



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 2016



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**LIFELINE**  
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Office of Telecommunications  
Office of Consumer Assistance & Outreach



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## 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

In accordance with Section 364.10, Florida Statutes, the Florida Public Service Commission (FPSC) has oversight over the Florida Lifeline Program. The federal Universal Service Program provides the funding in Florida for the Lifeline Program and establishes certain rules. The Lifeline Program is designed to enable low-income households to obtain and maintain telephone service. 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 2015 through June 2016 program year, and evaluates procedures put in place to strengthen and streamline the Lifeline Program.

In Florida, 852,255 eligible households participated in the Lifeline Program as of June 30, 2016. This equates to approximately one of every eleven Florida households participating in the Lifeline Program.<sup>1</sup> Lifeline assistance participation includes the involvement of the FPSC, the Florida Department of Children and Families (DCF), the Florida Office of Public Counsel (OPC), the Florida Department of Education and other state agencies that provide benefits to persons eligible for Lifeline service.<sup>2</sup>

Half 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 2016 SNAP participants, the number of Lifeline eligible households decreased by 14.8 percent compared to last year.<sup>3</sup>

The FPSC participated in events to promote and provide consumers with information regarding eligibility. For example, the FPSC was active in March during the National Consumer Protection Week. FPSC Chairman Julie I. Brown kicked off the week by hosting a press conference in Tallahassee at America's Second Harvest of the Big Bend.

The FPSC continues to focus on improving the enrollment process, while eliminating any waste, fraud, and abuse in the program. Specific enrollment 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

In addition, the Federal Communications Commission (FCC) revised its rules related to the Lifeline Program with some portions effective as early as December 2, 2016.

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<sup>1</sup> Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households Jul. 2016: 7,914,312, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed Sept. 16, 2016, p. T-2.

<sup>2</sup> Section 364.10(2)(g)1., Florida Statutes.

<sup>3</sup> USDA, Supplemental Nutrition Assistance Program: Households Participating, Florida SNAP households for Jun. 2016: 1,712,005, <http://www.fns.usda.gov/sites/default/files/pd/30SNAPcurrHH.pdf>, accessed Sept. 26, 2016.

## II. Background

The FPSC is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives each year 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 Process<sup>4</sup> to apply for Lifeline, the process will confirm if the applicant is currently participating in the Medicaid, SNAP or Temporary Cash Assistance (TCA)<sup>5</sup> 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.

If a Lifeline applicant chooses to apply for Lifeline directly with an eligible telecommunications carrier (ETC), the ETC can access the DCF web services<sup>6</sup> in real-time to confirm program participation for Medicaid, SNAP, and TCA. Certification and verification in Florida 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),<sup>7</sup> is designed to help carriers identify and resolve duplicate claims for Lifeline Program supported services 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.

In April 2016, the FCC released an Order to further reform the Lifeline Program.<sup>8</sup> The FCC's Order takes a variety of actions to encourage more Lifeline providers to deliver newly supported broadband services. Over the next five years, FCC plans to shift support from voice-only services to services that at least include a broadband component.

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<sup>4</sup> 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 being approved for the DCF program.

<sup>5</sup> Nationally known as Temporary Assistance for Needy Families (TANF).

<sup>6</sup> 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.

<sup>7</sup> 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.

<sup>8</sup> FCC 16-38, WC Docket No. 11-42, Lifeline Reform and Modernization, Third Report and Order, released April 27, 2016, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf), accessed on September 26, 2016.



While the explicit support of broadband is an important aspect of the FCC's reform, the aspects that impact Florida's program relate to customer eligibility, implementation of a national verifier, and reductions in support for voice-only services. As part of the expansion to support broadband through the Lifeline Program, the FCC also established minimum service standards for broadband and mobile voice services to ensure those services meet the needs of consumers.

### III. Lifeline Participation

Currently, FCC rules allow a \$9.25 maximum reimbursement per Lifeline-eligible customer per month from 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.<sup>9</sup>

#### Program-Based

Customers can qualify for Lifeline service in Florida by enrollment in any one of the following programs:<sup>10</sup>

- 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

Federal changes to the list of qualifying programs are effective on December 2, 2016. The Veterans Pension program will be added and Low-Income Home Energy Assistance, TCA, and the National School Lunch programs will no longer be included.

#### 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.<sup>11</sup> The Federal Poverty Guidelines used are updated annually by U.S. Department of Health of Human Services. The 2016 Federal Poverty Guidelines are shown in Attachment A.<sup>12</sup> The Office of Public Counsel (OPC) certifies customer eligibility under the income-based criteria for customers requesting to be enrolled in the Lifeline Program for the three major wireline companies designated as ETCs.<sup>13</sup> The OPC also performs income certification for wireless ETCs

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<sup>9</sup> Section 364.105, Florida Statutes.

<sup>10</sup> Rule 25-4.0665(1) and (2), Florida Administrative Code.

<sup>11</sup> See Section 364.10(2)(a), Florida Statutes.

<sup>12</sup> Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. See Federal Register Notice, January 25, 2016.

