



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



December 2021

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List of Acronyms

CFR	Code of Federal Regulations
EBB	Emergency Broadband Benefit
ETC	Eligible Telecommunications Carrier
FDCF	Florida Department of Children and Families
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
RDOF	Rural Digital Opportunity Fund
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company
USF	Universal Service Fund

I. Executive Summary

The Florida Lifeline Assistance report is prepared pursuant to the requirements found in Section 364.10, Florida Statutes (F.S.). The Florida Public Service Commission (FPSC or Commission) 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.

The Lifeline program is designed to enable low-income households to obtain and maintain basic telephone and broadband services by offering qualifying households a discount on their monthly bills. Alternatively, consumers can choose to receive monthly wireless minutes and/or measured data service from certain wireless providers. This report presents Lifeline participation data from July 2020 through June 2021, and evaluates procedures put in place to strengthen the Lifeline program.

As of June 30, 2021, there were 273,641 Florida households participating in the Lifeline program. This represents approximately 1 of every 32 Florida households and is a 26 percent reduction in participation from the previous reporting period.¹ Most of the reduction in this year's participation rate can be attributed to the expiration of the Lifeline usage rule waiver. The FCC had waived this rule until May 1, 2021, as part of its pandemic response. Customers who were de-enrolled as a result of not using their devices may still be eligible for the Lifeline program and can reapply. This is discussed in more detail in Section V.

The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 15 percent of SNAP participants subscribe to Lifeline as of June 2021.² Using SNAP participation as a proxy for the number of Lifeline eligible households suggests that there are significant growth opportunities for Lifeline enrollment. However, it should be noted that only carriers that have been designated as an Eligible Telecommunications Carrier (ETC) are permitted to provide the Lifeline discount. If a customer's preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers.

"Stay Connected Florida" was the slogan for Florida's 2021 Lifeline Awareness Week, held on September 20-24. This year's Lifeline Awareness Week continued efforts to increase awareness and enrollment in the Lifeline program.

¹ Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households April 2021: 8,722,081, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed on September 16, 2021, p. 3.

² Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/service-programs/access/StandardDataReports.asp>, accessed on September 5, 2021.

II. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. Initially, the program goal was to ensure that all Americans had the opportunity and security that basic phone service provides. Over time, that goal has evolved to include broadband service. Qualifying households can receive up to a \$9.25 discount on their monthly phone or broadband bills from wireline service providers that have been designated as ETCs. Alternatively, consumers can choose to receive monthly wireless minutes and/or measured data service from designated wireless providers. Although some Florida wireless ETCs have historically offered a free cellphone along with Lifeline service, currently only one wireless ETC continues to do so.³ The distribution of wireless devices is not funded by the Lifeline program.

The FPSC has oversight over the Florida Lifeline program pursuant to Section 364.10, F.S. However, the Lifeline program is a federal Universal Service Fund (USF) program, along with the high-cost, rural healthcare, and schools and libraries programs. Lifeline is available to eligible low-income households in every state and territory, as well as federally recognized Tribal lands.

The federal USF provides funding for the Lifeline program. The rules affecting the Lifeline program are established by the FCC, which has designated the Universal Service Administrative Company (USAC), an independent not-for-profit corporation, 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 USF programs. Additionally, in 2016, the FCC directed USAC to develop and administer a National Verifier to determine customer eligibility in every state and territory. In Florida, the National Verifier was fully launched in March 2020.

Eligibility

Consumers can qualify to participate in the Lifeline program either through program-based or income-based eligibility standards. Program-based eligibility is determined by a customer's enrollment in specific qualifying programs. Customers can qualify for the Lifeline program by being enrolled in any one of the following programs:

- SNAP
- Medicaid
- Federal Public Housing Assistance
- 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

³ Assurance Wireless.

Consumers whose total household income is less than 135 percent of the Federal Poverty Guidelines can participate in the Lifeline program under the income-based standard. The Federal Poverty Guidelines are updated annually by the U.S. Department of Health and Human Services.⁴ Consumers can enroll in the Lifeline program through income-based eligibility by providing qualifying documentation to the National Verifier.

Application Process

Lifeline eligibility is determined through the National Verifier. Consumers have several methods by which they can apply:

- Through USAC’s website using the National Verifier consumer portal
- In person with certain ETCs using the National Verifier service provider portal
- By mailing their application to USAC’s Lifeline Support Center
- Through ETC websites that have access to the National Verifier

Applications are validated by the National Verifier through available automated eligibility data sources. Applications are checked to confirm identity, verify that the consumer is not already a Lifeline participant, and ensure compliance with all program rules. If eligibility cannot be validated through these checks, customers can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Upon completion of the application process, the individual is either determined qualified for the Lifeline benefit or is required to submit more information. Those that qualify must then contact a participating provider in their area to enroll in the Lifeline program.

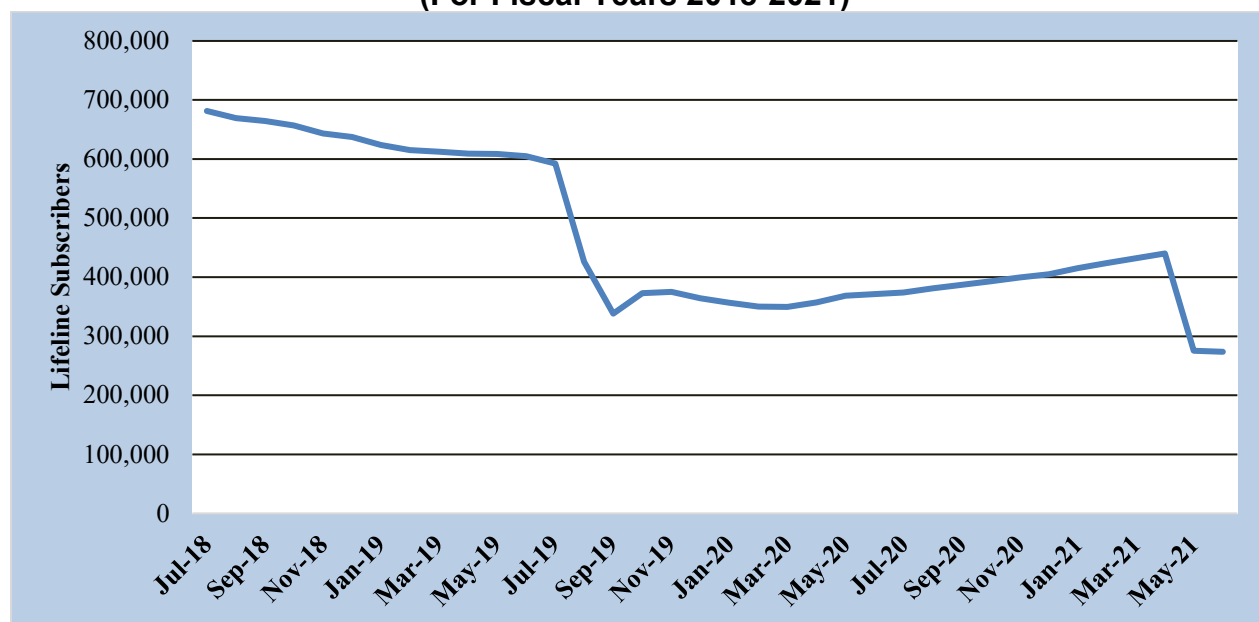
⁴ Appendix A.

