



A report to the
Governor
President of the Senate
Speaker of the House of Representatives

FLORIDA

LIFELINE

ASSISTANCE

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

December 2015



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

Office of Telecommunications
Office of Consumer Assistance & Outreach

Table of Contents

I. Executive Summary	1
II. Background	2
III. Lifeline Participation.....	3
IV. Lifeline Providers.....	5
V. Lifeline Enrollment Process and Improvement Activities	8
A. Lifeline Electronic Coordinated Enrollment Process	8
B. Transitional Lifeline.....	8
C. Florida Public Service Commission Activities	9
D. Federal Communications Commission Activities	12
VII. Conclusion.....	20

Attachments

Attachment A. 2015 U.S. Poverty Guidelines	20
Attachment B. Lifeline Net Enrollment and Year-to-Year Net Growth Rate	21
Attachment C. Recertification of Florida Lifeline Subscribers	22
Attachment D. Agencies, Organizations, and Business Lifeline Partners	23

List of Figures

Figure 1. Florida Lifeline Subscribership	4
Figure 2. Lifeline Participation Rate In Eligible Florida Households for 2012-2015	4
Figure 3. ETCs Participating in Florida Lifeline Program	6
Figure 4. Companies with Pending ETC Designation Petitions at FCC as of June 2015.....	6
Figure 5. Six Florida ETCs with the Largest Number of Lifeline Customers in June 2015	7
Figure 6. USAC Low Income ETC Disbursements to Florida Providers.....	7
Figure 7. AT&T, Verizon, and CenturyLink Transitional Lifeline Participants 2011-2015.....	9
Figure 8. Events and locations where Lifeline information was shared in Florida	17

List of Acronyms

CFR	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
NCPW	National Consumer Protection Week
NLAD	National Lifeline Accountability Database
OPC	Office of Public Counsel
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
TCA	Temporary Cash Assistance
USAC	Universal Service Administrative Company

I. Executive Summary

The Florida Lifeline program is part of the federal Universal Service Program designed to enable low-income households to obtain and maintain basic local telephone service in accordance with Section 364.10, Florida Statutes. The Lifeline program offers qualifying households a minimum \$9.25 discount on their monthly phone bills, or a free Lifeline cell phone and monthly minutes from certain wireless providers. This report presents Lifeline participation data for the July 2014 through June 2015 program year, and evaluates procedures put in place to strengthen and streamline the Lifeline program.

As of June 30, 2015, 833,612 eligible households participated in the Florida Lifeline program, which equates to approximately one of every ten Florida households.¹ Lifeline assistance participation includes the involvement of the Florida Public Service Commission (FPSC), the Florida Department of Children and Families (DCF), the Florida Office of Public Counsel (OPC), the Florida Department of Education (DOE) and other state agencies that provide benefits to persons eligible for Lifeline service.²

Over 41% of all Lifeline-eligible Florida households are receiving Lifeline assistance. The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. Based upon June 2015 SNAP participants, the Lifeline eligible households³ increased by 4.2 percent compared to 2014 data.

“*Spread a Little Goodwill!*” was the slogan for Florida’s 2015 Lifeline Awareness Week, September 14-20. In addition to increasing awareness among eligible citizens, this year’s LAW continued educating residents on the FCC rule changes. FPSC Commissioner Ronald Brisé kicked off the week by hosting an event at Goodwill Industries’ Prosperity Center in Tallahassee.

The Commission continues to focus on enrollment process issues as a means of increasing participation. Specific enrollment process initiatives include the following:

- FPSC Lifeline Coordinated Online Application Process
- FPSC/DCF Coordinated Lifeline Enrollment
- Annual Recertification Procedures
- DCF Certification/Verification Web Services Interface
- Lifeline Work Group Meetings
- National Lifeline Accountability Database

¹ Based on the Florida Legislature Office of Economic and Demographic Research, there are approximately 7,768,092 households in Florida as of the July 2015 Florida Demographic Estimating Conference.

² Section 364.10(2)(g)1, Florida Statutes, requires each state agency that provides benefits to persons eligible for Lifeline service to undertake, in cooperation with the DCF, the Department of Education, the FPSC, the OPC, and ETCs providing Lifeline services, the development of procedures to promote Lifeline participation.

³ According to the U.S. Department of Agriculture Report, “*Supplemental Nutrition Assistance Program: Number Of Households Participating, ending June 30, 2015,*” over 2,011,166 Florida households participated in the Supplemental Nutrition Assistance Program. See Figure 2.

II. Background

Each year, the FPSC is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program. This report is prepared pursuant to the requirements contained in Section 364.10, Florida Statutes.

In Florida, if an applicant uses the electronic Lifeline Coordinated Enrollment Process⁴ to apply for Lifeline, the process will confirm if the applicant is currently participating in the Medicaid, SNAP or Temporary Cash Assistance (TCA)⁵ programs. If a program other than Medicaid, SNAP, or TCA, is used for certification, the customer must provide documentation of participation from the administering agency, which could be the Florida Department of Education (free school lunch program), the Social Security Administration (Supplemental Security Income), a county-level agency (Low-Income Home Energy Assistance Plan or Section Eight Housing), or the Bureau of Indian Affairs for documentation. Current data shows that over ninety-eight percent of Florida applicants using the Lifeline Coordinated Enrollment Process participate in Medicaid, SNAP, or TCA for eligibility.

If a Lifeline applicant chooses to apply for Lifeline directly with an eligible telecommunications carrier (ETC), the ETC can access the DCF web services⁶ in real-time to confirm program participation for Medicaid, SNAP, and TCA. In Florida, certification and verification can be accomplished using this process if the applicant or existing Lifeline customer participates in the Medicaid, SNAP, or TCA programs which are administered by the DCF.

The National Lifeline Accountability Database (NLAD), which is maintained by the Universal Service Administrative Company (USAC),⁷ is designed to help carriers identify and resolve duplicate claims for Lifeline Program supported service and prevent future duplicates. This database provides a means for carriers and state commissions to check, on a real-time and nationwide basis, if the household is already receiving a Lifeline Program supported service. USAC activated the National Lifeline Accountability Database for Florida Lifeline participants on March 6, 2014.

The FCC Lifeline Reform Order also called for the creation of a national eligibility database for certification and program participation verification of Lifeline applicants.⁸

⁴ The electronic Lifeline coordinated enrollment process was developed by the FPSC and DCF to allow an applicant for Medicaid, SNAP, or TCA to request and receive Lifeline assistance after approved for the DCF program.

⁵ Nationally known as Temporary Assistance for Needy Families (TANF).

⁶ The Web services interface allows Florida ETCs a secure gateway into the DCF computer to verify that a Lifeline customer is participating in the Medicaid, SNAP, or TCA programs administered by DCF. The ETC enters the person's first and last name, date of birth, and last four digits of the person's social security number. The DCF computer responds as to whether the person currently participates in one of the DCF programs without identifying the program because of confidentiality. An ETC must pre-register with DCF to use the Web services interface to ensure security is maintained.

⁷ The Universal Service Administrative Company (USAC) is an independent, not-for-profit corporation designated by the Federal Communications Commission as the administrator of the Universal Service Fund. USAC collects contributions from telecommunications carriers and administers support programs designed to help communities across the country secure access to affordable telecommunications services.

⁸ A single nationwide database will be deployed and the physical infrastructure, connections, and all related components will be located in a single location (or several locations to establish sufficient redundancy).

III. Lifeline Participation

Currently, FCC rules allow a \$9.25 maximum reimbursement per Lifeline-eligible customer per month from the USAC to a participating Lifeline carrier. The additional tier of support, available only to eligible subscribers living on tribal lands, provides a credit up to \$25.00 per month.

