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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. UNDOCKETED

LIFELINE WORKING GROUP MEETING

PROCEEDINGS: LIFELINE WORKING GROUP MEETING

DATE: Wednesday, January 21, 2015

TIME: Commenced at 10:32 a.m.
 Concluded at 11:30 a.m.

PLACE: Florida Public Service Commission
 Room 105, Gerald L. Gunter Building
 2540 Shumard Oak Boulevard
 Tallahassee, Florida 32399-0850

REPORTED BY: LINDA BOLES, CRR, RPR
 Official FPSC Reporter
 (850) 413-6734

A P P E A R A N C E S

BY PHONE:

Jay Bradbury - Cox Communications
Leslie McLaughlin - Cox Communications
Martin Corcoran - Cox Communications
Rhonda Thomas - T-Mobile
Ann Morrison - FairPoint
Tim Loken - Windstream
Jorge Chamizo - TracFone/SafeLink
Harvey Spears - CenturyLink
Caryl Gilstrap - CenturyLink
Abby Matari - FLATEL/Zing Wireless
Sam Bailey - i-wireless

IN PERSON:

Debbie Nobles- NEFCOM
Debbie Finley - NEFCOM
De O'Roark - Verizon
Becki Edmonston - Verizon
Tracy Hatch - AT&T
Maryrose Sirianni - AT&T
Tom McCabe - TDS
Sandy Khazraee - CenturyLink
Lisa Steffens - OPC
Catherine Beard - PSC
Curtis Williams - PSC
Beth Salak - PSC
Adam Teitzman - PSC
Leslie Ames - PSC
Bob Casey - PSC
Mark Long - PSC
J.D. Johnson - DCF
Leah McCarthy - DCF

P R O C E E D I N G S

1
2 **MR. CASEY:** Okay. We can go ahead and get
3 started. I think everybody is here or on the phone.
4 I'll take appearances in just a moment.

5 This is a meeting of the Lifeline Working
6 Group. One thing I'd like to let the people here
7 know is that the microphones on the table are live.
8 Please make sure that no phones are near the mikes.
9 And if conversation needs to be taken offline,
10 please either mute the mike or move away from the
11 table. Okay. We are not -- this is not going to
12 be on TV, not being recorded. We do have a court
13 reporter here. Are you disappointed?

14 **MR. McCABE:** I wouldn't have showered, if I
15 had known.

16 **MR. CASEY:** We do have a court reporter here.
17 So let's get started by taking appearances here first
18 at the Commission. We'll start to my left.

19 **MS. SALAK:** I'm Beth Salak. I'm with the
20 Commission.

21 **MS. BEARD:** Catherine Beard with the
22 Commission.

23 **MR. O'ROARK:** De O'Roark with Verizon.

24 **MS. EDMONSTON:** Becky Edmonston with Verizon.

25 **MS. BOLES:** Linda Boles, court reporter.

1 **MS. KHAZRAEE:** Sandy Khazraee, CenturyLink.

2 **MR. McCABE:** Tom McCabe, TDS Telecom.

3 **MR. HATCH:** Tracy Hatch, AT&T.

4 **MS. NOBLES:** Debbie Nobles, NEFCOM.

5 **MS. FINLEY:** Debbie Finley, NEFCOM.

6 **MS. STEFFENS:** Lisa Steffens, OPC.

7 **MR. TEITZMAN:** Adam Teitzman with the

8 Commission.

9 **MR. CASEY:** And, of course, I'm Bob Casey.

10 Could we take appearances on the

11 telephone, please.

12 **MR. CHAMIZO:** Jorge Chamizo from TracFone

13 Wireless.

14 **MS. MATARI:** Abby Matari from Zing Wireless.

15 **MR. BRADBURY:** Jay Bradbury, Cox

16 Communications.

17 **MR. CORCORAN:** Martin Corcoran, Cox

18 Communications.

19 **MS. GILSTRAP:** Caryl Gilstrap, CenturyLink.

20 **MS. MORRISON:** Ann Morrison, Fairpoint.

21 **MR. BAILEY:** Sam Bailey, iWireless.

22 **MR. LOKEN:** Tim Loken, Windstream.

23 **MR. CASEY:** Anybody else?

24 Okay. I'm going to ask you to do me a

25 favor. For those people on the telephone, could

1 you please send me an email after the meeting to
2 make sure we get you down in the -- for the court
3 reporter and I get the spelling right? And my
4 email address is Bcasey, that's B-C-A-S-E-Y,
5 @psc.state.fl.us. I appreciate it. That'll help
6 us out.

7 Okay. We might as well go right into the
8 issues, if anybody doesn't have anything else,
9 questions or anything.

10 Number one, the Florida Department of
11 Children and Families Web Services Interface which
12 verifies participation in Medicaid, Temporary
13 Assistance for Needy Families, and Supplemental
14 Nutrition Assistance Program states that, "If an
15 eligible telecommunications carrier can determine a
16 subscriber's program-based eligibility for Lifeline by
17 accessing one or more databases containing information
18 regarding enrollment in qualifying assistance programs,
19 the eligible telecommunications carrier must access
20 such eligibility databases to determine whether the
21 prospective subscriber qualifies for Lifeline based on
22 participation in a qualifying assistance program."

23 To give you a little history on this, we were
24 approached by the FCC about a year and a half ago, I
25 think it was, which kind of surprised us. They asked

1 for a conference call. So we're on the conference
2 call, ready to talk, and we said, well, we're here.
3 What do you need? Well, your state has a qualifying
4 Lifeline database for programs. We want to know why
5 all your ETCs are not using it. It's federal law that
6 they have to use it. And we were kind of stunned and
7 surprised. We were just, well, you know, we'll find
8 out, we'll ask.

9 So at the last work group meeting in December
10 of 2013 we asked, and there were a number of
11 explanations. So we're here to update it, you know.
12 Is everybody on this database now with DCF? Because
13 what's going to happen now when the FCC comes to us
14 again and says how come all your ETCs are not on it,
15 we're going to say, okay, these are the ones that are
16 on it, these are the ones that are not on it. It's
17 your rule. You go after them.

18 So where can we start? Who wants to start?

19 **MR. HATCH:** Why does he look at me?

20 **MR. CASEY:** You started off the last one.

21 **MR. HATCH:** Yeah, I did.

22 **UNIDENTIFIED SPEAKER:** Come on, Tracy.

23 **MR. CASEY:** You were great. They didn't even
24 know who it was. They knew I picked you.

25 **MR. HATCH:** The short, sweet answer is not

1 much has changed for us. We still have some serious
2 fundamental problems with building a single state
3 solution when this is really a national issue. And
4 that's -- I know that some discussions have occurred on
5 this with the FCC. I don't know what the -- where they
6 are or where they're going or anything like that. I
7 just don't know.

8 So the answer is we are not -- we have not
9 built to a portal is the answer to your question.
10 As to whether we will is still an open question.

11 **MS. SALAK:** But you have not approached DCF
12 at all?

13 **MR. HATCH:** No. No. For us, there isn't any
14 real point unless we absolutely have to build to the
15 portal. And until we have to do that, you know,
16 there's no really -- no real reason to do that.

17 **MS. SALAK:** So you don't have any cost
18 estimates or anything like that?