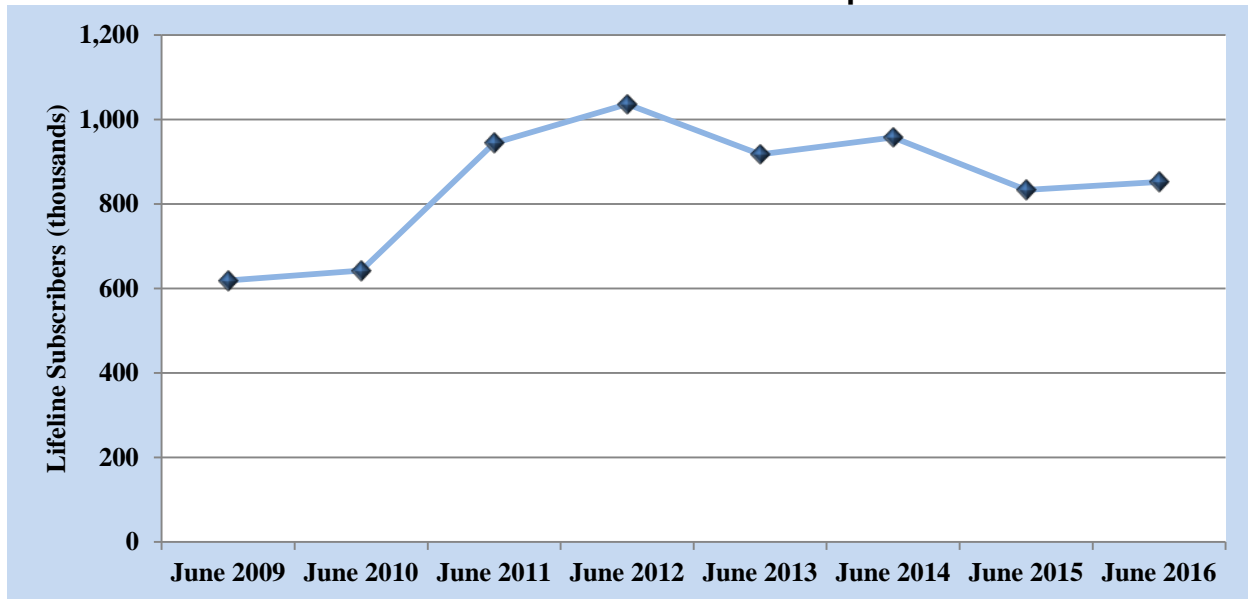
<sup>13</sup> The three major wireline companies are AT&T, CenturyLink, and Frontier Florida (formally Verizon Florida).

who have chosen to do so.<sup>14</sup> Effective on December 2, 2016, the FCC Reform Order allows income based eligibility to be up to 135 percent of the Federal Poverty Guidelines.<sup>15</sup>

## Participation

The number of subscribers enrolled in Lifeline was 852,255 as of June 30, 2016, a 2.3 percent increase from the number of subscribers last year. Figure 1 shows the number of Lifeline subscribers from June 2009 through 2016. In 2013, the decrease in subscribership was largely attributable to the FCC rules adopted in 2012 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 2016, subscribership grew as a result of overall increased demand for wireless Lifeline service. In contrast, wireline companies experienced an overall decline in Lifeline subscribers. Finally, the success of the National Lifeline Accountability Database, which prevents Lifeline subscribers from receiving more than one Lifeline credit per household, continues to be a factor.

**Figure 1**  
**Florida Lifeline Subscribership**



Source: Industry responses to FPSC data requests (2009-2016)

For fiscal year ending June 2016, there was an increase in subscribership of 18,829 households, or 2.3 percent. Lifeline eligible households decreased by 299,161, or 14.8 percent, resulting in the participation rate increasing to 49.8 percent.<sup>16</sup> This was an increase of 8.4 percentage points compared to 2015. Figure 2 shows participation rates in Florida households from June 2013 through June 2016.<sup>17</sup> Considering the number of households which are eligible to receive

<sup>14</sup> The wireless companies are SafeLink, T-Mobile and Virgin Mobile/Assurance Wireless.

<sup>15</sup> FCC 16-38, WC Docket No. 11-42, Lifeline Reform and Modernization, Third Report and Order, released April 27, 2016, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf), accessed on September 26, 2016.

<sup>16</sup> USDA, Supplemental Nutrition Assistance Program: Number of Households Participating, data as of September 9, 2016, <http://www.fns.usda.gov/sites/default/files/pd/30SNAPcurrHH.pdf>, accessed on September 26, 2016.

<sup>17</sup> Historical data in figure 2 has been corrected to remove a small number of resold lines that were counted twice.

Lifeline in Florida and the current participation rate, these numbers continue to demonstrate the need for the Lifeline Program.

**Figure 2**  
**Lifeline Participation Rate in Eligible Florida Households for 2013-2016**

<b>Year</b>	<b>Lifeline Enrollment</b>	<b>Eligible Households</b>	<b>Percent Participation Rate</b>
June 2013	917,467	1,952,890	47.0%
June 2014	957,533	1,930,106	49.6%
June 2015	833,426	2,011,166	41.4%
June 2016	852,255	1,712,005	49.8%

Source: U.S. Department of Agriculture

## IV. Lifeline Providers

As part of the Telecommunications Act of 1996, Congress allows state commissions to designate carriers as ETCs if they meet certain requirements.<sup>18</sup> Conversely, 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. Currently, the FPSC only designates wireline ETC applications, while wireless ETC applications are conducted by the FCC.<sup>19</sup>

To qualify as an ETC, a common carrier must offer services that are supported by federal universal service support mechanisms.<sup>20</sup> The carrier must advertise the availability of such services and charges. These services must be offered either using its own facilities or a combination of its own facilities and another carrier's resold service.

The FPSC has determined that before designating a telecommunications 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.<sup>21</sup> A company applying and qualifying for designation as an ETC must demonstrate good management and legitimate business practices to successfully administer the Lifeline Program.<sup>22</sup>

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 18 companies which had ETC status and participated in the Lifeline Program in Florida as of June 30, 2016. Attachment B represents the historic enrollment figures for the Lifeline Program listed by each of the ETCs.