Florida Transitional Lifeline Assistance requires that ETCs offer former Lifeline customers, who are no longer eligible, a 30 percent discount off the residential basic local service rate. The customers are eligible to receive the discount for one year from the date the customer ceases to be qualified for Lifeline.⁹

Program-Based

Eligibility for Lifeline in Florida can be determined by customer enrollment in any one of the following programs:¹⁰

- Food Assistance (SNAP)
- Medicaid
- Federal Public Housing Assistance (Section 8)
- Supplement Security Income
- Low-Income Home Energy Assistance Program
- Temporary Cash Assistance (TCA)
- National School Lunch Program - Free Lunch
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy and National School Lunch Program

Income-Based

In addition to the program-based criteria, customers with annual incomes up to 150 percent of the Federal Poverty Guidelines may be eligible to participate in the Florida Lifeline program. Section 364.10(2)(a), Florida Statutes, provides that each local exchange telecommunications company that has more than one million access lines and is an ETC shall provide Lifeline service to citizens who meet an income eligibility test of up to 150 percent of the Federal Poverty Guidelines.¹¹ The U.S. Department of Health and Human Services updated the 2015 Federal Poverty Guidelines, as shown in Attachment A.¹² The OPC certifies customer eligibility under the income test for customers requesting to be enrolled in the Lifeline program for the three major companies designated as ETCs. The OPC also performs income certification for wireless ETCs who have filed a notice of election to do so with the FPSC.¹³

The number of subscribers enrolled in Lifeline was 833,612 as of June 30, 2015, a 13 percent decrease from the number of subscribers last year. Figure 1 shows the number of Lifeline

⁹ Section 364.105, Florida Statutes.

¹⁰ Rule 25-4.0665(1) and (2), Florida Administrative Code.

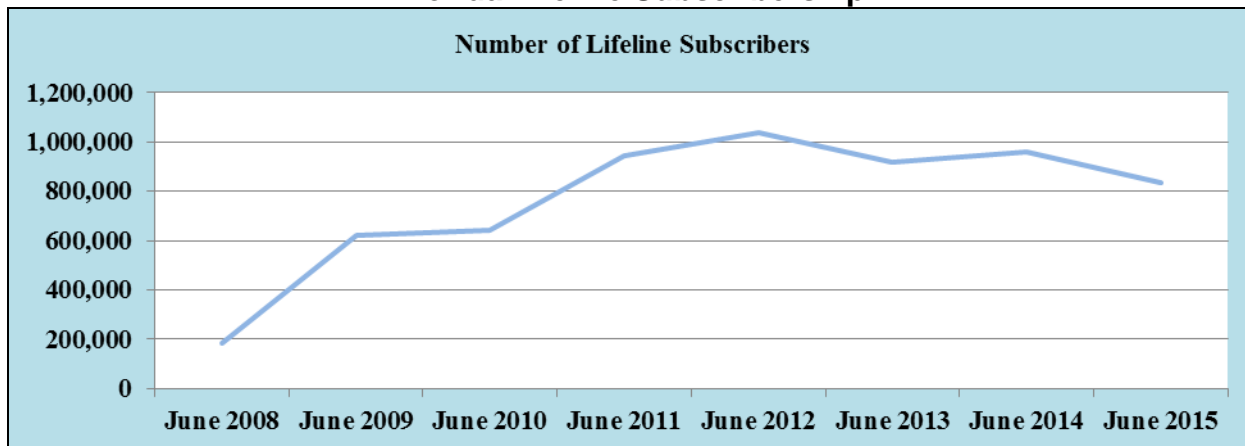
¹¹ 47 C.F.R. §54.409 (1) requires that a consumer's household income must be at or below 135% of the Federal Poverty Guidelines for a household.

¹² Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. See Federal Register Notice, January 22, 2015.

¹³ See Section 364.10(2)(a), Florida Statutes.

subscribers from June 2008 through 2015. In 2013, the decrease in subscribership was largely attributable to the new FCC rules which require annual recertification of every subscriber receiving Lifeline credits. Many customers failed to respond to the ETCs' recertification requests and were removed from the program. In 2015, the decrease in subscribership was again principally due to subscribers failing to recertify their eligibility, along with the implementation of the National Lifeline Accountability Database which prevents Lifeline subscribers from receiving more than one Lifeline credit, and oversight of the ETC agent sign-up process.

Figure 1
Florida Lifeline Subscribership



Source: Industry responses to FPSC data requests (2008-15)

For fiscal year ending June 2015, there was a decrease in subscribership of 124,180 households, or 13 percent. Wireless ETCs accounted for over 84 percent of the decrease. Lifeline eligible households increased by 81,060 or 4.2 percent compared to 2014. The participation rate decreased to 41.4 percent, a decrease of 8.2 percentage points from the previous year. The reason for the decrease can be attributed to subscribers failing to respond to recertification efforts, the success of fighting fraud, waste, and abuse in the program, and the initiation of the National Lifeline Accountability Database. Considering the number of households which are eligible to receive Lifeline in Florida and the current participation rate, these numbers demonstrate the continued need for the Lifeline program. Figure 2 shows participation rates in Florida households from June 2012 through June 2015.

Figure 2
Lifeline Participation Rate in Eligible Florida Households for 2012-2015

Year	Lifeline Enrollment	Eligible Households	% Participation Rate
June 2012	1,035,858	1,864,183	55.6%
June 2013	918,245	1,952,890	47.0%
June 2014	957,792	1,930,106	49.6%
June 2015	833,612	2,011,166	41.4%

Sources: U.S. Department of Agriculture data figures are as of June 2015

IV. Lifeline Providers

Section 54.201(b) of the Code of Federal Regulations (CFR) allows state commissions to designate a common carrier that meets certain requirements as an ETC¹⁴ in a non-rural service area. The CFR also allows state commissions to designate one or more common carriers as an ETC in a rural service area.¹⁵ The FPSC has determined that before designating a carrier as an ETC, it should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.¹⁶

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,¹⁷ and the carrier must advertise the availability of such services and charges. Additionally, a company applying and qualifying for designation as an ETC must demonstrate good management and legitimate business practices to successfully administer the Lifeline program.¹⁸

In 2011, the FCC took a technology neutral approach and determined that ETCs can use any platform to provide voice service. Figure 3 shows the twenty-one companies which had ETC status and participated in the Lifeline Program in Florida as of June 30, 2015.¹⁹

¹⁴ Florida House Bill 1231, the Florida 2011 Legislature, removed the FPSC authority to designate ETC wireless telecommunication providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

¹⁵ 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.

¹⁶ See Docket No. 120165-TP, In RE: Application for designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214(e)(2) of the Communications Act of 1934 for the limited purpose of receiving federal Universal Service Low Income support for providing Lifeline service to qualified households in its non-rural service territory, by Cox Florida Telecom, LP., Order No. PSC-12-0500-PAA-TP, issued September 28, 2012.

¹⁷ Those services supported by Universal Service include the following: (1) voice grade access to the public switched network or its functional equivalent, (2) minutes of use for local service provided at no additional charge to end users, (3) toll limitation to qualifying low-income consumers, and (4) access to the emergency services 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. However, the FCC started phasing down toll limitation service reimbursement in 2012 and completely eliminated it effective January 1, 2014.

¹⁸ 47 C.F.R. §54.201(h).

¹⁹ By Order No. PSC-15-0119-PAA-TX, issued March 6, 2015, the FPSC approved Nexus Communications, Inc. d/b/a Nexus Communications TSI, Inc.'s request for cancellation of its competitive local exchange certificate, and relinquishment of its ETC designation.

