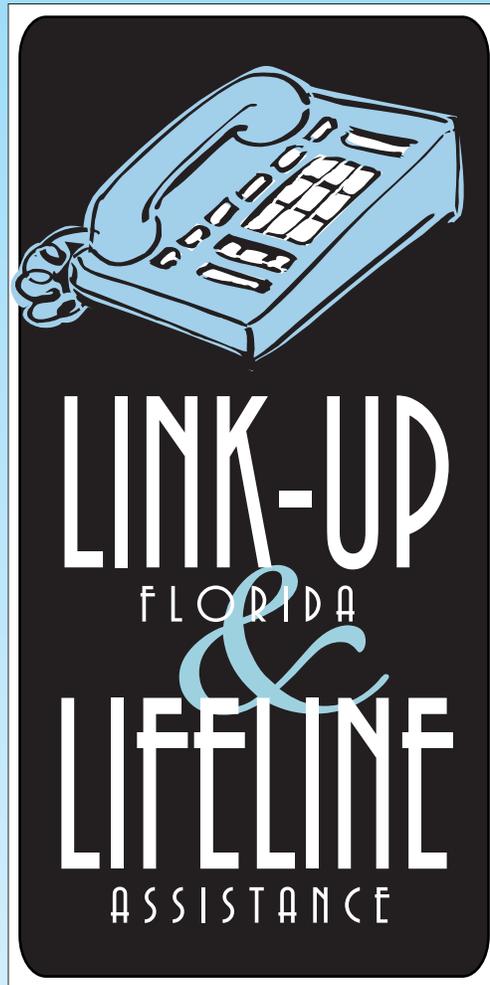


A REPORT TO THE  
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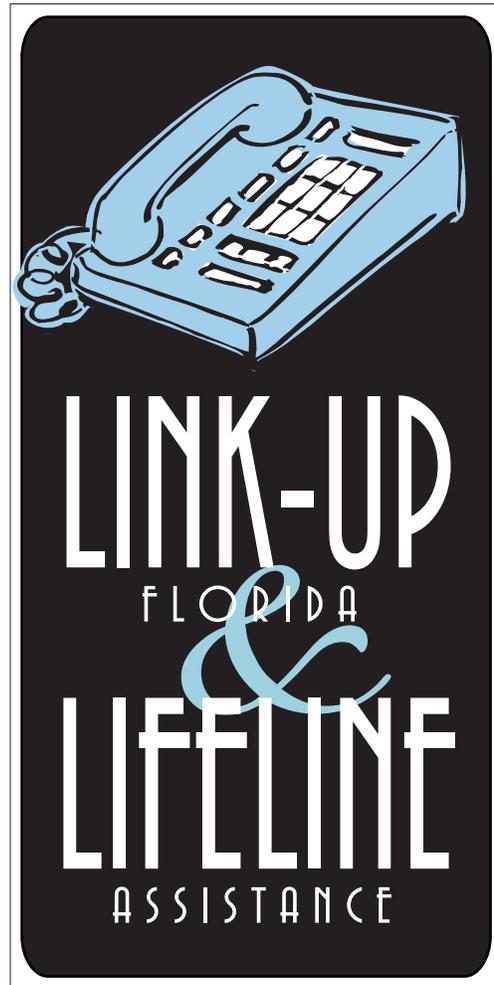


Number of Customers Subscribing  
to Lifeline Service and the  
Effectiveness of Procedures to  
Promote Participation

*Prepared by the*  
Florida Public Service Commission

DECEMBER 2007

PREPARED BY  
The Florida Public Service Commission  
Division of Competitive Markets and Enforcement  
Office of Public Information



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## Table of Contents

List of Tables and Figures.....	iv
List of Acronyms.....	v
Executive Summary.....	1
Chapter I. Background.....	3
Chapter II. Program Support.....	3
Chapter III. Customer Eligibility.....	4
Chapter IV. Carrier Eligibility.....	5
Chapter V. Subscribership and Participation Rates.....	6
A) Lifeline.....	6
B) Link-Up.....	9
C) Transitional Lifeline.....	10
Chapter VI. Recent Statutory Developments Impacting Florida’s Lifeline Program.....	10
Chapter VII. Regulatory Actions Impacting Florida’s Lifeline Program.....	11
A) Florida Public Service Commission.....	11
B) Office of Public Counsel.....	13
C) Federal Communications Commission.....	14
Chapter VIII. External Lifeline Research and Analysis.....	15
Chapter IX. Activities to Promote Lifeline Awareness.....	16
Chapter X. Effectiveness of Procedures to Promote Participation.....	21
Chapter XI. Conclusion.....	22
Appendix A. Lifeline Partners.....	23
Appendix B. Promotional Activities.....	27

## **List of Tables and Figures**

Table 1	Florida Lifeline Subscribership.....	6
Table 2	Lifeline Participation Rate in Florida.....	7
Table 3	Lifeline Net Participation in Florida.....	8
Table 4	AT&T, and Embarq Lifeline Customer Subscribership.....	9
Table 5	AT&T, Verizon, Embarq Link-Up Customers.....	10
Table 6	AT&T, Verizon, Embarq Transitional Lifeline Customers.....	10
Figure 1	AT&T and Embarq New Lifeline Customers Added Each Month.....	9
Figure 2	Income-Based Link-Up/Lifeline Applications Received.....	37
Figure 3	Income-Based Link-Up/Lifeline Participation.....	37

## **List of Acronyms**

AHCA	Agency for Health Care Administration
AWI	Agency for Workforce Innovation
CFR	Code of Federal Regulations
CLEC	Competitive Local Exchange Carrier
CMRS	Commercial Mobile Radio Service
CPS	Current Population Survey
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FNPRM	Further Notice of Proposed Rulemaking
FPG	Federal Poverty Guidelines
FPSC	Florida Public Service Commission
ILEC	Incumbent Local Exchange Carrier
LIHEAP	Low-Income Home Energy Assistance Plan
MOU	Memorandum of Understanding
NSL	National School Lunch Program's Free Lunch Program
OPC	Office of Public Counsel
WFI	Workforce Florida, Inc.

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## Executive Summary

The Tele-Competition Innovation and Infrastructure Enhancement Act of 2003 (the 2003 Act) requires that a statewide cooperative effort be made to support the Lifeline Assistance Program (Lifeline) in Florida. This report presents participation data for the 2006-2007 program year. The report also evaluates procedures put in place to strengthen the program and increase the number of participants.

During the 2007 Legislative Session, Section 364.10(3)(h)(2), Florida Statutes, was modified to require any state agency that determines a person is eligible for Lifeline service to immediately forward the information to the Florida Public Service Commission (FPSC or Commission) to ensure that the person is automatically enrolled in the Lifeline program. This section specifically required the FPSC to adopt rules by December 31, 2007, creating procedures to automatically enroll eligible customers in Lifeline service. The law also directed the FPSC, the Department of Children and Families (DCF), and the Office of Public Counsel (OPC) to enter into a Memorandum of Understanding (MOU) with respect to automatic enrollment procedures. The 2007 Legislature also acted to grant a public records exemption for personal identifying information of Lifeline Assistance plan participants.

In April 2007, the FPSC and the DCF formally implemented a process whereby the names of potential Lifeline customers, once certified through a DCF program, would be automatically forwarded to the FPSC, and ultimately to the appropriate eligible telecommunications carrier (ETC)<sup>1</sup> for possible enrollment. On September 25, 2007, the FPSC approved proposed amendments to Rule 25-4.0665, Florida Administrative Code (F.A.C.), Lifeline Service, to include the Lifeline Automatic Enrollment Process. A MOU was signed by the parties on September 27, 2007.

The number of eligible customers participating in the Lifeline program in Florida grew 13 percent during the 2006-2007 review period, representing the largest annual increase since inception of the program. As of September 2007, 164,626 eligible customers participated in the Lifeline program. Embarq-Florida, (Embarq) and AT&T-Florida f/k/a BellSouth (AT&T) experienced the largest increase in Lifeline participation among Florida's ETCs during the 2006-2007 review period. Embarq increased its Lifeline participation by 6,912, while AT&T's participation increased by 6,046. Verizon and Budget Phone were the only ETCs that experienced declines in Lifeline participation. Verizon experienced a net loss of 2,510 Lifeline customers, and Budget Phone had a net loss of 75 Lifeline customers during the 2006-2007 review period.

One of the major reasons for the increase in Lifeline participation has been the automatic enrollment process initiated by the FPSC and the DCF. Between April 1, 2007, and December 3, 2007, 70,375 Lifeline applications were filed through the FPSC/DCF automatic enrollment process. In addition, enrollment of new Lifeline customers by competitive local exchange carrier (CLEC) ETCs continues to have a positive impact. In total, CLEC Lifeline enrollment was 9,834, representing 6 percent of the total Lifeline customer enrollment as of September 30, 2007.

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<sup>1</sup> An eligible telecommunications carrier is a carrier that has been designated by the Florida Public Service Commission or the Federal Communications Commission to receive universal service support.

CLEC and wireless ETCs are continuing to design specific product offerings for Lifeline customers, and several companies are making Lifeline customers a major focus in their marketing strategy.

The FPSC remains committed to improving the success of the Link-Up and Lifeline programs. The FPSC will continue to identify and find solutions to possible barriers that prevent Lifeline from achieving greater success. In addition, efforts to improve the effectiveness of the FPSC/DCF automatic enrollment process will continue, as will efforts to increase public awareness of the Lifeline program through targeted consumer outreach. This report provides greater detail on these and other initiatives, along with historical insight on the development of the program.

## **I. Background**

The Tele-Competition Innovation and Infrastructure Enhancement Act of 2003 (the 2003 Act) became law on May 23, 2003, by the signature of the Governor. The 2003 Act requires that each state agency providing benefits to persons eligible for the Lifeline Assistance Program (Lifeline) shall, in cooperation with the Department of Children and Families (DCF), the Florida Public Service Commission (FPSC or Commission), and telecommunications companies providing Lifeline service, develop procedures to promote participation in Lifeline. The 2003 Act further requires the FPSC to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives by December 31 each year on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program.<sup>2</sup> This report is prepared pursuant to the requirements of the 2003 Act.

During the 2007 Session, the Legislature took further action to increase participation in the Lifeline program. Any state agency that determines a person is eligible for Lifeline services must forward the information to the FPSC for automatic enrollment in the Lifeline program. Furthermore, the FPSC, the DCF, and the Office of Public Counsel (OPC) were required to enter into a Memorandum of Understanding (MOU) with respect to automatic enrollment.

## **II. Program Support**

The Florida Link-Up and Lifeline programs are part of the federal Universal Service Program designed to enable low-income households to obtain and maintain basic local telephone service. Under the Federal Communications Commission's (FCC) rules, there are four tiers of monthly federal Lifeline support.

- The first tier of federal support is a \$6.50 monthly credit for the federal subscriber line charge which is available to all eligible subscribers. All fifty states have approved this tier of support.
- The second tier of federal support is a \$1.75 monthly credit that is available to subscribers in those states that have approved the credit. All fifty states have also approved this tier of support.
- The third tier of federal support is one-half the amount of additional state support up to a maximum of \$1.75 in federal support. Because Florida carriers provide an additional \$3.50 credit to Lifeline customers' bills,<sup>3</sup> Florida Lifeline subscribers currently receive a total monthly credit of at least \$13.50, consisting of \$10.00 (\$6.50 + \$1.75 + \$1.75) in federal support and \$3.50 in state support.<sup>4</sup> The telephone

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<sup>2</sup> Section 364.10, Florida Statutes.

<sup>3</sup> Since Florida does not have a state Universal Service Fund, the \$3.50 credit is absorbed by the ETC providing service.

<sup>4</sup> Verizon and Embarq include additional credit to offset rate increases authorized by Section 364.164, Florida Statutes (Rate Rebalancing).

subscriber may receive a credit less than \$13.50 if the subscriber's bill for basic local telephone service is less than the maximum available credit.

- The fourth tier of support, available only to eligible subscribers living on tribal lands, provides an additional credit up to \$25.00 per month. This amount is limited to the extent that the credit does not bring the basic local residential rate below \$1.00 per month.

Link-Up, a companion program, provides a 50 percent reduction in the telephone service installation charge, up to a maximum of \$30. Eligible residents of tribal lands may receive up to \$100 in discounts on initial connection charges. The \$100 maximum is based on the sum of the federally financed 50 percent discount (up to the \$30 maximum) available to all qualified low-income individuals, plus a dollar-for-dollar match (up to \$70) for connection charges above \$60.

Transitional Lifeline Assistance requires that each local exchange telecommunications carrier (LEC) provide subscribers no longer receiving Lifeline assistance a 30 percent discount off the residential basic local service rate. The subscriber may receive the subsidy for one year from the date the subscriber ceases to be qualified for Lifeline.