**Figure 3**  
**ETCs Participating in Florida Lifeline Program**

Access Wireless (i-wireless)	ITS Telecommunications
Assurance Wireless (Virgin Mobile)	Knology of Florida, Inc. (WOW!)
AT&T Florida (AT&T)	NEFCOM
CenturyLink	Quincy Telephone Company (TDS)
Cox Florida Telecom, LP	SafeLink Wireless (TracFone)
FairPoint Communications	Smart City Telecom
Frontier Communications of the South	Tele Circuit Corporation
Frontier Florida, LLC (formerly Verizon)	T-Mobile Wireless
Global Connection Inc.	Windstream Florida, Inc.

Source: Industry responses to 2016 FPSC data requests

<sup>18</sup> Section 214(e)(2) of the Telecommunications Act of 1996.

<sup>19</sup> The Florida 2011 Legislature (HB 1231), removed the FPSC authority to designate ETC wireless providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

<sup>20</sup> 47 C.F.R. §54.101(a)(1); Those services include: (1) voice grade access to the public switched network, (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.

<sup>21</sup> Docket No. 120165-TP, Order No. PSC-12-0500-PAA-TP, issued September 28, 2012.

<sup>22</sup> 47 C.F.R. §54.201(h).

Prior to August 15, 2016, resellers could sell Lifeline discounted service from an ETC through a resale agreement. The ETC would receive the support from USAC, and reduce the price of service to the reseller by the corresponding amount. The FCC’s 2015 Lifeline Reform Order amended the Lifeline rules to eliminate Lifeline reimbursement for non-ETC resellers provisioning service through resale agreements out of concern of possible waste and abuse of program funds.<sup>23</sup> As a result, some affected carriers have left the Florida market. The FCC did provide a way for affected carriers to become an ETC and provide Lifeline service by filing a compliance plan that addresses the FCC’s concerns regarding potential waste and abuse of the program. Specifically, such non-facilities based carriers must file a plan that demonstrates:

- 1) Commitment and ability to provide the supported services throughout the designated area;
- 2) Ability to remain functional in emergency situations;
- 3) Ability to satisfy consumer protection and service quality standards;
- 4) Provision of local usage comparable to that offered by the incumbent local exchange companies (ILEC).

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 40 Florida ETC Wireless petitions pending at the FCC.

**Figure 4**  
**Pending Wireless ETC Designation Petitions at FCC as of June 2016**

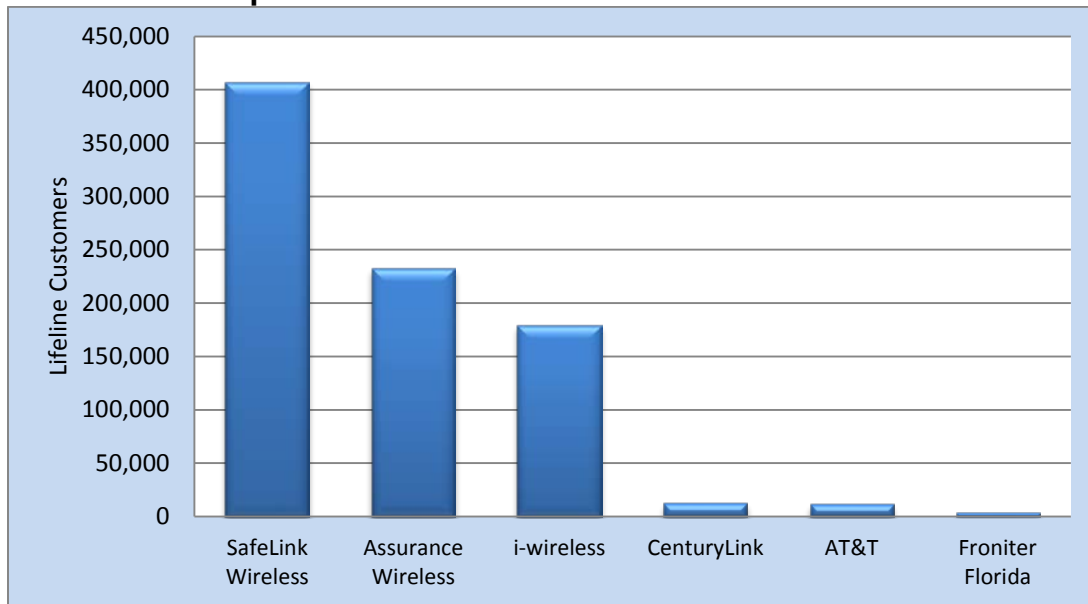
Airvoice Wireless	Mobile Net POSA
American Broadband	NewPhone Wireless
Amerimex	Nexus Communications
AmTel	Odin Wireless
Assist Wireless	Pinnacle Telecommunications
Birch Communications, Inc.	PlatinumTel Communications
Blue Jay Wireless	Q Link Wireless
Boomerang Wireless	Sage Telecom Communications, LLC
Budget PrePay, Inc.	SelecTel Wireless
Cintex Wireless	TAG Mobile
Consumer Cellular	TNT Wireless
EZ Reach Mobile	Tele Circuit Network
FedLink Wireless	Telrite
Free Mobile, Inc.	Tempo Telecom
Global Connection	TerraCom
IM Telecom, LLC	Total Call Mobile
Kajeet	True Wireless
Linkup Telecom	Vast Communications
LTS of Rocky Mount	You Talk Mobile
Millennium 2000	ZING PCS

Source: FCC Lifeline Compliance Plans & ETC Petitions

<sup>23</sup> FCC 15-71, WC Docket No. 11-42, Lifeline Reform and Modernization, Second Report and Order, released June 22, 2015, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-15-71A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf), accessed on September, 28, 2016.

Figure 5 shows the six Florida ETCs with the largest number of Lifeline customers as of June 2016. These ETCs represent 99 percent of the total Lifeline customer participation.

