



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 2018



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Office of Industry Development & Market Analysis
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
FPHA	Federal Public Housing Assistance
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
NLAD	National Lifeline Accountability Database
OPC	Office of Public Counsel
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company

I. Executive Summary

The Florida Public Service Commission (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 (F.S.).

The Lifeline program is designed to enable low-income households to obtain and maintain basic telephone and broadband services. The Lifeline program offers qualifying households a discount on their monthly bills. Alternatively, consumers can select a free Lifeline cell phone and monthly minutes and/or measured data service from certain wireless providers. This report presents Lifeline participation data from July 2017 through June 2018, and evaluates procedures put in place to strengthen and streamline the Lifeline program.

As of June 30, 2018, there were 694,647 eligible households participating in the Lifeline program in Florida. This equates to approximately one of every twelve Florida households.¹ Lifeline participation includes the involvement of the FPSC, the Florida Department of Children and Families (DCF), and the Florida Office of Public Counsel (OPC).²

The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. Based upon June 2018 SNAP participation numbers, 42 percent of Lifeline eligible Florida households are receiving Lifeline assistance. The number of Lifeline eligible households decreased by two percent compared to June of last year.³

“Stay Connected Florida” was the slogan for Florida’s 2018 Lifeline Awareness Week, September 10-16. In addition to increasing awareness among eligible citizens, this year’s Lifeline Awareness Week continued educating residents on the FCC rule changes that expanded support to include broadband services.

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

¹ Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households July 2018: 8,266,408, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed September 10, 2018, p. T-2.

² Section 364.10(2)(g)1, F.S.

³ USDA, Supplemental Nutrition Assistance Program: Households Participating, Florida SNAP households for June 2018: 1,628,111, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>, accessed September 10, 2018.

II. Lifeline Program

Since 1985, the Lifeline program has provided phone service discounts for qualifying low-income consumers. While the goal of the program was to ensure that all Americans had the opportunities and security that phone service brings, that goal has evolved to include broadband service.⁴ Qualifying households are eligible to receive up to a \$9.25 discount on their monthly phone or broadband bills from certain wireline service providers. Alternatively, customers may choose a free Lifeline cell phone and limited voice or broadband service from certain wireless carriers.

In accordance with Section 364.10, F.S., the FPSC has oversight over the Florida Lifeline program. However, the Lifeline program is part of the federal Universal Service Program, which also includes the high-cost, rural healthcare, and schools and libraries programs. Lifeline is available to eligible low-income households in every state, territory, commonwealth, and on Tribal lands.

The federal Universal Service Program provides funding for the Lifeline program. The rules affecting the Lifeline program are established by the Federal Communications Commission (FCC); however, the FCC has designated the Universal Service Administrative Company (USAC), an independent not-for-profit corporation, to act as the program's administrator. USAC is responsible for data collection and maintenance, support calculation, and disbursement for the Lifeline program along with other federal universal service programs.

In Florida, there are several ways to apply for Lifeline assistance. Consumers may choose to apply for Lifeline directly with an Eligible Telecommunications Carrier (ETC) by providing documentation of participation in a qualifying program along with a Lifeline application. Consumers applying for Medicaid or Supplemental Nutrition Assistance Program (SNAP) through DCF may utilize the electronic Lifeline Coordinated Enrollment Process to also apply for Lifeline.⁵ ETCs that have agreements with DCF may access their Web Service Interface in real-time to confirm program participation for Medicaid and SNAP.⁶ The process will then confirm that the applicant is currently enrolled in one of these two programs. Consumers can also apply for Lifeline through income eligibility with OPC.

In the 2016 Lifeline Modernization Order, the FCC directed USAC to develop a national eligibility verifier (National Verifier) by 2019, which will remove carriers from the process of verifying customer eligibility. As of November 2018, the National Verifier has been implemented in six states. No further information has been provided concerning USAC's implementation schedule as it relates to Florida's inclusion into the program. While the FPSC has reviewed and updated its rules to comply with changes in the program, the future implementation of the national eligibility verifier in Florida has components that would limit the FPSC's continued involvement in the Lifeline program. This will be addressed in more detail in Section V.

⁴ FCC 16-38, WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization, Third Report and Order, released April 27, 2016, https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf, accessed on August 18, 2017.

⁵ The electronic Lifeline Coordinated Enrollment Process was developed by the FPSC and DCF to allow an applicant for Medicaid or SNAP to request and receive Lifeline assistance after being approved for the DCF program.

⁶ The Web Services Interface allows Florida ETCs a secure gateway into the DCF computer to verify that a Lifeline customer is participating in the Medicaid or SNAP 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 verifies whether the person currently participates in one of the DCF programs without identifying the program. An ETC must pre-register with DCF to use the Web services interface to ensure security is maintained.

III. Lifeline Eligibility and Participation

Federal rules allow up to a \$9.25 reimbursement per Lifeline eligible customer per month from USAC to a participating Lifeline carrier. Additional support of up to \$25.00 per month is available only to eligible subscribers living on Tribal lands. Appendix A identifies federally recognized Tribal lands in Florida. Consumers can qualify to participate in the Lifeline program either through program-based or income-based eligibility standards. In 2016 the FCC implemented reforms that specify the criteria for such qualifications.⁷

Program-Based Eligibility

Customers can qualify for Lifeline program in Florida by enrollment in any one of the following programs:

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Supplemental Security Income
- Veterans or Survivors Pension Program
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy and National School Lunch Program

Income-Based Eligibility

Consumers can also qualify for Lifeline program based on income. Specifically, a consumer whose total household income is less than 135 percent of the Federal Poverty Guidelines is eligible to participate in the Lifeline program. The Federal Poverty Guidelines are updated annually by the U.S. Department of Health and Human Services. The 2018 Federal Poverty Guidelines are shown in Appendix B. OPC certifies consumer eligibility based on submitted documentation for certain carriers.⁸ Between July 2017 and June 2018, OPC received over 3,000 calls from potential applicants seeking assistance and processed 9,456 applications.⁹ Carriers that do not coordinate with OPC are responsible for verifying consumer income eligibility.