19 **MR. HATCH:** As far as I know -- there may be
20 some. They may have done some at some point. Because
21 I know that after the last workshop, MaryRose told them
22 to go pull that stuff because you had made -- there was
23 a discussion about how to find it, and I think we
24 relayed that information. Whether they pulled it or
25 not or looked at it or did any financial assessment, I

1 do not know. But it's a much bigger problem than just
2 the financial and building the machine-to-machine
3 interface. Certainly we're capable.

4 **MS. SALAK:** But you said that you have had
5 discussions on the federal level?

6 **MR. HATCH:** As far as I know, that has been
7 discussed. I don't know what the contents of those
8 discussions -- whether it was a specific discussion or
9 in the context of other things, I don't know.

10 **MS. SALAK:** Can you find out and put it in
11 your comments?

12 **MR. HATCH:** Maybe, maybe not. The answer is
13 I don't know. It depends on what the nature of the
14 discussions are. They may not tell me and they may not
15 want them divulged.

16 **MS. SALAK:** Can you file them confidentially?

17 **MR. HATCH:** Probably not.

18 **MR. CASEY:** I know at the last work group
19 meeting you mentioned that you had some problems with
20 the interpretation of it. Are you still having a
21 problem with the interpretation of the rule?

22 **MR. HATCH:** The answer to that is yes. And
23 the problem with the interpretation has to do with
24 looking at it with a view of is it mandatory or is it
25 optional, and that's kind of where we started the last

1 time. We didn't think it was mandatory. You, of
2 course, have informed us that it's mandatory and the
3 FCC apparently believes that it's mandatory, but we'll
4 see. We still hold that opinion, but it's not really
5 worth going through. I mean, it's --

6 **MR. BRADBURY:** This is Jay Bradbury at Cox.
7 I'll just follow Tracy since I was a participant last
8 time also. As we learned last time, there actually is
9 not a web portal access to this database. There is
10 only an application programming interface
11 machine-to-machine capability. That is extremely
12 expensive and cost-prohibitive.

13 We also don't believe that the rules as
14 they are written require us to have it. I've
15 got -- we have a two-page set of talking points
16 that we'd be willing to submit to the staff after
17 the meeting that addresses that, but basically the
18 rule, Parts A and Parts B, are "if" statements
19 separated by an "or." We are compliant with Part
20 B. That doesn't mean that we are not compliant
21 with Part A.

22 The state provides 90 percent of all the
23 enrollments that we do. The other 10 percent we do
24 under Part B, we receive all the documentation from
25 the subscriber. We're rule compliant.

1 **MR. CASEY:** Okay. Jay, could you send me
2 those talking points after the meeting? We'd like to
3 --

4 **MR. BRADBURY:** I'd be happy to do so.

5 **MR. CASEY:** All right. And, again, we're
6 just saying what the FCC told us. They slapped our
7 hand saying why aren't your ETCs on this database, so.

8 **MS. SALAK:** May I ask, you said it was
9 cost-prohibitive. Did you do a -- did you price it
10 out?

11 **MR. BRADBURY:** We haven't done any specific
12 pricing, but we know what we did in terms of the NLAD.
13 We don't even use an API with the NLAD because it's
14 cost-prohibitive. We use a batch process with them
15 through their secure web portal. But just what we had
16 to do to modify ourselves internally, even to do that
17 approached a half a million dollars. Doing something
18 just for the State of Florida --

19 **MR. CORCORAN:** Ain't gonna happen.

20 **MR. BRADBURY:** -- would probably cost us more
21 than the reimbursement that we would receive for the
22 next two years.

23 **MS. SALAK:** And it ain't gonna happen.

24 **MR. CASEY:** And it ain't gonna happen. We
25 got that little comment. That must have been Marty.

1 Is that Marty?

2 **MR. CORCORAN:** It is.

3 **MR. CASEY:** Yeah. Okay. You are now down on
4 the court record here.

5 **MS. KHAZRAEE:** Sandy Khazraee with
6 CenturyLink. We are not participating. We do not plan
7 to participate. We did have internal discussions after
8 the last session when we found out it was machine to
9 machine. I do not know whether we actually did a cost
10 study, but I will find out and let you know after this
11 meeting.

12 We basically have the same issues that the
13 others do. We're in 37 states as an ILEC and an
14 ETC, and it is not what we think of as a prudent
15 use of our resources, the IT resources, the
16 programming, the money to build 37 different
17 interfaces, and especially given that the DCF
18 portal doesn't even capture all of the Lifeline
19 eligible population in Florida. It's only three of
20 the programs granted, and probably the three with
21 the highest percentage of subscribers, but it does
22 not capture them all. So we at this point do not
23 plan to participate in that.

24 **MR. CASEY:** Okay. Just for your information,
25 we do keep track of how many people come in using

1 programs and what type of programs, and over 90 percent
2 of the ones that we come in are through DCF programs.

3 **MS. SALAK:** What percentage is it for
4 CenturyLink?

5 **MS. KHAZRAEE:** I would bet it's pretty close.
6 Yeah. We get some folks that come to us directly. We
7 get a few from OPC. We've had a few, you know, we've
8 had some through National School Lunch. But I'd say
9 probably 90 percent come through DCF, but it's not
10 100 percent.

11 **MS. SALAK:** How many do you think, how many
12 do you think apply directly with CenturyLink?

13 **MS. KHAZRAEE:** I do not know that percentage.
14 Caryl, I doubt you've got that percentage at the top of
15 your head either, do you?

16 **MS. GILSTRAP:** No. But I would agree it's
17 real close to the 90/10; 90 percent DCF, 10 percent
18 other.

19 **MR. CASEY:** How about other companies? Tom,
20 do you know?

21 **MR. McCABE:** TDS Telecom, our position is no
22 different than the rest of them. We have not used the
23 portal and we don't intend to. I mean, we've got
24 limited resources. You know, we're involved in -- you
25 know, we're trying to acquire companies and things of

1 that nature and trying to deal with our IS (phonetic)
2 folks focusing on those issues that are a lot more
3 important to the company than, than this would be.

4 I thought at the last meeting a while back
5 though that DCF was going to be looking into an
6 Internet-based arrangement that we would be able to
7 access through that as opposed to a machine-to-
8 machine arrangement, because I don't see us doing a
9 machine-to-machine arrangement.

10 **MR. CASEY:** JD, are you on the phone, by
11 chance?

12 **MS. JOHNSON:** I'm sitting right here.

13 **MR. CASEY:** Oh, JD, I didn't see you over
14 there. I'm sorry.

15 Has anything --

16 **MS. JOHNSON:** We had a discussion yesterday,
17 and we are looking into a web service based program.
18 So they're -- but they did advise that we try to do it
19 all as one group so we can keep the cost down for
20 everybody. So they're investigating that now and will
21 get that back to us.

22 **MR. CASEY:** Very good. Very good.

23 Go ahead.

24 **MS. NOBLES:** This is Debbie Nobles, and we
25 did provide some cost estimates previously, and they

1 were probably way understated because we actually don't
2 have in-house resources that are even knowledgeable
3 enough to determine what would be required to do this.

4 Also, also filed in my comments, just like
5 we were just saying that we do this in a number of
6 other states where we do access DCF's or the
7 comparable state service that, that oversees these
8 programs, but we've had to -- we have never had to
9 incur any costs to do that, and it has always been
10 something that's been easily accessible, very
11 user-friendly for us, makes it very easy for us to
12 do this.