### **III. Customer Eligibility**

#### Program-Based

Eligibility for both Link-Up and Lifeline in Florida can be determined by customer enrollment in any one of the following programs:

- Temporary Cash Assistance (TCA)<sup>5</sup>
- Supplemental Security Income (SSI)
- Food Stamps
- Medicaid
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Plan (LIHEAP)
- National School Lunch (NSL) Program's Free Lunch Program<sup>6</sup>
- Bureau of Indian Affairs Programs<sup>7</sup>

#### Income-Based

In addition to the program-based criteria, AT&T, Embarq, and Verizon customers with annual incomes up to 135 percent of the Federal Poverty Guidelines (FPG) may be eligible to participate in the Florida Link-Up and Lifeline programs. The OPC certifies customer eligibility

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<sup>5</sup> Known as Temporary Assistance to Needy Families (TANF) for federal universal service purposes.

<sup>6</sup> By Order No. PSC-06-0680-PAA-TL, issued August 7, 2006, in Docket No. 040604-TL, the FPSC required all ETCs to adopt the NSL for determining eligibility in the Link-Up and Lifeline programs in Florida.

<sup>7</sup> Eligible consumers living on tribal lands qualify for Lifeline if they participate in one of the following federal assistance programs: (1) Tribal TANF, (2) National School Lunch Free Lunch Program, or (3) Head Start Subsidy.

under the income test for customers requesting to be enrolled in the Lifeline program. Further information regarding Lifeline enrollment using the income eligibility criteria is available on page 36 of this report.

#### **IV. Carrier Eligibility**

Section 54.201(b) of the Code of Federal Regulations (CFR) provides that a state commission shall, upon its own motion or upon request, designate a common carrier that meets certain requirements as an Eligible Telecommunications Carrier (ETC) in a non-rural service area. Section 54.201(c) of the CFR provides that a state commission may, as long as the request is consistent with the public interest, convenience, and necessity, designate one or more common carrier(s) as ETC(s) in a rural service area.<sup>8</sup>

An ETC can be an incumbent local exchange carrier (ILEC), a competitive local exchange carrier (CLEC), or a wireless carrier. A carrier that is granted ETC status is eligible to receive universal service support<sup>9</sup> pursuant to FCC rules.<sup>10</sup> To qualify as an ETC, a common carrier must offer services that are supported by federal universal service support mechanisms either using its own facilities or a combination of its own facilities and another carrier's resold service.<sup>11</sup> Additionally, the carrier must advertise the availability of such services and charges using mass media.

The following companies have been granted ETC status in Florida:<sup>12</sup>

- AT&T
- Verizon
- Embarq
- FairPoint Communications
- Windstream
- TDS Telecom
- NEFCOM

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<sup>8</sup> A state commission also has the authority to rescind the ETC status of any ETC designated by it that does not follow the requirements of the Lifeline Assistance program.

<sup>9</sup> Universal Service support is provided to ETCs for providing Lifeline service; rendering service to schools and libraries; and provisioning, maintaining, and upgrading facilities and services for rural, insular (islands that are territories or commonwealths of the United States), and high cost areas.

<sup>10</sup> 47 CFR pt. 54 – Universal Service.

<sup>11</sup> Those services supported by universal service include the following: (1) voice grade access to the public switched network, (2) an amount of local minutes of use of local exchange service provided free of charge to end users, (3) dual tone multi-frequency signaling or its functional equivalent, (4) single-party service, (5) access to emergency services, (6) access to operator services, (7) access to interexchange services, (8) access to directory assistance, and (9) toll limitation for qualifying low-income consumers.

<sup>12</sup> The FCC designated Alltel Wireless and Sprint Nextel as ETCs. The remaining ETCs were designated by the FPSC. The following Florida ETC petitions are pending before the FCC: Southern Communications Services, Inc., d/b/a Southern LINC; and TracFone Wireless, Inc. The following Florida ETC petitions are pending before the FPSC: ALLTEL Communications, Inc.; Connect Paging, Inc. d/b/a Get A Phone; Global Connection, Inc. of America; Swiftel, LLC.; TracFone Wireless, Inc.; and Florida Telephone Company (FLATEL).

- Frontier
- ITS Telecom
- Smart City
- ALLTEL Wireless
- Sprint Nextel
- Knology of Florida, Inc.
- Budget Phone, Inc.
- Nexus Communications, Inc.
- Ganoco, Inc. d/b/a American Dial Tone
- Vilaire Communications, Inc.
- Midwestern Telecommunications, Inc.

In approving the designation of Commercial Mobile Radio Service (CMRS) carriers as ETCs, the FCC noted that ETCs must comply with state requirements in states that have Lifeline programs.<sup>13</sup> The FPSC provides a letter identifying the Florida Lifeline requirements to each wireless carrier granted ETC status in Florida by the FCC.

## V. Subscribership and Participation Rates

### A. Lifeline

Table 1 shows the number of Lifeline subscribers from December 2003 through September 2007. The Lifeline subscribership increase in 2007 appears to be largely the result of implementation of the FPSC/DCF automatic enrollment process in April 2007. The new process is discussed in greater detail in Section VII of this report. The subscribership decrease in 2005 is primarily the result of Lifeline customers determined to be ineligible by AT&T as a result of AT&T's implementation of federally mandated annual eligibility verification procedures. In compliance with FCC Order No. 04-87,<sup>14</sup> all of Florida's ETCs have established Lifeline verification procedures to verify consumers' continued eligibility.

**Table 1. Florida Lifeline Subscribership**

	December 2003	September 2004	September 2005	September 2006	September 2007
Lifeline Subscribers	148,905	154,017	139,261	145,734	164,626

Source: FCC: State-by-State Telephone Revenues and Universal Service Data [September 2003]; Universal Service Administrative Company responses to FPSC data requests [2004]; and Industry responses to FPSC data requests [2003-2007].

<sup>13</sup> FCC Nextel Order, DA 04-2667, adopted August 25, 2004, footnote 30; FCC ALLTEL Order, DA 04-3046, adopted September 24, 2004, footnote 29; FCC Sprint Order, DA 04-3617, adopted November 18, 2004, footnote 27.

<sup>14</sup> Report and Order and Further Notice of Proposed Rulemaking, WC Docket 03-109, In the Matter of Lifeline and Link-Up, Order No. FCC 04-87, paragraphs 33-34 (Released April 29, 2004).

The number of eligible Floridians enrolled in Lifeline increased by 18,892 consumers during the 2006-2007 review period, representing a 13 percent increase. This number is the largest annual increase in enrollment since inception of the program in Florida. Implementation of the FPSC/DCF automatic enrollment process has shown positive results during the initial six month implementation period, April 2007 through October 2007.

Table 2 shows Lifeline participation rates for years 2003 through September 2007.<sup>15</sup> As of September 30, 2007, the participation rate was 14 percent.

**Table 2. Lifeline Participation Rate in Florida**

Year	Lifeline Enrollment	Eligible Households <sup>16</sup>	Participation Rate
December 2003	148,905	819,112	18.0 %
September 2004	154,017	1,100,000	14.0 %
September 2005	139,261	1,122,593	12.4 %
September 2006	145,734	1,150,483	12.7%
September 2007	164,626	1,173,173	14.0%

Source: FCC: State-by-State Telephone Revenues and Universal Service Data (September 2003); Department of Children and Families (DCF); Report and Order and Further Notice of Proposed Rulemaking, WC Docket 03-109, In the Matter of Lifeline and Link-Up, Order No. FCC 04-87, Released April 29, 2004; Universal Service Administrative Company responses to FPSC data requests (2004); and industry responses to FPSC data requests (2003-2007).

Table 3 depicts the distribution of Lifeline enrollment from December 2003 to September 2007. The data show that, with the exception of Verizon and Budget Phone, every ETC serving in Florida experienced an increase in Lifeline enrollment between 2006 and 2007. The participation decrease in 2005 was primarily the result of AT&T's implementation of verification procedures, which eliminated Lifeline subscribers who could not present proof of eligibility. Embarq recorded the largest increase in net Lifeline enrollment at 6,912, during the 2006-2007 review period, followed by AT&T at 6,046.

Enrollment of Lifeline customers by CLEC ETCs was significant during the October 2006 through September 2007 review period. CLEC Lifeline enrollment was 9,834, representing 6 percent of Lifeline subscribership.

<sup>15</sup> The participation rate is the ratio of enrolled subscribers to the eligible population.

<sup>16</sup> Eligible households for Years 1998 through 2003 do not include households eligible under the 125 percent income-based criterion, as reported by DCF. Data for 2004 includes the 125 percent criterion and was taken from FCC Order 04-87, released on April 29, 2004. The number of total Florida households was obtained from the October 30, 2007 Florida Demographic Estimating Conference of the Florida Legislature Office of Economic and Demographic Research. The number of eligible households was calculated using the Florida percentage of eligible households provided by the FCC in Order FCC 04-87.

**Table 3. Lifeline Net Participation in Florida**

Florida ETCs	Dec 2003	Sept 2004	Net Growth Rate	Sept 2005	Net Growth Rate	Sept 2006	Net Growth Rate	Sept 2007	Net Growth Rate
AT&T	103,681	104,467	1 %	86,408	(17 %)	87,291	1 %	93,337	7%
Verizon	22,295	23,642	6 %	24,433	3 %	26,428	8 %	23,918	(9%)
Embarq	16,736	19,274	15 %	21,537	12 %	23,104	7 %	30,016	30%
FairPoint Communications	2,385	2,304	(3 %)	2,096	(9 %)	2,002	(4 %)	2,030	1%
Windstream	2,670	3,067	15 %	3,322	8 %	3,533	6 %	3,806	8%
TDS Telecom	496	571	15 %	657	15 %	697	6 %	736	6%
NEFCOM	510	561	10 %	630	12 %	588	(7 %)	635	8%
Frontier	104	104	0 %	120	15 %	118	(2 %)	150	27%
ITS Telecom	27	27	0 %	26	(4 %)	27	4 %	79	193%
Smart City	1	2	100 %	5	150 %	3	(40 %)	8	167%
ALLTEL Wireless	N/A	N/A	N/A	13	N/A	31	138%	38	23%
Sprint Nextel	N/A	N/A	N/A	14	N/A	28	100%	39	39%
Knology	N/A	N/A	N/A	0	N/A	64	N/A	126	97%
Budget Phone	N/A	N/A	N/A	N/A	N/A	134	N/A	59	(56%)
American Dial Tone	N/A	N/A	N/A	N/A	N/A	1,166	N/A	1,840	58%
Nexus	N/A	N/A	N/A	N/A	N/A	0	N/A	2,037	N/A
Vilaire	N/A	N/A	N/A	N/A	N/A	520	N/A	5,598	977%
Midwestern	N/A	N/A	N/A	N/A	N/A	0	N/A	174	N/A
Total	148,904	154,017	3 %	139,261	(10 %)	145,734	5 %	164,626	13%

Sources: Industry responses to FPSC data requests (2003-2007); Universal Service Administrative Company responses to FPSC data request (2004 and 2005).

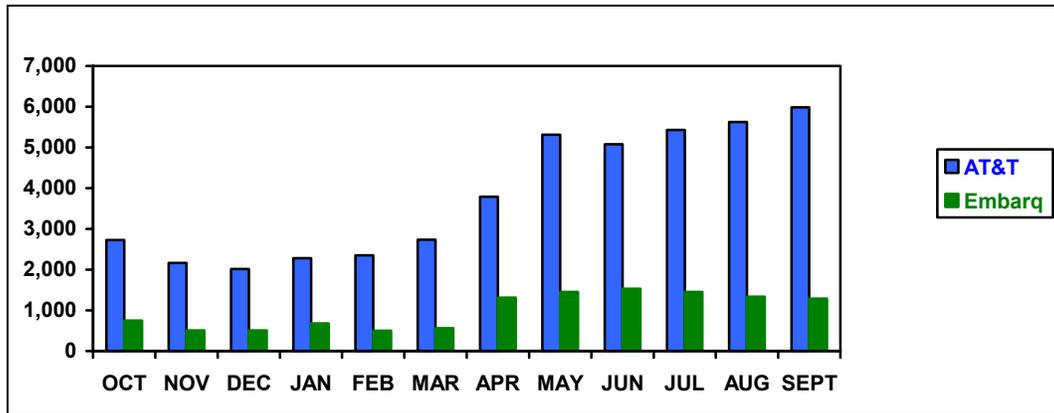
As discussed earlier, Embarq and AT&T experienced the largest increase in Lifeline participation among Florida’s ETCs during the 2006-2007 review period. As presented in Table 4 on the next page, the two ETCs enrolled a combined 57,351 new Lifeline customers. The two ETCs removed a combined 38,499 customers from Lifeline service during the program year. Customers were removed from Lifeline for various reasons including no longer meeting the eligibility requirements, switching telephone companies, and not paying their local service bill.