Participation

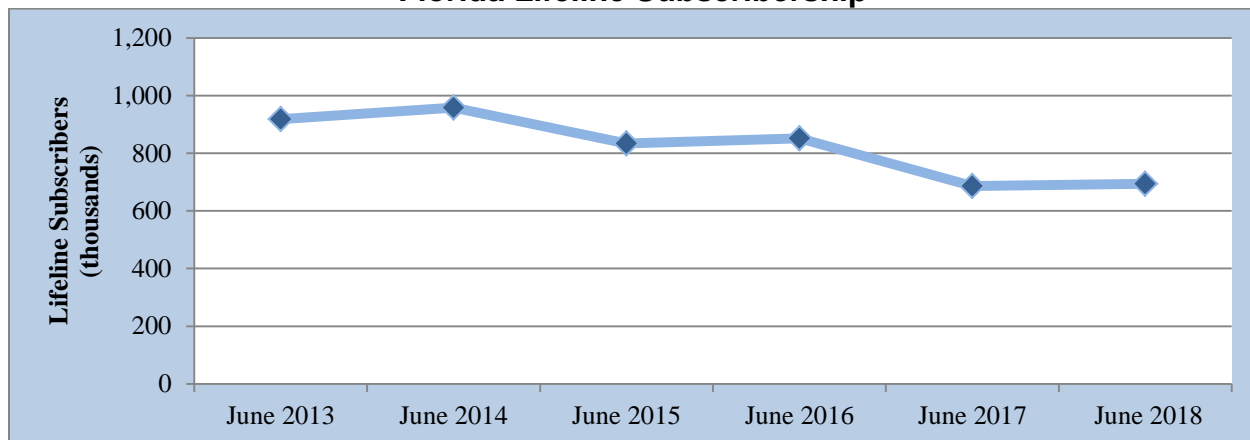
The number of subscribers enrolled in Lifeline was 694,647 as of June 30, 2018, a one percent increase from the number of subscribers last year. Figure 1 shows the number of Lifeline subscribers from June 2013 through June 2018. In 2018, wireless providers increased the number of Lifeline subscribers served by roughly three percent from the previous year. Wireline service providers saw a decrease in Lifeline subscription of 56 percent, a further decline from the 25 percent decrease in wireline Lifeline subscribers from 2016 to 2017. For 2018, only two carriers, Assurance Wireless and T-Mobile, saw an increase in the number of Lifeline customers.

⁷ 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, accessed on September 20, 2018.

⁸ AT&T, CenturyLink, Frontier Communications, T-Mobile, SafeLink Wireless and Assurance Wireless.

⁹ Source: OPC.

**Figure 1
Florida Lifeline Subscribership**



Source: Industry Responses to FPSC Data Requests (2013-2018)

Figure 2 shows the percent of Lifeline subscription by service type. This data appears to reflect that the type of Lifeline supported service consumers are using (voice or broadband) is related to the type of technology utilized by the provider (wireline or wireless). Currently, incumbent and competitive wireline carriers provide 95.8 percent and 99.3 percent of their Lifeline subscribers with voice service, respectively, while 68.9 percent of wireless Lifeline subscribers are receiving broadband assistance packages.

All of the wireless ETCs in Florida voluntarily include at least 250 minutes of voice minutes as part of their broadband service offering. However, this is fewer than the 750 minutes required for wireless voice-only Lifeline service. Appendix C provides greater detail of Lifeline subscriptions by service type for each carrier.

**Figure 2
Lifeline Subscription by Service Type**

Carrier Type	Voice	Broadband	Bundled
Wireless	19.3%	68.9%	11.8%
Incumbent Wireline	95.8%	0.8%	3.4%
Competitive Wireline	99.3%	0.4%	0.3%

Source: USAC Disbursements Florida as of June 2017

While an overall increase in Lifeline subscription has been observed, a large reduction in wireline Lifeline subscription has become apparent. Fifty-three percent of this year’s wireline subscription reduction is attributable to AT&T’s relinquishment of their ETC designation in certain areas in Florida.

Other wireline ETCs have identified a shift in consumer demand towards wireless service, as well as difficulty with USAC recertification processes as primary reasons for the decline in their Lifeline subscribership. Additionally, certain providers have noted that they have abstained from the acquisition of new customers as a result of higher costs and profitability concerns attributed to the FCC’s new Lifeline service standards.

Overall, Lifeline subscribership increased by 8,783 households for the fiscal year ending June 2018. At the same time, the number of Lifeline eligible households as measured by SNAP enrollment decreased by 34,263. The resulting participation rate for 2018 was 42.7 percent.¹⁰ This was an increase of 1.4 percent compared to 2017. Figure 3 shows participation rates in Florida households from June 2015 through June 2018.

Figure 3
Lifeline Participation Rate in Eligible Florida Households

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
June 2015	833,426	2,011,166	41.40%
June 2016	852,255	1,712,005	49.80%
June 2017	685,864	1,662,374	41.30%
June 2018	694,647	1,628,111	42.67%

Source: U.S. Department of Agriculture

Considering the number of households which are eligible to receive Lifeline in Florida and the current participation rate, these numbers continue to demonstrate the need for Lifeline outreach. However, the need for greater outreach may be at odds with the changing costs associated with offering the expanded Lifeline services. Specifically, some carriers have noted that with the implementation of the FCC’s 2016 Lifeline Modernization Order, it has become increasingly difficult to profitably acquire Lifeline subscribers at the current monthly support amount of \$9.25.

Transitional Lifeline

A customer usually transitions from the Lifeline program when their socio-economic status has improved, thus advancing them beyond the qualifying eligibility criteria. As required by Section 364.105, F.S., 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. For example, a former Lifeline customer with a \$25 phone bill would receive a \$7.50 monthly discount for one year.

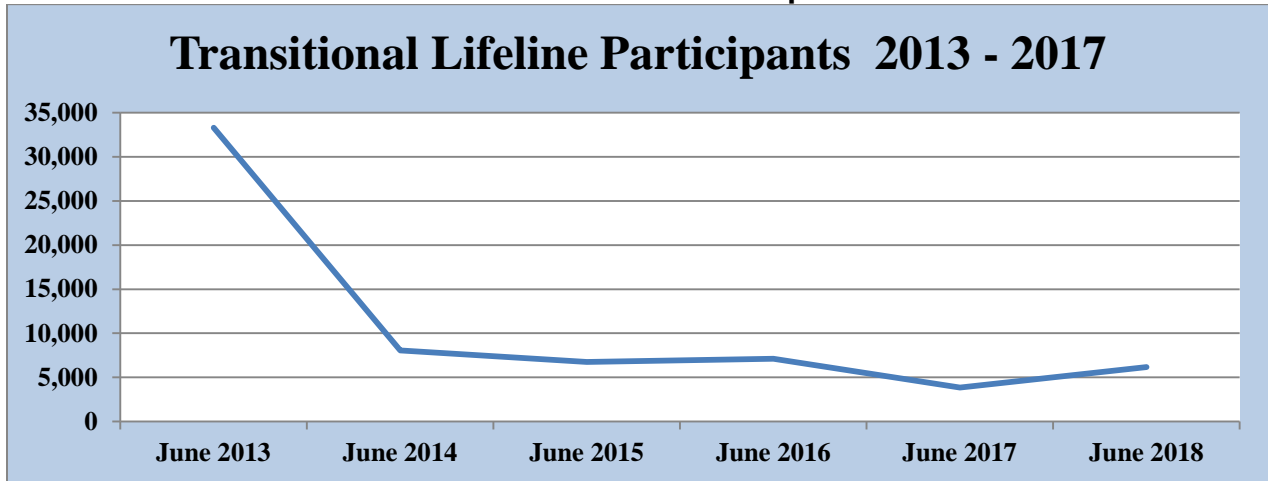
Figure 4 presents the number of Transitional Lifeline customers of Florida ETCs from June 2013 through June 2018. The large number of Transitional Lifeline participants in 2013 is attributable to customers being de-enrolled from the Florida Lifeline program due to the new FCC requirement to annually recertify Lifeline customers.