III. Lifeline Participation

Participation

There were 273,641 subscribers enrolled in Lifeline as of June 30, 2021, representing a 26 percent decrease from the number of subscribers last year. By comparison, the Lifeline subscribership decline between June 2019 and June 2020 was 38 percent. Figure 1 shows monthly Lifeline subscribership for fiscal year 2018-2019, through fiscal year 2020-2021. June 2021 Florida Lifeline subscribership data for Assurance Wireless was estimated using USAC funding disbursement data throughout this report as the company did not provide the data to the Commission’s data request.

Figure 1
Florida Lifeline Subscribership
(For Fiscal Years 2018-2021)

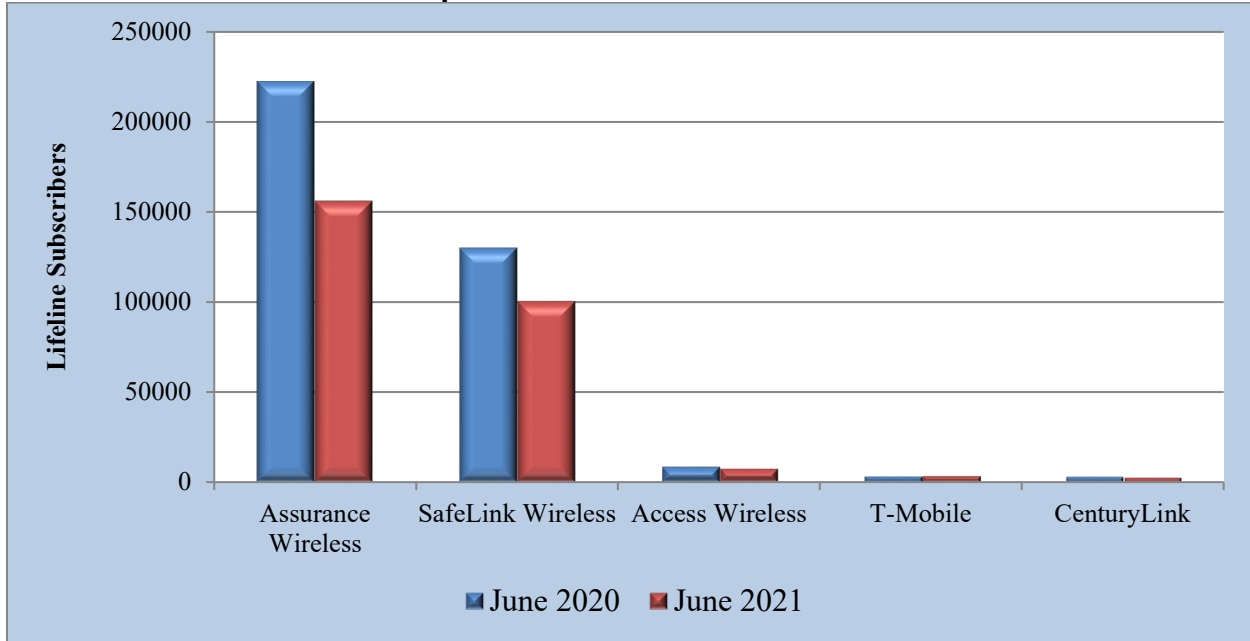


Source: Industry Responses to FPSC Data Requests (2018-2021) and USAC.

This year there was an overall decline in Lifeline subscribership. However, four ETCs (T-Mobile, Frontier Florida, Windstream, and WOW!) experienced an increase in the number of Lifeline customers as noted in Appendix B. Most of the decline in this year’s subscribership may be attributed to the expiration of the FCC’s Lifeline usage rule waiver on May 1, 2021. A significant drop in subscribers was observed the following month in June, while participation throughout the remainder of the fiscal year appeared constant. Customers who were de-enrolled as a result of not using their devices may still be eligible for the Lifeline program and can reapply for the program. The FCC’s Lifeline program rule waivers are discussed in more detail in Section V.

Figure 2 shows the five Florida ETCs with the most Lifeline subscribers for June 2020 and 2021. These ETCs represent 99 percent of Lifeline subscriber participation in Florida. For 2021, Assurance Wireless remains the ETC with the highest number of Lifeline subscribers, even with a decline of 66,000 Lifeline subscribers in Florida over the period.

**Figure 2
Top Five Florida Lifeline ETCs**



Source: Industry Responses to 2021 FPSC Data Requests and USAC.

Figure 3 compares the number of households enrolled in Lifeline with the estimated number of Lifeline eligible households, using SNAP participation as a proxy for eligibility. Using SNAP participation as a proxy for the number of Lifeline eligible households suggests there are significant growth opportunities for Lifeline enrollment. However, it should be noted that only carriers that have been designated as an ETC are permitted to provide the Lifeline discount. If a customer’s preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers. This is especially true when a customer is required to pay an early contract termination fee to make such a switch.

**Figure 3
Lifeline Participation Rate in Eligible Florida Households**

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
June 2016	852,255	1,747,684	48.76%
June 2017	685,864	1,690,899	40.56%
June 2018	694,647	1,655,134	41.97%
June 2019	604,693	1,540,682	39.25%
June 2020	371,180	2,151,503	17.25%
June 2021	273,641	1,882,842	14.53%

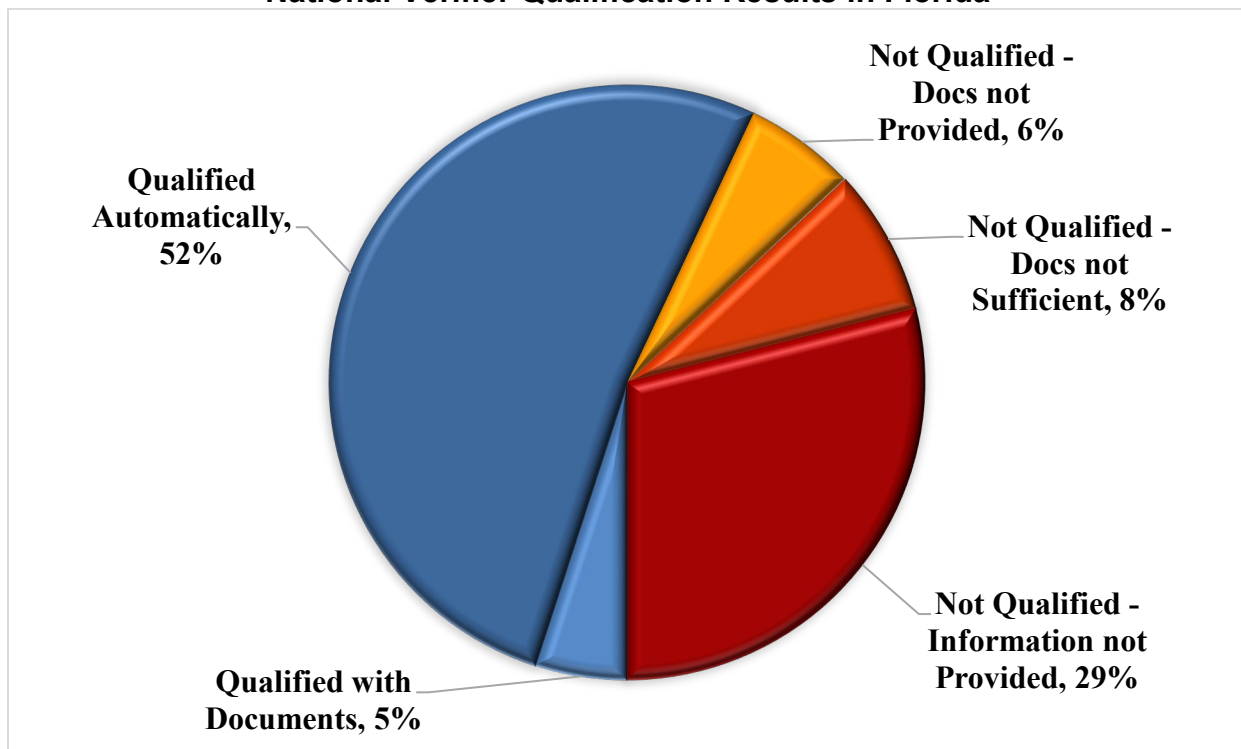
Source: Florida DCF, Access Florida: Standard Data Tables

Lifeline subscribership decreased by 97,539 between June 2020 and June 2021. At the same time, the number of Lifeline eligible households, based upon SNAP participation, decreased by 268,661.⁵ As a result, the participation rate as of June 2021 was 14.53 percent, which represents a decrease of 2.7 percent compared to 2020.