**Table 4. AT&T and Embarq Lifeline Customer Subscribership  
October 2006 – September 2007**

Company	New Lifeline Customers	Lifeline Customers Removed	Net Lifeline Customer Gain
AT&T	45,481	33,541	11,940
Embarq	11,870	4,958	6,912
<b>Total</b>	<b>57,351</b>	<b>38,499</b>	<b>18,852</b>

As presented in Figure 1, an upward trend in new Lifeline customer enrollment for AT&T and Embarq occurred during the October 2006 – September 2007 review period.<sup>17</sup>

**Figure 1. AT&T and Embarq New Lifeline Customers Added Each Month  
October 2006 - September 2007**



## B. Link-Up

Florida’s Link-Up program helps low-income consumers by reducing the telephone service installation charge. This program pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional wireline telephone, or activation fee for a wireless telephone. Eligible residents of tribal lands may receive up to \$100 in discounts on initial connection charges. The \$100 maximum is based on the sum of the federally financed 50 percent discount (up to the \$30 maximum) available to all qualified low-income individuals, plus a dollar-for-dollar match (up to \$70) for connection charges above \$60.

<sup>17</sup> Verizon is not included because the company’s response to staff’s data request did not allow the separation of the new Lifeline customers added.

Table 5 shows Link-Up program participants for AT&T, Verizon, and Embarq from 2005 through 2007.

**Table 5. AT&T, Verizon, and Embarq Link-Up Participants  
2005 – 2007**

Year	AT&T, Verizon, and Embarq Link-Up Participants <sup>18</sup>
2005	11,605
2006	15,353
2007	29,849 <sup>19</sup>

Source: Industry responses to FPSC data requests [2005-2007].

### C. Transitional Lifeline

In accordance with Section 364.105, Florida Statutes, customers who no longer meet eligibility criteria and are removed from Lifeline service receive a 30 percent discount off the residential basic local service rate for a period of twelve months after Lifeline service is removed. For example, a former Lifeline customer with a phone bill that includes a \$25.00 basic rate would receive a \$7.50 monthly discount for one year. Progressing from Lifeline service means the consumer’s socio-economic status may have improved and the customer may have advanced beyond the qualifying eligibility criteria. Table 6 presents data on Transitional Lifeline customers for AT&T, Verizon, and Embarq for September 2005 – September 2007.

**Table 6. AT&T, Verizon, Embarq Transitional Lifeline Customers  
September 2005 – September 2007**

Month	AT&T, Verizon, and Embarq Transitional Lifeline Customers
September 2005	16,372
September 2006	21,173
September 2007	11,463

## VI. Recent Statutory Developments Impacting Florida’s Lifeline Program

During the 2007 Legislative Session, legislation was enacted to increase participation in the Lifeline Assistance program.

- Section 364.10(3)(h)(2), Florida Statutes, was modified to require any state agency

<sup>18</sup> AT&T, Verizon, and Embarq Link-Up participants includes customers who did not previously have telephone service with the company and existing Lifeline customers who relocated to a different service address.

<sup>19</sup> AT&T’s response to the FPSC’s 2007 data request includes resold access lines to CLECs, thus overstating this figure.

that determines a person is eligible for Lifeline service to immediately forward the information to the FPSC to ensure that the person is automatically enrolled in the Lifeline program.

- Section 364.10, Florida Statutes, was modified to require the FPSC to adopt rules to automatically enroll eligible customers in Lifeline service and include an option for an eligible customer to choose not to subscribe to the Lifeline service. On September 25, 2007, the FPSC approved proposed amendments to Rule 25-4.0665, F.A.C., Lifeline Service, to include the Lifeline Automatic Enrollment Process which includes an option for DCF applicants to enroll or not to enroll in Lifeline.
- The law also directed the FPSC, the DCF, and the OPC to enter into a MOU with respect to Lifeline automatic enrollment procedures. A MOU was signed by the parties on September 27, 2007.
- Section 364.107, Florida Statutes, was created to protect the personal identifying information of Lifeline applicants by granting a public records exemption for such information. The information made confidential and exempt may be released to the applicant's telecommunications carrier for eligibility, verification, or auditing of a Lifeline Assistance Plan, and to the FPSC for enrollment purposes.

## **VII. Regulatory Actions Impacting Florida's Lifeline Program**

A number of regulatory initiatives have been undertaken by the FPSC, the OPC, and the FCC to promote the Link-Up and Lifeline programs. A discussion on these issues and dockets, including relevant background information, is presented below.

### **A. Florida Public Service Commission**

**1. Proposed amendment of Rule 25-4.0665, F.A.C., Lifeline Service (Docket No. 070572-TL).** Section 364.10(3)(h)(2), Florida Statutes, as amended during the 2007 Legislative Session, requires any state agency that determines a person is eligible for Lifeline service to immediately forward the information to the FPSC to ensure that the person is automatically enrolled in the Lifeline program. This section specifically requires the FPSC to adopt rules by December 31, 2007, creating procedures to automatically enroll eligible customers in Lifeline service.

On July 27, 2007, staff held a rule development workshop to receive comments on the draft rules addressing automatic enrollment. A number of ETCs as well as the OPC, the DCF, and AARP attended and participated in the discussion. The participants provided staff with feedback regarding the proposed rule language and offered suggestions to improve the language. On September 25, 2007, the FPSC approved proposed amendments to Rule 25-4.0665, F.A.C., Lifeline Service, which were effective December 6, 2007. The FPSC is also in the process of developing additional rules for

Florida's Link-Up and Lifeline programs which include certification, verification, data reporting, and a host of other issues.

**2. Memorandum of Understanding.** Section 364.10(3)(h)(3), Florida Statutes, requires that the FPSC, the DCF, and the OPC enter into a MOU with respect to automatic enrollment procedures. A MOU was signed by the parties on September 27, 2007. The MOU is available for review on the FPSC's Web site, <http://www.floridapsc.com/utilities/liaison/index.aspx>.

**3. Lifeline Automatic Enrollment Process.** In April 2007, the FPSC and the DCF formally implemented a process whereby the names of potential Lifeline customers, once certified through a DCF program, would be automatically forwarded to the FPSC, and ultimately to the appropriate ETC for possible enrollment.

The automatic enrollment process entails the DCF client checking a "yes" or "no" box on the DCF Web application, indicating an interest in receiving the Lifeline discount on his or her telephone service. The "no" box provides an option to the applicant not to subscribe to Lifeline. If the client answers in the affirmative, the applicant identifies a telephone service provider from a drop-down box on the application and answers applicable questions. The DCF forwards to the FPSC the necessary information of those clients approved by DCF for benefits who have indicated their desire to receive the Lifeline discount. The FPSC computers electronically sort the information by ETC and place the applications on the FPSC's secure Web site.

All ETCs are required to enroll the subscriber in the program as soon as practicable, but no later than 60 days from the receipt of the FPSC's automatic e-mail notification. In addition, upon completion of initial enrollment, the ETC is required to credit the subscriber's bill for Lifeline service as of the date the ETC received the FPSC's e-mail notification.

ETCs are required to provide the FPSC, within 20 calendar days of receiving the FPSC's e-mail notification, the names, addresses, telephone numbers, and date of the application for any misdirected applications; any applications for customers currently receiving Lifeline service; or any rejected applicants, including the reason(s) the applicants were rejected. The information filed by the ETCs is confidential and exempt from the public records requirement; however, the information contained in the response is disclosed to the Commission, pursuant to the criteria set forth in Section 364.107(3)(a)(4), Florida Statutes.

Staff began formally tracking the number of Lifeline applications filed via the DCF automatic enrollment process in April 2007. Between April 1, 2007, and December 3, 2007, 70,375 Lifeline applications were filed through the FPSC/DCF automatic enrollment process. Not all applications received through this process result in newly enrolled customers. As of December 3, 2007, 19,815 applications were disallowed for various reasons. Fifty percent of those applications were from consumers already receiving Lifeline assistance. Twenty-five percent of the applicants had disconnected

phones. Five percent of the applicants listed a non-ETC provider as their telephone company. Staff has instituted a process which includes contacting clients by phone and/or by letter to attempt to validate applications.

**4. Lifeline Research (Docket No. 070567-TL).** On August 22, 2007, AT&T and Embarq filed a Joint Petition requesting that the FPSC expand the use of Community Service Funds<sup>20</sup> to include research activities. The Joint Petition requested that monies from this fund be used to retain the Public Utility Research Center (PURC) to conduct research on Lifeline participation.

In November 2007, the FPSC found that in addition to using the Lifeline Community Service Fund (CSF) to educate and promote Link-Up and Lifeline services, the fund can be used to support research activities which are in the public interest and designed to benefit Link-Up and Lifeline service.<sup>21</sup>

## **B. Office of Public Counsel**

**Automatic Enrollment (Docket No. 060677-TL).** On October 11, 2006, the OPC and AARP (formerly the American Association of Retired Persons) filed a joint petition with the FPSC requesting that the FPSC order local exchange telecommunications companies in Florida to implement practices and procedures with the DCF to automatically enroll eligible customers in the Lifeline program.

OPC proposed that all persons applying for assistance with DCF, once approved, would be automatically enrolled in the Lifeline Assistance program and be given a period of time to opt out of the Lifeline program. This process would have to be set up between DCF and the ETCs in Florida. As discussed in Section VII.A.3 of this report, the FPSC has already implemented a similar process with the DCF.

By Order No. PSC-07-0417-PAA-TL, issued May 11, 2007, the FPSC:

- Recognized that because it had already implemented automatic enrollment for Lifeline with the DCF, keeping the docket open was appropriate pending analysis of the results and feedback from the parties of the newly instituted Lifeline automatic enrollment process.
- Directed staff to submit a status report on the automatic enrollment process in six months.

At the FPSC's October 15, 2007, Internal Affairs Meeting, staff submitted the status report to the FPSC. The FPSC expressed support of the process and directed staff

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<sup>20</sup> The FPSC, the OPC, and the ILECs have worked together to create Community Service Funds to be used to educate customers about and promote Lifeline and Link-Up. Through a series of stipulated agreements and settlements, funding mechanisms have been established by AT&T, Embarq, and Windstream to make contributions into the CSF for service quality violations.

<sup>21</sup> Order PSC-07-0919-PAA-TL, issued November 14, 2007, in Docket No. 070567-TL.

to continue with implementation. Furthermore, interested parties did not present any concerns with implementation of the FPSC/DCF process.

### C. Federal Communications Commission

#### **Measures To Safeguard the Universal Service Fund From Waste, Fraud, and Abuse as Well as Measures To Improve the Management, Administration, and Oversight of the Universal Service Fund.**

The FCC adopted several measures to further safeguard the Universal Service Fund (USF) from waste, fraud, and abuse.<sup>22</sup> The Report and Order addressed measures relevant to all four USF programs: Low-Income, High-Cost, Schools and Libraries, and Rural Health Care. However, this report only addresses those issues pertinent to the Low-Income program (Link-Up and Lifeline).

Key Link-Up and Lifeline findings and directives in the Report and Order include the following:

- **Independent Audits.** The FCC decided that additional audit requirements are unnecessary at this time. The FCC acknowledged that current FCC rules already authorize the Universal Service Administrative Company (USAC) to conduct audits of contributors to the universal service support mechanism. The FCC's Office of the Inspector General (OIG) annually oversees more than 400 USF audits of contributors and recipients. The FPSC has also initiated audits of Florida USF funds to make sure federal USF dollars are used properly.
- **Document Retention.** The FCC concluded that service providers should retain eligibility-determination records for the time period during which the service is provided and for three years after the service is terminated.
- **Sanctions for Misuse of Funds.** The FCC determined that funds from the Low-Income Program that are disbursed or used in violation of a FCC rule that implements the statute or a substantive program goal should be recovered. The FPSC monitors disbursements of USF dollars to all Florida ETCs.
- **Debarment for Actions that Harm the Integrity of the Program.** The FCC established that any party convicted of or held civilly liable for the commission or attempted commission of fraud and similar offenses will be debarred from participation in the program for three years.

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<sup>22</sup> Report and Order, WC Docket No. 05-195, CC Docket No. 96-45, CC Docket No. 02-6, WC Docket No. 02-60, WC Docket No. 03-109, CC Docket No. 97-21; FCC 07-150: Measures To Safeguard the Universal Service Fund From Waste, Fraud, and Abuse as Well as Measures To Improve the Management, Administration, and Oversight of the Universal Service Fund, Order No. FCC 07-150, Adopted August 22, 2007, Released August 29, 2007.

The FCC will use the information to assist in the establishment of performance measures in the future.

## **VIII. External Lifeline Research and Analysis**

The Public Utility Research Center (PURC) conducted a study to investigate reasons for Florida's low Lifeline participation. The PURC report,<sup>23</sup> released on February 1, 2006, included surveys that attempted to determine why eligible households do or do not participate in the Lifeline program. The PURC report concluded a lack of awareness of the Lifeline program exists as well as a distrust of support programs for low-income individuals. The study found that Lifeline participation rates in Florida would increase with higher local telephone prices, greater Lifeline discounts, higher education levels of the head of household, and higher concentrations of households on public assistance.