**Figure 5  
Top Six Florida Lifeline ETCs as of June 2016**



Source: Industry responses to 2016 FPSC data requests

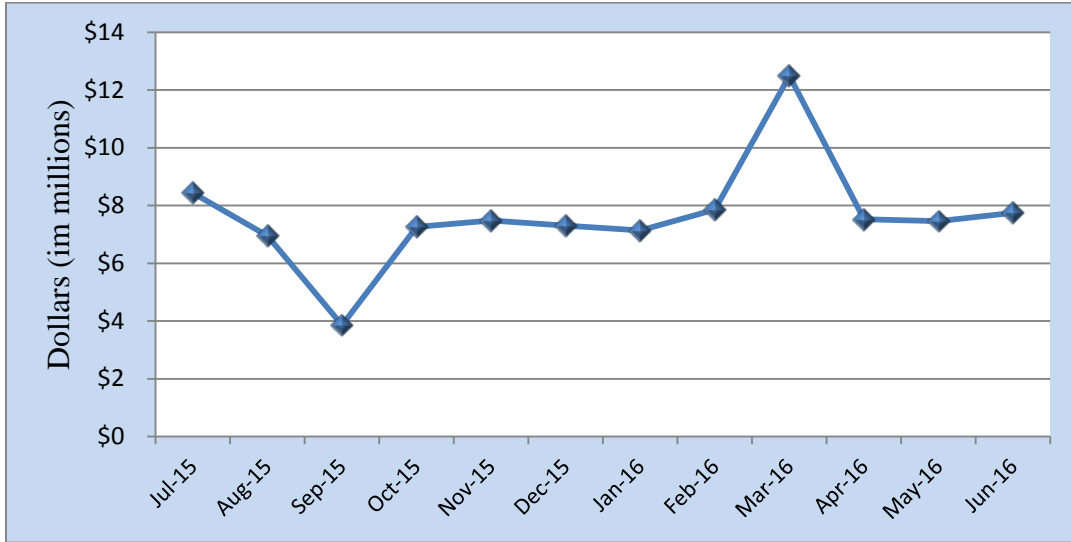
On May 2, 2016, Sprint announced the merger of its Assurance Wireless brand with Access Wireless' i-wireless brand.<sup>24</sup> Sprint will own 70 percent of the new business, with i-wireless owning the remaining 30 percent. The new combined company will continue to use the name i-wireless. In Florida, the combined company will have slightly more customers than SafeLink Wireless based on the 2016 data.

Figure 6 reflects USAC Lifeline disbursements to Florida ETCs between July 2015 and June 2016. The total amount disbursed during this 12 month period was \$91,499,102, an average of \$7,624,925 per month.

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. These amounts also include support corrections or true-ups from prior months when errors are made.

<sup>24</sup> Sprint Press Release, "Sprint Announces Wireless Lifeline Services Partnership with i-wireless, released May 2, 2016, <http://investors.sprint.com/news-and-events/press-releases/press-release-details/2016/Sprint-Announces-Wireless-Lifeline-Services-Partnership-with-i-wireless/default.aspx>, accessed Oct. 28, 2016.

**Figure 6**  
**USAC Low Income ETC Disbursements to Florida Providers**



Source: USAC Disbursements Florida July 2015-June 2016<sup>25</sup>

<sup>25</sup> The fluctuation in Figure 6 for the month of September 2015 is the result of Assurance Wireless' filing dates for Lifeline credit reimbursement from the universal service fund. For March 2016, the fluctuation is a result of true-up reimbursements attributable to TracFone for 2015.



## V. Lifeline Enrollment Process and Improvement Activities

### A. Lifeline Electronic Coordinated Enrollment Process

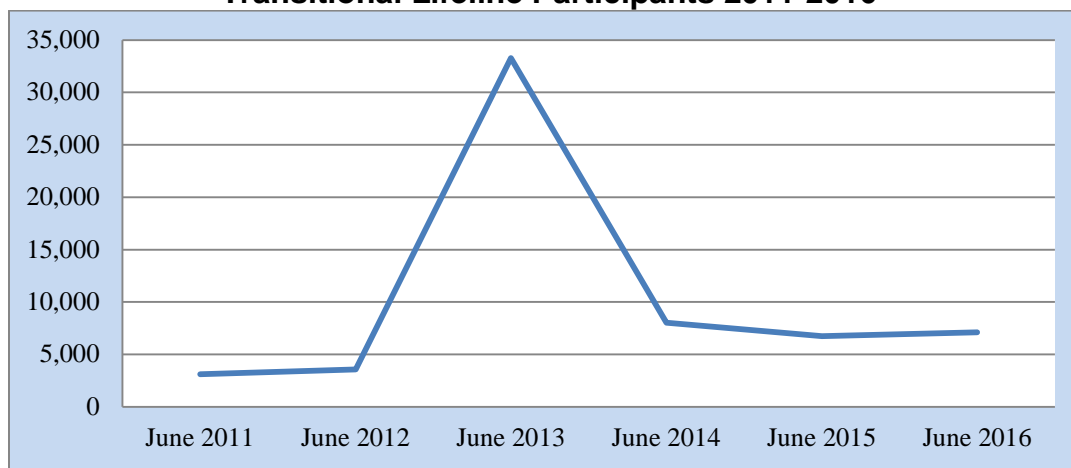
Florida has in place a streamlined, efficient, and verifiable Lifeline Electronic Coordinated Enrollment process. This advanced process involves a computer interface between the FPSC and the DCF for Lifeline applicants who currently participate in the Medicaid, the SNAP, or the TCA program. The FCC and USAC have commended the Florida Lifeline Electronic Coordinated Enrollment process and said that it is a good example of an enrollment process that states should use for the Lifeline coordinated enrollment process.<sup>26</sup>

### 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, Frontier (formally Verizon), and CenturyLink for June 2011 through June 2016. The large increase in the number of Transitional Lifeline participants in 2013<sup>27</sup> is attributable to customers being de-enrolled from the Florida Lifeline Program due to the new FCC requirement to annually recertify Lifeline customers. These former Lifeline participants may elect to receive Transitional Lifeline benefits for up to one year.