Figure 3
ETCs Participating in Florida Lifeline Program

Florida Companies Designated as ETCs	
AT&T Florida (AT&T)	Budget Phone
Cox Florida Telecom, LP	CenturyLink
FLATEL, Inc.	Frontier Communications
Global Connection Inc.	FairPoint Communications
Access Wireless	ITS Telecommunications
Knology of Florida, Inc.	Quincy Telephone Company
NEFCOM	Sun-Tel USA, Inc.
Smart City Telecom	Tele Circuit Corporation
T-Mobile Wireless	Verizon Florida, LLC
SafeLink Wireless	Windstream Florida, Inc.
Assurance Wireless	

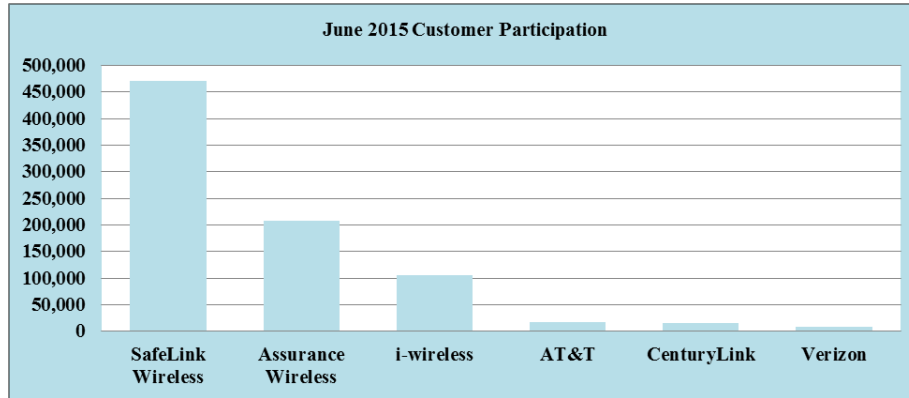
As of July 1, 2011, the FPSC no longer has authority to designate wireless ETCs in the State of Florida. Wireless ETC applications for Florida are now filed directly with the FCC. Figure 4 shows the 35 Florida ETC Wireless petitions pending at the FCC.

Figure 4
Companies with Pending ETC Designation Petitions at FCC
As of June 2015

ETC Petitions Pending at FCC	
Airvoice Wireless	American Broadband
Amerimex	Assist Wireless
Blue Jay Wireless	Boomerang Wireless
Budget PrePay, Inc.	Cintex Wireless
Consumer Cellular	Excess Telecom
EZ Reach Mobile	FedLink Wireless
ZING PCS	Free Mobile
Global Connection	Kajeet
Linkup Telecom	LTS of Rocky Mount
Millennium 2000	Mobile Net POSA
Nexus Communications	Platinum Tel
Odin Wireless	Q Link Wireless
TAG Mobile	TNT Wireless
Tele Circuit Network	AmTel
Telrite	Tempo Telecom
TerraCom	Total Call Mobile
True Wireless	Vast Communications
You Talk Mobile	

Figure 5 shows the six Florida ETCs with the largest number of Lifeline customers in June 2015, which represents 99 percent of the total Lifeline customer participation.

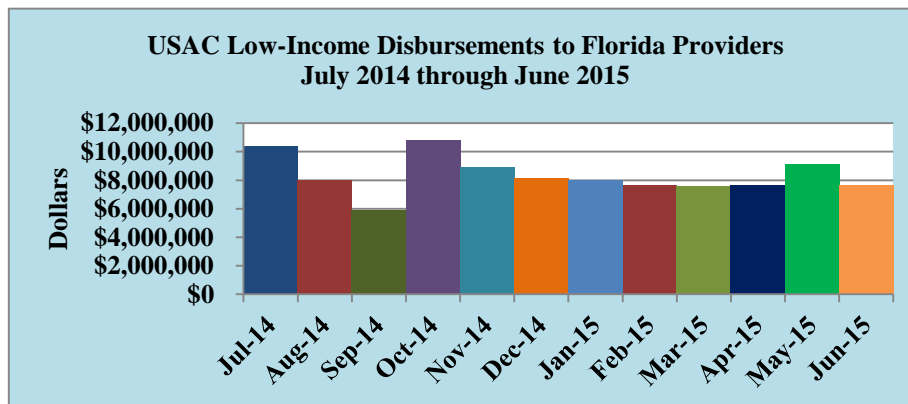
Figure 5
Six Florida ETCs with the Largest Number of Lifeline Customers
In June 2015



Source: Industry responses to 2015 FPSC data requests

Figure 6 reflects the USAC Lifeline disbursements to Florida for the 12-month period ending June 2015, totaling \$99,752,966, an average of \$8,312,747 per month over the period. These dollars enabled Florida citizens qualifying for Lifeline benefits to receive discounted monthly bills with a current minimum credit of \$9.25, or a free Lifeline wireless phone with up to 250 free monthly minutes from certain wireless providers.

Figure 6
USAC Low Income ETC Disbursements to Florida Providers



Source: USAC Disbursements Florida July 2014-June 2015²⁰

As of June 30, 2015, the total Lifeline enrollment in Florida was 833,612 households. Florida had a 13 net percentage decrease in enrollment as of June 30, 2015, over the previous year. Attachment B represents the historic enrollment figures for the Lifeline program listed by each of the ETCs.

²⁰ The Figure 6 fluctuations in the months of September 2014 and October 2014 were caused by Assurance Wireless' filing dates for Lifeline credit reimbursement from the universal service fund.

V. Lifeline Enrollment Process and Improvement Activities

A. Lifeline Electronic Coordinated Enrollment Process

Implementation of the electronic Lifeline Coordinated Enrollment Process has been a major success. The FPSC began formally tracking the number of Lifeline applications filed via the Lifeline Coordinated Enrollment Process in April 1, 2007. Cumulative Lifeline coordinated enrollment applications as of June 30, 2015, totaled 739,115 over the eight year period.

The coordinated enrollment process requires a DCF client to indicate an interest in receiving the Lifeline discount. The applicant then identifies a telephone service provider from a drop-down box on the application and answers applicable questions. Once a client is determined to be eligible for Medicaid, SNAP, or TCA, DCF will forward the necessary information for Lifeline enrollment to the FPSC. The FPSC places this information on a secure website for retrieval by the appropriate ETC.

All ETCs are required to enroll the subscriber in the Lifeline program as soon as possible, but no later than 60 days from the receipt of the FPSC's email notification. In addition, the ETC is required to credit the subscriber's bill for Lifeline service as of the date the ETC received the FPSC's email notification.²¹

ETCs are required to provide the FPSC the names, addresses, telephone numbers, and the 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. FPSC staff then sends letters to the rejected applicants if the company they named on the application as providing their telephone service does not have them listed as a current customer, or if DCF could not confirm their current participation in one of their qualifying programs. FPSC staff includes a new application with the letter along with staff contact information if they need assistance with the application process.

B. Transitional Lifeline

In accordance with Section 364.105, Florida Statutes, current Lifeline customers who no longer meet eligibility criteria and are removed from Lifeline service are eligible to receive a 30 percent discount on the residential basic local service rate for a period of one year after ending Lifeline service. 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. Transitioning from Lifeline service means that the consumer's socio-economic status may have improved, and the customer may have advanced beyond the qualifying eligibility criteria.