As mentioned previously, on August 22, 2007, AT&T and Embarq filed a Joint Petition requesting that the FPSC expand the use of Community Service Funds to include research activities. The Joint Petition requested that monies from this fund be used to retain the PURC to conduct research that will address four fundamental questions regarding Link-Up and Lifeline enrollment:

- How do enrollment procedures impact a household's participation in Lifeline?
- What do eligible households understand from the enrollment efforts?
- How does low-income household use of wireless communications impact enrollment in Lifeline?
- What communications services are low-income consumers in Florida purchasing and/or using?

The FPSC clarified that in addition to using the Lifeline Community Service Fund to educate and promote Link-Up and Lifeline services, the fund can be used to support research activities which are in the public interest and designed to benefit Link-Up and Lifeline service.<sup>24</sup> The FPSC also reiterated that responsibility for approval of specific disbursements from the Community Service Fund should remain with the OPC, AT&T, and Embarq.

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<sup>23</sup> Making Telephone Service Affordable for Low-Income Households: An Analysis of Lifeline and Link-Up Telephone Programs in Florida, February 1, 2006 (Revised March 4, 2006).

<[http://bear.cba.ufl.edu/centers/purc/documents/LifelineFinalReportcorrected3\\_04\\_05.pdf](http://bear.cba.ufl.edu/centers/purc/documents/LifelineFinalReportcorrected3_04_05.pdf)>

<sup>24</sup> Order PSC-07-0919-PAA-TL, issued November 14, 2007, in Docket No. 070567-TL.

## **IX. Activities to Promote Lifeline Awareness, Pursuant to Section 364.10, F.S.**

The requirement of the 2003 Act to promote Lifeline participation in cooperation with DCF, the Commission, other state agencies, and the telecommunications companies providing Lifeline service<sup>25</sup> has resulted in a comprehensive, collaborative process to develop promotional procedures with a statewide impact. Senate Bill 1322 was signed into law in 2005, expanding the 2003 Act to include the Department of Education (DOE) and the OPC.<sup>26</sup> During the 2007 Legislative Session, House Bill 529 amended the 2003 Act to require the FPSC and DCF to adopt rules creating procedures to automatically enroll eligible customers in Lifeline service. A Lifeline automatic enrollment process was implemented by the FPSC and DCF in April 2007.

Activities to promote Link-Up Florida and Lifeline began in 1995 and have increased each year since implementation of the 2003 Act. Since July 2003, the Lifeline Partners have been working together on promotional procedures. (A list of the current Lifeline Partners is provided in Appendix A.) Although several state agencies are involved in the administration of the eligible programs, DCF is the only Florida state agency that determines eligibility and provides program benefits directly to citizens. However, other agencies, organizations, and businesses have recognized the importance of Lifeline and joined in the outreach effort on a voluntary basis. Some have even enlisted the support of sister organizations that work with eligible individuals. Additional information about the Lifeline Partners is provided in Appendix B.

Promotional activities in 2007 focused on “grass roots” efforts to increase awareness about the automatic enrollment and automated online application processes. Highlights included expansion of the program-based Lifeline application to include all CLEC, wireless, and prepaid phone service providers; the Connect Florida Campaign; and educational presentations at community events and conferences. In addition, the FPSC’s Lifeline recording on the toll free number was updated to offer more information about Lifeline and advise callers about the online application.

**General Lifeline Training.** During 2007, lifeline brochures and training presentations were updated to include information about the automatic enrollment and automated online application options. The Lifeline Partners that are not involved in the development or operation of these new systems are updated through e-mail notifications, Lifeline informational packets, and training presentations. The Lifeline Partners then share this information with eligible consumers through brochure distribution, training meetings, and community events. Information is also available on the FPSC’s Web site, as well as through Lifeline Web links posted on several Lifeline Partners’ Web sites.

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<sup>25</sup> As passed in 2003: Section 364.10(3)(d), Florida Statutes, “By December 31, 2003, each state agency that provides benefits to persons eligible for Lifeline service shall undertake, in cooperation with the Department of Children and Family Services, the commission, and telecommunications companies providing Lifeline services, the development of procedures to promote Lifeline participation.”

<sup>26</sup> As expanded in 2005: Section 364.10(3)(h), Florida Statutes, “By December 31, 2003, each state agency that provides benefits to persons eligible for Lifeline service shall undertake, in cooperation with the Department of Children and Family Services, the Department of Education, the commission, the Office of Public Counsel, and the telecommunications companies providing Lifeline services, the development of procedures to promote Lifeline participation.”

**DCF Lifeline Training.** A key element in the success of the automatic enrollment process is the DCF staff. DCF has educated and informed its staff about the automatic enrollment process through biweekly conference calls, e-mail notifications, and training conferences. DCF managers are notified by e-mail any time a change is made to the Automated Community Connection to Economic Self-Sufficiency system (ACCESS Florida), such as the changes that were made to include the Lifeline automatic enrollment questions. The managers then share that information with the DCF ACCESS workers who assist clients applying for benefits. In 2007, the DCF included Lifeline training at its annual statewide conference, as well as in training presentations and exhibit booths provided at other conferences and community workshops.

**ACCESS Community Network Lifeline Training.** The DCF has developed the ACCESS Community Network of local community participants to improve clients' access to DCF's online benefits application. The ACCESS Community Network Partners (Community Partners) include organizations such as aging resource centers, child advocacy centers, county public health units, domestic abuse centers, faith-based organizations, and food banks. The organizations assist clients in using the ACCESS Florida system by providing access to computers, printers, telephones, fax machines, and copy machines, as well as helping the applicants complete an online application. The ACCESS Community Network has increased to include 3,046 Community Partner sites as of October 2007. The DCF staff includes Community ACCESS Liaisons who work with the Community Partners to ensure they receive the information needed to help clients apply for benefits using the online system and to educate them about the new Lifeline automatic enrollment process.

**DCF Client Computer Training.** Clients who have questions about the Lifeline program or the automatic enrollment process can request assistance while completing their DCF benefits application. Recent data indicates that about 91 percent of DCF applicants are now applying for Food Stamps, Medicaid, or Temporary Cash Assistance using the ACCESS Florida online system. In addition to computer access offered by the Community Partners, the DCF provides computer access to clients in its lobby areas. Clients who visit a DCF or Community Partner office are greeted by a staff member who trains them how to use the computer to complete their application, update their information, and re-apply for continuing benefits in the future. Clients who apply using a home computer can call the ACCESS Florida toll free number to speak to a live agent for additional assistance. DCF has three call centers which employ 500 staff members. Clients who do not know how to use a computer often have a relative or friend who can help them with the online application process.

In September 2007, the ACCESS Florida program received the 2007 Innovations in American Government Award from the Ash Institute for Democratic Governance and Innovation at Harvard University's John F. Kennedy School of Government. Three highlighted features of the program are the "anytime, anywhere access" through the Internet, the rapid application approval process averaging 18 days, and the Web-based document management that allows DCF staff across the state to easily retrieve client information. According to a recent satisfaction survey, 95 percent of first time applicants planned to use the system again, and 83 percent required no assistance in filing benefits applications online. The addition of the Lifeline

automatic enrollment process to the already successful ACCESS Florida program provides an excellent opportunity to increase participation in the Link-Up and Lifeline programs.

**Program-Based Lifeline Applications.** The Lifeline Partners continued to work to make the program-based Lifeline applications more accessible and easier to use. All Florida ETCs are now required to accept Lifeline applications submitted electronically through the FPSC's online application system. Although customers are encouraged to apply using the online application, some eligible individuals prefer a printed application. During 2007, the FPSC's printed Lifeline application was updated to include all 18 Florida ETCs that are represented on the online application, including CLEC, wireless, and prepaid phone companies. Customers may obtain a printed application from the Commission's Web site or by mail. The Commission also continues to distribute printed brochures and applications to the agencies and organizations having contact with eligible individuals, as well as at training sessions and community events.

A common question asked at Lifeline training sessions is whether Lifeline is available for cellular and prepaid phones. The answer is yes for customers of Alltel, Sprint Nextel, or Budget Phone. To better serve customers using wireless or prepaid phone plans, information has been added to the application to assist them in contacting those companies to complete the application process. Also, Alltel and Sprint Nextel have provided the FPSC with copies of the Lifeline applications used in wireless retail stores, along with information about Lifeline service areas.

**Link-Up and Lifeline Public Service Announcements (PSAs) and Messages.** During 2007, the Commission updated the recording on its toll free number to provide a description of the Link-Up and Lifeline discounts, the eligibility requirements, the FPSC Web site address where the consumer may apply online, a description of the 135 percent income-based eligibility requirement, and the OPC's toll free number for customers of AT&T Florida, Embarq, or Verizon who want to apply based upon their income. Consumers who call the toll free number also have the option of requesting a Lifeline brochure or printed application, as well as talking to a customer service representative. In addition, anyone who calls the Commission and placed on hold will hear a short PSA about Lifeline.

The Commission's most recent Lifeline radio PSAs and television educational interviews, featuring Commissioner Matthew M. Carter II and former Commissioner Isilio Arriaga, continue to be broadcast by radio stations and public broadcasting television stations as filler on a voluntary basis at no charge. Both the PSAs and television segments, in English and Spanish, are available on the FPSC's Web site at <http://www.floridapsc.com/utilities/telecomm/lifeline/>.

**Connect Florida Campaign.** The Connect Florida Campaign (Campaign) was established by Linking Solutions, Inc., OPC, and AT&T Florida in 2004 to increase Lifeline awareness and participation through the development of public-private partnerships. State Legislators, FPSC Commissioners, local officials, the AARP, and Embarq also joined the effort. The Campaign focuses on establishing sustained partnerships with local non-profit community-based organizations. Link-Up and Lifeline community events are held to present information about the programs and encourage individuals and non-profit organizations to participate in the Campaign on a year-round basis. Key groups such as senior centers, Section 8 housing units, churches, and

urban leagues are notified of the event well in advance to encourage attendance by community representatives and eligible individuals. Event attendance generally ranges from 50 people to several hundred, and eligible individuals can submit an application then. Both income-based and program-based Lifeline applications are used at these events depending on which one works best for each applicant. Completed income-based applications are subsequently processed by the OPC, and the program-based applications are forwarded to the appropriate company by Linking Solutions. Statistical information on the number of calls received, applications received, and applications approved by the OPC is provided in Appendix B.

During 2007, the Campaign representatives continued to work with the One Stop Centers, managed by the Workforce Florida Regional Boards throughout the state, which provide job placement training, temporary cash assistance, and special support services. Many citizens served by the One Stop Centers have a low income, experience a temporary financial hardship, or participate in publicly-supported programs. As part of the 2006 Campaign, Linking Solutions conducted training for the One Stop Center staff to help identify and enroll clients eligible for the Link-Up and Lifeline programs. Linking Solutions met with One Stop Centers from Key West to Pensacola in 20 of the 24 Workforce Florida Regions and conducted more than 75 training sessions. In early 2007, training sessions were held at One Stop Centers in the remaining four Workforce Florida Regions. Beginning in late 2007, Linking Solutions plans to contact the One Stop Centers again to ensure that the staff members are aware of the new online application and automatic enrollment processes. Additional training sessions will be offered to the One Stop Centers. In addition to the Workforce Florida training, Linking Solutions sent Lifeline letters and applications to all NAACP chapters and approximately 1,100 churches and non-profit groups throughout Florida during 2007.

The Campaign also promoted the Link-Up and Lifeline programs through organized community activities with the Commission and participating telecommunications companies. During late 2006 and 2007, events were held in Hollywood, Orlando, Gainesville, Jacksonville, Daytona Beach, Hialeah, Belle Glade, Pembroke Pines, Hallandale Beach, and Panama City. Some events were attended by more than 200 potential subscribers. Linking Solutions also held smaller training sessions on a daily basis around the state. Between October 2006 and November 2007, the Campaign held over 587 events throughout Florida with approximately 38,000 attendees.

**Community Events.** The Lifeline Partners continued to seek existing community events and develop new events where Lifeline educational materials could be distributed and discussed with citizens. Examples of 2007 events include FPSC Lifeline training sessions at Leon and Wakulla county libraries; Senator Jeremy Ring's Information Fairs in Fort Lauderdale; the Lincoln Neighborhood Service Center Senior Day in Tallahassee; Sage Senior Health Fair in Fort Lauderdale; New Mount Zion AME Church Come Together Day in Tallahassee; Kings Point Town Hall Forum with Congressman Robert Wexler, Governor Charlie Crist, and Senator Ring in Tamarac; and the AARP Health Fair in Williston. In addition, the FPSC and Florida's public libraries partnered on a new project to increase awareness of Lifeline during National Consumer Protection Week, February 4-10, 2007. FPSC staff visited 20 libraries in Fort Walton Beach, Pensacola, Orlando, Tampa, St. Petersburg, West Palm Beach, Fort Lauderdale, and Jacksonville to provide educational displays and meet with consumers.