**Figure 7**  
**Transitional Lifeline Participants 2011-2016**



Source: Industry responses to FPSC data requests (2011-2016)

<sup>26</sup> FCC 15-71, WC Docket No. 11-42, Lifeline Reform and Modernization, Second Report and Order, released June 22, 2015, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-15-71A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf), accessed September, 28, 2016, Footnote 215.

<sup>27</sup> In 2013, AT&T reported 32,783; CenturyLink reported 488; and Verizon reported 23. By comparison in 2016, AT&T reported 6,033; CenturyLink reported 747; and Frontier Florida reported 329.

## **C. Florida Public Service Commission Activities**

### **Lifeline Work Group Meeting November 2016**

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 November 3, 2016. The purpose of this meeting was for the Lifeline Work Group to discuss:

- The new FCC Order (FCC 16-38) and revised Lifeline rules
- FPSC rulemaking related to the Lifeline Program
- Readiness of Florida ETCs to implement the new rules by December 2, 2016
- Concerns with the new FCC rules
- Florida ETC Outreach plans to inform consumers of the new rules
- Standards to advertise the availability of Lifeline services using media of general distribution pursuant to federal rules.

### **Phone Club Corporation ETC Designation**

The FPSC granted ETC designation to Phone Club Corporation (Phone Club) on September 23, 2016.<sup>28</sup> Phone Club was approved as an ETC for the limited purpose of receiving federal universal service low income support for providing Lifeline service to qualified households in non-rural AT&T Florida's service areas. Prior to its ETC designation, Phone Club had resold Lifeline Service from AT&T Florida.

As a result of the FCC's reforms in 2015, non-ETC resellers could no longer receive Lifeline discounts after August 15, 2016. As required by 2015 rules, Phone Club filed its proposed wireline Compliance Plan with the FCC to obtain forbearance from the facilities requirement of the Act, for the provision of Lifeline service, on July 26, 2016.<sup>29</sup> The FCC approved Phone Club's proposed Lifeline Compliance Plan on August 10, 2016.<sup>30</sup>

### **Integrated Path ETC Designation**

On January 11, 2016, Integrated Path filed an application for designation as an ETC with the FPSC.<sup>31</sup> The application requested both low-income and high-cost ETC designation throughout AT&T Florida's service territory. The application also sought ETC designation in those AT&T Florida wire centers that serve federally recognized tribal lands.<sup>32</sup> On November 21, 2016, Integrated Path filed a request to withdraw its application.

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<sup>28</sup> FPSC Order No. PSC-16-0411-PAA-TX, Docket No. 160150-TX, issued Sept. 23 2016.

<sup>29</sup> Phone Club Compliance Plan, <https://www.fcc.gov/ecfs/filing/10725243429438/document/1072524342943875c5>.

<sup>30</sup> FCC Public Notice, WC Docket No. 09-197 and WC Docket No. 11-42, DA 16-905, Released August 10, 2016.

<sup>31</sup> FPSC Docket No. 160016-TP.

<sup>32</sup> The federal low income program includes Lifeline and link-up on federally recognized tribal lands, whereas in areas outside of federally recognized tribal lands, only Lifeline is available.

## **FPSC Continues Actions to Prevent Waste, Fraud and Abuse of the Federal Universal Service Fund**

Florida continues to enforce safeguards to prevent waste, fraud, and abuse of the Universal Service Fund. Florida’s participation with the National ETC State Coordinating Group to monitor prospective and existing ETCs across the country, has enabled information sharing with all states on a national basis.<sup>33</sup> Protecting against waste, fraud, and abuse in the Lifeline Program is contingent upon developing adequate safeguards to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

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.

### **D. Federal Communications Commission Activities**

#### **2016 Lifeline Modernization Reform Order**

On April 27, 2016, the FCC released its Lifeline Modernization Order. In this Order, the FCC took steps to both expand services supported and also limit the qualifying criteria consumers can use to sign up for Lifeline services. Some of the FCC new rules became effective in December 2016. Specific changes regarding qualifications can be found in Section III of this report. Consumers that are already enrolled in the Lifeline Program will continue to be eligible for up to one year from their initial application or recertification.

In addition to reforming eligibility, the FCC has also refocused the program goal on broadband adoption, encouraging adoption of minimum broadband standards<sup>34</sup> by tying compliance with funding eligibility. Figure 8 below outlines the FCC’s dates for new phased-in standards for mobile and fixed services.

**Figure 8  
Mobile and Fixed Service Standards**

Effective Dates	Mobile Voice	Mobile Broadband	Fixed Broadband
From 12/2/16 to 11/30/17	500 Minutes	Usage Allowance: 500 MB	Speed 10/1 Usage Allowance: 150 GB
From 12/1/17 to 11/30/18	750 Minutes	Usage Allowance: 1 GB	Updated annually based on usage reported to FCC
From 12/1/18 to 11/30/19	1,000 Minutes	Usage Allowance: 2 GB	
From 12/1/19 to 11/30/20	1,000 Minutes	Updated annually based on usage reported to FCC	

Source: FCC 2016 Lifeline Reform Order (FCC 16-38)

<sup>33</sup> The ETC State Coordinating group includes state commission members from all fifty states, the District of Columbia, and the Commonwealth of Puerto Rico.

<sup>34</sup> Upon written notification to the FCC, certain ETCs do not have to comply with the broadband standards.

The FCC states that to be sustainable and achieve its goals of providing low-income consumers with robust, affordable and modern service offerings, a forward-looking Lifeline Program must focus on broadband services. Therefore, the FCC concludes that it is necessary that, following an extended transition period, to determine whether Lifeline will apply to a voice-only offering. The FCC did include an exception in those census blocks with only one Lifeline provider.