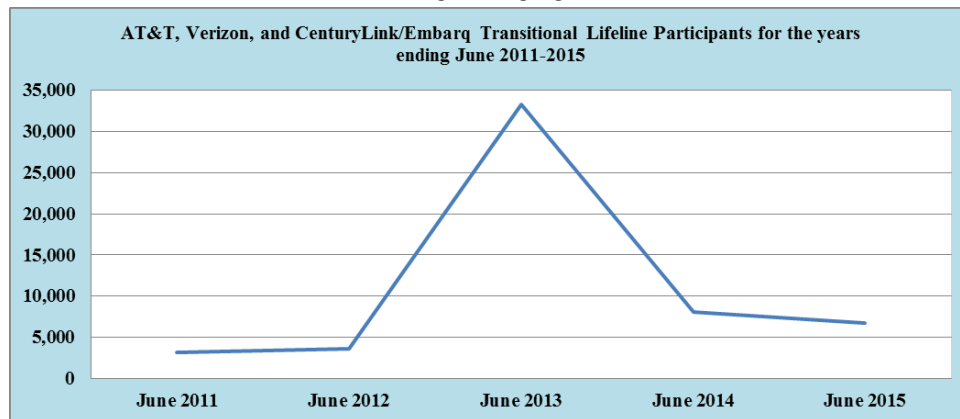
Figure 7 presents the number of Transitional Lifeline customers for AT&T, Verizon, and CenturyLink for June 2011 through June 2015. The large increase in the number of Transitional Lifeline participants in 2013²² is attributable to customers being de-enrolled from the Florida Lifeline program due to the new FCC requirement to annually recertify Lifeline customers.

²¹ See Rule 25-4.0665(10)(b), Florida Administrative Code.

²² In 2013, AT&T reported 32,783; CenturyLink reported 488; and Verizon reported 23. In 2014, AT&T reported 4,921; CenturyLink reported 566; and Verizon reported 2,550. In 2015, AT&T reported 3,162; CenturyLink reported 1,429; and Verizon reported 2,155.

These former Lifeline participants may elect to receive Transitional Lifeline benefits for up to one year.

Figure 7
AT&T, Verizon, and CenturyLink Transitional Lifeline Participants
2011-2015



Source: Industry responses to FPSC data requests (2011-2015)

Several actions by the FPSC and FCC occurred during the July 1, 2014 through June 30, 2015 period. A discussion of these initiatives is presented below.

C. Florida Public Service Commission Activities

Lifeline Work Group Meeting January 2015

The Lifeline Work Group was created by Section 364.10(2)(g)3, Florida Statutes, and includes the FPSC, DCF, OPC, and each Florida ETC offering Lifeline service. Its purpose is to determine how the eligible Lifeline subscriber information will be shared, the obligations of each party with respect to the use of that information, and the procedures to be implemented to increase enrollment and verify eligibility in these programs.

FPSC staff conducted a meeting of the Lifeline Work Group on January 21, 2015. The purpose of this meeting was for the Lifeline Work Group to discuss:

- The Florida Department of Children and Families Web Services Interface which verifies participation in the Medicaid, Temporary Assistance for Needy Families, and Supplemental Nutrition Assistance Programs. 47 C.F.R. §54.410(c)(1)(i)(A) requires the following.

If the eligible telecommunications carrier can determine a prospective subscriber's program-based eligibility for Lifeline by accessing one or more databases containing information regarding enrollment in qualifying assistance programs ("eligibility databases"), the eligible telecommunications carrier must access such eligibility databases to determine whether the prospective subscriber qualifies for Lifeline based on participation in a qualifying assistance program.

- Has each ETC obtained access to the DCF portal? If not, why?
- The National Lifeline Accountability Database (NLAD) – How is it working? What are the problems? Are you receiving complaints from consumers that NLAD is providing incorrect information?
- TDM to IP transition – What will happen to Lifeline? When?
- What is the status of Incumbent Local Exchange Company request to FCC to make provision of Lifeline voluntary? In this proceeding, AT&T suggests that the Commission should allow incumbent wireline Lifeline providers to choose whether to participate in the Lifeline program, arguing that wireline telephone companies are no longer the dominant provider of voice services. (FCC 12-11, ¶ 503)
- How will each Florida ETC perform the required 2014 Lifeline customer recertifications? Will the recertifications be accomplished in person, in writing, by phone, by text message, by email, or otherwise through the Internet? Did your ETC elect to have USAC conduct the 2014 annual recertification of your Lifeline customers?
- Any other ideas to streamline the Lifeline enrollment process for both the applicant and ETC?

A transcript of the meeting along with post-workshop comments can be found at <http://www.floridapsc.com/utilities/telecomm/>.

Comments Filed by the FPSC in Response to the FCC Lifeline Second Further Notice of Proposed Rulemaking

On June 18, 2015, the FCC adopted a Second Further Notice of Proposed Rulemaking in which the FCC sought comment and reply comment on proposals to modernize the Lifeline program. On August 31, 2015, the FPSC submitted comments in response to the FCC's Second Further Notice of Proposed Rulemaking and encouraged the FCC to consider the following:

- A budget or cap for Lifeline would help curb the excessive growth of the low-income program as broadband is introduced into it. If necessary, the budget could be tied to the growth or decrease in federal Supplemental Nutrition Assistance Program (SNAP) program participants.
- The Florida Public Service Commission (FPSC) would support limiting the number of qualifying Lifeline programs to SNAP, Medicaid, and Temporary Assistance for Needy Families (TANF).
- The FPSC believes that before any preemption of authority of states to designate ETCs takes place, the FCC should refer the matter to the Federal-State Universal Service Joint Board for consideration and input.
- The FPSC believes agents should not be paid on commission for each Lifeline application submitted. Until such time as the FCC decides whether a third party should

conduct Lifeline eligibility, ETCs, rather than their agents or representatives, should review and approve consumer documentation of eligibility before the ETC activates Lifeline service or seeks reimbursement from the Fund. In addition, any agents or third-parties acting on behalf of ETCs should receive training before taking part in the enrollment process and again every twelve months thereafter in order to ensure that every person involved in enrolling and verifying consumers for Lifeline has been adequately educated about the program and its requirements. To assist in the Federal-State partnership goal of eliminating fraud, waste, and abuse in the universal service fund (USF) low-income program, the FPSC also suggests that the FCC include language in future ETC designation orders that if a state has a state Lifeline program, the ETC must follow it.

- If an agency administers Lifeline eligible programs such as SNAP and Medicaid and participates in Lifeline coordinated enrollment, there should also be a process whereby Lifeline participants who are determined to be no longer eligible for these programs are automatically de-enrolled.
- The FPSC believes that a “yes” or “no” response indicating whether the person is currently participating in SNAP, Medicaid, or TANF is appropriate for queries into state eligibility databases.
- The FPSC supports changing the 60-day non-usage requirement to 30 days in order to eliminate any unnecessary reimbursement from the USF Fund.
- The FPSC believes that any new Lifeline broadband rules implemented as a result of the FCC’s FNPRM, should be reassessed after a period of one year to determine if the \$9.25 reimbursement rate is sufficient. The FPSC also believes that an end-user charge would be a barrier to enrollment, and should not be imposed if broadband is added to Lifeline.
- Ideally, the FCC should refer all the Lifeline issues to the Universal Service Joint Board that jointly involve the FCC and states, before implementation. However, if it is determined that this procedure might delay the process beyond the timeframe of the FCC, then only the issues that require the FCC and state partnership should be referred to the Joint Board. The FCC should also refer those issues to the Universal Service Joint Board after new rules have been in effect for one year in order to assess the outcome of the new rules and enable some of them to be tweaked, if necessary.