Transitional Lifeline participation increased by 2,346 subscribers from 2017 to 2018. This increase may be due to AT&T voluntarily providing a Transitional Lifeline benefit to the customers living in areas where AT&T relinquished its ETC designation in Florida. These customers may still be qualified for the Lifeline program, but would be required to switch to a different carrier in order to receive the Lifeline benefit.

¹⁰ USDA, Supplemental Nutrition Assistance Program: Households Participating, Florida SNAP households for June 2018: 1,628,111, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>, accessed September 20, 2018.

Responses to FCC Form 555 have historically been used by the FPSC to track Lifeline subscriber de-enrollment and establish relationships between newly ineligible households and those that are participating in Transitional Lifeline. Changes to the 2018 Form 555 have removed the distinction between an ETC finding a subscriber ineligible and a customer that fails to respond to a recertification attempt (which would remove a customer from the Lifeline program). As such the FPSC cannot make a direct comparison between the number of customers that have lost eligibility and those that are taking advantage of Transitional Lifeline.

Figure 4
Transitional Lifeline Participation



Source: Industry Responses to FPSC Data Requests (2013-2018)

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.¹¹ Conversely, a state commission also has the authority to rescind the ETC status of any ETC that does not follow the requirements of the Lifeline Program.

To qualify as an ETC, a telecommunications carrier must offer services that are supported by federal universal service support mechanisms.¹² The carrier must advertise the availability of such services and charges, and must provide the services either using its own facilities or a combination of its own facilities and another carrier's resold service. A company applying for designation as an ETC must demonstrate good management and legitimate business practices to successfully administer the Lifeline program.¹³

Currently, the FPSC only evaluates wireline ETC applications, while wireless ETC applications are evaluated by the FCC.¹⁴ Figure 5 shows the 19 companies that had ETC status and participated in the Lifeline program in Florida as of June 30, 2018. Appendix D provides Lifeline enrollment figures for each ETC between 2015 and 2018.

Figure 5
ETCs Participating in Florida Lifeline Program

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

Source: Industry Responses to 2018 FPSC Data Requests

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. As part of the FCC's reforms to the Lifeline program, rules were established that eliminate Lifeline reimbursement for these resale arrangements out of concern of possible waste and abuse of program funds. As a result, some

¹¹ Section 214(e)(2) of the Telecommunications Act of 1996.

¹² 47 CFR. §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.

¹³ 47 CFR. §54.201(h).

¹⁴ The Florida Legislature in 2011 (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.

affected carriers have left the Florida market. The FCC established a process for affected carriers to become an ETC and provide Lifeline service by filing a compliance plan addressing the FCC’s concerns regarding potential waste and abuse of the program. Specifically, such non-facilities based carriers must file a plan that demonstrates:

- Commitment and ability to provide the supported services throughout the designated area
- Ability to remain functional in emergency situations
- Ability to satisfy consumer protection and service quality standards
- Provision of local usage comparable to that offered by the incumbent local exchange companies

As previously mentioned, 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 6 shows the 35 Florida wireless ETC petitions pending at the FCC. Some of these companies applied with the FCC as early as August 2011. The date of each company’s respective initial wireless ETC petition is included.

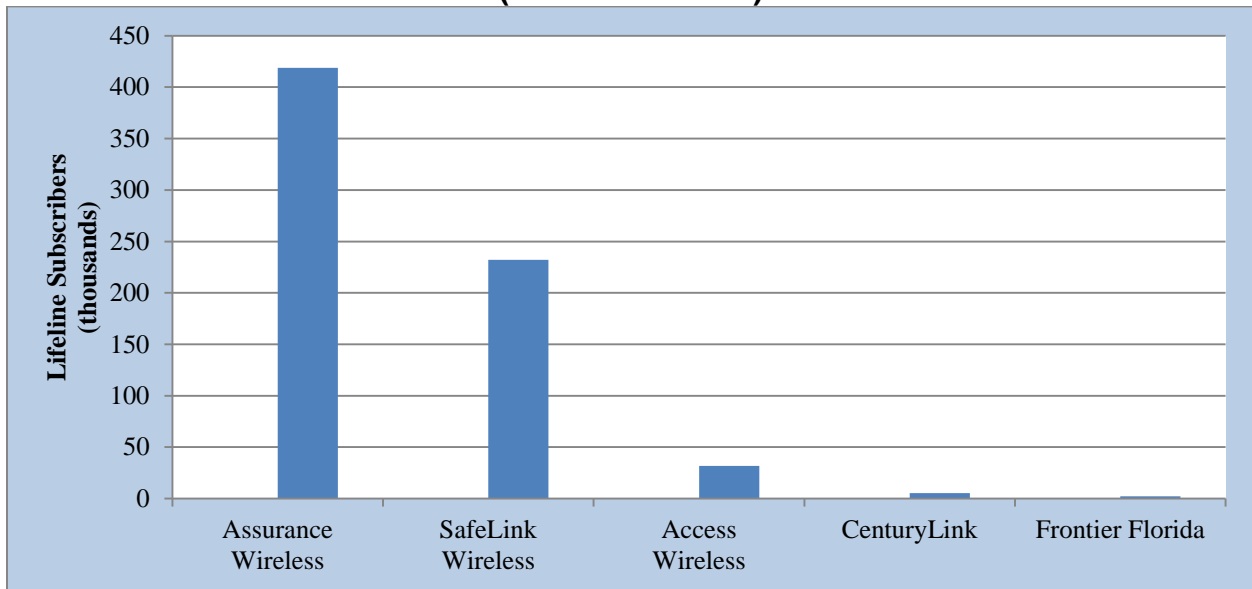
Figure 6
Florida Pending Wireless ETC Designation Petitions at FCC
(As of August 2018)

Airvoice Wireless (2/13)	NewPhone Wireless (9/12)
American Broadband (6/13)	Pinnacle Telecommunications (2/13)
Amerimex (2/13)	Q Link Wireless (8/15)
AmTel (1/13)	Sage Telecom Communications, LLC (8/13)
Assist Wireless (1/13)	SelecTel Wireless (8/15)
Blue Jay Wireless (5/12)	TAG Mobile (6/11)
Boomerang Wireless (8/16)	TNT Wireless (1/13)
Budget PrePay, Inc. (8/11)	Tele Circuit Network (7/12)
Cintex Wireless (5/12)	Telrite (4/12)
Consumer Cellular (4/12)	Tempo Telecom (11/14)
EZ Reach Mobile (5/12)	TerraCom (4/12)
Free Mobile, Inc. (9/12)	Total Call Mobile (4/13)
Global Connection (4/12)	True Wireless (5/12)
IM Telecom, LLC (1/16)	TX Mobile (11/12)
Kajeet (3/12)	Vast Communications (4/13)
LTS of Rocky Mount (10/12)	You Talk Mobile (2/13)
Millennium 2000 (4/13)	ZING PCS (12/12)
Mobile Net POSA (5/14)	

Source: FCC Lifeline Compliance Plans & ETC Petitions

Figure 7 shows the five Florida ETCs with the most Lifeline subscribers as of June 2018. These ETCs represent 99 percent of Lifeline subscriber participation in Florida. For 2018, Assurance Wireless had the highest number of Lifeline subscribers in Florida. This represents a significant shift from the status quo. For the prior nine years, the carrier with the most Lifeline subscribers was SafeLink Wireless.