**Community and Professional Training Presentations.** The Lifeline Partners reached out to eligible individuals and service professionals on a more personal level. Increased emphasis was placed on offering training to service professionals who regularly assist eligible clients. In 2007 Lifeline training presentations and exhibits were provided at the Elder Affairs' Best Practices Conference; Florida Voters League, Inc.'s 49<sup>th</sup> Annual Convention; and the Mount Pleasant Missionary Baptist Church in Orlando, which included a presentation by Commissioner Carter. Also, FPSC Lifeline events were held with the Lakeland Housing Authority for residents of eight complexes. The housing authority events offered eligible residents one-on-one help completing their Lifeline applications, while at the same time providing hands-on training for the housing authority staff members to assist current and future residents.

In addition to working with large groups, the Lifeline Partners also offered small staff training meetings with various organizations. Examples include the Central Florida Community Action Agency, Inc. in Gainesville; Suwannee River Economic Council, Inc. in Live Oak; Suncoast Center and Pinellas Opportunity Council, Inc. in St. Petersburg; and the Beardall Senior Center, Claudia Allen Senior Center, and Metropolitan Urban League in Orlando.

**Back-to-School Lifeline Project.** In 2005 and 2006, the Lifeline Partners worked with Florida's public school system to include Lifeline information in back-to-school packets. During 2007, the Lifeline Partners have been working with the DOE, the Florida Association of School Superintendents, and the Florida PTA to determine if there are other avenues that can be used to provide Lifeline information to families whose children participate in the free lunch program.

**Lifeline Across America.** In 2007, the Lifeline Across America Working Group (FCC, National Association of Regulatory Utility Commissioners [NARUC], and National Association of State Utility Consumer Advocates [NASUCA] representatives) created a "webinar" posted on the [www.lifeline.gov](http://www.lifeline.gov) Web site to provide training to social workers and others who deal directly with eligible consumers. The Working Group also started production of a similar webinar specifically on the tribal Lifeline program. A Lifeline listserv was designed for public utility commission staff to share questions on the USF low-income programs.

Since the NARUC Summer Meetings in July 2007, the Working Group has been discussing how to publicize the webinar and identify interested organizations. The Working Group is planning a targeted webinar media campaign and determining appropriate publications for placing short articles about Lifeline and Link-Up in addition to the webinar availability. An outreach tool kit with sample articles, press releases, fliers, and other printed materials was also prepared and posted on the Lifeline Across America Web site.

In addition to the Lifeline Across America Working Group, a sub-group was formed in the summer of 2007 to address technical issues related to administration of the Link-Up and Lifeline programs. Specifically, the goal of the sub-group is to provide a discussion forum for Lifeline issues so the FCC and state public utility commissions can learn from each other and share best practices. Representatives from the FCC, NARUC, USAC, and nearly 20 state commissions are participating in quarterly conference calls to discuss administrative concerns or problems encountered by the state commissions. Topics include whether states are experiencing

a decline in enrollment, what states are doing to publicize the availability of Link-Up and Lifeline, which states use automatic enrollment and how it works, and how states are handling eligibility verification and re-verification. The quarterly calls are open to any state public utility commission that chooses to participate.

**Lifeline Awareness Week.** During 2007, the Commission, OPC, LECs, and Linking Solutions continued discussions for a future Lifeline Awareness Week to promote program awareness throughout the state. Possible options include requesting a Lifeline Awareness Week Resolution from the Governor. The parties agree that such a resolution would add increased significance to this promotional effort. Agencies and organizations that assist with Lifeline promotion would be asked to participate. Possible events include a kick-off ceremony in Tallahassee at the Capital Courtyard, followed by similar promotional events in other cities during that week. The Commission would coordinate news releases prior to the planned events, and media coverage would be encouraged.

Clearly, the Lifeline promotional activities undertaken by the Lifeline Partners are responsible for increasing awareness and enrollment in the Link-Up and Lifeline programs. There is still work to be done. The Lifeline Partners have been fortunate in receiving marketing assistance at no charge through various radio stations, and public and government television stations and will work to expand the network of broadcast stations willing to help. If financial resources become available, use of commercial television public service announcements and target marketing should also be pursued.

## **X. Effectiveness of Procedures to Promote Participation**

Efforts to increase Link-Up and Lifeline participation can be separated into two categories, enrollment process and consumer outreach. In recent years, the Commission has placed increased attention on enrollment process issues as a means of increasing participation.

Specific enrollment process initiatives include the following:

- Adoption of the simplified certification process for enrollment under the program-based criteria.
- Implementation of the Back-to-School Lifeline Project on a statewide basis.
- Development of comprehensive rules to guide the Link-Up and Lifeline programs in Florida.
- Initiation of an FPSC Automated Online Application Process on the Commission Web site allowing potential Link-Up and Lifeline customers to enroll in these programs with the click of a mouse.
- Implementation of the FPSC/DCF Automatic Enrollment Process, which has shown positive early results.

The FPSC, in cooperation with other state and federal agencies, the OPC, the ILECs, and other organizations, remains engaged in extensive outreach efforts. Because most of these efforts run concurrently, measuring the impact of any single activity on Link-Up and Lifeline participation is difficult. Nevertheless, outreach efforts are having a positive impact and should be continued. In the past, only the ILECs have been involved in the coordinated outreach efforts, so outreach should continue to be expanded to encompass CLEC and wireless ETCs. As the number of CLEC and wireless ETCs increase, bringing them into the coordinated outreach effort is important.

## **XI. Conclusion**

The overall net Lifeline customer growth rate of 13 percent during the 2006-2007 review period represents the highest percentage increase to date. As of September 2007, 164,626 eligible customers participated in the Lifeline program. The FPSC attributes this growth primarily to implementation of the FPSC/DCF automatic enrollment process in April 2007.

Efforts to improve and streamline the enrollment process are having a positive impact on enrollment and should continue to be a primary focus. Outreach efforts contribute to Lifeline awareness and enrollment and should be continued. Key enrollment issues include:

- FPSC/DCF Automatic Enrollment
- FPSC Online Application
- Consumer Awareness

Embarq and AT&T experienced the largest increase in Lifeline participation among Florida's ETCs during the 2006-2007 review period. Embarq increased its Lifeline participation by 6,912, while AT&T's participation increased by 6,046. Embarq and AT&T's combined increase represented 69 percent of the net increase in Lifeline participation during the review period.

Enrollment of new Lifeline customers by CLEC ETCs continues to show positive results. VCI, TSI, and American Dial Tone, which all began offering Lifeline in 2006, have enrolled 5,598, 2,037, and 1,840 Lifeline customers, respectively. In total, CLEC Lifeline enrollment was 9,834, representing six percent of total Lifeline customers as of September 30, 2007. CLEC and wireless ETCs are designing specific product offerings for Lifeline customers, and several are making Lifeline customers a major focus in their marketing strategy.

Implementation of the FPSC/DCF automatic enrollment process has shown excellent results during the initial six-month implementation period, April 2007 through October 2007. The FPSC remains committed to improving the success of the Link-Up and Lifeline programs. The FPSC will continue to identify and find solutions to any barriers that may prevent Lifeline from achieving greater success for the benefit of Florida low-income consumers.

## **APPENDIX A**

### **Lifeline Partners**

## **Lifeline Partners**

The following local, state, and federal agencies, organizations, businesses, and telecommunications companies are involved in the collaborative effort to increase awareness and participation in the Link-Up and Lifeline programs.

Local, State, and Federal Agencies, Organizations, and Businesses:

- ◆ AARP - Florida Chapter (formerly the American Association of Retired Persons)
- ◆ ACCESS Florida Community Network Partners
- ◆ Agency for Health Care Administration (AHCA)
- ◆ Agency for Workforce Innovation (AWI) and Workforce Florida, Inc. (WFI)
- ◆ Area Agency on Aging
- ◆ Big Bend 2-1-1 and other 2-1-1 Agencies
- ◆ Braille and Talking Book Library
- ◆ Bureau of Indian Affairs Programs
- ◆ Capital Area Community Action Agency, Inc. (CACAA)
- ◆ City and County Consumer Assistance Departments
- ◆ Faith Radio Station and Other Florida Radio Stations
- ◆ Federal Social Security Administration (SSA)—Tallahassee District
- ◆ Florida Alliance for Information and Referral Services (FLAIRS)
- ◆ Florida Association for Community Action (FACA)
- ◆ Florida Association of Community Health Centers
- ◆ Florida Association of Food Banks (FAFB)
- ◆ Florida Council on Aging
- ◆ Florida Department of Children and Families (DCF)
- ◆ Florida Department of Community Affairs (DCA)
- ◆ Florida Department of Education (DOE)
- ◆ Florida Department of Elder Affairs (DEA)
- ◆ Florida Department of Revenue (DOR)
- ◆ Florida Office of Public Counsel (OPC)
- ◆ Florida Public Libraries
- ◆ Florida Public School Districts
- ◆ Florida Public Service Commission (FPSC)
- ◆ Florida Telecommunications Relay, Inc. (FTRI)
- ◆ Florida Voters League
- ◆ Habitat for Humanity—Florida
- ◆ Leon County School Board
- ◆ Linking Solutions, Inc.
- ◆ Tallahassee Memorial Hospital (TMH) and other Florida Hospitals
- ◆ Tallahassee Urban League
- ◆ United Way of Florida
- ◆ U.S. Department of Housing and Urban Development (HUD)

Telecommunications Companies:

- ◆ Alltel Wireless
- ◆ American Dial Tone
- ◆ AT&T Florida (AT&T f/k/a BellSouth Telecommunications, Inc.)
- ◆ Budget Phone, Inc.
- ◆ Embarq Florida, Inc. (Embarq)
- ◆ Frontier Communications of the South, Inc. (Frontier)
- ◆ GTCOM
- ◆ ITS Telecommunications Systems, Inc. (ITS)
- ◆ Knology, Inc.
- ◆ Midwestern Telecommunications, Inc.
- ◆ NEFCOM—Northeast (Northeast)
- ◆ Nexus Communications
- ◆ Smart City Telecom (Smart City)
- ◆ Sprint Nextel
- ◆ TDS Telecom/Quincy (TDS)
- ◆ Verizon Florida, Inc. (Verizon)
- ◆ Vilaire Communications, Inc.
- ◆ Windstream Florida, Inc.

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## **APPENDIX B**

### **Promotional Activities**

## Specific Promotional Activities by Lifeline Partners

The following text is a detailed discussion of the role that each of the Lifeline Partners is playing in the development of procedures to promote Lifeline. The discussion includes the eligible programs that each participant is involved with, past and present outreach efforts, existing procedures that can be continued or expanded, and new procedures that are being considered for development and implementation.

The focus of the 2007 Lifeline promotional activities continued to be outreach at the grass roots level. Also, added emphasis was placed on increasing awareness about the automated online Lifeline application and Lifeline automatic enrollment processes, training the professionals who regularly assist eligible clients, and updating educational information to reflect recent program improvements.

**AARP - Florida Chapter.** The requirements of the 2003 Act do not apply to the AARP. However, the AARP is a strong advocate for Lifeline awareness, and representatives of the AARP-Florida Chapter have offered to assist the Commission and other state agencies in the development of promotional procedures. The AARP currently provides Lifeline information on a recurring basis in its magazine and at the three Florida AARP Offices located in Miami, St. Petersburg, and Tallahassee, and has agreed to continue these promotional activities. The AARP has also been involved in the Connect Florida Campaign. During 2007, the AARP worked with AT&T Florida to mail approximately 143,000 letters with Lifeline applications to a targeted group of potentially eligible customers in Florida.

The AARP currently provides age-related news and information to its Florida members through two Web sites at [www.floridaagingnews.org](http://www.floridaagingnews.org) and [www.aarpflorida.org](http://www.aarpflorida.org). During 2007, the AARP continued to include a Lifeline link on both Web sites. AARP also provides a Florida Aging News e-newsletter six days a week. The newsletter is provided free of charge and can be requested through the Florida Aging News Web site. The e-newsletter contains a link to the Florida Aging News Web site, which in turn includes a Lifeline link. As discussed previously, the AARP helped in the development of the automatic enrollment process through its joint petition with the OPC to require automatic enrollment, as well as in its legislative efforts. Following implementation of the new automatic enrollment process, the AARP updated the Lifeline information provided on its Web site to help inform AARP members about the availability of automatic enrollment for low-income customers.

**ACCESS Florida Community Network Partners.** In 2004, the DCF launched the Automated Community Connection to Economic Self-Sufficiency system known as ACCESS Florida. The system allows citizens to apply for Food Stamps, Temporary Cash Assistance, or Medicaid through the Internet. In order to improve citizens' access to these services, the DCF has developed the ACCESS Community Network of local community participants who are willing to help clients obtain these services. The ACCESS Community Network Partners (Community Partners) include organizations such as aging resource centers, child advocacy centers, community centers, county public health units, domestic abuse centers, faith-based organizations, food banks, homeless organizations, hospitals, libraries, public schools, social services, and Workforce Florida One Stop Centers. The organizations assist clients in using the

ACCESS Florida system by providing access to computers, printers, telephones, fax machines, and copy machines. Staff members are also available to help clients complete an online application.