FPSC Continued Actions to Prevent Waste, Fraud and Abuse of the Federal Universal Service Fund

In 2014-2015, Florida continued enforcing safeguards to prevent waste, fraud, and abuse of the Universal Service Fund. Florida’s leadership in implementing and administering the National ETC State Coordinating Group to monitor prospective and existing ETCs across the country, has enabled information sharing with all states²³ on a national basis. Protecting against waste, fraud, and abuse in the Lifeline program is contingent upon developing adequate safeguards to ensure

²³ The ETC State Coordinating group includes state commission members from all fifty states, the District of Columbia, and the Commonwealth of Puerto Rico.

that funds are being disbursed and expended according to state and federal regulations and guidelines. Florida has put in place a streamlined, efficient, and verifiable Lifeline Electronic Coordinated Enrollment process. This advanced process involves a computer interface between the FPSC and the DCF for Lifeline applicants who currently participate in the Medicaid, the SNAP, or the TCA program. The FCC used the Florida Lifeline Electronic Coordinated Enrollment process as an example of how states could implement a Lifeline coordinated enrollment process.²⁴ The FPSC monitors monthly federal universal service funds disbursed to ETCs operating in Florida to determine the number of Lifeline participants in Florida by month.

In January 2015, the FPSC began receiving complaints from consumers that TracFone Wireless, d/b/a SafeLink Wireless, was signing-up consumers using only a veteran's status as a qualifying Lifeline criteria, which it is not. Further complaints and inquiries by FPSC staff indicated SafeLink agents were using qualifying criteria such as being a law enforcement officer, a firefighter, a state employee, or just a resident of Florida as qualifying criteria for consumers to sign-up for Lifeline, which they are not. On August 4, 2015, a conference call was held with SafeLink management to discuss this matter. SafeLink management advised the FPSC that all agent sign-ups in Florida had been suspended that day pending further investigation. Since that time, SafeLink fired the agent company responsible for signing-up the ineligible consumers to Lifeline. As a consolation to those veteran's who have received a SafeLink phone but are ineligible, SafeLink is allowing them to keep the handset and is providing free minutes to them each month until the end of 2015. In addition, SafeLink self-reported the agent scheme to the FCC and Department of Justice in addition to reimbursing the federal universal service fund over \$11 million.

The FPSC strives to protect the integrity of the Lifeline program in the State of Florida and takes appropriate enforcement action when necessary. The FPSC has statutory authority to grant landline ETC designations, and can also revoke ETC status when warranted. Unlawful and inappropriate federal Universal Service Fund disbursements are inconsistent with public trust and negatively impacts states like Florida, which contribute more into the Universal Service Fund than it receives. Florida continues to be commended by the FCC for its continued and formidable efforts to identify and eliminate fraud in the Lifeline Assistance program and Universal Service Fund.

D. Federal Communications Commission Activities

FCC Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order

On June 22, 2015, the FCC released Order FCC 15-71 which seeks to rebuild the current framework of the Lifeline program and continue its efforts to modernize the Lifeline program to utilize advanced networks. Among other issues, the FCC is seeking comment on inclusion of broadband into the Lifeline program, whether to set a budget for the Lifeline program, whether to change the programs through which consumers qualify for Lifeline, whether to permit Lifeline providers to opt-out of providing Lifeline service, and whether the ETC designation process should be streamlined by having only the FCC designate companies as ETCs instead of states

²⁴ See Order FCC 15-71, Footnote 215.

and the FCC. The FCC Order removed the requirement that local exchange carriers must resell retail Lifeline-discounted service to other telecommunications companies for use by end users.

2014 Recertification of Florida Lifeline Subscribers

The FCC adopted a set of uniform recertification procedures that all ETCs must perform annually to verify the ongoing eligibility of their Lifeline subscribers.²⁵ To comply with the annual requirement for 2014, all ETCs and state Lifeline administrators were required to recertify the eligibility of their Lifeline subscriber base by the end of 2014, and report the results to USAC by January 31, 2015. Subscribers failing to respond to recertification efforts had to be de-enrolled from Lifeline. As a result of the 2014 recertification process, 142,248 customers or 14.34 percent were de-enrolled from the Florida Lifeline program.²⁶ Results of the recertification by company are presented in Attachment C.

ETCs have the option of recertifying subscribers in one of three ways in 2015. The first is to verify program or income-based eligibility where an ETC can query the available database to confirm the subscriber's continued eligibility. The second means is, in the absence of a database, the ETC must recertify the continued eligibility of a subscriber by writing, phoning, text messaging, emailing, Interactive Voice Response, or otherwise through the Internet using an electronic signature.

The third method of recertifying Lifeline customers would be to have the ETC elect the USAC to perform Lifeline recertification for their subscribers. USAC recertifies subscribers by mailing each subscriber a letter that provides the subscriber the notice, informing the subscriber that the subscriber has 30 days to recertify the subscriber's continued eligibility to receive Lifeline service or the subscriber will be de-enrolled from the Lifeline program. The letter would also explain the recertification process and how the subscriber may confirm his or her eligibility. Subscribers also would receive a call or text message during the 30-day period to prompt a response. Any subscriber response submitted after the 30-day deadline will not be processed, and the subscriber would be considered ineligible for the program and will be de-enrolled. If an ETC is unable to recertify a subscriber, the subscriber is offered transitional Lifeline benefits at a 30 percent discount of the local telecommunications service rate for one year.²⁷

Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.²⁸ If there are two households residing at one address and each desires to participate in Lifeline, each applicant has to complete a one-per-household worksheet to demonstrate that each applicant is living in a separate economic unit and not sharing living expenses (bills, food, etc.) or income with another resident.²⁹

²⁵ See Order FCC 12-11, 27 FCC Rcd at 6714-22, paras. 129-148; 47 C.F.R. § 54.410(f).

²⁶ The 2013 recertification process de-enrolled 350,817 customers or 34.05 percent of participants from the Florida Lifeline program.

²⁷ Section 364.105, Florida Statutes, Discounted rate for basic service for former Lifeline subscribers.

²⁸ See *id.*, 27 FCC Rcd at 6689, para. 74. The one-per-household rule is codified at 47 C.F.R. § 54.409(c). See 47 C.F.R. § 54.409(c). This rule became effective June 1, 2012. See Lifeline Reform Order, 27 FCC Rcd at 6859-60, para. 515; 77 FR 12952 (March 2, 2012), corrected by 77 FR 19125 (Mar. 30, 2012).

²⁹ A household Lifeline eligibility pre-screening tool is available at www.lifelinesupport.org.

By Order FCC 12-11, the FCC directed USAC to establish a database to both eliminate existing duplicative support and prevent duplicative support in the future. To prevent waste in the Universal Service Fund, the FCC created and mandated the use by ETCs of a National Lifeline Accountability Database (NLAD) to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber. The NLAD conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving a Lifeline Program-supported service. Florida ETCs were operational on the NLAD starting March 6, 2014. At Florida's request, the FCC has agreed to allow states to have read-only access to this database starting in September 2015, to help prevent waste, fraud, and abuse of the Lifeline program.

National Lifeline Eligibility Verifier

In Order FCC 15-71, the FCC suggests establishing a national Lifeline eligibility verifier (national verifier) to make eligibility determinations and perform other functions related to the Lifeline program. A national verifier would review consumer eligibility documentation to verify Lifeline eligibility, and where feasible, interface with state eligibility databases to verify Lifeline eligibility. The FCC proposal for a national verifier would, at a minimum, review consumers' proof of eligibility and certification forms, and be responsible for determining prospective subscribers' eligibility.