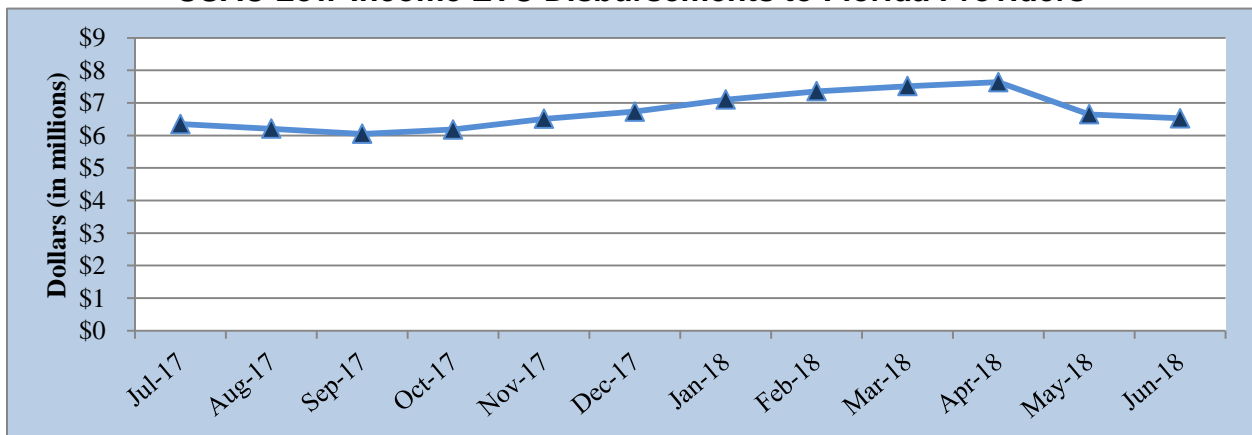
Figure 7
Top Five Florida Lifeline ETCs
(As of June 2018)



Source: Industry Responses to 2018 FPSC Data Requests

Figure 8 reflects USAC Lifeline disbursements to Florida ETCs between July 2017 and June 2018. The total amount disbursed during this 12 month period was \$80,813,546, an average of \$6.7 million per month. These amounts also include support corrections or true-ups from prior months when errors are made.

Figure 8
USAC Low-Income ETC Disbursements to Florida Providers



Source: USAC Disbursements Florida July 2017-June 2018

V. Regulatory Activities and Updates

A. Florida Public Service Commission Activities

Lifeline Electronic Coordinated Enrollment Process

In 2007, Florida implemented the Lifeline Electronic Coordinated Enrollment Process. This process involves a computer interface between the FPSC and DCF for Lifeline applicants who currently participate in the Medicaid and SNAP programs. The coordinated enrollment process requires a DCF client to indicate an interest in receiving Lifeline assistance. The applicant then identifies a telephone service provider from a drop-down box on the application and answers applicable questions. Once a client is determined to be eligible for Medicaid and/or SNAP, DCF will forward the necessary information for Lifeline enrollment to the FPSC. The FPSC places this information on a secure website for retrieval by the appropriate ETC.

Once ETC's retrieve and process customer information from the FPSC's secure website, all rejected applications are submitted back to the FPSC. An application may be rejected if an applicant identifies the wrong ETC as their current provider or if the ETC does not provide Lifeline assistance in the applicant's area. The FPSC sends these rejected applicants a paper application along with a list of each ETC's contact information.

Comments filed by the FPSC in response to the FCC 2017 Lifeline Reform Order

On December 1, 2017, the FCC released an Order implementing further reforms to the federal Lifeline program and sought comment on additional proposed reforms.¹⁵ The FCC sought comment on whether to limit Lifeline support to facilities-based carriers, whether to continue the phase down of voice-only support, possible changes to the existing Lifeline budget, and strategies intended to limit waste, fraud and abuse. On February 21, 2018, the FPSC submitted comments encouraging the FCC to consider the following:

- Resellers contribute, albeit indirectly, to the infrastructure of the underlying network they use. Specifically, resellers pay wholesale companies a market-based rate for the services they use that should include the wholesale companies expenses related to infrastructure.
- Competitive options for consumers would be constrained if the FCC limited support to only facility-based Lifeline providers. Resellers are the only option in many areas where AT&T relinquished its ETC designation for wireline service.¹⁶
- Consumers are best situated to determine if they need or can afford both broadband and voice services.
- Broadband Internet Access Service cannot be eligible for universal service support unless it includes a telecommunications service such as voice.

¹⁵ FCC 17-155, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, released December 1, 2017, <https://www.fcc.gov/document/fcc-action-transform-lifeline-program-low-income-americans>, accessed September 28, 2018.

¹⁶ The areas AT&T relinquished as an ETC can be found in Appendix E.

- Any conduct-based standards adopted by the FCC should be applied to all ETCs.
- Collaboration among the FCC, USAC, and state commissions to identify instances of potential fraud is in everyone's best interest.
- Integrating access to existing state databases for purposes of eligibility verification may take time and requires resources that should be reimbursed to states.
- If the FCC implements a self-enforcing budget, the FCC should not discriminate among rural, non-rural, and tribal households.

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. 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 wireline 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. Therefore, the FPSC monitors federal Universal Service Funds disbursed to Florida ETCs to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

B. Federal Communications Commission Activities

2016 Lifeline Modernization Reform Order

On April 27, 2016, the FCC released its Lifeline Modernization Order which became effective December 1, 2016.¹⁷ This Order was primarily established to modernize the Lifeline program by including broadband as a supported service and to streamline qualifying programs. Specific changes that occurred during 2018 are discussed below.

Minimum Service Standards

In the 2016 Lifeline Modernization Order, the FCC required all ETC's to provide broadband internet access support that meets the FCC's established minimum service standards, unless they were granted a forbearance. Minimum service standards were established to determine the level of service an ETC must provide in order to receive the Lifeline support amount. These minimum standards are updated on an annual basis by the FCC to ensure that low-income consumers have access to supported services that will remain viable as technology improves. Below are the minimum service standards effective December 1, 2018:

- Mobile voice: 1,000 minutes per month
- Mobile broadband: 2 GB/month at 3G or better speeds
- Fixed broadband: 1 TB/month at 18/2 Mbps or better speeds

¹⁷ FCC 16-38, WC Docket Nos. 11-42, 10-90, 09-197, Third Report and Order, Further Report and Order, and Order on Reconsideration, released April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed September 28, 2018.