The ACCESS Community Network has grown to include 3,046 Community Partner sites as of October 2007. About two-thirds of the sites prefer to offer assistance only to their clients. However, nearly 1,000 of the Community Partner sites are open to the general public. Those sites offer assistance with the application process to all people seeking help whether they are affiliated with that organization or not. The DCF staff includes DCF Community ACCESS Liaisons who work with the Community Partners to ensure that they receive the information needed to help clients apply for benefits using the online system. The DCF District Offices and DCF Liaisons have been working with the Community Partners this year to educate them about the new Lifeline automatic enrollment process. Also, the DCF Liaisons are assisting with distributing Lifeline brochures to the Community Partners as needed.

**Agency for Health Care Administration (AHCA).** AHCA has contact with recipients of Medicaid and Supplemental Security Income (SSI) benefits but does not provide benefits through either program. Specifically, AHCA administers the Medicaid Program, but client eligibility is determined by the DCF and benefits are distributed by approved Medicaid providers. The Social Security Administration (SSA) performs all functions for the SSI Program (i.e., administration, eligibility determination, and distribution of benefits). Although Medicaid and SSI recipients will likely receive Lifeline information through the DCF or SSA, AHCA has volunteered to assist in distributing Lifeline information in other forums not used by those agencies.

AHCA's Long Term Care Monitoring Program ensures that all nursing homes in Florida are visited by a Quality of Care Monitor each quarter. Since 2004, AHCA's Quality of Care Monitors have helped distribute Lifeline brochures and applications to nursing home administrators for their residents. In 2006, the AHCA implemented a Lifeline link on its home page so that Medicaid recipients and other eligible individuals who visit AHCA's Web site for information will have easy access to Lifeline information as well. During 2007, AHCA staff members were informed about the addition of the online application and automatic enrollment processes by e-mail notification.

**Agency for Workforce Innovation (AWI) and Workforce Florida, Inc. (WFI).** WFI is the state's chief workforce policy organization. Created by the Workforce Innovation Act of 2000, the public-private partnership supports and promotes economic growth through workforce development. The AWI serves as the administrative agency for WFI. Neither the AWI nor WFI provides benefits through any of the eligible programs. However, due to WFI's extensive contact with eligible individuals, WFI has volunteered to assist with the outreach efforts.

WFI's Career Council (formerly the Better Jobs/Better Wages Council) helps underemployed workers improve their skills so they can get better jobs with better wages that provide economic self-sufficiency. The Career Council is responsible for the state's welfare transition program with an expanded emphasis on helping former welfare recipients succeed in the workplace. WFI programs are implemented through 24 regional workforce boards.

Workforce development services are provided through a system of more than 100 One Stop Centers designed to give easy access to services including job placement, job training, and temporary cash assistance. The WFI regional workforce boards and One Stop Centers work in coordination with the DCF District Offices and other organizations to assist citizens at the local level. In 2004, Lifeline informational packets were distributed by the FPSC to all 24 regional workforce boards. The FPSC subsequently received additional orders for educational materials from the workforce boards during 2004, 2005, and 2006. Each regional workforce board determined the best procedure for distributing educational materials within its area.

As part of the 2006 Connect Florida Campaign, Linking Solutions conducted training for the One Stop Center staff members to help identify clients who might be eligible for the Link-Up and Lifeline programs. Participants in the training were encouraged to share program applications and help their eligible clients sign up for the programs. Linking Solutions met with One Stop Centers from Key West to Pensacola in 20 of the 24 Workforce Florida Regions and conducted more than 75 training sessions in 2006. In early 2007, Linking Solutions completed training sessions for the remaining four Workforce Florida Regions. Beginning in late 2007, Linking Solutions plans to contact the One Stop Centers again to ensure that the staff members are aware of the new online application and automatic enrollment processes. Additional training sessions will be offered if needed.

**Area Agency on Aging.** Local Area Agencies on Aging have contact with senior citizens who may be eligible for Lifeline due to their income level or participation in an eligible program. These organizations assist in the effort by offering Lifeline educational materials to their clients. The Lifeline Partners will continue to work with these organizations to provide educational materials and schedule additional grass roots meetings in the upcoming year.

**Big Bend 2-1-1 and other 2-1-1 Agencies.** Big Bend 2-1-1 is the Information and Referral Service Agency for the Big Bend area in Florida and has contact with eligible individuals seeking information and assistance for various needs. Since 2004, Big Bend 2-1-1 has included information about the Link-Up and Lifeline programs in its database of information used to assist local citizens. In addition, Big Bend 2-1-1 has assisted the Lifeline Partners with contacting other 2-1-1 Information and Referral Service Agencies and the Florida Alliance for Information and Referral Services (FLAIRS.) As a result, additional 2-1-1 Agencies across the state have included information about the Link-Up and Lifeline programs in their information databases as well. Also, the FPSC provided a Lifeline presentation and educational materials at the FLAIRS 2005 and 2006 Annual Conferences. In addition to the Big Bend 2-1-1, some telecommunications companies have worked directly with Informational and Referral Services located in the companies' service areas. In 2007, the Lifeline Partners began notifying 2-1-1 service providers about the availability of the online application and automatic enrollment processes.

**Braille and Talking Book Library.** The Bureau of Braille and Talking Book Library Services is under the Department of Education, Division of Blind Services. Since 1950, the bureau has been designated by the Library of Congress/National Library Service for the Blind and Physically Handicapped as the regional library for Florida. The bureau loans Braille and recorded books and magazines to all eligible residents of the state. In addition, the bureau has

established 11 sub-regional libraries to provide local talking book services to residents of metropolitan areas. Reading materials are sent to and from customers via postage-free mail, and all services are provided at no charge. The bureau serves more than 39,000 Florida residents who cannot use standard print reading materials as the result of a visual, physical, or reading disability. It is the largest library of its kind in the United States, with a collection of more than 2.4 million items in Braille or on cassette and annual loans exceeding 1.6 million items.

The bureau has translated the Commission's Lifeline brochure into Braille and produced copies for the FPSC to distribute as needed. The Braille brochures became available for use in July 2004. Since that time the FPSC has continued to work with the Braille and Talking Book Library to make Lifeline information available to sight impaired individuals who may be eligible for Lifeline.

**Bureau of Indian Affairs Programs.** Individuals receiving benefits through a qualified Bureau of Indian Affairs program are eligible for expanded Link-Up and Lifeline benefits. Florida's two federally recognized tribes, the Miccosukee and Seminole Tribes, fall under the Bureau of Indian Affairs Regional Office located in Nashville, Tennessee. The agencies located near federally recognized lands have been informed about the expanded benefits so they may inform clients living in those areas. The Lifeline Partners have worked with the Florida Association of Community Action to provide Link-Up and Lifeline educational materials to its two Tribal Lands agencies representing the Seminole and Miccosukee Tribes. The Commission will continue to work with these and other agencies to ensure that eligible individuals living on tribal lands are informed about Link-Up and Lifeline.

**Capital Area Community Action Agency, Inc. (CACAA).** CACAA is a private non-profit organization created to help low-income families gain financial independence and self-sufficiency in the Big Bend area. Since 2004, the CACAA has provided Lifeline educational materials to its clients. In addition, the CACAA helped the Lifeline Partners contact other Community Action Agencies throughout the state. In 2005, this promotional effort was expanded to include all local Community Action Agencies that are members of the Florida Association of Community Action. During 2007, the CACAA was notified about the availability of the online application and automatic enrollment processes.

**City and County Consumer Assistance Departments.** A number of cities and/or counties have Consumer Assistance Departments that provide information and assistance to local citizens. These Departments have contact with individuals who are eligible for Lifeline based upon their income level or participation in eligible programs. City and county Consumer Assistance Departments throughout Florida have agreed to assist in the Lifeline outreach effort by distributing educational materials to local citizens seeking assistance through their offices. Cities represented include Jacksonville, Miami, Orlando, Tallahassee, Tampa, and West Palm Beach. Counties that have agreed to assist in the outreach effort include Broward, Duval, Hillsborough, Leon, Miami-Dade, Orange, Pinellas, and Palm Beach. During 2007, the Lifeline Partners continued to work with these and other local governments to make Lifeline educational materials and applications available to local citizens. Also, the Consumer Assistance Departments were notified about the automated online application and automatic enrollment processes.

**Faith Radio Station and Other Florida Radio Stations.** In keeping with the grass roots theme for outreach, the Lifeline Partners initiated a pilot project with a local radio station in 2004. Faith Radio Station in Tallahassee agreed to play a Lifeline Public Service Announcement (PSA) free of charge. In 2006, the Commission produced new Lifeline PSAs for radio broadcast featuring Commissioner Matthew M. Carter II and former Commissioner Isilio Arriaga. The Lifeline PSAs were produced in English and Spanish to reach a larger population of eligible citizens. The 30-second and 60-second PSAs were distributed to Faith Radio Station and 83 other radio stations across the state with either English- or Spanish-speaking target audiences. No changes were made to the radio PSAs during 2007. While the information provided in the PSAs is accurate and still useful, updating the PSAs to include information about the online application process may be more beneficial.

**Federal Social Security Administration (SSA) - Tallahassee District.** The SSI Program is administered by the SSA. The SSA District Offices determine client eligibility and distribute program benefits at the local level. The SSA—Tallahassee District Office has assisted in expanding Lifeline outreach to all of the SSA Offices in Florida. Information packets were previously sent to all 57 SSA District Offices, and the offices subsequently ordered additional Lifeline educational materials from the FPSC. During 2007, the SSA District Offices were notified about the online application and automatic enrollment processes.

**Florida Alliance for Information and Referral Services (FLAIRS).** FLAIRS is a statewide association of agencies and individuals committed to the provision of quality information, referral, and hotline services. FLAIRS members include Florida 2-1-1 Agencies, United Way Agencies, crisis hotlines, libraries, military service centers, elder helplines, child-care resource and referral providers, and others who provide hotline and information services. The Alliance offers an annual training conference for members and other interested service providers. During 2005 and 2006, FLAIRS assisted in the Lifeline promotional effort by allowing the Commission to participate as a presenter at its Annual Conference. In addition, FLAIRS representatives helped distribute Lifeline educational materials to the conference attendees, encouraging them to share the materials with others in their organizations who were not able to attend the conferences. During 2007, FLAIRS representatives were notified about the new automated online application and automatic enrollment processes.

**Florida Association for Community Action (FACA).** Since 1981, the FACA has served as a network of Florida Community Action Agencies, Head Start programs, weatherization programs, and other sanctioned programs to raise the health, education, and economic standards of Florida's economically disadvantaged citizens. FACA serves its members through such avenues as educational programs, information exchange, advocacy and support services, and collaboration and shared resources. Between 1988 and 2007, the FACA developed and managed Florida's statewide, toll-free Hunger Hotline. The Hunger Hotline provided referrals to approximately 2000 agencies across the state that offer various assistance programs to Floridians. FACA provided Lifeline information to individuals seeking help through the Hunger Hotline from 2005 through 2007. In September 2007, the Hunger Hotline was discontinued due to a lack of federal funding.

In 2005, FACA also assisted in the Lifeline promotional effort by allowing the Commission to participate as a Link-Up and Lifeline exhibitor at FACA's 25<sup>th</sup> Annual Training Conference. Also, FACA helped facilitate the distribution of Link-Up and Lifeline educational materials and applications to all 56 of its member local community action agencies, including two Tribal Lands agencies representing the Seminole and Miccosukee Tribes. During 2006, the FACA assisted further by allowing the Commission to participate as both a presenter and exhibitor at its 26<sup>th</sup> Annual Training Conference. During 2007, FACA was notified about the online application and automatic enrollment processes. Although FACA is no longer able to use the Hunger Hotline as a means of increasing Lifeline awareness, the organization is still committed to assisting in the outreach effort through the local community action agencies.

**Florida Association of Community Health Centers.** The Florida Association of Community Health Centers represents community health centers which assist individuals who may be eligible for Lifeline. Since 2004, the Association has assisted the Lifeline Partners in the outreach effort by making Lifeline educational materials available to individuals who visit the community health centers. During 2007, the FPSC distributed new Lifeline informational packets to each of the 33 federally qualified community health centers that are members of the association. The informational packets told about the availability of the online application, provided updated Lifeline materials, and encouraged the health centers to assist eligible individuals with the enrollment process when possible.

**Florida Association of Food Banks (FAFB).** The Florida Association of Food Banks represents 16 member food banks that serve all 67 counties in Florida. The FAFB is affiliated with America's Second Harvest which has a nationally recognized food distribution system and 200 member food banks throughout the country. Since 2005, the FAFB has worked with the Lifeline Partners to help provide Lifeline materials to eligible individuals who receive assistance through the member food banks. During 2007, the FPSC mailed Lifeline informational packets to the 16 member food banks to inform them about the availability of the online application process. The packets included updated Lifeline brochures and printed applications, as well as order forms that could be used by the food banks to order additional materials as needed. The food bank staff members were also encouraged to assist clients with the application process when possible.