13 We have not made any plans to connect to
14 DCF through their portal. We have talked about
15 alternatives, because I think one of the, one of
16 the things that also was discussed at the last
17 workshop was whether the Public Service Commission,
18 who does have access to the portal, could be used
19 as some sort of an interface, at least for the
20 smaller companies, where the costs would really be
21 very considerable based on the number of customers
22 that would even be qualifying for Lifeline.

23 As a go-around, kind of a workaround
24 program for that we were thinking of setting up a
25 computer within our business office. And if

1 customers came in and they qualified for Lifeline
2 under one of those programs, we would walk them
3 through the steps of sitting down at the computer,
4 logging into the Commission's website, and having
5 everything done that way. We do have a lot of
6 walk-in traffic, so this would probably take care
7 of a number of our customers. Other folks that
8 apply online obviously have access to a computer,
9 and we would prefer to refer them to the Florida
10 Public Service Commission's website and have them
11 apply using the form -- I think it's 158 -- the
12 online application if they qualify under one of
13 those programs. And then that way we sort of meet
14 the requirement without us actually having to spend
15 the money to connect directly to DCF.

16 **MR. CASEY:** So it's a very streamlined
17 process on the PSC website.

18 **MS. NOBLES:** Yes, it looks like it is.

19 **MR. CASEY:** They can apply, and our computer
20 actually does a query over at DCF to verify that that
21 person is actually on the program they said they are.
22 So they're automatically qualified if they come back.

23 **MS. NOBLES:** Yeah. And that's the way we
24 were looking at it is if the customer has walked into
25 the office, they don't have to perform really any extra

1 steps. They would have to fill in an application
2 regardless. So sitting them down at the computer and
3 having them do it there would be, would work just as
4 well. Now we can do that, the size company we are.

5 **MR. CASEY:** Would you mind if I shared the
6 cost? Is that okay?

7 **MS. NOBLES:** Oh, no. Yeah, not at all. Not
8 at all.

9 **MR. CASEY:** Okay. The comments that we
10 received from NEFCOM would be \$36,290 to set it up
11 initially; an additional \$3,500 needed for hardware.

12 **MR. O'ROARK:** De O'Roark with Verizon. We
13 may be in a bit different position than the other
14 companies because we are undertaking a similar project
15 in another state and expect to connect to their portal
16 next month. And so it may be that work done on that
17 project could help us here in Florida. Like the
18 others, we have not connected to the DCF portal. We're
19 not connected today. We have reached out to the IT
20 department at DCF and were told that they were swamped
21 with the Affordable Care Act and that they would get
22 back to us, and they haven't gotten back to us.

23 Obviously, as Jay Bradbury said, it's a
24 machine-to-machine interface. You've got to get
25 requirements from DCF so that you can build to the

1 portal, and we don't have those requirements. So
2 we've kind of been stuck. But it's something that
3 we're willing to look at and perhaps pursue, but
4 we've got to get the information.

5 **MR. CASEY:** JD, do you have any idea how long
6 in the future it would be before you look at a web --
7 or internet-based instead of machine-to-machine?

8 **MS. JOHNSON:** We had -- like, yesterday we
9 had a conversation with IT, and they're trying to get
10 us someone to figure out how long it's going to take
11 because they are doing the Affordable Care Act and
12 that's top priority right now. And so they are trying
13 to figure out how we can get you guys in there quickly,
14 but they are working on it. And I've been
15 corresponding with your staff back and forth.

16 **MR. O'ROARK:** With Kevin?

17 **MS. JOHNSON:** Yes. Uh-huh.

18 **MR. O'ROARK:** Okay. Good.

19 **MR. CASEY:** Okay. Other companies like to
20 comment on this on the phone maybe?

21 **MR. BAILEY:** Hi. This is Sam Bailey with
22 iWireless. Similar to the Verizon guy there, we
23 definitely would be interested in looking into it. I
24 know we've reached out in the past and kind of gotten
25 similar feedback. So we would, we would definitely be

1 eager to learn more about it.

2 **MR. CASEY:** Okay. We'll keep you updated on
3 it as it progresses, as DCF progresses.

4 **MR. BAILEY:** Okay.

5 **MR. CASEY:** JD, would you keep me informed?

6 **MS. JOHNSON:** Yes.

7 **MR. CASEY:** Or Beth informed.

8 **MS. SALAK:** Us informed.

9 **MS. JOHNSON:** Are you short timing it?

10 **MR. CASEY:** How could you tell? October this
11 year I'll be retired.

12 Okay. Any other comments?

13 Okay. Let's go on to number two then.

14 The National Lifeline Accountability Database, how
15 is it working? Are you having any problems with
16 it? Are you receiving complaints from consumers
17 that NLAD is providing incorrect information?

18 I just received three complaints on it
19 yesterday and today from consumers saying, hey,
20 they rejected me because they say I have multiple
21 phones. I only have one phone. And so we have to
22 send those complaints on.

23 And are you, are the companies taking
24 people off that are no longer eligible? Are you
25 taking them off NLAD within the 24-hour period

1 that's required? Do you know that, if you're doing
2 that?

3 **MR. McCABE:** I don't have an answer on that,
4 but we've had the same issue with regard to customer
5 complaints. Being told that they're duplicate, they
6 get upset over that. They also don't understand why
7 they have to provide any of their identity. They don't
8 understand the whole process. And that's been the
9 biggest issues that we've had, but it's duplicate.

10 **MS. KHAZRAEE:** Sandy Khazraee with
11 CenturyLink. We're having issues with TPIV failures,
12 we're having address duplicates, subscriber duplicate
13 issues, and I actually have a person on the phone who
14 can probably answer your question as far as
15 CenturyLink.

16 Caryl, I know we've talked about it, but
17 I'd rather you answer the question. So when we
18 have a customer who's no longer either our customer
19 or they are no longer our Lifeline discounted
20 customer, that is a real-time process removing that
21 from their, their account and having that update
22 NLAD; correct? It's real-time.

23 **MS. GILSTRAP:** Correct. In fact, its
24 automated process, we do use the API. So once the
25 order processes, the account is de-enrolled from NLAD.

1 **MS. KHAZRAEE:** But we do, we do get
2 complaints, we have issues. And Caryl actually gave me
3 some, some specific examples when we were preparing for
4 this where -- okay. First of all, TPIV failures. So
5 --

6 **MR. CASEY:** Could you, could you say what TP
7 --

8 **MS. KHAZRAEE:** Third-party verification.

9 **MR. CASEY:** Okay. Just for the record.

10 **MS. KHAZRAEE:** Right. It's part of USAC
11 verification. And I got educated on this yesterday.
12 Caryl, correct me if I say anything wrong. It uses a
13 LexisNexis database, which actually seems to be a
14 credit check database. So we sometimes have Lifeline
15 customers who are not in that database because they
16 don't have credit, they've never probably tried to get
17 credit, and so it doesn't find anything for those
18 customers.

19 We also have -- and it uses date of --
20 name, date of birth, and the last four of the
21 Social Security number. That's specifically what
22 it's checking against.