Additionally, the 2016 Lifeline Modernization Order gradually phases out Lifeline support for voice-only services to further its goal of transitioning to a broadband-focused Lifeline program. Support for voice-only Lifeline service will end on December 1, 2021. The FCC included an exception for those census blocks with only one Lifeline provider. The Lifeline program will continue to support voice services when bundled with a broadband service that 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	\$0	\$9.25	\$9.25

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

Forbearance from Lifeline Voice Obligation

The 2016 Lifeline Modernization Order also established forbearance from Lifeline voice service obligations in targeted areas where certain competitive conditions are met. In particular, the FCC granted forbearance from high-cost/Lifeline ETCs’ obligation to offer and advertise Lifeline voice service in counties where the following conditions are met: (a) 51 percent of Lifeline subscribers in the county are obtaining broadband Internet access service; (b) there are at least three other providers of Lifeline broadband Internet access service that each serve at least five percent of the Lifeline broadband subscribers in that county; and (c) the ETC does not actually receive federal high-cost universal service support. In last year’s report there were 44 counties in Florida that met these conditions; however, no Florida counties met all of these conditions in 2018.

National Lifeline Eligibility Verifier

The FCC’s Order directed USAC to develop a National Verifier to determine initial subscriber eligibility, conduct annual recertification, populate the Lifeline database and provide support payments to providers. The National Verifier was intended to be implemented in phases with nationwide implementation by December 31, 2019. The first wave of states identified to transition to the National Verifier were Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming. Initially, the National Verifier was expected to be utilized in the initial six states by December 5, 2017. However, the FCC postponed the initial launch mainly due to potential vulnerabilities that had not been resolved in accordance with the Federal Information Security Management Act of 2002.

Upon resolution of these issues on June 18, 2018, a soft launch of the National Verifier was implemented in the initial six states. On November 3, 2018, the soft launch ended for states in the first wave and those states have fully transitioned to utilizing the National Verifier. The second implementation wave began on October 15, 2018, in the following five states and one territory: Hawaii, Idaho, New Hampshire, North Dakota, South Dakota, and Guam. The third implementation wave is scheduled to begin on December 4, 2018, with a soft launch in Missouri, North Carolina, Pennsylvania and Tennessee.

During the soft launch period, ETCs could use the National Verifier for eligibility determinations, in addition to using existing eligibility determination processes. The soft launch period also provided ETCs the opportunity to become familiar with the National Verifier online portal before use of the National Verifier became mandatory. Consumers could not access the National Verifier to file their Lifeline applications online during this period. The soft launch process is expected to be implemented again as additional states transition to using the National Verifier. Florida’s transition to the National Verifier has not been determined.

Once the National Verifier is implemented in a state, service providers in that state will no longer determine eligibility. Where available, the National Verifier will automatically verify an applicant’s participation in a qualifying government program through automated eligibility data sources from state and federal government organizations. However, where automated eligibility data sources are not available, the National Verifier will utilize manual processes to review eligibility documentation submitted by consumers. Figure 10 identifies the eligibility data sources used for automatic verification in the first phase on the National Verifier.

Figure 10
Automatic National Verifier Eligibility Data Sources

State	Automated Verifications
Colorado	SNAP, Medicaid, and FPHA
Mississippi	SNAP, and FPHA
Montana	FPHA
New Mexico	SNAP, Medicaid, and FPHA
Utah	SNAP, Medicaid, and FPHA
Wyoming	FPHA

Source: USAC

Under current Florida statutes, the FPSC may only share a customer’s confidential information with the ETC serving the customer.¹⁸ Once the National Verifier is implemented, enrollment data would no longer go to the ETC, but would go directly to USAC for verification. As such, without a legislative change the FPSC would not be able to participate in the application process.

Universal Lifeline Forms

On February 20, 2018, the FCC announced the implementation of Universal Lifeline forms.¹⁹ These forms are to be used by all ETCs to verify and recertify customer eligibility for Lifeline benefits by July 1, 2018. The FCC stated that “Implementing universal forms will foster greater consistency in the Lifeline eligibility determination and recertification processes, thereby aiding in program administration and reducing improper payments due to errors in application and recertification forms.”²⁰

¹⁸ Section 364.107, F.S.

¹⁹ FCC, Public Notice, DA 18-161, WC Docket No. 11-42, released February 20, 2018, <https://docs.fcc.gov/public/attachments/DA-18-161A1.pdf>, accessed September 19, 2018.

²⁰ Ibid.

The FCC approved the Lifeline application form, Lifeline Annual Recertification form, and Lifeline household worksheet form. Beginning on July 1, 2018, ETCs using paper enrollment forms must use these Universal Lifeline forms. ETCs enrolling Lifeline applicants with an electronic form must use exactly the same language used in the FCC's Universal Lifeline forms. Florida's coordinated enrollment process is currently exempt from using the national Lifeline form based on a waiver from the FCC.

2017 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.²¹ To comply with the annual requirement for 2017, all ETCs were required to recertify the eligibility of their Lifeline subscriber base by the end of 2017, and report the results to USAC by January 31, 2018. Subscribers failing to respond to recertification efforts had to be de-enrolled from Lifeline.

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. Second, the ETC can verify subscribers continued eligibility 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 by mailing each subscriber a letter notifying them they have 30 days to recertify or they 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 de-enrolled.

Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.²² If there are two households residing at one address and each desires to participate in Lifeline, each applicant has to complete a 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.²³

The FCC directed USAC to establish a database to both eliminate existing duplicative support and prevent duplicative support in the future.²⁴ To prevent waste in the Universal Service Fund, the FCC created a National Lifeline Accountability Database (NLAD) and mandated its use 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

²¹ 47 CFR. § 54.410(f).

²² 47 CFR. § 54.409(c).

²³ A household Lifeline eligibility pre-screening tool is available at www.lifelinesupport.org.

²⁴ FCC 12-11, WC Docket No. 11-42, Lifeline Reform and Modernization, Report and Order, released February 6, 2012, https://apps.fcc.gov/edocs_public/attachmatch/FCC-12-11A1.pdf, accessed September 19, 2018.

service. Florida ETCs were operational on NLAD starting March 6, 2014. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

VI. Lifeline Promotion Activities

Promotional activities in 2018 featured National Lifeline Awareness Week, National Consumer Protection Week, Older Americans Month, and ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline program.

The FPSC continues to work with state commissions, the National Association of Regulatory Utility Commissioners, the FCC, and the National Association of State Utility Consumer Advocates to promote Lifeline Awareness Week and educate consumers on the nationwide implementation of a consumer-friendly Lifeline National Verifier by USAC. The national effort also ensures that low-income families and individuals are aware of the Lifeline program and understand the participation requirements, including annual recertification and that only one Lifeline discount per household is allowed. The shared goal is for all eligible households to be enrolled and receive Lifeline program benefits.