The current participation rate in the Lifeline program in Florida compared to the number of Lifeline eligible households demonstrates the continued need for Lifeline outreach. However, the need for greater outreach may be at odds with the changing costs associated with offering expanded Lifeline services. Some carriers have noted that with the implementation of the FCC’s 2016 Lifeline Modernization Order, it has become increasingly difficult to acquire Lifeline subscribers at the current monthly support amount and continue to be profitable.

Between the fourth quarter of 2020 and the second quarter of 2021, the National Verifier received 365,014 applications from Florida. Figure 4 illustrates that 52 percent of these applications qualified automatically. By comparison, only 5 percent qualified through manual documentation review. Among the applications submitted, 154,667 were “Not Qualified” because they did not meet the program criteria and were not able to prove their eligibility within 45 days.

Figure 4
National Verifier Qualification Results in Florida



Source: USAC Lifeline Program Data (4Q 2020 to 2Q 2021)

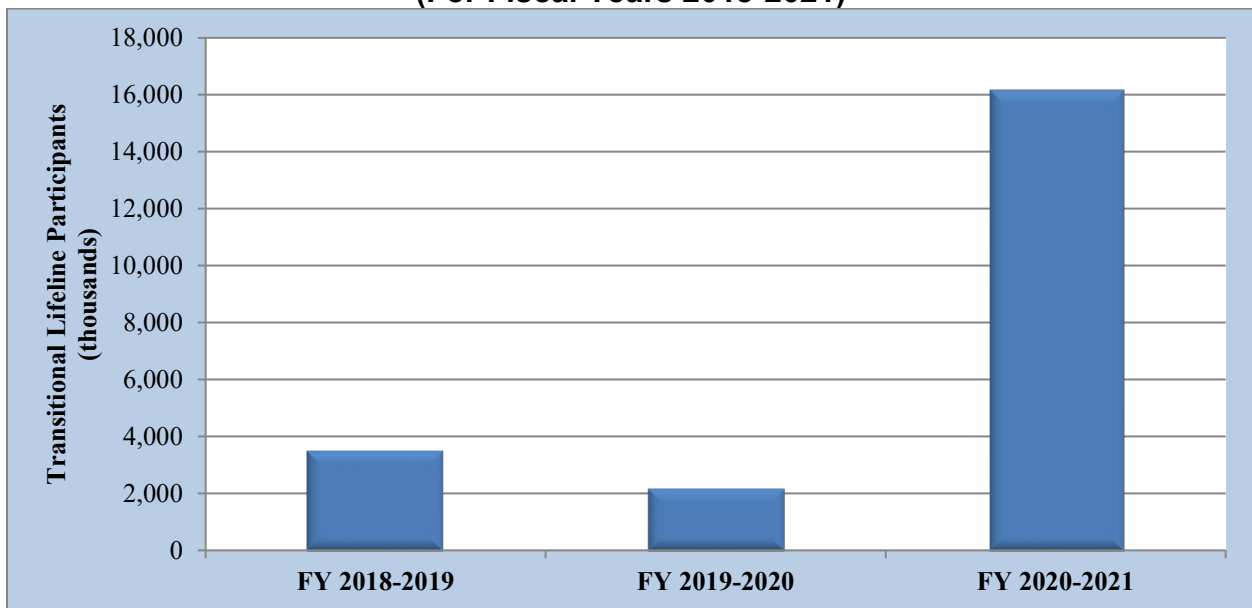
⁵ Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/service-programs/access/StandardDataReports.asp>, accessed on August 20, 2021.

Transitional Lifeline

Transitioning from the Lifeline program usually occurs when a customer’s socio-economic status has improved, thus advancing them beyond the qualifying eligibility criteria. As required by Section 364.105, F.S., customers who no longer qualify for Lifeline are eligible to receive a 30 percent discount on the residential basic local service rate for one year. For example, a former Lifeline customer with a \$25 phone bill would receive a \$7.50 monthly discount for one year.

Figure 5 represents the average monthly number of Transitional Lifeline customers of Florida ETCs from fiscal year 2018-2019, through fiscal year 2020-2021. This fiscal year, the average number of monthly customers receiving the Transitional Lifeline benefit was 16,162, which represents an average monthly increase of 13,960 customers per month compared to the prior fiscal year. While the majority of Florida ETCs have confirmed the availability of the Lifeline benefit for former Lifeline customers, AT&T has indicated that they do not advertise this service. Additionally, T-Mobile did not respond to staff’s data request questions concerning Transitional Lifeline.

Figure 5
Average Monthly Transitional Lifeline Participants
(For Fiscal Years 2018-2021)



Source: Industry Responses to FPSC Data Requests (2016-2021).

It should be noted, to comply with Section 364.105, F.S., TracFone offers its former Lifeline customers at least a 30 percent increase on the customer’s chosen prepaid wireless service card. TracFone does not track Transitional Lifeline customers participating in this manner and, therefore, is not included in Figure 5.

IV. Lifeline Providers

Congress has granted state commissions the authority to designate carriers as ETCs if they meet certain requirements.⁶ Conversely, state commissions may rescind ETC designation should a company fail to follow the Lifeline program requirements. In instances where a state commission lacks jurisdiction to grant ETC status to a carrier, the FCC may make the designation.

To qualify as an ETC, a telecommunications carrier must offer services supported by federal universal service support mechanisms.⁷ The carrier must advertise the availability of such services and charges. The services can be provided 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 provide Lifeline service.⁸ When the 1996 Telecommunications Act was initially implemented, all ETCs were eligible to participate in the high-cost program and were required to offer Lifeline services. Since then, the FCC has revised its rules to allow companies to request ETC designation to participate in the Lifeline program only and forgo participation in the high-cost programs, which have evolved to include buildout requirements.

Currently, the FPSC only evaluates wireline ETC applications, while the FCC evaluates wireless ETC applications.⁹ Figure 6 shows the 16 companies that were ETCs and participated in the Lifeline program in Florida as of June 30, 2021. Appendix B provides Lifeline enrollment figures for each ETC between 2018 and 2021.

Figure 6
ETCs Participating in Florida

Access Wireless (i-wireless)	NEFCOM
Assurance Wireless (T-Mobile)	Phone Club Corporation
AT&T Florida	SafeLink Wireless (TracFone)
CenturyLink	Smart City Telecom
Consolidated Communications	TDS (Quincy Telephone Company)
Frontier Communications of the South	T-Mobile
Frontier Florida, LLC	Windstream Florida, LLC
ITS Fiber	WOW! (Knology of Florida, Inc.)

Source: Industry Responses to 2021 FPSC Data Requests

Lifeline Service Obligations by Technology

ETCs can meet their Lifeline service obligations either through offering voice, broadband, or a combination of both services. Figure 7 shows the percent of Lifeline subscription by service type and by what type of underlying carrier. Currently, incumbent and competitive wireline carriers

⁶ Section 214(e)(2) of the Telecommunications Act of 1996.

⁷ 47 Code of Federal Regulations (CFR) §54.101(a).