23 Usually the third party, the TPIV failures
24 are because of duplicate subscribers. Duplicate
25 address, we had one recently where it told us that

1 there was already a Lifeline discount at that location,
2 so it was a customer that I think had come through the
3 FPSC database. We had to send a letter to the customer
4 and say we can't give you Lifeline. It says there's a
5 duplicate address. They said, well, I'm the only --
6 you know, no, there's not one here. So then they have
7 to fill out the IEH, independent economic household,
8 form.

9 **MR. CASEY:** To show that there's two
10 households at the one address?

11 **MS. KHAZRAEE:** Or -- and I may be getting
12 that wrong, Caryl. So sometimes we require them to
13 fill out the IEH which either says I'm it and we don't
14 have another one here and I'm swearing to that, or
15 there's two independent and that one doesn't have
16 anything to do with me. And then --

17 **MS. GILSTRAP:** That's correct.

18 **MS. KHAZRAEE:** And then we can update NLAD if
19 it turns out that it requires an IEH.

20 Caryl also tells me that address
21 duplication sometimes happens in apartment
22 buildings even when our customer has provided their
23 apartment number and we have submitted that. NLAD
24 only recognizes the street address, does not
25 recognize the individual unit, and we have

1 customers fail because it didn't pick up that it
2 was a different apartment number.

3 Caryl, are there any others that just
4 stand out at you that you'd like to mention?

5 **MS. GILSTRAP:** One of the things that I've
6 noticed about the first issue that was brought up where
7 customers are not removed in a timely manner from NLAD
8 so it looks like they're a duplicate subscriber isn't
9 so much that they, the company who originally had
10 provided the Lifeline service didn't de-enroll them in
11 time, it's that they're still stuck in the duplicate
12 database. And once they hit a duplicate database at
13 some point, you can't remove them. And USAC won't
14 remove them until they've completed whatever their
15 process is. And, unfortunately, we're going through
16 another round of duplicate mailings because NLAD has
17 allowed duplicates to be entered into the database.

18 **MR. TEITZMAN:** Do you get a confirmation --
19 I'm sorry. Do you get a confirmation when you
20 de-enroll someone, or is there no feedback?

21 **MS. GILSTRAP:** Yeah. It says successful. If
22 you do it through API, there is no confirmation other
23 than the file was accepted and the row was accepted.
24 If you do it through manual processing, if you're just
25 in the app and actually keying it in, you'll get a

1 screen notice that says the de-enroll is successful.

2 **MR. CASEY:** So, Caryl -- this is Bob Casey --
3 let me ask you one thing. If a person showed up on the
4 duplicates database from June of last year and they got
5 rid of both those companies but now they want to apply
6 with a new one, they would still be rejected, right,
7 because they're on the duplicates database?

8 **MS. GILSTRAP:** Yes. Exactly. If they
9 haven't been moved out of the duplicates database, and
10 quite a few customers are still in that duplicates
11 database, there's nothing we can do about it. And we
12 have complained and complained and complained.

13 Now just recently with the latest round of
14 mailings they've told us that if you find any of
15 the customers in this list are no longer with you
16 on Lifeline, let us know and we will de-enroll
17 them. So that just happened in January, so this is
18 new. But since then, it's -- they've left them in
19 the duplicates database.

20 **MR. CASEY:** And that's caused --

21 **MS. GILSTRAP:** But that could have caused
22 some of those errors that we were seeing in those
23 complaints.

24 **MR. CASEY:** I could see where it causes a lot
25 of problems.

1 **MS. GILSTRAP:** Yes.

2 **MR. CASEY:** Okay. Other companies like to
3 comment or OPC?

4 **MS. SIRIANNI:** Bob, this is MaryRose with
5 AT&T. And just to kind of follow up with what others
6 are saying, we basically feel like we're kind of stuck
7 in the middle because we get the customers' complaints
8 and, you know, we can't send them to NLAD for
9 questions, you know. Our comment is maybe there needs
10 to be some customer service that they can call there to
11 find out, you know, like, what's the problem, because
12 we really can't answer it at that point. So, I mean,
13 that's something that maybe they could do that could
14 help the customers -- on the customers' end that they
15 would have some, you know, somewhere to go or to call.
16 So we are getting complaints, and a lot of it has to
17 do, you know, with the issues that they're talking
18 about, but there needs to be somewhere where the
19 customer can go to get answers.

20 **MS. KHAZRAEE:** And this is Sandy with
21 CenturyLink. Caryl has also made that plea to us as
22 well, that we do have some states where there is a
23 state administrator who is in the middle, and it kind
24 of takes us out of the middle. And they would love to
25 see that in Florida. I don't know, you know, who that

1 would be, but, you know, I don't really think it should
2 be us because, you know.

3 **MS. GILSTRAP:** This is Caryl. We see a lot
4 of repeat add requests, Lifeline requests from the PCS
5 [sic] file where we will see the customer come in,
6 let's say, in October and request us to add Lifeline
7 but they fail NLAD for either TPIV or duplicate
8 subscriber, whatever, duplicate address. And then so
9 we send them a letter saying I'm sorry we couldn't add
10 Lifeline because of this error, but if you'll send us
11 this information, then we will enroll you in Lifeline.
12 They don't. They go back to the PCS, reapply, and then
13 in January we get another request to add Lifeline. And
14 it's just a vicious circle because the customer is not
15 completing the additional information needed to get
16 them into NLAD.

17 **MR. CASEY:** How has NLAD been working with
18 the companies? Have they been responsive?

19 **MS. GILSTRAP:** NLAD just fails them. They
20 don't really --

21 **MR. CASEY:** You don't call them up or
22 anything?

23 **MS. GILSTRAP:** NLAD can't resolve the problem
24 if the customer doesn't provide the proof needed. So
25 if they don't complete the IEH worksheet and return it

1 to us, NLAD doesn't -- isn't going to accept them. And
2 USAC isn't really willing to work with us on that, no,
3 not at all. If the customer doesn't provide proof of
4 identity, if they just go back to your portal and
5 reapply and you send us a new file to add them, then
6 we're just hitting a vicious circle of them failing
7 NLAD. We tell them we need this additional
8 information, they don't do it, they go back to you and
9 reapply. And so we have no one to contact to say, hey,
10 your customer has to fill this out or we're never going
11 to be able to add them to the Lifeline program.

12 **MR. CASEY:** De, did you have something?

13 **MR. O'ROARK:** I did. De O'Roark with
14 Verizon. Actually overall we think the process is
15 working reasonably well, but we are seeing the same
16 problems that everybody else is with these false
17 positives.

18 One thing I understand that NLAD is going
19 to do is start giving us at least some of the
20 reasons for the rejects. Right now you've just got
21 a reject and you have to send a letter to the
22 customer saying, sorry, you're rejected. We need
23 proof. So -- and others probably have more detail.
24 But my understanding is that at least they'll tell
25 you, okay, there was a date of birth issue, had a

1 last four of the Social Security number issue, so
2 that at least if you know that, when you send the
3 letter you can be specific as to the information
4 that you need and maybe avoid some of the vicious
5 cycle problem. But, otherwise, it's pretty much
6 the same remarks as the others.

7 **MR. CASEY:** Okay. Tom?

8 **MR. McCABE:** The initial complaint that we've
9 seen more recently is providing the identity
10 information because customers are concerned about
11 identity theft, and that's become the bigger problem.

12 **MR. CASEY:** That's a balance they have to
13 work out, identity theft or, you know, getting on
14 Lifeline. That's required by law. You got to -- they
15 got to make the choice.

