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Public Service Commission

December 26, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
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Re: CC Docket No. 96-45, Federal-State Joint Board on Universal Service, Review of Lifeline and Link-up Service for All Low-income Consumers

Dear Ms. Salas:

Forwarded herewith are comments of the Florida Public Service Commission regarding the review of Lifeline and Link-up Service for all low-income consumers in the above docket.

Sincerely,

/ s /

Gregory D. Fogleman
Bureau of Intergovernmental Liaison

GDF:tf
cc: Brad Ramsay, NARUC

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	

COMMENTS OF THE FLORIDA PUBLIC SERVICE COMMISSION REGARDING THE REVIEW OF LIFELINE and LINK-UP SERVICE FOR ALL LOW-INCOME CONSUMERS

The Florida Public Service Commission (FPSC) submits these comments in response to the Public Notice (FCC 01J-2) released on October 12, 2001. In this Notice, the Federal-State Joint Board on Universal Service (Joint Board) seeks comment on the rules and effectiveness of the current universal service programs that ensure affordable rates to low-income consumers. Specifically, the Joint Board seeks comment on whether changes to the current Lifeline and Link-up programs are warranted, and inquires about the effectiveness of outreach programs. These programs are designed to raise phone subscribership for low-income users by providing subsidies for recurring monthly local phone bills (Lifeline), and a one-time installation charge for connection (Link-up).

According to the data provided by the Missouri Office of Public Counsel cited in the public notice, the national participation rate for the Lifeline/Link-up discount is relatively low (26 percent). To get a true understanding of the success of these programs, however, the Joint Board will have to analyze differences in how the program is implemented in each state. To that end, the FPSC is happy to provide information relating to how eligible telecommunications carriers (ETCs) implement these programs in Florida.

CURRENT EFFECTIVENESS

The FPSC continues to support the original intent of the Lifeline program, which is to increase subscribership for low-income households that want, but cannot afford, telephone service. Under existing rules, however, the federal low-income program has produced some unfavorable results in that the majority of states are net contributors to the low-income support fund. While one may expect this to occur because a few states have most of the low-income population, this does not appear to be the case. According to data from the U.S. Census Bureau, approximately 60% of the nation's population in poverty reside in ten states.[1] Of these ten, only two, California and New York, are net recipients under the low-income program.

The Telecommunications Industries Analysis Project (TIAP) issued a report on July 19, 2000 that sought to examine the effectiveness of the Lifeline program and identify strategies to improve participation.[2] TIAP measured the "take rate" as the ratio of individuals who are actually enrolled in the program divided by the eligible population. The report noted that there are significant differences in take rates between states. For example, Oklahoma had the lowest take rate at 1.6 percent, while Maine had the highest reported take rate at 91.1 percent. While not providing additional specific take rate data on a state-by-state basis, the report noted that both California and the District of Columbia had take rates of over 100 percent. Based on the most recent FCC data, the number of consumers receiving Lifeline support in California is more than five times larger than the participation by the next largest state.[3] This suggests that the administration, enrollment efforts, and eligibility criteria vary significantly from state to state and possibly from carrier to carrier.

FLORIDA DATA

In preparing to respond to this public notice, the FPSC conducted a Lifeline and Link-up survey. The survey specifically asked each eligible telecommunication carrier (ETC) in Florida how it deals with certification, verification, promotion, and collection issues. Attachment 1 is a summary table that outlines the results of the survey on a carrier-by-carrier basis. In general, the following points can be gleaned about the low-income programs in Florida:

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[1] U.S. Census Bureau, Table 25. Poverty Status by State in 2000, URL: http://ferret.bls.census.gov/macro/032001/pov/new25_001.htm . In order of largest to smallest: California, Texas, New York, Florida, Illinois, Ohio, Pennsylvania, Michigan, North Carolina, Georgia.

[2] Telecommunications Industries Analysis Project, Closing the Gap: Universal Service for Low-Income Households, June 19, 2000; pp. 9-10.