⁸ 47 CFR §54.201(h).

⁹ In 2011, the Florida Legislature passed HB 1231, removing FPSC authority to designate wireless ETC providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

meet their Lifeline obligation predominantly through voice service provision, but they experienced an increase in broadband service. By comparison, wireless ETCs met their Lifeline obligation predominantly through the provision of bundled connections and experienced an increase of 18 percent in bundled service in 2021. While incumbent wireline carriers experienced a slight increase in bundled services, competitive wireline carriers experienced a decline of similar magnitude. Appendix C provides greater detail of Lifeline subscriptions by service type for each carrier.

Figure 7
Lifeline Subscription by Service Type
(As of June 2020 / 2021)

Carrier Type	Voice		Broadband		Bundled	
	2020	2021	2020	2021	2020	2021
Wireless	8.0%	6.1%	59.9%	43.7%	32.1%	50.2%
Incumbent Wireline	79.2%	72.9%	4.2%	7.9%	16.6%	19.1%
Competitive Wireline	84.8%	82.0%	4.4%	9.7%	10.8%	8.3%

Source: USAC Disbursements Florida

Wireless Service Standards

All wireless ETCs in Florida meet the minimum FCC standards by offering at least 1,000 minutes or 4.5 gigabytes (GB) of data to Lifeline subscribers. It should be noted that wireless carriers frequently offer some voice or data along with the service that meets the FCC’s standard. Figure 8 outlines different Lifeline services offered by Wireless ETCs in Florida and how they qualify with the federal standards.

Figure 8
Wireless Service Standard Met by Carrier
(As of September 2021)

Wireless ETC	Minimum Standards Met	Voice	Data
Access Wireless	Voice/Data	1,000 Minutes	4.5 GB
Assurance	Voice/Data	1,000 Minutes	4.5 GB
SafeLink	Data	350 Minutes	4.5 GB
T-Mobile	Voice	Unlimited	No Data

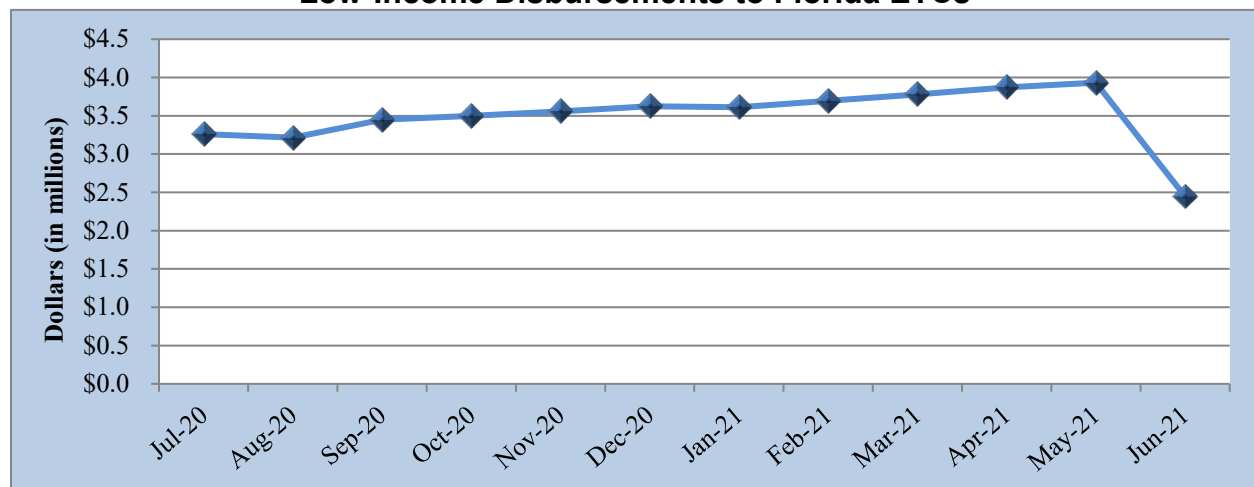
Source: Wireless ETC’s websites

Most wireless ETCs offer a Lifeline plan covered by the Lifeline subsidy. Customers only have to pay for additional voice minutes or data beyond their phone plan as needed. By comparison, T-Mobile’s Lifeline customers can apply their discount towards any plan that T-Mobile offers. T-Mobile’s least expensive plan provides unlimited voice minutes without a data component, costing Lifeline consumers \$14.75 after the Lifeline discount.

Funding Distributions

Figure 9 reflects USAC Lifeline disbursements to Florida ETCs between July 2020 and June 2021. The total amount disbursed during these 12 months was \$41,942,954, with an average of \$3.5 million per month. These amounts also include prior period support corrections. As previously discussed in Section 3, the FCC’s Lifeline non-usage rule waiver expired on May 1, 2021. As such, Figure 9 reflects the substantial decrease in funding disbursed for the month of June 2021 as a result of Lifeline subscribers who did not meet their usage requirements, and have been de-enrolled.

**Figure 9
Low-Income Disbursements to Florida ETCs**



Source: USAC Disbursements Florida July 2020-June 2021

FCC Pending Wireless ETC Designations

The FPSC no longer has the authority to designate wireless ETCs. As such, petitions for wireless ETC designation in Florida are filed directly with the FCC. Figure 10 shows the 35 wireless ETC petitions pending at the FCC, along with the date of each company’s initial ETC petition. Some of these companies applied with the FCC as early as June 2011.

Of these wireless carriers, 13 have cancelled their registration with the Florida Secretary of State, and 5 were never registered. These companies may no longer be seeking ETC designation, but it is unclear based on the FCC’s website list of pending wireless ETC petitions. It appears unlikely that the FCC will take any action on these petitions given the length of time that has transpired since they were originally filed.

Figure 10
Pending Florida Wireless ETC Designations at FCC
(As of September 2021)

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 (8/15)	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 (1/14)
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

Viasat Carrier Services, Inc.

On September 18, 2019, the FCC designated Viasat Carrier Services, Inc. (Viasat) as an ETC in selected areas in Florida, Alabama, California, and West Virginia.¹⁰ As a winning bidder in the Connect America Fund Phase-II auction, Viasat was required to be designated as an ETC in all of the Census Blocks it had won. To satisfy this obligation, the FCC designated Viasat as an ETC in all states that lack the jurisdiction to do so, such as Florida. As a condition of Viasat's ETC designation, it must offer service in at least 40 percent of its designated ETC service territory by December 2022, with 20 percent increases in each subsequent year.¹¹ This includes offering Lifeline service. For this reporting year, Viasat did not provide Lifeline services due to needed upgrades of its internal systems. Viasat is currently conducting service upgrades, and it anticipates meeting the first service deployment obligation by the December 2022 deadline.¹²

AT&T

Over the past several years, AT&T has moved to exit the Lifeline market. On November 23, 2016, AT&T accepted the FCC's forbearance relief offered in the 2016 Lifeline Modernization Order from the requirement to offer broadband service to Lifeline customers in their ETC service

¹⁰ FCC Order, DA 19-925, WC Docket No.'s 09-197, Telecommunications Carriers Eligible for Universal Service Support Connect America Fund, released September 18, 2019, <https://docs.fcc.gov/public/attachments/DA-19-925A1.pdf>, accessed on September 15, 2021.

¹¹ FCC, Connect America Fund Phase II Auction (Auction 903), <https://www.fcc.gov/auction/903>, accessed on September 15, 2021.

¹² FPSC Staff Email Correspondence with Viasat on September 15, 2020, with Eric Baulesh.

areas, except in areas it received high-cost support.¹³ On April 7, 2017, AT&T filed a petition with the FPSC for relinquishment of its ETC status in all Florida areas where it did not receive high-cost support. This petition was granted on August 16, 2017.¹⁴ As a result, AT&T had no universal service obligations in these areas.