16 Okay. Any other comments on the telephone
17 maybe?

18 **MR. BAILEY:** This is Sam with iWireless. The
19 one thing that I would point out from the applications
20 from the, the PSC would be, I mean, we need to have a
21 valid address. We're seeing a lot of rejects from
22 that. I don't know if we're getting a whole lot of
23 complaints from it, but that would definitely be my
24 recommendation is just to validate the address. So,
25 you know, that could be -- even, even though NLAD still

1 does that when we get the application, if we don't have
2 a completed address on that subscriber, I mean, it's
3 going to get rejected. So -- and we have to reach back
4 out to the customer to go through that process again.

5 So my recommendation would be even to
6 validate the address through USPS.gov or something
7 like that to at least get us in -- you know, when
8 we get the subscriber from you guys, that we're
9 able to have a valid address.

10 **MS. SALAK:** You were very specific. Those
11 were ones coming from the PSC, meaning from our
12 website?

13 **MR. BAILEY:** Yeah.

14 **MS. SALAK:** Or do you mean the ones that were
15 routing through DCF?

16 **MR. BAILEY:** I thought it was from the --

17 **MR. CASEY:** The ETCs --

18 **MR. BAILEY:** -- website, but I'm honestly not
19 sure.

20 **MR. CASEY:** The emails that we send ETCs
21 don't differentiate whether they come through the PSC
22 website or DCF. All we say is that they have been
23 approved and validated.

24 **MR. BAILEY:** Yeah. So my recommendation is
25 just to give us a valid address. I mean, if the, if

1 the information says homeless, we're not able -- I
2 mean, we try to reach back out to the customer, if we
3 can, but we're not able to validate anything else. I
4 mean, we won't -- we'll have to reject that subscriber
5 if we don't have a valid address. And I'm not sure
6 that this is related to consumer complaints, but it's
7 definitely -- I mean, we've had issues with it.

8 **MR. CASEY:** Okay. I appreciate it, Sam.
9 Anybody else have comments or like to make a comment?

10 Okay. Let's go on to number three then.
11 TDM to IP transition -- what will happen to
12 Lifeline? Anybody know? Tracy?

13 **MR. HATCH:** I don't think anyone knows. We
14 clearly do not know.

15 **MR. CASEY:** You don't know?

16 **MR. HATCH:** And we didn't know before but we
17 really don't know now with the whole push now to
18 essentially declare everything under Title 2. It just
19 muddies up everything completely. Nobody knows what's
20 going to happen to Lifeline.

21 **MR. CASEY:** Okay. I know in the trials, in
22 the AT&T trials you had put in one of your filings that
23 you're going to eventually ask to, ask for ETC status
24 to be rescinded.

25 **MR. HATCH:** That's correct.

1 **MR. CASEY:** And by doing that, then you
2 wouldn't be providing Lifeline; right?

3 **MR. HATCH:** That would be correct. But that
4 would be just us going through a 214 process at the
5 FCC, not Lifeline in general.

6 **MR. CASEY:** Right. Well, I'm looking at
7 2020. I'm looking down the road, you know. When you
8 do a full IP transition, will people still be able to
9 have Lifeline?

10 **MR. HATCH:** We don't know.

11 **MR. CASEY:** You don't know.

12 **MR. HATCH:** We don't know whether
13 Lifeline will exist. If you regulate everything under
14 Title 2, it's a fair -- if you get that far and it's a
15 full Title 2 regulation, then nothing changes today.
16 All IP is still Title 2, it's still subject to -- it
17 becomes a telecom service and everything flows.

18 So either -- if you're assuming Title 2
19 then I don't think much is going to change. There may
20 be individual skirmishes between carriers about
21 should I be a Lifeline carrier or 214 and, you know,
22 relinquish perhaps? But, in general, that won't change
23 unless some major change happens at the FCC under
24 Title 2.

25 If it isn't Title 2, then it begs the

1 question what will happen, and, candidly, we don't know.
2 Obviously, you know, our intent is to essentially not
3 become -- not be an ETC, but that's not necessarily the
4 same as Lifeline all goes away.

5 **MR. CASEY:** How about CenturyLink? You're
6 going to do trials in Las Vegas?

7 **MS. KHAZRAEE:** But -- yes. But our trial is
8 only a business trial.

9 **MR. CASEY:** Oh, okay.

10 **MS. KHAZRAEE:** And it's us and CLECs and
11 business customers. So we actually don't have any
12 residential, therefore, no Lifeline customers involved
13 in that trial.

14 I think at this point, you know, Tracy is
15 probably right, it's probably too early to
16 speculate on exactly -- we don't think that, you
17 know, we're going to say nobody could have Lifeline
18 if we went to IP. I mean, we're going to have
19 voice customers still, we feel sure. If you've got
20 voice customers, you can have Lifeline customers.
21 But, you know, I can't make any guarantee at this
22 point that going to IP won't change anything. I
23 just don't know.

24 **MR. CASEY:** We're just trying to look down
25 the road.

1 **MS. KHAZRAEE:** Yeah. I mean, but --

2 **MR. CASEY:** You know, in the future is there
3 going to be Lifeline five years from now?

4 **MS. KHAZRAEE:** So the short answer is we
5 don't see why we couldn't over IP, but it's not part of
6 our trial and we don't know what the future will hold.

7 **MR. CASEY:** Would anybody else like to
8 comment on that, TDM to IP transition and whether there
9 will be Lifeline?

10 **MR. CORCORAN:** Are you speaking -- this is
11 Martin. Are you speaking technically will it be
12 provided? Certainly we can do that today at Cox.

13 **MR. CASEY:** Right.

14 **MR. CORCORAN:** I don't see that technically
15 being a problem. I'm just wondering, listening to the
16 other ones, it sounds more like it could be more of a
17 regulatory battle.

18 **MR. CASEY:** A regulatory policy question.

19 **MR. CORCORAN:** Yeah.

20 **MR. CASEY:** Okay.

21 **MR. McCABE:** I would find it hard to believe
22 that the FCC would eliminate Lifeline, because if they
23 don't put it under Title 2, essentially they wouldn't
24 be able to provide support to IP; therefore, Lifeline
25 wouldn't exist. So one would certainly assume that the

1 FCC is going to find some way to make a change to their
2 procedures, I mean, just like they require, you know,
3 universal service fees on IP, I would have to think.
4 Otherwise, they'd just be gutting the whole program,
5 which I find that hard to envision unless there's a
6 complete change in administration and folks up there.

7 **MR. CASEY:** Would anybody else like to
8 comment, have any comments? Before we leave, Tracy,
9 this isn't on the agenda for Lifeline, but I just
10 thought about this.

11 In your filing with the IP transition you
12 state that coin phones, payphones aren't going to
13 be able to be provided. In other words, the CLECs
14 are --

15 **MR. HATCH:** On an IP basis there aren't any
16 IP payphones is, I think, your question.

17 **MR. CASEY:** Right. And what I was thinking
18 is, well, are there going to be -- if you go all IP,
19 will there be any coin telephone providers out there
20 because you won't be able to supply them?

21 **MR. HATCH:** The answer is I don't know.

22 **MR. CASEY:** You don't know?