AT&T TDM-to-IP Transition

On November 7, 2012, AT&T filed a petition asking the FCC to allow incumbent local exchange carriers to retire their existing Time-Division Multiplexing (TDM) services in select exchanges and introduce all-IP services in their place. On January 31, 2014, the FCC invited interested providers to submit detailed proposals to test real-world applications of planned changes in technology likely to have tangible effects on consumers. AT&T submitted its proposal to the FCC on February 27, 2014, to conduct the trials in a rural wire center in Carbon Hill, AL, and in a suburban wire center in Palm Beach County, FL (Kings Point).

AT&T is conducting the trials in three phases: phase one will have customers opt for new services voluntarily, phase two will grandfather TDM-based services, and phase three will sunset all TDM-based services in these exchanges and require customers to migrate to IP-based products. Within AT&T's wireline and wireless footprints, it will offer consumers and businesses wireline and wireless products as substitutions for traditional TDM services. In areas within AT&T's wireless footprint but outside its wireline footprint, only wireless services plan will be offered. In its February 27, 2014 filing, AT&T states that there is no reason to require AT&T to remain an eligible telecommunications carrier in the trial rate center solely to provide Lifeline, so it will be requesting that its ETC status be relinquished in the trial rate center and, if approved, it will no longer provide Lifeline there.

Petitions to FCC to Allow Incumbent Wireline Lifeline Providers to Opt Out of the Lifeline Program

On September 15, 2014, AT&T submitted comments to the FCC stating that there is no reason in law or policy for the FCC to continue its current overly-broad ETC regime or its mandatory Lifeline requirements for incumbent local exchange companies. It believes Lifeline participation

should be made voluntary for ILECs. AT&T urged the FCC to update its ETC and Lifeline rules and requirements to better reflect the existing competitive landscape.”³⁰

On October 6, 2014, the United States Telecom Association (USTA) filed a petition with the FCC for forbearance from various outdated regulatory requirements applicable to incumbent local exchange carriers, including mandatory provision of Lifeline. The USTA stated that almost all Lifeline customers prefer wireless services, and given the substantial non-reimbursable costs to carriers involved in Lifeline participation and the multiple Lifeline providers in price cap carriers’ service areas, there is no reason to continue compelling price cap carriers to offer Lifeline service to consumers that do not want it.³¹

In Order FCC 15-71, the FCC sought comment on proposals that the FCC permit ETCs to opt-out of providing Lifeline supported service in certain circumstances. Pursuant to FCC’s rules, carriers designated as ETCs are required to offer Lifeline supported service. AT&T, among others, notes in comments in response to the *Further Notice* that competition in the Lifeline program has resulted in multiple areas where several ETCs provision Lifeline supported service to the same potential customer base. The FCC sought additional comment on whether the FCC should relieve ETCs of the obligation to provide Lifeline supported service, pursuant to their ETC designation, in specific areas where there is a sufficient number of Lifeline providers. In considering this approach, it sought comment on what constitutes a sufficient number of providers and any other appropriate conditions to protect the public interest. It also sought comment on how to define an appropriate geographic area. The FCC asked that any party supporting such an opt-out mechanism comment on the process, transition, and other issues associated with permitting ETCs to opt-out of providing Lifeline supported service in areas served by a sufficient number of ETCs offering Lifeline support.

The FCC noted that these proposals are similar to those currently under consideration in two other FCC proceedings—the USTA forbearance proceeding, and the Connect America Fund proceeding. In both of those proceedings, AT&T and others have argued that the FCC should separate or “de-link” carriers’ Lifeline obligations from their ETC status.

In a September 9, 2015 filing at the FCC, AT&T reiterated that there are multiple Lifeline providers offering Lifeline-discounted service in every single AT&T wire center, and that the data shows that few Lifeline customers actually want AT&T’s Lifeline service. Instead, these consumers overwhelmingly prefer wireless Lifeline service. AT&T maintains that it is unnecessary to require any of AT&T’s price cap carrier affiliates to continue participating in the Lifeline program. The FCC committed that it would resolve all of the issues raised in AT&T’s petition by January 4, 2016.³²

³⁰ WC Docket No. 10-90, Connect America Fund; WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization.

³¹ Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) from Obsolete ILEC Regulatory Obligations that Inhibit Deployment of Next-Generation Networks.

³² In the Matter of Connect America Fund, WC Docket No. 10-90; Petition of USTelecom from Forbearance Pursuant to 47 U.S.C. §160(c) from Obsolete ILEC Regulatory Obligations that Inhibit Deployment of Next-Generation Networks, WC Docket No. 14-192; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197. Comments of AT&T.

VI. Lifeline Promotion Activities

Promotional activities in 2015 featured National Lifeline Awareness Week, National Consumer Protection Week, Older Americans Month, and ongoing “grass roots” efforts to increase awareness and enrollment in the Lifeline program.

Lifeline Across America

In 2015, the Lifeline Across America Working Group (FCC, National Association of Regulatory Utility Commissioners, and National Association of State Utility Consumer Advocates representatives) concentrated on the seventh annual National Lifeline Awareness Week (LAW). The Group’s national effort is to ensure that low income families and individuals are aware of the Lifeline program and understand the participation requirements, including annual recertification and only one Lifeline discount per household. The FCC has taken steps to modernize its Lifeline program, seeking comment on restructuring the program to better support 21st Century communications while building on existing reforms to further reduce program fraud and abuse.

According to the National Association of Regulatory Utility Commissioners, more than thirteen state public utility commissions issued press releases, received gubernatorial proclamations, released radio and television public service announcements, and published letters-to-the-editor to help promote Lifeline in 2015.

National Lifeline Awareness Week (September 14-20, 2015)

“Spread a Little Goodwill!” was the slogan for Florida’s 2015 Lifeline Awareness Week, September 14-20. In addition to increasing awareness among eligible citizens, this year’s LAW continued educating residents on the FCC rule changes. FPSC Commissioner Ronald Brisé kicked off the week by hosting an event at Goodwill Industries’ Prosperity Center in Tallahassee. Event participants included: Mary Ann Lindley, Chairman, Leon County Board of County Commissioners; Scott Maddox, Commissioner, City of Tallahassee; and Fred G. Shelfer, Jr., President and CEO, Goodwill Industries–Big Bend.

LAW events were held at Goodwill facilities in Daytona, Orlando, Ft. Myers, Naples, Lehigh Acres, Port Charlotte, and Tallahassee to help Florida’s eligible residents connect with possible job prospects, emergency and community services, and family and friends. Each event offered individual assistance to consumers applying for the Lifeline program.

National Consumer Protection Week and Other Community Events

The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with citizens. National Consumer Protection Week (NCPW), March 1-7, 2015, was a good back drop for Lifeline outreach activities. An annual consumer education campaign, NCPW encourages consumers to take advantage of their consumer rights. This year, FPSC Chairman Art Graham teamed up with the Jacksonville Jaguars to remind consumers to “Suit Up and Stay Protected!” and to tackle fraud. The FPSC made presentations in North Lauderdale, Hallandale Beach, Miramar, LaBelle, Punta Gorda, and Arcadia on protection against scams aimed at utility customers, energy and water conservation, and the Lifeline program.

For the fourth year, the FPSC participated in a national project called Older Americans Month--celebrated each May to honor and recognize older Americans for their contributions to families, communities, and society. *Get into the Act* was this year's theme, and the FPSC hosted ten educational sessions and distributed Lifeline, conservation, and fraud prevention information at senior communities in the Fort Myers area.