More recently, AT&T filed a second notice with the FCC accepting its forbearance on July 29, 2021.¹⁵ In this notice AT&T is seeking to eliminate its obligation to provide broadband services to customers enrolled in the Lifeline program for what remains of its ETC service territory in Florida, effective January 1, 2022. AT&T states that it will meet the conditions for forbearance offered in the 2016 Lifeline Modernization Order because its high-cost funding will be exhausted after December 31, 2021, leading to a material change in circumstances. With AT&T's decision to forbear from its obligation to provide broadband services to Lifeline customers, AT&T's only Lifeline service obligation would be to provide voice-only service in areas that formerly received high-cost support.

On October 12, 2021, AT&T filed a petition with the FPSC for relinquishment of its ETC designation in its remaining service territory.¹⁶ AT&T states that despite its relinquishment petition, it is not discontinuing the availability of any AT&T Florida legacy voice service anywhere in its service territory. If approved by the Commission, AT&T has requested an effective date of February 15, 2022.

Verizon / TracFone

On September 14, 2020, Verizon announced plans to purchase TracFone, Florida's second largest Lifeline ETC and the nation's largest reseller of wireless service.¹⁷ Currently, approximately 13 million of TracFone's 21 million customers receive resold Verizon service. Verizon intends to continue providing service through the TracFone brand with a commitment of providing Lifeline service for at least three years. This includes advertising Lifeline services, honoring current resale agreements, making 5G available to Lifeline customers, and continuing to provide Lifeline services at no charge to the consumer.¹⁸ Finalization of the purchase is contingent upon regulatory approval by the FCC. Industry and state opposition could slow the merger; however, Verizon believes the purchase should be completed by fourth quarter 2021.

¹³ AT&T, In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, AT&T Notice for Forbearance from Lifeline BIAS Requirements, <https://ecfsapi.fcc.gov/file/1124049451170/FINAL%2011.23.16%20Lifeline%20Forbearance%20Notice.pdf>, accessed on September 29, 2021.

¹⁴ FPSC, Docket No. 20170082, Order No. PSC-2017-0329-CO-TP.

¹⁵ AT&T, In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, AT&T Notice for Forbearance from Lifeline BIAS Requirements, <https://ecfsapi.fcc.gov/file/107290417200072/FINAL%207.29.21%20ATT%20ILEC%20Lifeline%20Forbearance%20Notice.pdf>, accessed on September 7, 2021.

¹⁶ FPSC, Docket No. 20210163-TP, Document No. 12079-2021.

¹⁷ Verizon, Verizon to Acquire TracFone, released September 14, 2020, <https://www.verizon.com/about/sites/default/files/2021-08/Final%20Verizon%20ex%20parte%20%288.11.21%29-c3%20%283%29.pdf>, accessed on September 5, 2021.

¹⁸ Verizon, Verizon, TracFone formalize commitments to Lifeline program, released August 12, 2021, <https://www.verizon.com/about/news/verizon-tracfone-formalize-commitments-lifeline-program>, accessed on September 6, 2021.

Sprint and T-Mobile Merger

On April 1, 2020, Sprint and T-Mobile completed a corporate merger that was approved by the FCC on November 5, 2019.¹⁹ The \$26 billion transaction involved the sale of all of Sprint's prepaid services to Dish Network for \$5 billion, thus creating a fourth major mobile carrier. Sprint's postpaid services were subsumed by T-Mobile. Assurance Wireless, a subsidiary of Sprint, accounts for 58 percent of all Florida Lifeline customers. Assurance Wireless continues to provide Lifeline service as a subsidiary of T-Mobile.

¹⁹ Applications of T-Mobile US, Inc., and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, FCC Order 19-103, <https://docs.fcc.gov/public/attachments/FCC-19-103A1.pdf>, accessed September 21, 2021.

V. Regulatory Activities and Updates

A. Federal Communications Commission Activities

2016 Lifeline Modernization Reform Order

On April 27, 2016, the FCC released its Lifeline Modernization Order. This Order was primarily established to modernize the Lifeline program by including broadband as a supported service, designating minimum service standards for Lifeline services, and establishing the National Verifier. Implementation of this Order continues to have an impact on the federal Lifeline program.

State Defined Eligibility Criteria

Prior to the implementation of the FCC's 2016 Lifeline Modernization Order, states that mandated Lifeline support, such as Florida, could establish its own qualification criteria. Thus, a state could have income eligibility standards that are different from the FCC's or include additional state qualifying programs. However, in 2016, the FCC amended its rules resulting in the elimination of that provision.²⁰ The FCC stated that it made this change to simplify the administration of the Lifeline program and establish eligibility criteria that do not vary from state to state.²¹

Section 364.10(2), F.S., currently contains a conditional poverty qualifier that exceeds the FCC's threshold of 135 percent of the Federal Poverty Guidelines. Specifically, wireline ETCs with more than a million access lines are required to provide Lifeline service to customers whose income is 150 percent or less of the Federal Poverty Guidelines. However, no wireline carriers have had more than a million access lines since 2016.²² Wireless ETCs were given more flexibility in that they "may" provide Lifeline services at the 150 percent threshold. It is unlikely that any wireless ETC is currently qualifying customers using this expanded criterion because those customers would not qualify for reimbursement from USAC.

Minimum Service Standards

In the 2016 Lifeline Modernization Order, the FCC required all ETC's to provide a discount for broadband access that meets the FCC's minimum service standards, unless they were granted forbearance from this obligation. These standards were established to determine an appropriate level of service ETCs must provide to receive USF support. These standards are reviewed annually through an FCC update mechanism to ensure that Lifeline customers continue to receive viable service options as technology improves.²³ The minimum service standards that will become effective December 1, 2021 include:

- Mobile voice remains unchanged at 1,000 minutes per month.

²⁰ FCC, Third Report and Order, FCC 16-38, WC Docket No. 11-42, released April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed on September 5, 2021, par. 212.

²¹ Ibid, par. 215.

²² FPSC, Report on the Status of Competition in the Telecommunications Industry as of December 31, 2020, <http://www.psc.state.fl.us/Files/PDF/Publications/Reports/Telecommunication/TelecommunicationIndustry/2021.pdf>, accessed on September 5, 2021, Figures 2-5 and 2-6.

²³ FCC, Public Notice, DA 19-704, WC Docket No. 11-42, released July 25, 2019, <https://docs.fcc.gov/public/attachments/DA-19-704A1.pdf>, accessed on September 5, 2021.

- Mobile broadband usage remains unchanged at 4.5 GB per month, while speed remains at 3G.
- Fixed broadband speed increases to 25 megabits per second (Mbps) downstream and 3 Mbps upstream while data usage increases to 1.229 terabytes per month.

Phase Out of Voice-Only Support

The 2016 Lifeline Modernization Order gradually phases out support for voice-only services to further the FCC’s goal of transitioning to a broadband-focused Lifeline program. On December 1, 2019, the support provided for voice-only services was reduced to \$7.25 per Lifeline customer. Support for voice-only Lifeline service was scheduled to be completely phased out on December 1, 2021. However, on November 5, 2021, the FCC released an Order that delayed the complete phase out of voice-only Lifeline service support until December 1, 2022.²⁴ In this Order, the FCC states that new data from its Marketplace Report, and other extenuating circumstances have provided evidence that favors the pausing of the phase-down. Therefore, support for voice-only Lifeline service will remain at \$5.25 until that time. Broadband services that include a voice service will continue to be eligible to receive Lifeline support after the new phase-out date. Figure 11 outlines the FCC’s revised phase down schedule.