23 **MR. HATCH:** But I never thought there would
24 be as many payphones out there as there were at one
25 point. It boggled the mind as to how -- I mean, you

1 could find one on every tree and fencepost and five in
2 every hotel lobby. You know, they were just
3 everywhere, almost like slot machines in Las Vegas.

4 **MR. BRADBURY:** Yeah. But try to find one
5 now.

6 **MR. HATCH:** Yeah, exactly right. And so if
7 there aren't any under IP, I'm not sure that most
8 people would miss them because there just aren't any
9 now hardly.

10 **MR. CASEY:** That's still a question to be
11 answered.

12 **MR. HATCH:** That's a question to be answered.
13 The question becomes is if somebody invents and builds
14 an IP payphone, could they get an IP line and connect
15 it to a network and do something with it? Almost
16 certainly. It's probably not even a big technical
17 challenge if somebody is just willing to invest in it,
18 but that's the other question.

19 **MR. CASEY:** Okay. I appreciate that. That
20 was just something --

21 **MR. HATCH:** You know we are out of the
22 payphone business.

23 **MR. CASEY:** Oh, yeah.

24 **MS. SIRIANNI:** Or would there even be a
25 market for it?

1 **MR. HATCH:** Yeah. That's a whole different
2 issue, but yes.

3 **MR. CASEY:** Okay. Number four, what's the
4 status of the ILEC request to the FCC to make provision
5 of Lifeline voluntary?

6 **MR. HATCH:** I think you know the answer to
7 that. I haven't read the order, but they basically
8 said no is what I understand. They have done some
9 rearranging of how the ETCs are required to provide
10 Lifeline and to whom, but as far as I know, the notion
11 of voluntary was rejected, so -- within our footprint.

12 **MR. CASEY:** Number five, let's talk about --
13 did anybody else have questions?

14 Recertifications, which are due
15 January 31st. How will the recertifications be
16 accomplished: In writing, phone, text message,
17 email, are you going to let USAC do it?

18 **MS. KHAZRAEE:** This is Sandy Khazraee with
19 CenturyLink. So in Florida we plan to do it this year
20 the same way we did last year, which, as you know, is
21 where we burned the disk, Harvey brought it to you, you
22 took it to DCF. We had our little thing worked out
23 there. It worked really well; we got excellent results
24 from using that method.

25 With regard to the question about USAC, we

1 did have one of our 37 states that we chose to have
2 USAC do the audit for last year sort of to check it
3 out, and it wasn't even a particularly large state
4 of hours. They gave us the results on
5 December 20th, which really put us in a time crunch
6 trying to finish that. So we thought, you know, if
7 we'd have done all 37 states, we'd have been in a
8 bind getting the results that late. I do not
9 believe we intend to use USAC this year for
10 anything. I know we don't intend to use them in
11 Florida. I don't think we intend to use them
12 anywhere.

13 **MR. CASEY:** Tom?

14 **MR. McCABE:** TDS will be doing it in writing
15 and we'll be doing it ourselves, like we have in the
16 past, and will not be using USAC.

17 **MR. CASEY:** AT&T?

18 **MS. SIRIANNI:** AT&T the same way as last
19 year, in writing.

20 **MR. CASEY:** Which was?

21 **MS. SIRIANNI:** In writing.

22 **MR. CASEY:** In writing?

23 **MS. SIRIANNI:** Yes.

24 **MR. CASEY:** Okay.

25 **MS. NOBLES:** NEFCOM is also in writing. And

1 we had heard horror stories about USAC doing the
2 recertification, so we have no intention of using USAC.

3 **MR. CASEY:** Okay. De?

4 **MR. O'ROARK:** I'm the outlier today.

5 De O'Roark with Verizon. We used USAC last year in
6 Florida. We'll use them again this year.

7 **MR. CASEY:** Did it work out pretty well?

8 **MR. O'ROARK:** As far as I know. I didn't
9 even ask, frankly. I just got the answer. But I'm not
10 aware of major problems.

11 **MR. CASEY:** How about people on the phone,
12 could you let us know?

13 **MR. BRADBURY:** This is Jay, this is Jay at
14 Cox. We used USAC in 2014. We have not yet made our
15 decision for what we'll do in 2015.

16 **MR. CASEY:** Okay.

17 **UNIDENTIFIED SPEAKER:** This is Frontier
18 Communications, and we also used USAC and probably will
19 continue with that process.

20 **MS. SIRIANNI:** One of the things -- this is
21 MaryRose with AT&T -- and I'm just going to bring this
22 up and maybe y'all know. One of the things that my
23 folks were telling me is that one of the reasons that
24 we haven't used USAC is that we were told by them that
25 they have to do all the markets the same. So like if

1 you have a state that has a specific request, that they
2 couldn't do it. Like we have a state that's, I don't
3 know, Missouri has some special requests that are
4 different. So I guess unless we could have them do all
5 of them, then we'll, you know, continue to do them
6 ourselves so that there's not some they're doing and
7 some they're not. But has anybody else ran into that?

8 **MS. NOBLES:** We -- yeah. This is Debbie at
9 NEFCOM, and we did run into the same thing.

10 **MS. SIRIANNI:** Okay.

11 **MS. NOBLES:** And I even tried to get a
12 clarification from USAC. We have one study area that
13 crosses into two states and we do have one state that
14 has different requirements, and I thought it would just
15 be applied to that particular study area, but the
16 response I got back from USAC was it applies to all
17 study areas. It's either all or nothing.

18 **MS. GILSTRAP:** And this is Caryl with
19 CenturyLink. And I agree, we have the same problem.
20 We have 37 states and quite a few of them that have
21 unique state available programs that USAC would not
22 recognize or recertify. So we chose not to use USAC as
23 well.

24 **MS. SIRIANNI:** So, I mean, you know, from
25 AT&T's perspective, if that's something that USAC

1 would, you know, would talk about or work with us, I
2 mean, we probably would consider using them for the
3 recertification if they would do all of them. But to
4 have to, you know, pick and choose, then we'll continue
5 to do it ourself. Because we do use them on some of
6 our wireless recertifications, at least in one wireless
7 territory I know of.

8 **MR. CASEY:** Anybody else have comments?

9 **MS. MORRISON:** Fairpoint -- excuse me --
10 Fairpoint has been doing recertification in writing and
11 we plan to continue that.

12 **MR. CASEY:** Okay.

13 **MR. LOKEN:** Same for Windstream. This is
14 Tim.

15 **MR. CHAMIZO:** TracFone does all of ours
16 in-house as well.

17 **MR. CASEY:** You do a lot of text messaging,
18 don't you, TracFone?

19 **MR. CHAMIZO:** Text messaging, email, voice
20 blast, and direct mail.

21 **MR. CASEY:** Okay. Anybody else?

22 **MR. BAILEY:** Yeah, iWireless, Sam Bailey.
23 Yeah, we do the same thing. We bring it all in-house,
24 don't use USAC.

25 **MR. CASEY:** Okay. Anyone else?

1 One thing I would like to make a note of
2 is that when you submit the Form 555s this year,
3 the FCC opened a new docket to put it in, and
4 that's Docket 14-171. I've noticed on the FCC
5 website a lot of companies still put them in Docket
6 11-42, but they're asking the companies to put the
7 Form 555s in Docket 14-171 now so they'll all be
8 together.