**Florida Council on Aging (FCOA).** The Florida Council on Aging was founded in 1955 and is Florida's only statewide association representing all aging interests. The FCOA is committed to serving Florida's diverse aging interests through education, information-sharing, and advocacy. In 2006, the FCOA assisted in the Lifeline promotional effort by allowing the Commission to participate as an exhibitor at its 2006 Florida Conference on Aging. During 2007, the Lifeline Partners provided updated Lifeline information and educational materials to FCOA representatives that serve the central Florida region. The Lifeline Partners and FCOA are exploring possible options to branch out to the FCOA's volunteer programs such as the Foster Grandparent Program, the Retired Senior Volunteer Program, and the Senior Center's Volunteer Program in 2008.

**Florida Department of Children and Families (DCF).** The DCF determines eligibility and provides benefits to recipients of Food Stamps or Temporary Cash Assistance. The DCF also determines eligibility for Medicaid; however, benefits are distributed by approved Medicaid

providers. In April 2007, the FPSC and DCF implemented a Lifeline automatic enrollment process, but DCF's support of the Lifeline outreach effort began years earlier. The DCF began its Lifeline outreach efforts with a mass mailing of Lifeline information in 1998. The DCF subsequently implemented procedures to promote Lifeline on a regular basis. Specifically, the Florida Legislature appropriated \$500,000 for fiscal year 2001-2002 to be transferred from the Commission's Regulatory Trust Fund to the DCF to fund a Lifeline Project. On January 15, 2003, the Legislative Budget Commission approved the DCF Lifeline Project expenditure plan, which was designed to use \$130,050 of the original appropriation. During 2002 and 2003, the DCF, the Commission, the Florida Telecommunications Industry Association, and LECs worked together to implement the DCF Lifeline Project.

As part of that effort the DCF modified its eligibility determination procedures so that information about the Link-Up and Lifeline programs would be provided during client interviews. Brochures are provided by the Commission to individual DCF field offices for distribution to program beneficiaries. The DCF provides an eligibility notice to all clients who are determined to be eligible for Medicaid, Food Stamps, or Temporary Cash Assistance. Effective April 21, 2003, the eligibility notice began informing clients that they may be eligible for Lifeline assistance. Prior to that date, the required proof of eligibility varied among telecommunications companies. Under the DCF Lifeline Project, the LECs agreed to accept the DCF's eligibility notice as proof of eligibility for Lifeline. The new notification procedure and streamlined eligibility verification were expected to provide increased awareness and enrollment in these programs. Following implementation of the new procedures, several telecommunications companies confirmed they were receiving requests for Lifeline assistance from customers who had received the new DCF eligibility notice and that the notices were helpful in streamlining the enrollment process. In addition to promoting the new automatic enrollment process that was implemented in 2007, the DCF has continued to provide Lifeline information in the eligibility notices.

Effective June 19, 2006, the DCF added a Lifeline link to its Economic Services/ACCESS Florida Web page that is used by individuals seeking information about Food Stamps, Medicaid, and Temporary Cash Assistance. In April 2007, the DCF Lifeline automatic enrollment process became operational. This new process appears to hold the most promise for increasing Lifeline participation of any promotional effort implemented to date. The development of this process and related training efforts are detailed in the main body of this report.

**Florida Department of Community Affairs (DCA).** The DCA's Division of Housing and Community Development administers the Low-Income Home Energy Assistance Program (LIHEAP) but does not determine client eligibility or provide benefits. The DCA provides LIHEAP grants to local governments and non-profit agencies to assist eligible low-income households in meeting the costs of home heating and cooling. Prior to implementation of the 2003 Act, the Commission sent Lifeline educational packets to all the agencies in Florida that administered the LIHEAP at the local level. In 2006, the DCA and Commission provided updated Lifeline informational packets to the 32 agencies and organizations in the state that qualify customers for LIHEAP. The DCA has continued to work with those agencies to

incorporate the regular distribution of Lifeline educational materials into their client interview process.

In addition, during 2005, the DCA modified its procedures in the Community Services Block Grant program to add an indicator to its work plan that allows the Community Action Agencies to report on the number of clients they help to secure Lifeline services. During the first year reporting period of October 1, 2004 – September 30, 2005, the Community Services Block Grant program reported that 3,475 households were signed up for Lifeline benefits as a result of assistance received from the Community Action Agencies. During the second year reporting period of October 1, 2005 – September 30, 2006, an additional 236 households were signed up for Lifeline benefits through the Community Action Agencies. Data for October 2006 to September 2007 will be available in early 2008.

The DCA and Commission also initiated a project to supply Lifeline information through the DCA's Front Porch Florida program in 2006. The DCA provided FPSC staff with the opportunity to participate in a Front Porch Florida Training Meeting. A brochure was developed jointly to help increase awareness of the Link-Up and Lifeline programs in communities served by Front Porch Florida. During 2007, DCA assisted with informing the Community Action Agencies and other staff about the new online Lifeline application and automatic enrollment processes. The DCA is encouraging the agencies and organizations to continue helping clients apply for the Link-Up and Lifeline programs.

**Florida Department of Education (DOE).** The DOE began providing assistance with the Lifeline promotional effort through its Division of Blind Services in 2004. The DOE's Division of Blind Services provides assistance to sight impaired individuals who may be eligible for Lifeline. The Division agreed to assist in the outreach effort by supplying Lifeline educational materials to its clients. The Division also alerted the Lifeline Partners to the need for Lifeline educational materials in different formats that are accessible to sight impaired citizens. As a result, the Commission's Lifeline brochure was translated to Braille by the Braille and Talking Book Library. During 2005 and 2006, the DOE also assisted with the Back-to-School Lifeline Project. In 2007, the DOE assisted the Lifeline Partners with exploring additional options for working with Florida's school system to provide Lifeline information to eligible families. DOE staff members were also informed about the new online application and automatic enrollment processes.

**Florida Department of Elder Affairs (DEA).** The DEA does not administer or provide benefits through any of the eligible programs but does have contact with eligible individuals. The DEA has been assisting with Lifeline outreach efforts since 1998, and currently has procedures in place for providing Lifeline information to eligible citizens who contact the agency. The agency regularly includes information about the Link-Up and Lifeline programs in its *Elder Update* publication. Educational information is also provided through DEA's Elder Helpline and at health fairs and expositions. The DEA further assisted in the Lifeline promotional effort by allowing the FPSC to share a booth as a co-exhibitor at the 2006 Florida Conference on Aging. During 2007, the DEA invited the FPSC to provide a Lifeline exhibit at the Elder Affairs' Best Practices Conference. DEA staff were also informed about the

implementation of the new automated online Lifeline application and Lifeline automatic enrollment processes.

**Florida Department of Revenue (DOR).** The DOR does not administer or provide benefits through any of the eligible programs but does have contact with eligible individuals. During 2006, the DOR provided assistance with the Lifeline promotional effort through its Child Support Enforcement program. The Commission has provided Lifeline educational materials and applications to the DOR for distribution to eligible clients. During 2007, a Lifeline link was implemented on DOR's Child Support Web page. Also, DOR staff were informed about the availability of the online application and automatic enrollment processes.

**Florida Office of Public Counsel (OPC).** The 2003 Act expanded the Lifeline eligibility criteria to include AT&T Florida, Embarq, and Verizon customers who meet an income eligibility test at 125 percent of the Federal Poverty Guidelines (FPG). In 2005, the Florida Legislature increased the standard to 135 percent. Section 364.10(3)(a), Florida Statutes, states in part that, "The Office of Public Counsel shall certify and maintain claims submitted by a customer for eligibility under the income test authorized by this subsection." Accordingly, the OPC has implemented procedures to process customer applications.

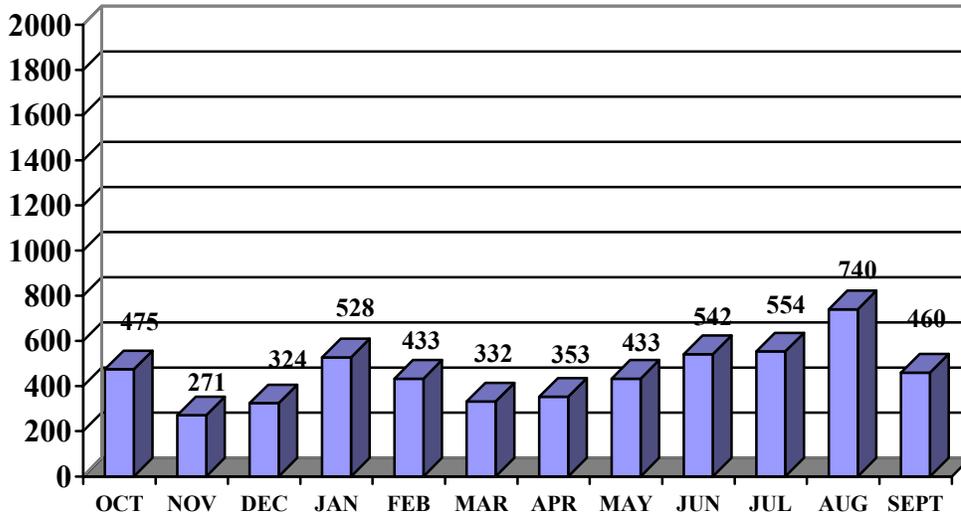
The OPC's procedures include telephone consultations to determine initial eligibility, distribution of applications to customers, review of submitted applications, written notification of the eligibility determination, and provision of customer eligibility information to the appropriate LECs. Customers who are currently receiving telephone service from AT&T Florida, Embarq, or Verizon are then enrolled in Lifeline by their telephone company based upon information provided by the OPC. Customers who do not currently have a telephone must contact their telephone company directly to request the installation of telephone service. In those cases, the OPC requests that the customer contact the OPC upon receiving his or her new telephone number so that the Link-Up and Lifeline credits may be activated.

The OPC also helped establish the Connect Florida Campaign and has been actively involved in the Connect Florida Campaign events. The OPC staff members are regularly on hand to assist customers with the application process during the events. The events have been beneficial in increasing awareness and participation in the Lifeline program. Additionally, the OPC believes that the information gathered seems to support the concept that the promotion of Link-Up and Lifeline is directly related to the programs' participation rates. The OPC reports that it regularly receives letters and calls of thanks from Lifeline participants who appreciate being able to speak to someone in person and receive assistance with signing up for the program. Statistics regarding the OPC's eligibility program are shown in the figures below.

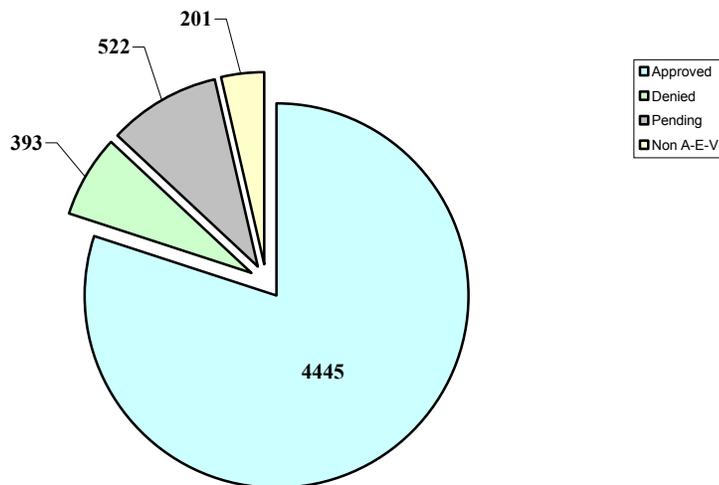
Figure 2 presents data on the number of income-based Lifeline applications received each month from October 2006–September 2007. Figure 3 presents data on the number of applications approved, denied, and pending. Figure 3 also includes the number of non AT&T, Embarq, or Verizon customers. During this time period, the OPC received 51,302 telephone calls about Lifeline, received 5,445 Florida OPC Lifeline applications, and approved 4,445 applications for customers of AT&T, Embarq, and Verizon. The remaining applications were either denied, pending, or from non AT&T, Embarq, or Verizon customers. Applications that

were received but not included in these totals were from out-of-state customers or public assistance program-based applications that were forwarded to the respective company. For comparison purposes, in the prior year from October 2005–September 2006, the OPC received 35,474 telephone calls about Lifeline, received 5,540 Lifeline applications, and approved 4,575 applications for customers of AT&T, Embarq, and Verizon.

**Figure 2. Income-Based Link-Up/Lifeline Applications Received by OPC  
October 2006 - September 2007**



**Figure 3. Income-Based Link-Up/Lifeline Participation  
October 2006 - September 2007**



**Florida Public Libraries.** Each year, Florida's Public Libraries are visited by thousands of people each year, some of whom may be eligible for assistance through the Link-Up and Lifeline programs. Many libraries have been helping to make Lifeline information available to library patrons for a number of years. However, in 2004, the Commission's Library Outreach Program was expanded to include all 280 Florida public libraries and branches. This was the first time the FPSC had undertaken such a comprehensive library outreach effort. The outreach effort was repeated in 2005, 2006, and 2007. Many of the libraries regularly request additional supplies.