**Figure 11
Lifeline Support Transition Schedule**

Effective Dates	Fixed Voice	Mobile Voice	Fixed Broadband	Mobile Broadband
From 12/1/19 to 11/30/20	\$7.25	\$7.25	\$9.25	\$9.25
From 12/1/20 to 11/30/22	\$5.25	\$5.25	\$9.25	\$9.25
After 11/30/22	\$0	\$0	\$9.25	\$9.25

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

The FPSC filed comments regarding this matter in the FCC’s 2017 Fourth Report and Order and Notice of Proposed Rulemaking.²⁵ The FPSC commented that customers should have the option to continue to receive Lifeline support for voice-only service and that the FCC should eliminate its planned phase down of support. The FPSC noted its concern that if the only option for customers to obtain Lifeline voice service is by combining the service with broadband, the cost of the combined services may become cost prohibitive for some consumers, without increasing financial support from the Lifeline program. The shift in support offered for voice-only support appears to have continued to cause a shift in Florida’s ETC service offerings to focus on broadband and bundled voice and broadband services.²⁶ Once voice-only support is phased out, an ETC that exclusively offers voice-only Lifeline service will likely relinquish its ETC designation.

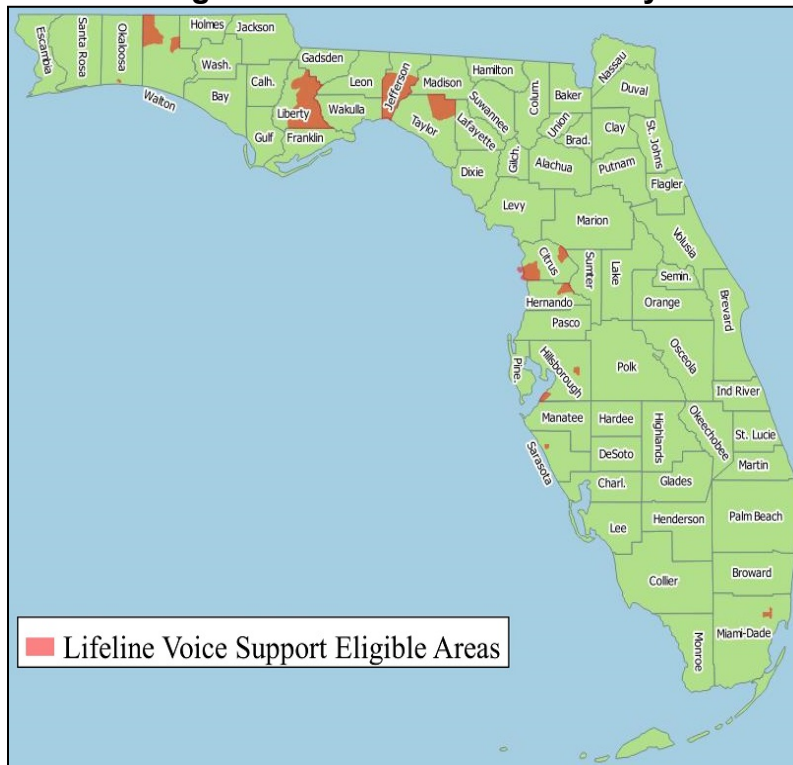
²⁴ FCC, Order, DA 21-1389, WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization, <https://docs.fcc.gov/public/attachments/DA-21-1389A1.pdf>, accessed on November 9, 2021.

²⁵ FPSC Comments, WC Docket No. 17-287, Bridging the Digital Divide for Low-Income Consumers, filed February 21, 2018, <https://ecfsapi.fcc.gov/file/1022171092868/FPSC%20Comments%20to%20the%20FCC.pdf>, accessed on September 5, 2021.

²⁶ Appendix C.

The 2016 Lifeline Modernization Order included an exception to the complete phase-down of voice-only support in Census Blocks where there is only one Lifeline provider. On June 2, 2021, the FCC released a Public Notice identifying the Census Blocks eligible to continue receiving the \$5.25 support amount for voice-only Lifeline service through November 30, 2022.²⁷ The list of eligible Census Blocks will be evaluated annually by the FCC and will continue through November 30 of the year that an eligible Census Block is identified as being served by more than one Lifeline provider. In Florida, 4,389 Census Blocks qualify for the continued voice-only support. Figure 12 highlights the areas eligible to continue receiving voice-only support in Florida.

Figure 12
Areas in Florida Eligible for Continued Voice-Only Lifeline Support



Source: FCC, Shapefile by Census Tracts

National Lifeline Eligibility Verifier

As a part of the FCC’s 2016 Lifeline Modernization Order, to fight waste, fraud, and abuse in the Lifeline program the FCC directed USAC to develop a national Lifeline eligibility verifier. The purpose of the National Verifier is to determine initial subscriber eligibility, conduct annual recertification, populate a national database consisting of Lifeline customers, and provide support payments to providers serving these customers.

New Lifeline customers may apply for the Lifeline program through the National Verifier online, or by mailing a physical copy of the application which can be found on the National Verifier

²⁷ FCC, DA 21-650, Public Notice, <https://docs.fcc.gov/public/attachments/DA-21-640A1.pdf>, accessed on September 5, 2021.

portal website.²⁸ Disabled individuals may call the USAC Lifeline Support Center hotline to receive assistance in filling out an application by phone.²⁹ For all other questions regarding the Lifeline program, customers are encouraged to visit the Lifeline support website, or call the USAC Lifeline Support Center hotline.³⁰

While ETCs can assist customers in applying for the National Verifier, that ability is somewhat limited. ETCs can check the status of National Verifier applications for customers after they have been submitted. ETCs may also assist customers with their applications; however, this must be done in person as the National Verifier computer interface does not allow for remote assistance. ETCs have expressed displeasure using the system, citing issues with their ability to effectively assist customers with applications, as well as National Verifier portal operational issues.³¹ USAC has actively addressed and worked toward rectifying these issues, and continues to keep state regulators and stakeholders informed on improvements through monthly conference calls and webinars.

USAC Interface with Florida DCF Database

The National Verifier's efficiency is contingent upon the establishment of automated verification interface processes connected to qualifying program databases. To assist in Florida's transition to the National Verifier, the FPSC coordinated an informal meeting between the Florida Department of Children and Families (FDCF) and USAC in 2019. The meeting established the groundwork for an automated verification process compliant with Florida Statutes that would allow USAC to interface with FDCF's qualifying program database. The FDCF database would provide USAC with confirmation that a customer is a participant in a qualifying program without revealing the program itself or any other customer information. Once a customer is verified as a qualifying program participant through this process, they are enrolled in the Lifeline program with no need for any further documentation. As of January 2021, USAC's connection to the FDCF database has been established.

The National Verifier is also connected to federal databases to provide for additional avenues to complete the verification process. These include both Federal Public Housing Assistance and the federal Medicaid databases. As of January 2021, USAC has been able to establish automated verification interfaces for state qualifying programs in 21 states and is working with the remaining states to establish interfaces. It is USAC's goal to be connected to all available state databases by the end of 2021.

Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.³² If there are two households residing at one address and each desire to participate in the Lifeline program, each applicant must complete USAC's Household Worksheet form. This form is used to demonstrate that each applicant is living in a separate economic unit and not sharing living

²⁸ USAC, National Verifier, <https://nationalverifier.servicenowservices.com/lifeline>, accessed on September 5, 2021.

²⁹ USAC, Lifeline Support Center Hotline, 1-800-234-9473.

³⁰ USAC, Lifeline Support Website, <https://www.lifelinesupport.org/>, accessed on September 5, 2021.