9 And also as a courtesy, if you would, as
10 you send them there, send us a copy, if you would.

11 Okay. Number 6, any other ideas to
12 streamline the enrollment process for both the
13 applicant and the ETC, make life easier for the
14 applicant and the ETC? That's what we're here for.

15 **MS. GILSTRAP:** This is Caryl with
16 CenturyLink, and I'd like to see that we have some kind
17 of personal interface, someone we can reach out to,
18 especially when we have those circling NLAD issues
19 where the customer applies with the PSC or the OPC and
20 fails NLAD and then goes back and reapplies with them
21 again. Personal contact.

22 **MR. CASEY:** Are you talking about personal
23 contact with USAC or anyone?

24 **MS. GILSTRAP:** No, with either the PSC or
25 with OPC.

1 **MR. CASEY:** Okay.

2 **MS. GILSTRAP:** So we can reach back out to
3 that customer. Because, like I said, the customers are
4 not replying to the letters that we're sending them and
5 they're just going back and reapplying with the state
6 agencies. So if we can have someone who will help us
7 interact with that customer and say the only way you're
8 going to get Lifeline is if you provide this additional
9 information, if you complete the IEH form, if you do
10 this, then we can resolve that problem and we don't
11 have that continuing circling back, back into PSC,
12 failing NLAD, back into PSC, failing NLAD, and never
13 actually getting Lifeline.

14 **MR. CASEY:** Okay. I think that could be
15 arranged.

16 **MS. SALAK:** How many, how many people are you
17 talking about? How many complaints? Just a rough
18 estimate.

19 **MS. GILSTRAP:** For example, I just looked at
20 last week's file from the PSC, and we had five people
21 who fell into this category from that. So every week
22 if we have five people, that's 20 to 25 people a month
23 that are running into this issue.

24 **MR. CASEY:** Because of failure from NLAD;
25 right?

1 **MS. GILSTRAP:** It's failing NLAD and then
2 never supplying the additional information needed to
3 get into NLAD. And, like I said, USAC isn't going to
4 resolve that problem for us. The customer has to
5 resolve that problem, except they're not. They're just
6 reapplying.

7 **MS. SALAK:** I thought that Sandy had
8 mentioned earlier that the states that have
9 administrators have been able to help, or are they --

10 **MS. GILSTRAP:** Yes, they have.

11 **MS. SALAK:** And what are they doing for you?

12 **MS. GILSTRAP:** They will actually reach out
13 to the customer and say we need this form completed.
14 If you, you know, complete this form, then we can
15 submit it, you can get into NLAD, and then Lifeline can
16 be added to your account.

17 **MR. CASEY:** That's something we'll have to --

18 **MR. SPEARS:** This is Harvey Spears.

19 Caryl, didn't you mention that you were
20 communicating electronically?

21 **MS. GILSTRAP:** Yes, via email.

22 **MR. SPEARS:** Thank you.

23 **MS. GILSTRAP:** So I emailed that
24 administrator, she reaches out to the customer, and
25 then emails me back either the form or the information

1 from the form. Either way is acceptable as long as I
2 can get the information into NLAD.

3 **MR. CASEY:** That's something we're going to
4 have to discuss here at the PSC.

5 **MR. HATCH:** Beth, your phone number is
6 850-413 --

7 **MS. SIRIANNI:** I was going to say, don't you
8 have Bob's number on speed dial?

9 **MR. HATCH:** Yeah, really.

10 **MR. CASEY:** Bob's a short-timer, remember.

11 **MS. SALAK:** I'll give you Bob's number.
12 Sure.

13 **MS. SIRIANNI:** How short again? Remind us.

14 **MR. CASEY:** October, October 31st.
15 Halloween.

16 **MR. HATCH:** Yeah. He'll be walking out the
17 door with Beth hanging on his leg.

18 **MS. SALAK:** You got it.

19 **MS. SIRIANNI:** We have Curtis's on speed
20 dial, too.

21 **MR. CASEY:** Again, that's something we'll
22 have to discuss here at the PSC because we don't -- our
23 resources are low, as you know. We've been getting
24 shorter and shorter, less people. We get an average of
25 2,500 applications a week through the electronic

1 process. I know if CenturyLink has five, there's going
2 to be a lot more, and I don't know that we have the
3 personnel that can handle that.

4 **UNIDENTIFIED SPEAKER:** Hey, Bob, you could,
5 in your next life, you could be a contract service.

6 **MS. SALAK:** There you go.

7 **MR. HATCH:** Sounds like a wonderful business
8 opportunity.

9 **MR. CASEY:** Could be. Never know.

10 **MS. SALAK:** So the companies are going to pay
11 him, is that --

12 **MR. CASEY:** Yeah. There you go.

13 **MS. SALAK:** Okay.

14 **MR. CASEY:** One of my thoughts, you know, we
15 have this electronic application process here where we
16 do a dip into DCF. In the long-term I was thinking,
17 well, maybe we can do it into NLAD and do a dip in DCF
18 and then do a dip in NLAD for you, but there's no way
19 we could possibly do it because we don't have the
20 resources for the rejections. There's just no way,
21 unless the companies would like to, you know, finance
22 another 20 people for our office.

23 **MS. GILSTRAP:** Another thing that I noticed
24 about the applications that are out there from the PSC
25 and from OPC and even DCF, that they don't contain an

1 IEH form. They also don't contain a statement or some
2 kind of attestation that says by applying I give
3 company X permission to transfer my Lifeline benefits
4 to company X, which is a problem. Because if I get a
5 file from the PSC and the customer is a duplicate
6 subscriber, I do have the opportunity to do a benefit
7 transfer, and whoever they have Lifeline with I would
8 remove the benefit and give it to CenturyLink. But I
9 can't do that because that would require me actually
10 having to call the customer and get in contact with
11 them, which will be difficult because most people are
12 at work during the day, and then get their permission
13 to do the benefit transfer. But if it were on the
14 application itself as one of the attestations, then
15 that would solve our problem. We would already have
16 permission.

17 **MS. SALAK:** As you're probably aware, we're
18 going to be doing a Lifeline workshop on the rule this
19 afternoon, so I'm hoping this will come up again.

20 **MR. BRADBURY:** Yeah. That's a very good
21 point there. This is Jay Bradbury, Cox Communications.
22 In point of fact, the Public Service Commission's
23 applications are not compliant with the FCC's rules. I
24 know the FCC has blessed them, but they're not
25 compliant with the rules.

1 **MR. CASEY:** And could you say why? What are
2 we missing?

3 **MR. BRADBURY:** Well, the things, several
4 things that she mentioned there are required but not on
5 the present, present form. The NLAD, the NLAD
6 disclaimer is not on there. Probably what we could do
7 is, you know, look at a compliant form versus the PSC
8 form and you could update your forms.

9 **MS. SALAK:** Certainly. Are you going to be
10 involved in our Lifeline workshop this afternoon?

11 **MR. BRADBURY:** I will be, yes, ma'am.

12 **MS. SALAK:** Great. And then, of course,
13 there's a comment period, too, where we ask for what
14 language you would like to see.

15 **MR. CASEY:** We're going to request comments
16 from the companies as a post-meeting type thing, if you
17 could give us some written comments.

18 **MR. BRADBURY:** Sure.

19 **MR. CASEY:** And if you -- we picked a date of
20 February 27th. Would everybody be okay with that?
21 That's a little over a month.