National Lifeline Awareness Week

As the FCC and USAC continue work to implement the Lifeline National Verifier, the National Association of Regulatory Utility Commissioners observed Lifeline Awareness Week, again in September for those states able to participate. “*Stay Connected Florida!*” was the slogan for Florida’s 2018 Lifeline Awareness Week, September 10-14. In addition to increasing awareness among eligible citizens, this year’s Lifeline Awareness Week continued educating residents about the discount on voice and broadband services.

Lifeline Awareness Week consumer events were held in Lecanto, Hudson, Jacksonville, and Woodville to help Florida’s eligible residents connect with the Lifeline program. Each event also offered individual assistance to consumers interested in the program.

National Consumer Protection Week and Other Community Events

The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with consumers. National Consumer Protection Week, March 4-10, 2018, was a good back drop for Lifeline outreach activities. An annual consumer education campaign, National Consumer Protection Week encourages consumers to take advantage of their consumer rights. This year, Chairman Art Graham recognized the 20th anniversary of this event and emphasized the importance of education and awareness about utility services and avoiding scams. During National Consumer Protection Week, Chairman Graham explained how the FPSC has been protecting consumers for more than 130 years, and encouraged consumers to contact the Commission for utility information or assistance if needed. The Commission keeps consumers informed year-round through awareness and education, free resources, and hearings, meetings and workshops. Also during the week, the Commission made presentations to consumers statewide showing them how to save money through energy and water conservation, how to avoid scams, and how to sign up for a Lifeline telephone and broadband discount program, if they qualify.

For the seventh year, the FPSC participated in a national project called Older Americans Month, which is celebrated each May to honor and recognize older Americans for their contributions to families, communities, and society. “*Engage At Every Age*” was this year’s theme, and the

Commission hosted educational sessions, distributing Lifeline, conservation and fraud prevention information at senior communities in Palm Beach, Leon and Hillsborough Counties. The FPSC also distributed brochures and publications at the Jacksonville Expo during the month.

Each quarter, 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. The Central Citrus Community Center in Lecanto partner received the FPSC Helping Hand for its assistance in promoting 2018 Lifeline Awareness Week. Figure 11 represents the various events and locations where Lifeline information was shared in Florida as of July 2018.

**Figure 11
FPSC Lifeline Promotion in Florida**

Lifeline Events and Locations	
2018 Elder Abuse and Fraud Prevention Summit	35th Annual Children’s Day–FL Museum of History
Active Living Expo	Boynton Beach Senior Center
Brandon Senior Center	Calhoun County Public Library
Calhoun County Senior Citizens Association	Community Back to School Family Health Fair
Earth Day – Museum of Florida History	Florida Department of Agriculture and Consumer Services’ Consumer Protection – Tallahassee
Florida Department of Agriculture and Consumer Services’ Consumer Protection Fair – Altamonte Springs	Florida Department of Agriculture and Consumer Services’ Consumer Protection Fair – Ocala
Florida Department of Agriculture and Consumer Services’ Consumer Protection Fair – Pensacola	Florida Department of Agriculture and Consumer Services’ Consumer Protection Fair – The Villages
Florida Senior Day at the Capitol	Fort White Senior Recreation Center
Fran Carlton Center	Gadsden County Senior Center
Gadsden County Senior Center	Jackson County Senior Center
Jackson County Senior Citizens Center	Jacksonville Senior Expo
Low-income/Affordable Housing in Gadsden County - Triple Oaks, Omega Villas, and Vanguard Village Apartments	Lunch and Learn–Chaires Community Center
Lunch & Learn–Ft. Braden Community Center	Lunch & Learn–Lake Jackson Community Center
Lunch & Learn–Miccosukee Community Center	Lunch & Learn–Woodville Senior Center
Ruskin Center	Senior Friendship Center – Venice
Senior Friendship Center, Inc. - Sarasota	Suwanee County Health and Wellness Fair at Advent Christian Village in Dowling Park
Tampa Baptist	Tampa Housing Authority – J. L. Young Garden Apartments
The Oaks at Riverview	Volen Center
Wakulla Senior Citizens Center	Washington County Council on Aging – 2018 Senior Citizen Expo
Washington County 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 600 state public libraries and branches in 2018. The FPSC sent the materials via a CD that included a print-ready copy of FPSC brochures for easy reproduction. Following the Campaign, many libraries' requests for additional publications have been filled.

Community Services Block Grant Program

The Florida Department of Economic Opportunity 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. Between October 1, 2016 and September 30, 2017, 788 households applied for Lifeline benefits through local Community Action Agencies, providing \$88,384 in benefits to clients. During this time period, 12 of the 27 Community Action Agencies provided Lifeline enrollment services to clients.