[3] FCC, Universal Service Monitoring Report, Table 2.11, released November 6, 2001. Estimated contributions in 2000 in California and New York were $48 and $37 million, respectively. Payments from USF to carriers for 2000 in California and New York are $285 and $50 million, respectively. This results in net revenues for California and New York of $237 and $13 million. Only 6 states and 2 territories were net recipients under the current rules for 2000.

- Verification methods for Lifeline eligibility vary across participating LECs. Verification ranges from the company confirming eligibility, to customer self-certification or state agency certification.
- The time frame for determining the follow-up of verification also varies depending on the ETC. Many of the companies perform this task semi-annually. Some companies, however, choose to have periodic verification, while others opt to have no follow-up verification.
- Some LECs utilize their Customer Service office as a vehicle for Lifeline promotion. Several advertise the availability of the program in newspapers and on the Internet. (The FPSC requires annual notification regarding the availability of Lifeline services on customers' bills, as well as Lifeline and Link-up information being included in telephone directories.[4])
- A Lifeline customer's basic local service will not be disconnected for nonpayment of unpaid toll charges or ancillary services, but may be disconnected for nonpayment of basic local service charges. A Lifeline customer's request for reconnection of basic local service will not be denied if the service was previously denied for nonpayment of toll or ancillary charges. These actions are in accord with a stipulation approved by the FPSC.[5]

In addition, the FPSC has recently approved a joint stipulation between the Florida Office of Public Counsel (OPC) and BellSouth regarding quality of service that will affect the lifeline program in Florida.[6] As part of the stipulation, BellSouth has agreed to:

- Establish a Community Service Fund for use in educating customers and promoting BellSouth's Lifeline and Link-up services;
- Contribute $250,000 to the Community Service Fund in the first year of the settlement (calendar year 2002);
- Contribute $150,000 to the Community Service Fund in the second year of the settlement (calendar year 2003); and

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[4] Order No. PSC-97-1262-FOF-TP, issued October 14, 1997.

[5] Order No. PSC-99-2503-PAA-TL, issued December 21, 1999.

[6] Order No. PSC-01-1643-AS-TL, issued August 13, 2001.

- File a tariff for an income eligibility test at 125% of the Federal poverty income guidelines for Lifeline customers that will augment, rather than replace, the current eligibility guidelines based on participation in certain low income assistance programs.

The stipulation states that another entity, such as the FPSC, OPC, non-profit organizations, or other governmental entity may implement the eligibility standard in the agreement. The OPC stated that we may designate it to assume the responsibility for certifying eligibility. The FPSC agreed, and designated the OPC as the entity responsible for certifying claims of eligibility for Lifeline customers under the standard contained in the stipulation.

RECOMMENDED MODIFICATIONS TO THE FCC'S EXISTING RULES

Given the above information, the FPSC proposes the following steps for increasing Lifeline enrollment:

- Encourage states to adopt procedures that give consumers the option of automatically enrolling in Lifeline and Link-up programs when they enroll in an eligible service. Ideally, this would occur though an automated process that would serve to both expand participation, and verify eligibility. This recommendation is consistent with the National Association of Regulatory Utility Commissioners' (NARUC) resolution adopted February 28, 2001.[7]
- Bill inserts about Lifeline should occur more than once a year. The absence of phone bill inserts can undermine customer awareness and thus affect participation in the program. The feasibility of requiring companies to have quarterly or semiannual bill inserts should be explored.
- All ETCs should be required to post their Lifeline services on the Lifeline Support website located at www.lifelinesupport.org.