22 **MS. SIRIANNI:** Are you talking about --

23 **MS. SALAK:** We're talking about this one.

24 **MR. CASEY:** For this meeting here, for the
25 work group. Yeah. Post work group meeting comments.

1 **MR. BRADBURY:** Sure.

2 **MR. HATCH:** That's after direct and before
3 rebuttal.

4 **MS. SALAK:** Yes, it is.

5 **MR. CASEY:** That's a whole other story.

6 **MR. HATCH:** But it fits right in the window
7 where it might actually work for me.

8 **MR. CASEY:** Right. And you can submit those
9 comments to me at my email address -- Bcasey
10 @psc.state.fl.us -- up until October 31st.

11 **MS. SALAK:** I'm just going to keep that one
12 open because you get so much stuff.

13 **MS. KHAZRAEE:** This is Sandy Khazraee with
14 CenturyLink. And one more pie in the sky idea for, for
15 Lifeline enrollment, and this is something that our
16 folks have said is, you know, we ETCs shouldn't be
17 doing the enrollment at all anyway. It's kind of like
18 a customer who qualifies for food stamps and asks the
19 grocery store where they go to buy their groceries to
20 get the paperwork all together and say, oh, okay, you
21 qualified, here's your coupon for your food stamps. I
22 don't know where it would go. There's so many
23 different programs that, you know, people can qualify
24 through to get the Lifeline. And I'm not generally one
25 who's in favor of big government, but that's just a

1 thought.

2 **MR. CASEY:** We'd have, we'd have two choices:
3 Either hire a third party or increase the size of the
4 Office of Telecommunications, both of which I don't
5 think is going to happen.

6 **MS. KHAZRAEE:** So, anyway, just a --

7 **MS. SIRIANNI:** Well, yeah. Go ahead.

8 **MR. HATCH:** Go ahead.

9 **MS. SIRIANNI:** No. Go ahead.

10 **MR. HATCH:** There's a lot of internal
11 discussion about this idea. It's not entirely new. In
12 fact, it's actually quite old.

13 **MS. SALAK:** Right.

14 **MS. SIRIANNI:** I think we brought it up a few
15 years ago.

16 **MS. SALAK:** You did.

17 **MR. HATCH:** And Sandy's right, the
18 carriers -- it just is a cumbersome process to put the
19 carriers in. I guess the basic thought would be when
20 they qualify for the programs today, other than the
21 people that walk through the door, they could be
22 accounted for, they're actually a fairly small number,
23 anybody that goes to DCF in that process or even you
24 could adapt OPC's program for that the same way, is
25 they're the ones that do all the background work to

1 determine eligibility. They could do the NLAD dip.
2 And at that point DCF is a social agency, their
3 function is to provide social benefits, that's what
4 they do. You could add essentially a telephone
5 component as an additional benefit that they could get
6 on their little debit cards they've been issued. Then
7 you're out of the ETC issue, you're out of the
8 everything. Lifeline could go on without any kinds of
9 special carrier requirements at all, and a person walks
10 in the door, they can pay for their phone service.
11 Some of it would be their money, some of it would be
12 their benefit, but we wouldn't care at that point.

13 **MS. SIRIANNI:** For that matter, it even, you
14 know, takes away some of the third-party administrator,
15 you know, that you were referring to that it, you know,
16 is the responsibility of the agency.

17 **MR. CASEY:** And I'm sure --

18 **MS. SIRIANNI:** And I know it's pie in the
19 sky, but, I mean --

20 **MR. CASEY:** It's pie in the sky. I'm sure
21 DCF has crunch on their budget, too.

22 **MS. JOHNSON:** Yes. Yes.

23 **MS. SIRIANNI:** Absolutely. I mean,
24 ultimately when we talk about it, I mean, really when
25 you think about Lifeline and the type of program it is,

1 I mean, you know, it should belong with the rest of the
2 social type programs. But, I mean, ultimately will we
3 get there, you know? But I think we shouldn't stop
4 talking about it or thinking about it, I mean, if
5 there's ever a way, I mean.

6 **MR. HATCH:** I mean, at that point then the
7 carriers wouldn't be submitting for reimbursement from
8 the feds. The feds could take the money direct to DCF.
9 Just on fraud alone you'd probably pay for the program.

10 **MR. CASEY:** Any other comments?

11 **MR. HATCH:** You wouldn't have to audit
12 carriers, do any of that kind of stuff.

13 **MR. CASEY:** Okay.

14 **MS. SIRIANNI:** Bob's like that's after my
15 life.

16 **MR. CASEY:** After I'm gone.

17 **MR. HATCH:** Anyway, that's a thought that's
18 gaining some traction.

19 **MR. CASEY:** Okay. How about any other ideas
20 to streamline the process? None? Well, if -- go
21 ahead.

22 **MR. BAILEY:** Bob, this is Sam from iWireless.
23 The only other thing that I would add would be the,
24 just to have a good contact phone number, if that's
25 possible. That way we can try to reach out to the

1 customer because we don't always --

2 **MR. CASEY:** A contact number for the PSC?

3 **MR. BAILEY:** The subscriber.

4 **MR. CASEY:** For the subscriber?

5 **MR. BAILEY:** Yeah. When we're getting the
6 applications from, you know, the PSC, we want to make
7 sure that we can reach back out to them if we need to.
8 You know, we are seeing the similar things that, you
9 know, with the IEH forms where we're having to reach
10 back out to them. But I would definitely want to --
11 I'm in agreement that we definitely need to make sure
12 that we're completely compliant on, you know, all of
13 the attestations that they need to go through as well.

14 **MR. CASEY:** Okay. Now --

15 **MR. BAILEY:** But we can talk this afternoon.

16 **MR. CASEY:** When you get the email from the
17 PSC, it includes their telephone number; right?

18 **MR. BAILEY:** Not always.

19 **MR. CASEY:** Okay.

20 **MR. BAILEY:** Yeah. And, you know, what I --
21 and I want to reiterate what I said earlier because I
22 think it probably fits more down here, just having a
23 valid address, you know, not putting homeless there or
24 something like that. Because we, you know, it takes an
25 extra step that we have to try to contact the customer,

1 and, you know, nine times out of ten we're not able to
2 get ahold of them.

3 **MR. CASEY:** Okay. Anybody else have some
4 ideas? If you don't have any right now, you can always
5 include them in your comments when you send in your
6 comments by February 27th. Any other things you'd like
7 to talk about Lifeline? If not, we can adjourn. Thank
8 you very much for coming.

9 (Meeting concluded at 11:30 a.m.)

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1 STATE OF FLORIDA)
2 COUNTY OF LEON) : CERTIFICATE OF REPORTER

3
4 I, LINDA BOLES, CRR, RPR, Official Commission
5 Reporter, do hereby certify that the foregoing
6 proceeding was heard at the time and place herein
7 stated.

8 IT IS FURTHER CERTIFIED that I
9 stenographically reported the said proceedings; that the
10 same has been transcribed under my direct supervision;
11 and that this transcript constitutes a true
12 transcription of my notes of said proceedings.

13 I FURTHER CERTIFY that I am not a relative,
14 employee, attorney or counsel of any of the parties, nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action, nor am I
17 financially interested in the action.

18 DATED THIS 29th day of January, 2015.

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