In an effort to reach out to citizens on a more personal level, the FPSC and Florida's Public Libraries partnered to increase awareness of Lifeline during National Consumer Protection Week held the week of February 4, 2007. Throughout the week, FPSC staff visited 20 libraries in Fort Walton Beach, Pensacola, Orlando, Tampa, St. Petersburg, West Palm Beach, Fort Lauderdale, and Jacksonville to have educational displays and meet with consumers. Plans are being developed for similar events for the 2008 National Consumer Protection Week which is tentatively planned for the week of February 4, 2008.

**Florida Public School Districts.** In 2005 and 2006, Florida Public School Districts participated in the Back-to-School Lifeline Project. In 2006, 25 districts assisted in providing English/Spanish Lifeline educational brochures including Lifeline applications to 1.8 million Florida students, and Haitian Creole Lifeline brochures with applications to another 400,000 students in Miami-Dade County. The Back-to-School Project was not repeated in 2007, but options are being considered for future projects.

**Florida Public Service Commission (FPSC).** The Commission's Lifeline consumer outreach program began in 1995, following the establishment of the Link-Up and Lifeline programs by the Florida Legislature. The focus of the outreach program continues to be distributing educational materials to those agencies, organizations, and individuals most likely to come into contact with citizens who qualify for the benefits. To accomplish these goals, the Commission publishes a variety of educational materials, including brochures, posters, and applications in English, Spanish, and Haitian Creole, and a brochure in Braille. The Commission also produces Lifeline information on computer disks and offers a Power Point Training CD with an audio voice-over so that individuals unable to attend training presentations in person may still learn about the programs in an easy-to-use format. In addition to providing training presentations at various professional conferences, the FPSC has provided in-house training sessions for FPSC staff members. During 2007, the FPSC focused on increasing awareness about the availability of the automated online Lifeline application and Lifeline automatic enrollment processes. The FPSC's Lifeline brochures have been updated to reflect these system changes. In addition, the printed Lifeline application was updated to include all 19 telephone companies that provide Lifeline benefits in Florida. Additional information is now available for eligible consumers who use certain wireless or prepaid phone plans.

The Commission has formed partnerships with a number of organizations to provide Lifeline information to the public. In addition to the original Lifeline Partners, the Commission has partnered with county libraries, city and county consumer affairs offices, churches, senior centers, and other organizations to increase awareness about Lifeline. These organizations are

kept informed about changes to the Lifeline program through e-mail notifications, Lifeline informational packets, and training presentations at meetings or conferences. In addition to the organizations mentioned in the report, the FPSC sent informational packets to 150 senior centers around the state to inform them about the online application. Similar packets were sent to Centers for Independent Living and Catholic Charities. The Commission also regularly provides Lifeline information at utility hearings, on the Commission's Web site, and through a Lifeline e-mail periodically sent to the Commission's Lifeline Partners and other interested persons. The Lifeline e-mail includes a form that can be used by recipients to order supplies of Lifeline educational materials by e-mail, postal mail, or telephone. In addition, the OPC provides the Commission with supplies of its income-based applications throughout the year. The Commission assists in the distribution of the income-based applications to other Lifeline Partners for eligible clients and at Lifeline events.

**Florida Telecommunications Relay, Inc. (FTRI).** FTRI provides specialized telecommunications equipment to qualified residents of Florida who are deaf, hard of hearing, deaf/blind, or speech impaired. FTRI has contact with individuals who may be eligible for Lifeline. Since 2004, FTRI has assisted in the outreach effort by providing the Commission's Lifeline educational materials to its clients. During 2006, FTRI further assisted in the Lifeline promotional efforts by allowing the FPSC to give Lifeline training presentations to the FTRI professionals based in Tallahassee and at FTRI's Annual Conference. During 2007, FTRI was notified about the new online application and automatic enrollment processes.

**Florida Voters League.** The Florida Voters League is a nonpartisan political organization that encourages and informs active participation of citizens in government and works to increase understanding of major public policy issues through education and advocacy. One of the Florida Voters League's primary functions is to increase voter participation. The Florida Voters League has contact with individuals who may be eligible for Link-Up and Lifeline, as well as with many citizens who can help share the information with others who may be eligible. During 2006, the Florida Voters League assisted with the Lifeline promotional effort by allowing the FPSC to give two Lifeline presentations at its 48<sup>th</sup> Annual Convention. The FPSC also provided a Lifeline exhibit at the League's 49<sup>th</sup> Annual Convention held in June 2007.

**Habitat for Humanity-Florida.** Habitat for Humanity International was founded in 1976. Habitat helps break the cycle of poverty by working in partnership with low-income families to build affordable homes. Habitat for Humanity's work is accomplished at the community level by affiliates representing independent, locally run, nonprofit organizations. Each affiliate coordinates all aspects of Habitat home building in its local area: fund raising, building site selection, partner family selection and support, house construction, and mortgage servicing. Many of the Habitat families are eligible for Link-Up and Lifeline based on the income eligibility criteria. Habitat for Humanity and the FPSC are working together to provide Link-Up and Lifeline information to Habitat families, so they may obtain affordable telephone service in their new Habitat homes. During 2007, the FPSC sent Lifeline informational packets to the Florida Habitat for Humanity's 64 local affiliates to inform them about the availability of the new automated online application. The packets included updated brochures, applications, and order forms for additional supplies. The affiliates were also encouraged to assist the homeowners with the application process when possible.

**Leon County School Board.** During 2004, the Leon County School Board agreed to work with the Lifeline Partners to explore ways to provide Lifeline information through the school system. The school board was instrumental in the development of the Back-to-School Lifeline Projects. At the beginning of each school year, local schools provide informational packets for the students to take home to their parents. As a pilot project in 2004, the School Board agreed to include Lifeline information in the packets to help inform possible eligible families about the availability of the Link-Up and Lifeline programs. During 2005 and 2006, the School Board participated in the Back-to-School Lifeline Projects and assisted with local promotional media events. During 2007, the Leon County School Board offered additional assistance with providing Lifeline brochures and applications in local schools. The Lifeline Partners will continue to work with the school board on future promotional efforts.

**Linking Solutions, Inc.** Linking Solutions is a private business under contract with AT&T Florida to promote the Link-Up and Lifeline programs. Embarq also contracted with Linking Solutions for part of 2006-2007 review period. Linking Solutions assisted in the initial development of and continues to take a lead role in the Connect Florida Campaign. The Campaign focuses on establishing sustained partnerships with local non-profit community based organizations. Link-Up and Lifeline community events are held to present information about the programs and to encourage individuals and non-profit organizations to participate in the Campaign on a year-round basis. Attendance at these events ranges from 50 people at the smaller events up to several hundred at the larger events. Attendees are given the opportunity to ask questions and complete a Lifeline application during the event. These events have been a successful tool in promoting increased participation in the Lifeline program.

In addition, Linking Solutions has been actively involved in increasing awareness of Lifeline through smaller grass roots meetings at the local level with entities such as senior centers and churches. Non-profit organizations, churches, and community groups that naturally serve eligible consumers are encouraged to join the Campaign as Alliance Partners. Alliance Partners participate in a training session, share the information with their members, and through their outreach programs assist consumers with the application process. As part of the 2006 and 2007 Campaigns, Linking Solutions conducted training for the Workforce Florida One Stop Center staff members in all 24 Workforce Florida Regions to help identify clients eligible for Link-Up and Lifeline. In addition, Linking Solutions sent Lifeline letters and applications to all NAACP chapters and approximately 1,100 churches and non-profit groups throughout Florida during 2007. Linking Solutions staff members conduct training sessions around the state almost daily. Between October 2006 and November 2007, the Campaign held over 587 events throughout Florida with approximately 38,000 attendees.

**Tallahassee Memorial Hospital (TMH) and other Florida Hospitals.** Health care professionals throughout the state come in contact with eligible individuals on a daily basis, primarily in hospital emergency rooms. TMH staff suggested that it would be helpful to include hospital social workers and emergency room waiting rooms in the outreach effort. During 2004, as a pilot project, the FPSC provided Lifeline educational materials to TMH for patients and their family members who visited the emergency room. During 2005, this promotional effort was

expanded to include all 279 hospitals registered with the Florida Department of Health. In 2007, the FPSC mailed new Lifeline informational packets to all the hospitals again to inform them about the online application.

**Tallahassee Urban League and other Urban Leagues.** The Urban League provides assistance to many people within the community, some of whom may be eligible for Lifeline. Previously, the Tallahassee Urban League joined in the outreach effort to supply Lifeline educational materials to eligible citizens in the Tallahassee area and explore new ways for expansion. During 2007, the Lifeline Partners continued to work with various urban leagues across the state to supply educational materials and applications to eligible clients.

**Telecommunications Companies.** The LECs have worked in conjunction with the state agencies on outreach efforts such as the electronic Lifeline application system, DCF Lifeline Project to include Lifeline information in the DCF eligibility notices, the OPC's implementation of the income eligibility criteria procedures, and the Lifeline Project resulting from the 2003 Act. Additionally, each LEC that offers Lifeline provides Lifeline information to the customers on an annual basis through mass mailings or bill inserts. Some companies voluntarily give Lifeline information more than once a year or advertise the availability of Lifeline in local newspaper, radio, or television ads. Several companies also provide information on USAC's Web site and on their own company Web sites. During 2007, all 18 ETCs providing Lifeline in Florida participated in development of the Lifeline automatic enrollment process.

The ETCs have also initiated outreach activities at the local level within their service territories, often working jointly with the local public assistance organizations. During 2007, AT&T Florida continued working with Linking Solutions to coordinate Lifeline events throughout the state. Over the past year, more than 390 events have been held with approximately 18,000 attendees. Special emphasis was placed on working with Hispanic communities in south Florida. AT&T also worked with Linking Solutions to provide Lifeline brochures and applications to the Workforce Florida One Stop Centers, all Florida NAACP chapters, and approximately 1,100 churches and non-profit groups. In a joint effort with the AARP, approximately 143,000 letters were sent to potentially eligible subscribers. In addition, AT&T provided a promotional \$15 gift card to new Link-Up or Lifeline customers who enrolled between December 4, 2006 and May 31, 2007. Approximately 350 gift cards were distributed to the new Link-Up/Lifeline subscribers.

Embarq participated in several central Florida Lifeline events coordinated by Linking Solutions during 2007. Additionally, Embarq provided Lifeline applications to the Head Start program in Tallahassee and certain schools within Embarq's service territory. Embarq furnishes bill inserts and a newsletter to its customers each quarter. At least twice a year, the bill inserts and newsletter each contain information about Link-Up and Lifeline.

During 2007, Verizon conducted Lifeline presentations at the Rocky Creek Retirement housing development in Tampa, and at three senior citizens volunteer meetings in Tampa, St. Petersburg, and Lakeland. Also, the company furnished information to the 2-1-1 Information and Referral Call Centers located in its service territory. The information is used by call center representatives to inform low-income clients about Lifeline and how to contact Verizon for

assistance. In addition, Verizon has provided Lifeline flyers and posters to various social service agencies within its territory. Examples include the United Way, Metropolitan Ministries, Florida Council on Aging, Redlands Christian Migrant Association (serves more than 500 families in Hillsborough, Polk, and Manatee counties), and work development organizations in Pinellas and Polk Counties. Verizon is also working with the chairperson of the Seminole Tribe of Florida to provide information about the Native American Lifeline program.

Also during 2007, the remaining ETCs participated in community events or worked with social service agencies in their service territory. A few examples include Windstream's customer information booth at "Christmas on the Square" in Live Oak, Knology's partnership with the United Way, and Alltel's partnership with unemployment and social security offices. Another example is Frontier's partnership with the Escambia Department of Human Resources, Escambia County Department of Health's Molino Clinic, and local social security offices to provide Lifeline posters, brochures, and applications to eligible clients. This type of grass roots work at the local level is a vital component in the effort to increase Lifeline awareness.

**United Way of Florida.** The United Way works with local organizations to improve the community. Many of those organizations have regular contact with individuals who may be eligible for the Link-Up and Lifeline programs. During 2004, the United Way of the Big Bend agreed to assist in providing Lifeline educational materials to eligible citizens through its member organizations in the Big Bend area, as well as assist in distributing Lifeline educational packets to all of the United Way Regional Offices in Florida. In 2006, the FPSC provided Lifeline educational packets to all United Way directors in the state to update them on program changes. Additional packets were sent in 2007 to inform the United Way directors about the availability of the automated online application, and provide new supplies of updated brochures and applications.

**U.S. Department of Housing and Urban Development (HUD).** The Federal Public Housing Assistance (Section 8) Program is under the U.S. Department of Housing and Urban Development but is administered at the state level through local public housing agencies. Prior to implementation of the 2003 Act, Lifeline educational kits were sent to all 128 agencies administering Section 8 Housing in Florida. Some agencies have repeatedly placed new orders for additional educational materials. Since 2005, the Connect Florida Campaign events have included Section 8 Housing locations. During 2007, the FPSC also conducted staff training and customer sign-up sessions with the Lakeland Housing Authority.