Each month, the FPSC also names a valued partner agency or organization as a "Helping Hand," for helping raise public awareness about the Lifeline program, energy and water conservation, and utility impersonation scams. One ongoing FPSC partner is the Jacksonville Senior Expo, where more than 5,500 seniors attend and have access to Commission brochures and publications, as well as to FPSC staff. The FPSC also shares Commission Lifeline brochures and publications during many events throughout Florida.

Figure 8
Events and locations where Lifeline information was shared in Florida

Lifeline Events and Locations	
Active Living Expo	Earth Day at Cascades Park
Senior Day at the Capitol	Jim Fortuna Senior Center
Wildwood Presbyterian Church	Ft. Braden Community Center
Martin Anderson Senior Center	Career Source Brevard
Titusville Housing Authority	North Brevard Senior Center
Marks Street Senior Center	Hatton B. Rogers Apartments
Sandpiper Run Apartments	Bonair Towers Apartments
Lake Kennedy Senior Center	Renaissance Preserve
Sunshine Villas Apartments	Edgar Johnson Senior Center
Lifeline Events and Locations (continued)	
Hispanic Heritage Month Community Celebration	Auburndale Senior Center
Greater Palm Bay Senior Center	Wickham Park Senior Center
Lake Morton Senior Center	L. Claudia Allen Senior Center
Renaissance Senior Center	Swansee River Economic Council
Eagle Lake Senior Center	Lake Maude Neighborhood Center
Liberty Senior Center	Cherry Tree Apartments
Barry Manor Apartments	St. Johns River Apartments
The Villas at Hampton Park	The Villas at Carver Park
Joseph Meyerhoff Senior Center	Austin Hepburn Senior Center
L.J. Nobles Senior Center	Rebecca Neal Owens Center
Miramar Senior Center	Friendship Centers of DeSoto County
Jake Gaither Senior Day	Green Cove Springs Center
Weigel Senior Center	Players Community Center
Reverend Dr. Martin Luther King, Jr., Empowering Senior Day	6 th Annual Southside Community Health & Fitness Fair-Marannatha Seventh Day Adventist Church
Suwanee County Health and Wellness Fair at Advent Christian Village in Dowling Park	Jacksonville Senior Expo

Library Outreach Campaign

Each year the FPSC provides educational packets, including FPSC publications and Lifeline brochures and applications in English, Spanish, and Creole, to Florida public libraries across the state for consumer distribution. The FPSC's Library Outreach Campaign reached 583 state public libraries and branches in 2015. This year, the FPSC sent the materials via a CD that included a print-ready copy of FPSC brochures for easy reproduction. Following the Campaign, many libraries' requests for additional publications have been filled.

Community Services Block Grant Program

The Florida Department of Economic Opportunity (DEO) includes Lifeline services as an indicator in its work plan, allowing Community Action Agencies to report the number of clients they help to secure Lifeline services. During the October 1, 2013 through September 30, 2014 reporting period, an estimated 1,397 households signed up for Lifeline benefits through local Community Action Agencies, with \$245,700 in estimated benefits to clients. For the reporting period, 16 of the 27 Community Action Agencies provided Lifeline enrollment services to clients.

Income-Based Lifeline Applicants

The Office of Public Counsel (OPC) provides assistance to consumers applying for Lifeline based upon income level. During the July 2014 through June 2015 reporting period, OPC received over 15,000 calls from potential applicants seeking assistance and processed approximately 24,000 applications. OPC verifies income eligibility for consumers of the following telecommunication carriers: Assurance Wireless, AT&T Landline, CenturyLink Landline, Safelink Wireless, T-Mobile Wireless, and Verizon Landline.

Ongoing Lifeline Outreach

Ensuring easy access to Lifeline information through the agencies and organizations having regular interaction with eligible consumers is crucial to the Lifeline awareness effort. The FPSC partners with many agencies year-round to make sure eligible consumers know about Lifeline and know how to apply. The Lifeline Partners listed in the next section have continued to develop new partnerships, participate in local community events, offer training sessions, provide updates about program changes, and supply brochures and applications.

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 Lifeline program. Each month, the FPSC sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele. Additionally, the FPSC schedules and conducts two monthly community events to promote Lifeline.

VII. Conclusion

As of June 30, 2015, 833,612 eligible customers participated in the Florida Lifeline program. The success of the Florida Lifeline program can be attributed to the continued partnership between the FPSC, DCF, OPC, and other agencies around the state that assist Florida low-income families.

As a result of Florida Lifeline participation, USAC Low Income disbursements for Florida ETCs for the 12-month period ending June 2015, totaled approximately \$100 million. These dollars enabled Florida citizens qualifying for Lifeline benefits to receive discounted monthly bills with a current credit of at least \$9.25, or a free Lifeline wireless phone with 250 free monthly minutes. The ETC designation of successful prepaid wireless providers, such as SafeLink Wireless Assurance Wireless, and i-wireless, which provide a free phone and free monthly minutes to the customer, has been a major growth factor in the Florida Lifeline program the last several years.

Efforts to increase Lifeline participation can be separated into two categories, consumer outreach and enrollment process. The FPSC, in cooperation with other state and federal agencies, the OPC, ETCs, and other organizations, remains engaged in extensive outreach efforts. Because most of these efforts run concurrently, measuring the impact of any single activity on Lifeline participation is difficult. Nevertheless, outreach efforts overall are having a positive outcome and should be continued. Outreach efforts are also being expanded to include more competitive local exchange carrier and wireless ETCs.

The FPSC continues to focus on enrollment process issues as a means of increasing participation. As previously discussed in this report, specific enrollment process initiatives include the following:

- FPSC Lifeline Coordinated Online Application Process
- FPSC/DCF Coordinated Lifeline Enrollment
- Annual Recertification Procedures
- DCF Certification/Verification Web Services Interface
- Lifeline Work Group Meetings
- National Lifeline Accountability Database

The FPSC remains committed to enabling low-income households in Florida obtain and maintain basic local telephone service to help them find jobs, contact community services, call doctors and schools, and connect to family and friends. The FPSC will continue to identify and find solutions to barriers that may prevent Lifeline from achieving greater success for the benefit of Florida's low-income consumers. The FPSC will also continue its work on streamlining the Lifeline enrollment process and refining the FPSC/DCF Lifeline coordinated application procedure in Florida so that applying for the Lifeline program is easier and faster than in previous years.

Attachment A
2015 U.S. Poverty Guidelines

Household size (number persons)	2015 U.S. Poverty Guidelines Total Household Annual Income	150% of U.S. Poverty Guidelines Total Household Monthly Income	150% of U.S. Poverty Guidelines Total Household Annual Income*
1	\$11,770	\$1,471	\$17,655
2	\$15,930	\$1,991	\$23,895
3	\$20,090	\$2,511	\$30,135
4	\$24,250	\$3,031	\$36,375
5	\$28,410	\$3,551	\$42,615
6	\$32,570	\$4,071	\$48,855
7	\$36,730	\$4,591	\$55,095
8	\$40,890	\$5,111	\$61,335
*For families with more than 8 persons, add \$6,240 for each additional person to the yearly amount.			

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines.
See Federal Register Notice, January 22, 2015.