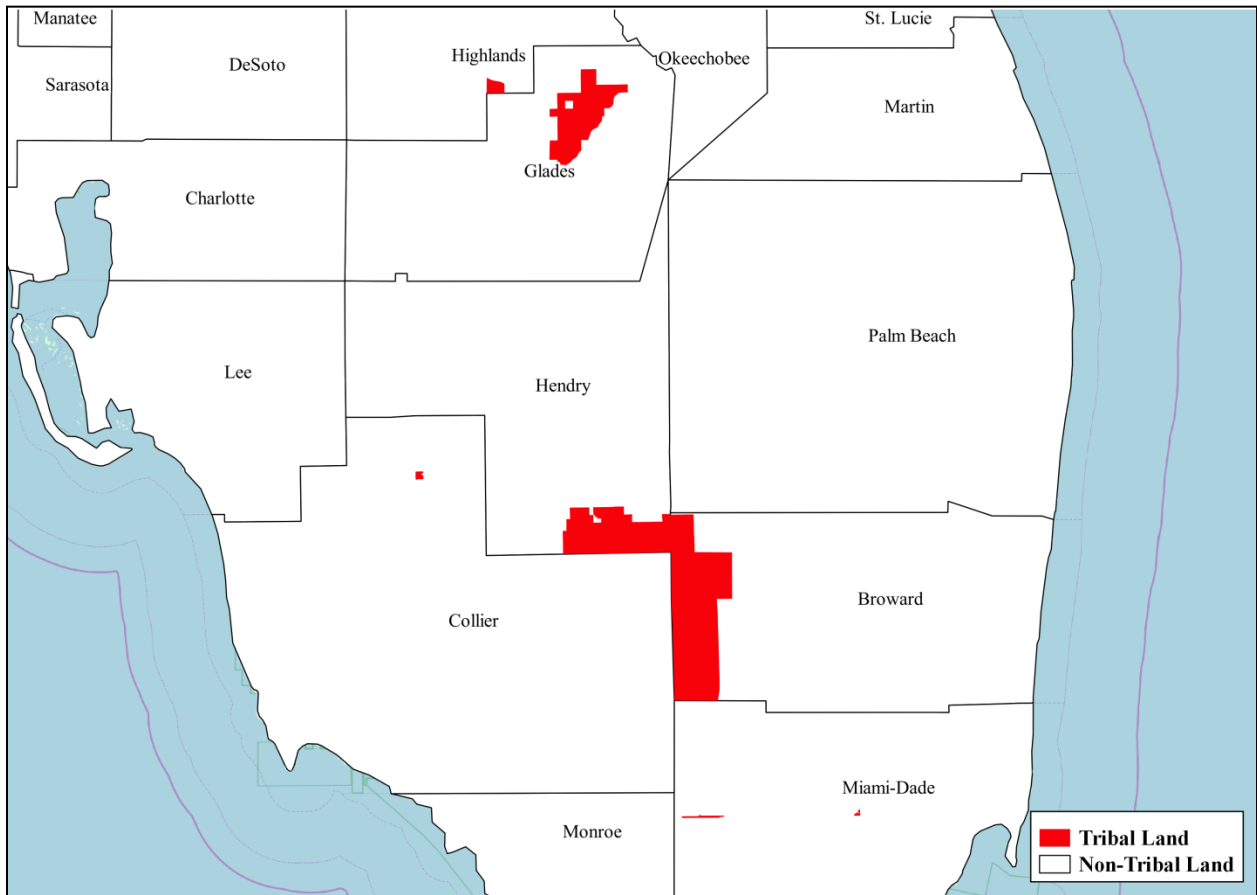
Ongoing Lifeline Outreach

Ensuring easy access to Lifeline information through the agencies and organizations having regular interaction with eligible consumers is crucial to the Lifeline awareness effort. The FPSC partners with many agencies year-round to make sure eligible consumers know about Lifeline and how to apply. Additionally, the FPSC schedules and conducts two monthly community events to promote Lifeline. Each month, the FPSC sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele.

Lifeline Partners

The local, state, and federal agencies, organizations, businesses and telecommunications companies listed in Appendix F are involved in the collaborative effort to increase awareness and participation in the Lifeline program. These Lifeline Partners have continued to develop new partnerships, participate in local community events, offer training sessions, provides updates about program changes and supply brochures and applications.

Appendix A Map of Florida Tribal Lands



Source: FCC Tribal Locational Data

Appendix B
2018 U.S. Poverty Guidelines

Persons in family/household	2018 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$12,140.00	\$16,389.00	\$1,365.75
2	\$16,460.00	\$22,221.00	\$1,851.75
3	\$20,780.00	\$28,053.00	\$2,337.75
4	\$25,100.00	\$33,885.00	\$2,823.75
5	\$29,420.00	\$39,717.00	\$3,309.75
6	\$33,740.00	\$45,549.00	\$3,795.75
7	\$38,060.00	\$51,381.00	\$4,281.75
8	\$42,380.00	\$57,213.00	\$4,767.75

Source: Department of Health and Human Services. Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, January 18, 2018.

<https://www.federalregister.gov/documents/2018/01/18/2018-00814/annual-update-of-the-hhs-poverty-guidelines>

Appendix C
Lifeline Subscription by Service Type
(as of June 2017)

	ETCs	Voice	Broadband	Bundled	Total
Wireless	Assurance Wireless	59,895	347,751	4,284	411,930
	SafeLink Wireless	38,689	125,633	76,387	240,709
	Access Wireless	34,076	758	0	34,834
	T-Mobile	297	1	709	1,007
Incumbent Wireline	CenturyLink	6,047	73	307	6,427
	Frontier Florida	2,223	14	26	2,263
	Windstream	1,543	1	0	1,544
	Consolidated Communications	399	0	16	415
	NEFCOM	302	3	0	305
	AT&T	129	0	0	129
	TDS Telecom	113	0	1	114
	ITS Telecom	20	0	24	44
	Frontier of the South	22	0	3	25
	Smart City	1	2	0	3
Competitive Wireline	Cox Telecom	577	0	0	577
	TeleCircuit	281	0	0	281
	Phone Club	121	0	0	121
	WOW!	38	4	3	45
	Global Connection	7	0	0	7
	Total	144,780	474,240	81,760	700,780