The Lifeline Program will continue to support voice services when bundled with a broadband service which meets the FCC’s minimum service standards. Figure 9 outlines the FCC’s phase down schedule.

**Figure 9**  
**Lifeline Support Phase Down Schedule**

Effective Dates	Fixed Voice	Mobile Voice	Fixed Broadband	Mobile Broadband
Through 11/30/19	\$9.25	\$9.25	\$9.25	\$9.25
From 12/1/19 to 11/30/20	\$7.25	\$7.25	\$9.25	\$9.25
From 12/1/20 to 11/30/21	\$5.25	\$5.25	\$9.25	\$9.25
After 11/30/21	\$0 <sup>35</sup>	\$0	\$9.25	\$9.25

Source: FCC 2016 Lifeline Reform Order (FCC 16-38)

### **National Lifeline Eligibility Verifier**

The FCC has established 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’s actions intend to achieve the following:

- A National Verifier would act as neutral third-party entity that removes the opportunity for providers to enroll ineligible subscribers
- Refines list of federal programs that may be used to validate Lifeline eligibility to those that support electronic validation, are most accountable, and best identify people needing support (SNAP, SSI, Medicaid, Veterans Pension, Tribal), along with income-based eligibility
- Increases transparency by making program data publicly available and understandable, including subscriber counts by provider and uniform disclosure of annual subscriber recertification data
- Determines subscriber eligibility
- Populates the Lifeline Eligibility Database
- Allows access to service providers, subscribers, states, and state administrators

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

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<sup>35</sup> If determined that a voice-only service is no longer eligible for Lifeline support.

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.<sup>36</sup>

### **2015 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.<sup>37</sup> To comply with the annual requirement for 2015, all ETCs and state Lifeline administrators were required to recertify the eligibility of their Lifeline subscriber base by the end of 2015, and report the results to USAC by January 31, 2016. Subscribers failing to respond to recertification efforts had to be de-enrolled from Lifeline. As a result of the 2015 recertification process, 53,556 customers or 6 percent were de-enrolled from the Florida Lifeline Program.<sup>38</sup> Of the 53,556 customers de-enrolled, 54 percent were as a result of Lifeline subscribers not responding to the recertification request. Results of the recertification by company are presented in Attachment C.

ETCs have the option of recertifying subscribers in one of three ways. 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 USAC to perform Lifeline recertification for their subscribers. USAC recertifies subscribers by mailing each subscriber a letter that provides the subscriber a 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.<sup>39</sup>

### **Duplicate Lifeline Support**

Eligible consumers can only receive one Lifeline-supported service per household.<sup>40</sup> 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.<sup>41</sup>

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<sup>36</sup> Section 364.105, Florida Statutes, Discounted rate for basic service for former Lifeline subscribers.

<sup>37</sup> 47 C.F.R. § 54.410(f).

<sup>38</sup> By comparison, the 2014 recertification processes de-enrolled 142,248 customers or 14 percent of participants from the Florida Lifeline program.

<sup>39</sup> Section 364.105, Florida Statutes. Discounted rate for basic service for former Lifeline subscribers.

<sup>40</sup> 47 C.F.R. § 54.409(c).

<sup>41</sup> A household Lifeline eligibility pre-screening tool is available at [www.lifelinesupport.org](http://www.lifelinesupport.org).

The FCC directed USAC to establish a database to both eliminate existing duplicative support and prevent duplicative support in the future.<sup>42</sup> 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. 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 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.

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<sup>42</sup> FCC 12-11, WC Docket No. 11-42, Lifeline Reform and Modernization, Report and Order, released Feb. 6, 2012, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-12-11A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-12-11A1.pdf), accessed Oct. 27, 2016.

## **VI. Lifeline Promotion Activities**

Promotional activities by the FPSC in 2016 featured participation in National Consumer Protection Week, Older Americans Month, and ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline Program. Figure 10 represents the various events and locations where Lifeline information was shared in Florida as of August 2016.

### **Lifeline Across America**

The Lifeline Across America Working Group includes representatives from the Federal Communications Commission, National Association of Regulatory Utility Commissioners (NARUC), and National Association of State Utility Consumer Advocates. The working group’s primary 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. Supported by the working group, Lifeline Awareness Week promotes these messaging efforts. In April 2016, the FCC released its Lifeline Modernization order, and the working group agreed no further conference calls and/or promotional planning were necessary until the new federal Lifeline guidelines were implemented.

### **National Lifeline Awareness Week**

In August 2016, NARUC announced that Lifeline Awareness Week, normally recognized each September, would be postponed due to the new federal guidelines. NARUC reported it will take time for carriers and states, especially those with matching programs, to adjust to the FCC’s Lifeline Program changes. To avoid consumer confusion by providing outdated information, NARUC postponed the 2016 awareness week.

### **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 6-12, 2016, was such an opportunity for Lifeline outreach activities. An annual consumer education campaign, NCPW encourages consumers to take advantage of their consumer rights. For this year’s event, FPSC Chairman Julie I. Brown kicked off the week by hosting a press conference in Tallahassee at America’s Second Harvest of the Big Bend to help consumers get access to food and phone service. Event participants included Commissioner Nancy Miller, City of Tallahassee; Katrina Rolle, President/CEO, United Way of the Big Bend; and Jim Croteau, Interim CEO of America’s Second Harvest of the Big Bend. The participants shared information for low-income residents to maintain a healthy lifestyle, through access to good nutrition and to phone service to connect with job opportunities, emergency services, family, and friends. Also during the week, FPSC staff made presentations in Jacksonville, Tampa, St. Petersburg, and Panama City, showing consumers how to apply for Lifeline, if they qualify.