Attachment B
Lifeline Net Enrollment and Year-to-Year Net Growth Rate

ETCs	June 2011	June 2012	Net Growth Rate	June 2013	Net Growth Rate	June 2014	Net Growth Rate	June 2015	Net Growth Rate
SafeLink	447,379	430,048	-3.87%	490,828	14.13%	543,174	10.66%	470,695	-13.34%
Assurance	286,866	428,830	49.49%	323,014	-24.68%	249,664	-22.71%	208,902	-16.33%
i-wireless/ Access				12,450		97,044	679.47%	106,440	9.68%
AT&T	122,849	102,363	-16.68%	44,796	-56.24%	28,156	-37.15%	18,302	-35.00%
CenturyLink	39,524	35,154	-11.06%	22,179	-36.91%	18,756	-15.43%	16,163	-13.82%
Verizon	22,307	18,496	-17.08%	11,327	-38.76%	8,245	-27.21%	4,721	-42.74%
Windstream	6,249	6,775	8.42%	5,176	-23.60%	4,348	-16.00%	2,746	-36.84%
T-Mobile	70	232	231.43%	1,373	491.81%	3,091	125.13%	2,110	-31.74%
FairPoint	2,446	2,146	-12.26%	1,437	-33.04%	1,307	-9.05%	671	-48.66%
Cox Telecom				41		522	100.00%	659	26.25%
Non-ETC Reseller	4,941	2,828	-42.76%	979	-65.38%	658	-32.79%	495	-24.77%
NEFCOM	795	804	1.13%	712	-11.44%	545	-23.46%	458	-15.96%
Tele Circuit		1,497		637	100.00%	666	4.55%	337	-49.40%
TDS Telecom	811	728	-10.23%	582	-20.05%	406	-30.24%	264	-34.98%
Global Connection		594		789	32.83%	275	-65.15%	194	-29.45%
Budget Phone	2,912	1,399	-51.96%	776	-44.53%	407	-47.55%	161	-60.44%
Knology d/b/a WOW	761	751	-1.31%	516	-31.29%	294	-43.02%	138	-53.06%
ITS Telecom	178	190	6.74%	112	-41.05%	77	-31.25%	80	3.90%
Frontier	157	174	10.83%	114	-34.48%	84	-26.32%	46	-45.24%
Flatel	2,845	1,469	-48.37%	304	-79.31%	10	-96.71%	23	130.00%
Smart City	23	33	43.48%	21	-36.36%	12	-42.86%	7	-41.67%
ETCs which Relinquished Designation	2,741	1,347	-50.86%	82	-93.91%	51	-37.80%	0	100.00%
Total	943,854	1,035,858	9.75%	918,245	-11.35%	957,792	4.31%	833,612	-12.97%

Sources: FPSC data requests (2011-2015).

Attachment C
Recertification of Florida Lifeline Subscribers

Company	Number of Subscribers Claimed in February 2015	Number of Lifeline Customers Not Responding To Recertification	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-Enrolled	Percent of Lifeline Subscribers De-Enrolled
<u>ILECs</u>					
NEFCOM	598	254	4	258	43.14%
Smart City Telecommunications	12	4	1	5	41.67%
TDS/Quincy	522	97	1	98	18.77%
AT&T	32,808	14,638	N/A	14,638	44.62%
CenturyLink	21,326	1,945	0	1,945	9.12%
ITS Telecommunications	110	58	0	58	52.73%
Frontier	74	0	0	50	67.57%
Verizon	8,749	0	0	4,045	46.23%
Windstream	4,406	2,003	0	2,003	45.46%
GTC - Florala, St. Joe, Gulf	1,191	489	27	516	43.32%
<u>CLECs</u>					
Knology	389	0	0	280	71.98%
Global Connection Inc.	7	1	0	1	14.29%
Telecircuit	103	0	0	0	0.00%
Budget Prepay	538	179	0	179	33.27%
FLATEL	199	0	199	199	100.00%
Sun-Tel USA	0	0	0	0	0.00%
Nexus Communications	0	0	0	0	0.00%
Cox Florida Telecom, L.P.	234	0	0	63	26.92%
<u>Wireless</u>					
T-Mobile	3,283	1,350	0	1,350	41.12%
Assurance Wireless	255,355	76,463	4,428	80,891	31.68%
SafeLink Wireless	579,288	28,269	1	28,270	4.88%
i-wireless	82,654	7,370	29	7,399	8.95%
Total	991,846	133,120	4,690	142,248	14.34%

Source: Form 555 forms submitted to FCC and Universal Service Administrative Company by ETCs.

Attachment D
Agencies, Organizations, and Business Lifeline Partners

Florida Lifeline Partners	
AARP - Florida Chapter	Ability Housing of Northeast Florida
ACCESS Florida Community Network Partners	Agency for Health Care Administration (AHCA)
Agency for Persons with Disabilities	Aging Matters in Brevard County
Aging With Dignity	Florida Senior Medicare Patrol
Alliance for Aging, Inc.	Florida Senior Program
America's Second Harvest of the Big Bend, Inc.	Florida Telecommunications Relay, Inc. (FTRI)
Area Agencies on Aging	Florida Voters League
Big Bend 2-1-1 and other 2-1-1 Agencies	1000 Friends of Florida, Inc.
Boley Centers, Inc.	Habitat for Humanity – Florida
Braille and Talking Book Library	HANDS of Central Florida
Brain Injury Association of Florida, Inc.	Hemophilia Foundation of Greater Florida
Broward County Elderly and Veterans Services Division	Hispanic Office for Local Assistance
Bureau of Indian Affairs Programs	HOPE Connection
Capital Area Community Action Agency, Inc. (CACAA)	Leon County School Board
Catholic Charities of Central Florida	Linking Solutions, Inc.
Centers for Drug Free Living	Little Havana Activities and Nutrition Centers of Dade County, Inc.
Centers for Independent Living	Living Stones Native Circle
Central Florida Community Action Agency	Marion Senior Services
City and County Consumer Assistance Departments	Mid-Florida Housing Partnership, Inc.
City and County Housing Authorities	Miccosukee Tribe of Indians of Florida
Communities In Schools Foster Grandparent Program	Monroe County Social Services
Community Partnership Group	Feeding South Florida
Disability Rights Florida	NAACP (Florida Associations)
Faith Radio Station and other Florida radio stations	One-Stop Career Centers (DEO)
Federal Social Security Administration (SSA) - Tallahassee District	Seminole County Government Community Development
First Quality Home Care	Seniors First
Florida Alliance for Information and Referral Services (FLAIRS)	Senior Resource Alliance
Florida Assisted Living Association	South East American Council, Inc.
Florida Association for Community action (FACA)	Refuge House of the Big Bend

Florida Lifeline Partners (continued)	
Florida Association of Community Health Centers	Tallahassee Memorial Hospital (TMH) and other Florida Hospitals
Florida Association of Counties	Tallahassee Urban League
Florida Association of County Human Service Administrators	Tampa Vet Center
Florida Association of Food Banks (FAFB)	Three Rivers Legal Services, Inc.
Florida Association of Housing and Redevelopment Officials (FAHRO)	United Home Care Services
Florida Coalition for Children	United Way of Florida
Florida Coalition for the Homeless	Urban Leagues of Florida
Florida Council on Aging	U.S. Department of Housing and Urban Development (HUD)
Florida Deaf Services Centers Association	Washington County Council on Aging
Florida Department of Children and Families (DCF)	Wakulla County Senior Citizens Council
Florida Department of Community Affairs (DCA)	Nursing Homes Administrators
Florida Department of Economic Opportunity (DEO)	Florida Department of Education (DOE)
Florida Department of Elder Affairs (DEA)	Florida Department of Revenue (DOR)
Florida Department of Veterans' Affairs (DVA)	Florida Developmental Disabilities Council
Florida Elder Care Services	Florida Home Partnership
Florida Hospital Association	Florida Housing Coalition
Florida Housing Finance Corporation	Florida League of Cities, Inc.
Florida Low Income Housing Associates	Florida Nurses Association
Florida Office of Public Counsel (OPC)	Florida Public Libraries
Florida Public School Districts	Florida Rural Legal Services, Inc.