The Joint Board also invited comment on whether individuals should be able to qualify for Lifeline and Link-up support merely by being eligible for low-income assistance programs, rather than actually participating in them. While this proposal has merit, the FPSC has concerns about the ability to verify eligibility. Attempts to expand eligibility in this way may be ineffective and make

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[7] NARUC, Resolution Concerning low-income components of the Federal Universal Service Mechanism, Sponsored by the Committee on Telecommunications, Second Resolved, Adopted by the NARUC Board of Directors, Adopted February 28, 2001.

any process of verification administratively burdensome for both the consumer and a verifying entity. We believe that it is necessary to certify consumers' eligibility and perform periodic verifications in order to prevent waste, fraud, and abuse, and ensure the integrity of the program consistent with the Joint Board's previous recommendation.[8] NARUC, in its aforementioned resolution, also noted its support for implementing mechanisms "to insure accountability of the low-income programs."[9]

States already have the ability to expand the list of qualifying programs, and thereby increase the pool of eligible consumers, by establishing a state funded low-income program. Customers participating in the state fund would be eligible for additional federal support as long as the criteria used in the state program are income-related. The FPSC is concerned, however, since it does not appear that there are any other restrictions as to how states can tap into the federal support. The FPSC believes that it would be appropriate for the FCC to review states' qualifying programs to ensure that the income criteria for the federal qualifying programs are comparable to the criteria for any state program. Federal Lifeline support should not extend to subscribers eligible under expanded state program requirements unless the income criteria is comparable.

The Joint Board specifically asked if low-income consumers should be removed immediately from Lifeline rolls when they no longer meet the eligibility standards. The FPSC believes that customers should be removed from Lifeline rolls when they are no longer eligible. States then have the ability to step in if they so choose to ease the transition for these customers. In Florida, the state legislature has done just that. Specifically, under Section 364.105, Florida Statutes, each local exchange telecommunications company is required to offer discounted residential basic local telecommunications service at 70 percent of the local service rate for any Lifeline subscriber who no longer qualifies for Lifeline, for up to one year. We believe that similar approaches would be reasonable and consistent with the intent of the Telecommunications Act.

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[8] FCC, First Report and Order, FCC 97-157, CC Docket 96-45, Par. 376 Released May 8, 1997.

[9] NARUC, Resolution Concerning low-income components of the Federal Universal Service Mechanism, Sponsored by the Committee on Telecommunications, Third Resolved, Adopted by the NARUC Board of Directors, Adopted February 28, 2001.

CONSUMER OUTREACH EFFORTS IN FLORIDA

The FPSC has made consumer education about Lifeline a priority. The FPSC operates an innovative "warm transfer line" which allows consumers who call the agency with Lifeline questions to be automatically transferred to the appropriate ETC providing phone service in their service area. The warm transfer line assures consumers that they will be in touch directly with the company who can initiate service.

The FPSC also works closely with key state agencies, such as the Florida Department of Children and Families (DCF) and Department of Community Affairs, to ensure that the materials get into the hands of the target population. The FPSC created a postcard-sized flier to be sent to eligible Florida consumers using the DCF’s mailing lists and mail system. Approximately 35,000 of the fliers, which were written in English on side and Spanish on the other, were mailed to consumers in 2000. If low awareness is a principal barrier to Lifeline participation, timely dissemination of information about the program's benefits should translate into higher enrollment figures for participating local exchange phone companies.

A positive impact on enrollment depends on eligible consumers receiving information and responding according to the program's financial incentives. The latter point is particularly important given recent DCF observations that low subscriber enrollment in Lifeline may reflect consumer rejection of the credit due to the stigmatizing effect (enrollees must reveal socio-economic status) often associated with participation. If the stigma effect is significant, neither timely information nor market incentives will be sufficient to raise Lifeline enrollment figures.

Table 1 examines whether or not the DCF December 2000 distribution of the Lifeline insert affected enrollment. The data captures the distribution of Lifeline enrollment across ETCs between December 2000 and March 2001. This time frame allows for the normal lags common for these types of mailings.

The data show that most companies experienced an increase in Lifeline enrollment during this time period. Overall, the Lifeline enrollment growth rate was 1.93%. While the data does not provide definitive evidence about the impact of the recent Lifeline insert mailing, the results are nonetheless encouraging; growth has accelerated somewhat since year-end. The three largest companies, BellSouth, Verizon and Sprint-FL combined for 97.5% of Lifeline enrollment at the end of both quarters. While Verizon and Sprint-FL show significant growth in Lifeline enrollment, BellSouth exhibited a slight quarterly decline in enrollment.