For the fifth year, the FPSC participated in the national Older Americans Month project; celebrated each May to honor and recognize older Americans for their contributions to families, communities, and society. *Blaze A Trail* was this year’s theme, and the FPSC hosted and

attended 11 educational sessions, distributing Lifeline, conservation, and fraud prevention information at senior communities in Bay, Broward, Duval, Hillsborough, and Leon Counties.

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 7,000 seniors attend and have access to Commission brochures and publications, as well as to FPSC staff.

**Figure 10  
Commission Lifeline Promotion in Florida**

<b>Lifeline Events and Locations</b>	
Active Living Expo	Evergreen Missionary Baptist Church
Senior Day at the Capitol	Trinity Café
Woodland Point Apartments	St. Petersburg Free Clinic
Hollyridge Apartments	Healthy Wealthy Senior Living Fair
River House Senior Center	Senior Awareness Day, Pensacola
Coastal Community Center	Lunch and Learn - Lake Jacksonville Senior Center
Trout Creek Senior Center	Lunch & Learn Bradfordville Senior Center
Leon County Senior Outreach Appreciation Mtg.	Fraud Prevention Seminar
Community Day of Empowerment – Live Oak	World Elder Abuse Awareness Day – Tallahassee
Community Day of Empowerment – Gainesville	World Elder Abuse Awareness Day – Melbourne
Community Day of Empowerment – Newberry	Career Source Capital Region Job and Resource Fair
Community Day of Empowerment – High Springs	Newberry Municipal Senior Building
Micanopy Town Hall Community Meeting	High Springs Civic Center
Thelma Boltin Center	FOOD4KIDZ
High Springs Senior Center	Springfield Center
Apopka Job Connection Center	Daniel D. Cantor Senior Center
Kissimmee Job Connection Center	Sunrise Senior Center
Waldo Community Center	Southcentral/Southeast Focal Point Senior Center
LifeStyle Enrichment Center of Ft. White	Woodville Community Center
33 <sup>rd</sup> Annual Children’s Day – Florida Museum of History	Feeding Northeast Florida
LifeStyle Enrichment Center of Lake City	The Oaks at Riverview Senior Center
Columbia County Public Library	Bennie Furlong Senior Center
Feeding Northeast Florida Christian Fellowship Ministries	7 <sup>th</sup> 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
Panama City Beach Senior Center	Bay County Area Council on Aging

Source: Florida Public Service Commission, Office of Consumer Assistance & Outreach

### **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 2016. To reduce mailing and production costs, the Commission sent the materials via a CD that included print-ready brochure copies for easy reproduction. Following the Campaign, many libraries' requests for additional publications are filled.

### **Community Services Block Grant Program**

The Florida Department of Economic Opportunity 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, 2014 – September 30, 2015 reporting period, 1,645 households applied for Lifeline benefits through local Community Action Agencies, providing \$215,166 in benefits to clients. For the reporting period, 14 of the 27 Community Action Agencies provided Lifeline enrollment services to clients.

### **Income-Based Lifeline Applicants**

OPC provides assistance to consumers applying for Lifeline Assistance based upon income level. During the July 2015 - June 2016 reporting period, OPC received over 5,000 calls from potential applicants seeking assistance and processed 11,689 applications. OPC verifies consumers' income eligibility for the following telecommunication carriers: Assurance Wireless, AT&T Landline, CenturyLink Landline, Frontier Landline (formally Verizon), SafeLink Wireless, and T-Mobile Wireless.

### **Lifeline Partners**

Agencies and organizations that regularly interact with eligible consumers must have easy access to Lifeline information to support program awareness efforts. 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 help develop Lifeline awareness by participating in local community events, offering training sessions, providing updates about program changes, and supplying brochures and applications.

### **Ongoing Lifeline Outreach**

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Attachment D 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, 2016, 852,255 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 2016 totaled approximately \$92 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 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 while implementing the new FCC requirements.

**Attachment A**  
**2016 U.S. Poverty Guidelines**

Persons in family / household	2016 U.S. Federal Poverty Guidelines	150% of Federal Poverty Guidelines	Monthly income at 150% of Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$11,880	\$17,820	\$1,485	\$16,038	\$1,337
2	\$16,020	\$24,030	\$2,003	\$21,627	\$1,802
3	\$20,160	\$30,240	\$2,520	\$27,216	\$2,268
4	\$24,300	\$36,450	\$3,038	\$32,805	\$2,734
5	\$28,440	\$42,660	\$3,555	\$38,394	\$3,200
6	\$32,580	\$48,870	\$4,073	\$43,983	\$3,665
7	\$36,730	\$55,095	\$4,591	\$49,586	\$4,132
8	\$40,890	\$61,335	\$5,111	\$55,202	\$4,600
For families/households with more than 8 persons, add \$4,160 for each additional person.					

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, January 15, 2016.

<https://www.federalregister.gov/documents/2016/01/25/2016-01450/annual-update-of-the-hhs-poverty-guidelines> .