³¹ 2021 Lifeline Report Data Request Responses. T-Mobile did not provide responses to questions concerning issues experienced with the National Verifier.

³² 47 CFR § 54.409(c).

expenses (bills, food, etc.) or income with another resident.³³

To prevent waste in the USF, the FCC created a National Lifeline Accountability Database and mandated its use to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber.³⁴ The National Lifeline Accountability Database conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving Lifeline service. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

Lifeline Rule Waivers

On March 17, 2020, the FCC released an Order suspending the usage requirement rule of the Lifeline program because of the COVID-19 pandemic.³⁵ This rule requires that subscribers must use their Lifeline service at least once within a 30 day period, or must be de-enrolled from the program. The Order also suspended de-enrollment due to customer reverification non-response, halted USAC from requesting new reverification eligibility information from customers and waived the recertification rules of the Lifeline program. A follow-up Order was released on April 29, 2020, which amended the income eligibility rules for the Lifeline program, as well as halted all involuntary de-enrollment from the Lifeline program.³⁶

The income eligibility rule requires customers qualifying for the Lifeline program under income eligibility documentation to provide three consecutive months of documentation proving they make at or less than 135 percent of the Federal Poverty Guidelines.³⁷ The amendment allowed customers to provide documentation proving recent unemployment due to COVID-19, such as a notice of unemployment benefits or notice of a successful application for unemployment benefits. While this amendment expands the pool of potential Lifeline qualified customers, the majority of Florida ETCs stated they did not see an influx of new Lifeline customers outside of ordinary trends, or that they could directly attribute to COVID-19 related unemployment.³⁸ On February 24, 2021, the FCC released an Order that declined to extend the Lifeline usage requirement rule beyond May 1, 2021.³⁹ The remainder of the aforementioned rule-waivers were extended until December 31, 2021, with the FCC continuing to monitor the pandemic to determine whether additional extensions are appropriate.⁴⁰

³³ A household Lifeline eligibility pre-screening tool is available at www.lifelinesupport.org, accessed September 6, 2021.

³⁴ FCC, Report and Order, WC Docket No. 11-42, released February 6, 2012, <https://docs.fcc.gov/public/attachments/FCC-12-11A1.pdf>, accessed on September 5, 2021.

³⁵ FCC, Order, Lifeline and Link Up Reform Modernization, DA 20-285, released March 17, 2020, <https://docs.fcc.gov/public/attachments/DA-20-285A1.pdf>, accessed on September 5, 2021.

³⁶ Lifeline and Link Up Reform and Modernization, FCC Order, DA 20-462, <https://docs.fcc.gov/public/attachments/DA-20-462A1.pdf>, accessed on September 5, 2021.

³⁷ USAC, Federal Poverty Guidelines for Lifeline, https://www.usac.org/wp-content/uploads/lifeline/documents/handouts/Income_Requirements.pdf, accessed on September 5, 2021.

³⁸ 2021 FPSC Lifeline Report Data Request Responses. Staff notes that T-Mobile and Assurance Wireless did not respond to this part of the data request.

³⁹ Lifeline and Link Up Reform and Modernization, FCC Order, DA 21-229, <https://docs.fcc.gov/public/attachments/DA-21-229A1.pdf>, accessed on August 26, 2021.

⁴⁰ Lifeline and Link Up Reform and Modernization, FCC Order, DA 21-1191, <https://docs.fcc.gov/public/attachments/DA-21-1191A1.pdf>, accessed on September 29, 2021.

Emergency Broadband Benefit Program

On December 27, 2020, the Consolidated Appropriations Act of 2021 became law, establishing the Emergency Broadband Connectivity Fund consisting of \$3.2 billion from the United States Treasury being allocated towards helping Americans afford internet service during the COVID-19 pandemic. The Emergency Broadband Benefit program (EBB) was established to provide funding for low-income households to receive a discount on the cost of broadband and certain connected devices. The fund allows eligible service providers to apply for an expedited approval process to participate in the program; not to be confused with the ETC application process, since approved providers are not given ETC status. Upon the exhaust of the allocated funds, or six months after the federal Department of Health and Human Services declares an end to the COVID-19 pandemic, the EBB will end. At the time of this report, the EBB benefit is still available.

The EBB offers a discount up to a \$50 a month on broadband service and associated equipment rentals, as well as a one-time discount of up to \$100 for qualifying broadband access devices.⁴¹ The EBB launched on May 12, 2021, and eligible consumers may apply for the program online at the EBB portal.⁴²

B. Florida Public Service Commission Activities

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

Florida continues to enforce safeguards to prevent waste, fraud, and abuse of the USF. The FPSC strives to protect the integrity of the Lifeline program in 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 USF disbursements are inconsistent with public trust and negatively impact all contributors to the fund. This is especially true for states like Florida that contribute more into the USF than it receives. Therefore, the FPSC monitors federal USF disbursements to Florida ETCs to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

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 FDCF for Lifeline applications for people who currently participate in the Medicaid and SNAP programs. The coordinated enrollment process requires a FDCF 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, FDCF will forward the customer information to the FPSC. The FPSC places this information on a secure website for retrieval by the appropriate ETC.

Prior to the National Verifier, customers identified through this process would be automatically

⁴¹ Qualifying broadband access equipment includes laptops, tablets, and desktop computers. Only certain EBB providers offer these devices.

⁴² EBB Internet Portal, Getemergencybroadband.org, accessed on September 6, 2021.

considered eligible and enrolled in Lifeline service by the ETC. However, now that eligibility is determined only by the National Verifier, ETC's must now contact the customer to determine if they have already been approved for the Lifeline Program through the National Verifier.

For those customers who have not yet applied for the program, ETCs will either instruct customers on where they can apply or assist these customers with their applications in person. If a customer mistakenly identifies an ETC that does not serve the area in which they live, the FPSC sends instructions on how to apply through the National Verifier, along with a list of each ETC's contact information.

Recent ETC Designations

On December 7, 2020, the FCC announced the winning bidders of the Rural Digital Opportunity Fund (RDOF) auction. The RDOF is a form of high-cost support intended to help connect millions of unserved rural homes and small businesses to high-speed broadband. In Florida, a total of 11 bidders were selected to receive approximately \$192 million of high-cost support in phase I. As a condition of receiving funding, the carriers were required to obtain ETC designation that covered their winning bid areas.

Following the completion of the RDOF bidding process, the FPSC was tasked with processing ETC applications for several winning bidders.⁴³ If a company's ETC application is approved, that company would be eligible for high-cost support under the RDOF program, but would also have to offer Lifeline service. The FPSC has the primary jurisdiction over ETC designation; however, Florida law has limited the FPSC's jurisdiction as it relates to certain services offered by ETC applicants.⁴⁴ Spanning from January 4, 2021, to August 3, 2021, the FPSC evaluated six winning bidders in Florida for ETC designation relating to the RDOF.⁴⁵

To be designated as an ETC by the Commission, a carrier must meet the definition as a "telecommunications company" according to Section 364.02(13), F.S.⁴⁶ Furthermore, Section 364.011, F.S., establishes that service providers using satellites, wireless technology, and VOIP to provide its services are outside of the Commission's jurisdiction. As a result, four ETC petitioners were directed to apply for ETC designation with the FCC. Bright House Networks Information Services (Florida), LLC, and CenturyLink Communications, LLC were found to be carriers within the Commission's jurisdiction, and therefore, designated as ETCs by the FPSC. While federal law requires that carriers designated as ETCs by the FCC abide by all applicable state law, the FPSC has received positive confirmation through data request responses from each of the ETC applicants that Florida Statutes will be adhered to regardless of the designating agency. Because the program provides for an opportunity for carriers to buildout their network, none of these companies have an obligation to offer Lifeline discounts at this time.