TABLE 1

Lifeline Participation by Eligible Telecommunications Carrier

Florida ETCs	December 2000 Participants	March 2001 Participants	Growth Rate
BellSouth	104,575	104,507	Less than (.01%)
Verizon	18,685	20,164	7.92%
Sprint-FL	7,712	8,767	13.68%
GT Com	1,504	1,560	3.72%
ALLTEL	1,128	1,159	2.74%
TDS	289	296	2.42%
Northeast	253	281	11.06%
Frontier	47	59	25.53%
ITS	34	31	(8.82%)
Smart City	0	0	N/A
Total	134,227	136,824	1.93%

Finally, the FPSC is partnering with the American Association of Retired Persons (AARP), the Florida Association of Counties, and the Florida League of Cities (FLC) to further promote Lifeline. In January 2002, AARP will be launching a special Lifeline campaign in Florida. The FPSC will be providing Lifeline literature and a special toll-free number to assist in this statewide outreach effort. The FLC has agreed to include Lifeline advertisements in its monthly statewide newsletter.

CONCLUSION

Before proceeding with changes to the current Lifeline program, the FCC should endeavor to understand the reasons for low versus high participation rates in the various states. The FPSC continues to support the original intent of the Lifeline program, which is to increase subscribership for low-income households that want, but cannot afford, telephone service.

States should make every effort to ensure that eligible households with and without telephone service are aware of and can easily enroll in the Lifeline/Link-up programs. Keeping the program objective in mind, low program participation should not be cause to manipulate eligibility criteria to increase the number of households that could qualify.

The FPSC recommends that the Joint Board and the FCC encourage states to explore various automatic enrollment strategies to effectively target funding to consumers and determine eligibility for Lifeline and Link-up support. We believe that it is necessary to certify consumers' eligibility and perform periodic verifications in order to prevent waste, fraud, and abuse, and to ensure the integrity of the program. We recommend increased promotion of the program through more frequent bill inserts and requiring all ETCs to post application information about their Lifeline service on the Lifeline Support website.

Respectfully submitted

/ s /

Gregory D. Fogleman
Bureau of Intergovernmental Liaison

DATED: December 26, 2001

Attachment 1

Florida ETCs	Initial Eligibility Certification	Follow Up Eligibility Verification
BellSouth	Proof of participation in a qualifying program.	Continued eligibility is reviewed periodically by sending a sample of participants to Florida Department of Children and Families (DCF). Ineligible participants are identified.
Verizon	New customers must provide proof of participation in a qualifying program or certification by DCF. Existing customers can self certify.	Continued eligibility is reviewed twice a year by sending a list of participants to DCF. Ineligible participants are identified.
Sprint-FL	Application plus proof of participation in a qualifying program.	None. The application requires the customer to advise the company when they are no longer eligible.
GT Com	Proof of participation in a qualifying program or certification by DCF.	Continued eligibility is reviewed periodically on a one-on-one basis.
ALLTEL	Customers sign an application form certifying that they are eligible under one of the qualifying programs.	None.
TDS	Application plus proof of participation in a qualifying program.	None. The application requires the customer to advise the company when they are no longer eligible.
Northeast	Application certified by authorized representative of DCF or other agency.	Continued eligibility is reviewed twice a year by sending a list of participants to DCF. Ineligible participants are identified.
Frontier	Verbal statement from customer regarding their eligibility to participate in one of the qualifying programs.	None.
ITS	Application certified by representative of qualifying agency.	Continued eligibility is reviewed annually in the same manner as the initial certification.
Smart City	Application certified by representative of qualifying agency via fax or email.	Continued eligibility is reviewed twice a year by sending a computer tape of participants to the qualifying agency. Ineligible participants are identified.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida Public Service Commission is being furnished this date to the parties on the attached list.

/s/

Cynthia B. Miller, Esquire
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DATED: December 26, 2001

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