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

	ETCs	June 2013	June 2014	Net Growth Rate	June 2015	Net Growth Rate	June 2016	Net Growth Rate
Wireless	SafeLink	490,828	543,174	11%	470,695	-13%	406,506	-14%
	Assurance	323,014	249,664	-23%	208,902	-16%	232,481	11%
	i-wireless/ Access	12,450	97,044	679%	106,440	10%	179,429	69%
	T-Mobile	1,373	3,091	125%	2,110	-32%	762	-64%
Incumbent Wireline	CenturyLink	22,179	18,756	-15%	16,163	-14%	12,528	-22%
	AT&T	44,796	28,156	-37%	18,302	-35%	11,404	-38%
	Frontier Florida	11,327	8,245	-27%	4,721	-43%	3,896	-17%
	Windstream	5,176	4,348	-16%	2,746	-37%	2,436	-11%
	FairPoint	1,437	1,307	-9%	671	-49%	526	-22%
	NEFCOM	712	545	-23%	458	-16%	286	-38%
	TDS Telecom	582	406	-30%	264	-35%	179	-32%
	ITS Telecom	112	77	-31%	80	4%	86	8%
	Frontier of the South	114	84	-26%	46	-45%	28	-39%
	Smart City	21	12	-43%	7	-42%	11	57%
Competitive Wireline	Cox Telecom	41	522	100%	659	26%	689	5%
	TeleCircuit	637	666	5%	337	-49%	646	92%
	Knology d/b/a WOW	516	294	-43%	138	-53%	79	-43%
	Global Connection <sup>43</sup>	11	16	45%	8	-50%	3	-63%
	Non-ETC Reseller	979	658	-33%	495	-25%	71	-86%
	ETCs which Relinquished Designation	1,162	468	-60%	184	-61%	0	-100%
<b>Total</b>	<b>917,467</b>	<b>957,533</b>	<b>4%</b>	<b>833,426</b>	<b>-13%</b>	<b>852,046</b>	<b>2%</b>	

Sources: FPSC data requests (2013-2016).

<sup>43</sup> Historical data has been corrected to remove resold lines that were counted twice.

**Attachment C**  
**Lifeline Subscriber Recertification as of February 2015**

	ETCs	Lifeline Subscribers	No Subscriber Recertification Response	Subscribers Reported - No Longer Eligible	Finding of Ineligibility	Lifeline Subscribers De-Enrolled	Percent of Lifeline Subscribers De-Enrolled
Wireless	SafeLink	480,672	1,968	0	21,105	23,073	5%
	Assurance	200,616	8,812	2,204	0	11,016	5%
	i-wireless/ Access	118,710	8,418	31	0	8,449	7%
	T-Mobile	2,110	890	0	0	890	42%
Incumbent Wireline	CenturyLink	16,700	3,575	0	0	3,575	21%
	AT&T	13,635	4,664	9	0	4,673	34%
	Frontier Florida	4,260	0	0	752	0	18%
	Windstream	2,360	0	0	965	965	41%
	FairPoint	877	254	4	0	258	29%
	NEFCOM	423	177	2	0	179	42%
	TDS Telecom	270	97	0	0	97	36%
	ITS Telecom	72	16	0	0	16	22%
	Frontier of the South	50	0	0	5	5	10%
	Smart City	6	0	0	0	0	0%
Competitive Wireline	Cox Telecom	602	0	0	246	246	41%
	TeleCircuit	0	0	0	0	0	0%
	Knology d/b/a WOW	169	0	0	41	41	24%
	Global Connection	3	0	0	0	0	0%
	Budget Prepaid	186	73	0	0	73	39%
<b>Total</b>	<b>841,721</b>	<b>28,944</b>	<b>2,250</b>	<b>23,114</b>	<b>53,556</b>	<b>6%</b>	

Source: Form 555 submitted to FCC and Universal Service Administrative Company by ETCs, Due by January 31, 2016.

**Attachment D**  
**Agencies, Organizations, and Business Lifeline Partners**

<b>Florida Lifeline Partners</b>	
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	Little Havana Activities and Nutrition Centers of Dade County, Inc.
Centers for Drug Free Living	Living Stones Native Circle
Centers for Independent Living	Marion Senior Services
Central Florida Community Action Agency	Mid-Florida Housing Partnership, Inc.
City and County Consumer Assistance Departments	Miccosukee Tribe of Indians of Florida
City and County Housing Authorities	Monroe County Social Services
Communities In Schools Foster Grandparent Program	Feeding South Florida
Community Partnership Group	NAACP (Florida Associations)
Disability Rights Florida	One-Stop Career Centers (DEO)
Faith Radio Station and other Florida radio stations	Seminole County Government Community Development
Federal Social Security Administration (SSA) - Tallahassee District	Seniors First
First Quality Home Care	Senior Resource Alliance
Florida Alliance for Information and Referral Services (FLAIRS)	South East American Council, Inc.

<b>Florida Lifeline Partners (continued)</b>	
Florida Assisted Living Association	Refuge House of the Big Bend
Florida Association for Community action (FACA)	Tallahassee Memorial Hospital (TMH) and other Florida hospitals
Florida Association of Community Health Centers	Tallahassee Urban League
Florida Association of Counties	Tampa Vet Center
Florida Association of County Human Service Administrators	Three Rivers Legal Services, Inc.
Florida Association of Food Banks (FAFB)	United Home Care Services
Florida Association of Housing and Redevelopment Officials (FAHRO)	United Way of Florida
Florida Coalition for Children	Urban Leagues of Florida
Florida Coalition for the Homeless	U.S. Department of Housing and Urban Development (HUD)
Florida Council on Aging	Washington County Council on Aging
Florida Deaf Services Centers Association	Wakulla County Senior Citizens Council
Florida Department of Children and Families (DCF)	Nursing Homes Administrators
Florida Department of Community Affairs (DCA)	Florida Department of Education
Florida Department of Economic Opportunity (DEO)	Florida Department of Revenue (DOR)
Florida Department of Elder Affairs (DEA)	Florida Developmental Disabilities Council
Florida Department of Veterans' Affairs (DVA)	Florida Home Partnership
Florida Elder Care Services	Florida Housing Coalition
Florida Hospital Association	Florida League of Cities, Inc.
Florida Housing Finance Corporation	Florida Nurses Association
Florida Low Income Housing Associates	Florida Public Libraries
Florida Office of Public Counsel (OPC)	Florida Rural Legal Services, Inc.
Florida Public School Districts	HOPE Community Center
ASPIRE Health Partners	National Church Residences
Goodwill Industries of Central Florida	Good News Outreach
Florida Department of Education	Aging True Community Senior Services
Elder Options	