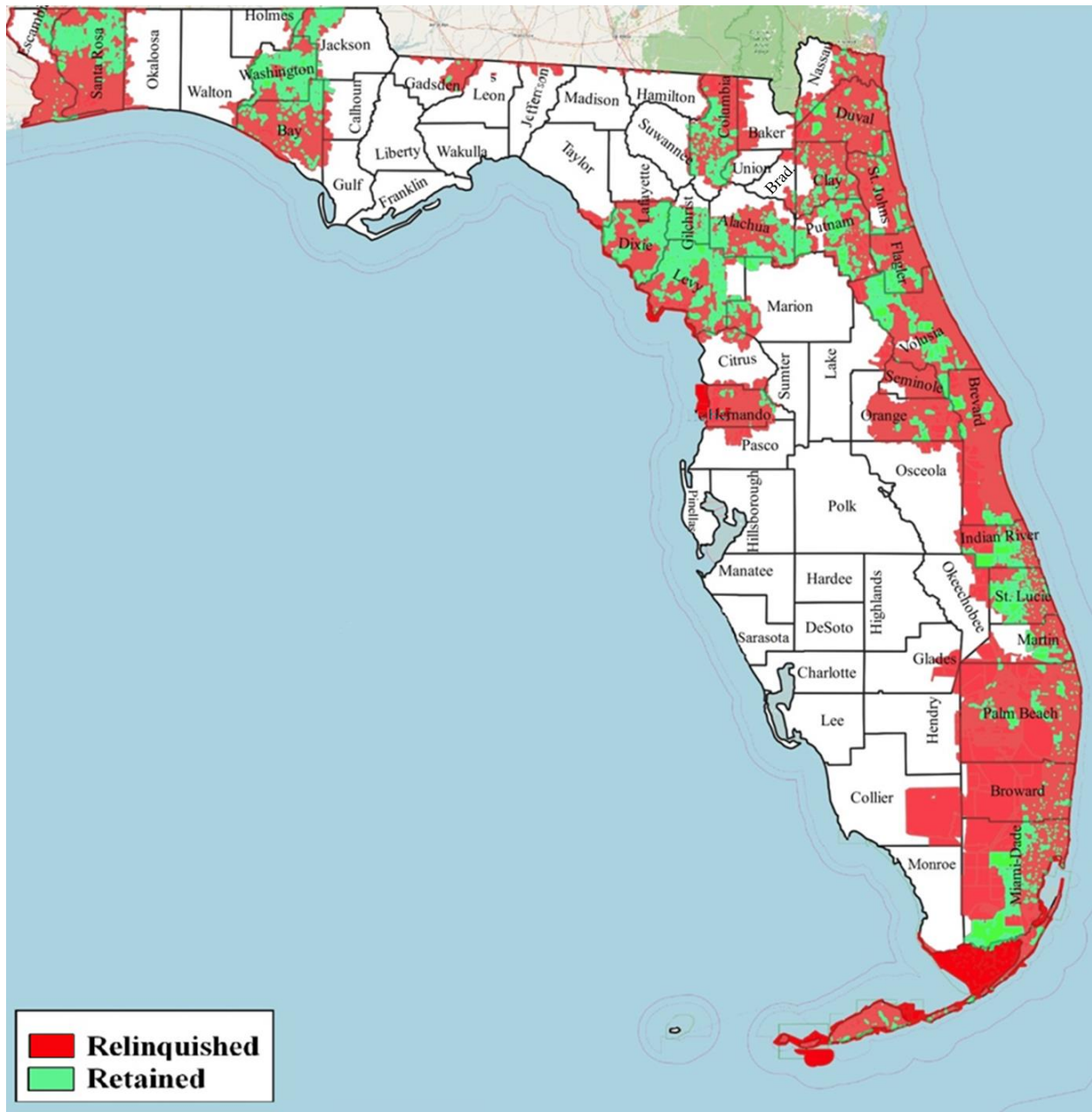
Source: USAC Disbursements in Florida

Appendix D
Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETCs	June 2015	June 2016	Net Growth Rate	June 2017	Net Growth Rate	June 2018	Net Growth Rate
Wireless	Assurance Wireless	208,902	232,481	11%	224,282	-4%	418,874	87%
	SafeLink Wireless	470,695	405,506	-14%	346,488	-15%	232,088	-33%
	Access Wireless	106,440	179,429	69%	89,904	-50%	31,874	-65%
	T-Mobile	2,110	762	-64%	630	-17%	1,023	62%
Incumbent Wireline	CenturyLink	16,163	12,528	-22%	9,108	-27%	5,251	-42%
	Frontier Florida	4,721	3,896	-17%	3,116	-20%	2,113	-32%
	Windstream	2,746	2,436	-11%	2,004	-18%	1,546	-23%
	Consolidated Communications	671	526	-22%	561	7%	397	-29%
	NEFCOM	458	286	-38%	366	28%	247	-33%
	AT&T	18,302	11,404	-38%	7,871	-31%	123	-98%
	TDS Telecom	264	179	-32%	138	-23%	112	-19%
	ITS Telecom	80	86	8%	69	-20%	46	-33%
	Frontier of the South	46	28	-39%	26	-7%	20	-23%
	Smart City	7	11	57%	4	-64%	3	-25%
Competitive Wireline	Cox Telecom	659	689	5%	675	-2%	556	-18%
	TeleCircuit	337	646	92%	321	-50%	201	-12%
	Phone Club	n/a	n/a	n/a	148	n/a	120	-19%
	WOW!	138	79	-43%	58	-27%	46	-21%
	Global Connection	8	3	-63%	95	3067%	7	-93%
	ETCs which Relinquished Designation	184	0	0%	0	0%	0	0%
Total		833,426	850,975	2%	685,864	-19%	694,647	1%

Source: FPSC Data Requests 2015-2018

Appendix E Map of AT&T Relinquishment Areas



Source: AT& T Florida Service Area Data

Appendix F
Agencies, Organization and Business Lifeline Partners

Florida Lifeline Partners	
1000 Friends of Florida, Inc.	Federal Social Security Admin - Tallahassee District
A Caring Hand Home Care	Feeding South Florida
AARP - Florida Chapter	First Quality Home Care
Ability Housing of Northeast Florida	Florida Alliance for Information and Referral Services
ACCESS Florida Community Network Partners	Florida Assisted Living Association
Agency for Health Care Administration	Florida Association for Community Action
Agency for Persons with Disabilities	Florida Association of Community Health Centers
Aging Matters in Brevard County	Florida Association of Counties
Aging True Community Senior Services	Florida Assoc of County Human Service Admin
Aging With Dignity	Florida Association of Food Banks
Alliance for Aging, Inc.	Florida Assoc of Housing and Redevelopment Officials
America's Second Harvest of the Big Bend, Inc.	Florida Coalition for Children
Area Agencies on Aging	Florida Coalition for the Homeless
ASPIRE Health Partners	Florida Council on Aging
Big Bend 2-1-1 and other 2-1-1 Agencies	Florida Deaf Services Centers Association
Boley Centers, Inc.	Florida Dept of Business and Professional Regulation
Braille and Talking Book Library	Florida Department of Children and Families
Brain Injury Association of Florida, Inc.	Florida Department of Community Affairs
Bridges at Riviera Beach	Florida Department of Economic Opportunity
Broward County Elderly & Veterans Services Division	Florida Department of Education
Bureau of Indian Affairs Programs	Florida Department of Education
Capital Area Community Action Agency, Inc.	Florida Department of Elder Affairs
Catholic Charities of Central Florida	Florida Department of Revenue
Center for Hearing and Communication	Florida Department of Veterans' Affairs
Centers for Drug Free Living	Florida Developmental Disabilities Council
Centers for Independent Living	Florida Elder Care Services
Central Florida Community Action Agency	Florida Highway Safety and Motor Vehicles
City and County Consumer Assistance Departments	Florida Home Partnership
City and County Departments of Human Services	Florida Hospital Association
City and County Health Departments	Florida Housing Coalition
City and County Housing Authorities	Florida Housing Finance Corporation
City and County Social Programs	Florida League of Cities, Inc.
Communities In Schools Foster Grandparent Program	Florida Low Income Housing Associates
Community Partnership Group	Florida Nurses Association
Disability Rights Florida	Florida Office of Public Counsel
Elder Options	Florida Ombudsman Program
Faith Radio Station and other Florida radio stations	Florida Public Libraries

Florida Lifeline Partners (continued)	
Florida Public School Districts	Nursing Homes Administrators
Florida Rural Legal Services, Inc.	One-Stop Career Centers
Florida Senior Medicare Patrol	Refuge House of the Big Bend
Florida Senior Program	Seminole County Community Development
Florida Telecommunications Relay, Inc.	Senior Friendship Centers
Florida Voters League	Senior Medicare Patrol
Good News Outreach	Senior Resource Alliance
Goodwill Industries of Central Florida	Senior Solutions
Habitat for Humanity – Florida	Seniors First
HANDS of Central Florida	SHINE Program
Hemophilia Foundation of Greater Florida	South East American Council, Inc.
Hispanic Office for Local Assistance	Tallahassee Memorial Hospital
HOPE Community Center	Tallahassee Urban League
HOPE Connection	Tampa Vet Center
League for the Hard of Hearing	Three Rivers Legal Services, Inc.
Leon County School Board	U.S. Department of Housing and Urban Development
Little Havana Activities and Nutrition Centers	United Home Care Services
Living Stones Native Circle	United Way of Florida
Marion Senior Services	Urban Jacksonville
Micosukee Tribe of Indians of Florida	Urban Leagues of Florida
Mid-Florida Housing Partnership, Inc.	Wakulla County Senior Citizens Council
Monroe County Social Services	Washington County Council on Aging
NAACP (Florida Associations)	We Care-Jacksonville
National Church Residences	