⁴³ Starlink Services, LLC, Hotwire Communications Ltd., Bright House Networks Information Services (Florida), LLC, Windstream Communications, LLC, AB Indiana LLC.

⁴⁴ 47 U.S.C. 54.201

⁴⁵ See FPSC Docket No.'s 20210011, 20210012, 20210013, 20210047, 20210070, 20210110.

⁴⁶ FPSC Order No. PSC-2021-0222-PAA-TX, Docket No. 20210013-TX, Application for designation as an eligible telecommunications carrier to receive rural digital opportunity fund auction (Auction 904) support for voice and broadband services and request for expedited consideration, by Bright House Networks Information Services (Florida), LLC., pp. 3-4.

VI. Lifeline Promotion Activities

Promotional activities in 2021 featured National Lifeline Awareness Week and National Consumer Protection Week, and ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline program.

The FPSC works with state commissions, the National Association of Regulatory Utility Commissioners and the FCC to promote Lifeline Awareness Week and educate consumers on the nationwide implementation of the 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 one discount per household. The shared goal is for all eligible households to be enrolled and receive Lifeline program benefits.

National Lifeline Awareness Week

NARUC observed Lifeline Awareness Week, again in September for those states able to participate. “*Stay Connected Florida!*” was the slogan for Florida’s 2021 Lifeline Awareness Week, September 20-24. 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.

This year, Florida’s outreach focused on senior and community centers in rural Miami-Dade, Taylor, Walton, Citrus, and Hernando Counties. With in-person events cancelled or restricted due to the pandemic, FPSC representatives distributed information to seniors and answered questions with the help of the senior and community services coordinators in each county. Lifeline information is also readily available on the FPSC’s website.⁴⁷

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, February 23-March 6, 2021, provided a good opportunity for Lifeline outreach activities. An annual consumer education campaign, National Consumer Protection Week encourages consumers to take advantage of their consumer rights. Chairman Gary Clark recognized the 23rd Annual National Consumer Protection Week with a consumer message on important scam awareness education, energy and water conservation tips, as well as Lifeline information.

Many of the senior and community centers the FPSC regularly visit remain temporarily closed, with in-person events cancelled or restricted. For National Consumer Protection Week 2021, the FPSC partnered with coordinators at the Tallahassee Senior Center and Foundation to deliver and distribute information to seniors and answer questions via their “*Learn and Wave*” events. For 14 years, the FPSC has joined government agencies, advocacy organizations, and private sector groups nationwide to highlight National Consumer Protection Week.

⁴⁷ FPSC, Lifeline Assistance, <http://www.floridapsc.com/ConsumerAssistance/LifelineAssistance>, accessed on September 21, 2021.

Each May, the Commission participates in Older Americans Month, a national project to honor and recognize older Americans for their contributions to families, communities, and society. “Communities in Strength” was this year’s theme. Senior centers in Broward, Palm Beach, and Washington Counties received and distributed FPSC information on Lifeline and utility bill reduction strategies to area seniors. FPSC outreach staff are always available to answer questions and provide further information.

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. Helping Hands named in 2021 include: Tallahassee Senior Center, the City of Lauderhill and the Walton Okaloosa Council on Aging.

Library Outreach Campaign

Each year the FPSC provides educational packets, including FPSC publications and Lifeline brochures and applications in English and Spanish, to Florida public libraries across the state for consumer distribution. The FPSC’s Library Outreach Campaign reached 615 state public libraries and branches in 2021. To reduce mailing and production costs, the Commission’s 2021 campaign included a cover letter, book marks, and a brochure order form. Following the Campaign, many libraries’ requests for additional publications have been filled.

Ongoing Lifeline Outreach

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

Lifeline Partners

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Appendix D 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, provide program updates, and supply brochures and applications.

Appendix A 2021 U.S. Poverty Guidelines

Persons in family/household	2020 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$12,880.00	\$17,388.00	\$1,449
2	\$17,420.00	\$23,517.00	\$1,959.75
3	\$21,960.00	\$29,646.00	\$2,470.50
4	\$26,500.00	\$35,775.00	\$2,981.25
5	\$31,040.00	\$41,904.00	\$3,492
6	\$35,580.00	\$48,033.00	\$4002.75
7	\$40,120.00	\$54,162.00	\$4,513.50
8	\$44,660.00	\$60,291.00	\$5,024.25

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines, Federal Register Notice, February 1, 2021, <https://www.federalregister.gov/documents/2021/02/01/2021-01969/annual-update-of-the-hhs-poverty-guidelines#:~:text=2021%20Poverty%20Guidelines%20for%20the%2048%20Contiguous%20States,%20%2026%2C500%20%204%20more%20rows%20>, accessed on September 28, 2021.

Appendix B

Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETCs	June 2018	June 2019	Net Growth Rate	June 2020	Net Growth Rate	June 2021	Net Growth Rate
Wireless	Assurance Wireless	418,874	411,114	-2%	222,128	-46%	155,848	-30%
	SafeLink Wireless	232,088	167,966	-28%	130,362	-22%	100,463	-23%
	Access Wireless	31,874	14,795	-54%	8,740	-41%	7,566	-13%
	T-Mobile	1,023	2,489	143%	3,307	33%	3,523	7%
Incumbent Wireline	CenturyLink	5,251	3,875	-26%	3,056	-21%	2,652	-13%
	Frontier Florida	2,113	1,690	-20%	1,405	-17%	1,478	5%
	Windstream	1,546	1,332	-14%	1,274	-4%	1,289	1%
	Consolidated Communications	397	329	-17%	275	-16%	255	-7%
	NEFCOM	247	221	-11%	179	-19%	169	-6%
	TDS Telecom	112	112	0%	98	-13%	88	-10%
	AT&T	123	89	-28%	70	-21%	58	-17%
	ITS Fiber	46	20	-57%	58	190%	37	-36%
	Frontier of the South	20	19	-5%	21	11%	19	-10%
	Smart City	3	3	0%	4	33%	3	-25%
Competitive Wireline	Phone Club	120	143	19%	158	10%	138	-13%
	WOW!	46	50	-9%	45	-10%	55	22%
	Cox Telecom	556	409	-26%	0	0%	0	0%
	Tele Circuit	201	37	-82%	0	0%	0	0%
	Global Connection	7	0	-100%	0	0%	0	0%
	Total	685,864	694,647	1%	371,180	-39%	273,641	-26%

Source: FPSC Data Requests 2018-2021

Appendix C
Lifeline Subscription by Service Type
(as of June 2021)

	ETCs	Voice	Broadband	Bundled	Total
Wireless	Assurance Wireless	8,527	101,063	46,258	155,848
	SafeLink Wireless	6,628	16,327	80,184	103,139
	Access Wireless	1,083	16	5,376	6,475
	T-Mobile	281	10	3,231	3,522
Incumbent Wireline	CenturyLink	2,468	30	154	2,652
	Frontier Florida	1,040	216	246	1,502
	Windstream	389	209	682	1,280
	Consolidated Communications	281	4	4	289
	NEFCOM	100	2	68	170
	TDS Telecom	75	0	14	89
	AT&T	58	0	0	58
	ITS Fiber	5	24	8	37
	Frontier of the South	20	4	3	27
	Smart City	1	1	1	3
Competitive Wireline	Phone Club	155	0	0	155
	WOW!	14	20	17	51
Total		21,125	117,926	136,246	275,297

Source: USAC Disbursements in Florida

Appendix D Florida Lifeline Partners

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

Appendix D (continued) Florida Lifeline Partners

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