

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



December 2024

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List of Acronyms

ACP	Affordable Connectivity Program
C.F.R.	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
GB	Gigabytes
IHP	Individuals and Households Program
Mbps	Megabits per second
NARUC	National Association of Regulatory Utility Commissioners
NCPW	National Consumer Protection Week
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company
U.S.C.	United States Code
USF	Universal Service Fund

Executive Summary

The Florida Lifeline Assistance report is prepared pursuant to the requirements in Section 364.10(2)(g), 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 2023 through June 2024, and evaluates procedures put in place to strengthen the Lifeline program.

As of June 30, 2024, there were 212,243 Florida households participating in the Lifeline program. This represents approximately 1 of every 43 Florida households.¹ The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 12.8 percent of SNAP participants subscribe to Lifeline as of June 2024.² Using SNAP participation as a proxy for the number of Lifeline eligible households suggests that there continues to be 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 2024 Lifeline Awareness Week, held on September 8-14. 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, released on July 9, 2024, <u>http://edr.state.fl.us/Content/conferences/population/ConferenceResults_Tables.pdf</u>, accessed on October 11, 2024, p. 2, Households 9,127,327.

² Florida DCF, Access Florida: Standard Data Reports, <u>https://www.myflfamilies.com/services/public-assistance/</u> additional-resources-and-services/ess-standard, accessed on October 7, 2024.

I. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. The Lifeline program would later be codified with the passage of the Telecommunications Act of 1996. Initially, the program goal was to ensure that all Americans had the opportunity and security that basic phone service provides. In 2016, that goal was expanded by the Federal Communications Commission (FCC) to include broadband service.

One of the principles of the universal service program as described in the Telecommunications Act of 1996 is that consumers in all regions of the Nation, including low-income consumers and those in rural or high cost areas, should have reasonably comparable access to telecommunications and information services at rates that are reasonably comparable to those charged in urban areas.³ The federal Lifeline program supports the goal of universal service by providing a monthly discount for services to qualifying households, thereby ensuring that low-income households have access to modern communications networks capable of providing voice and broadband service.⁴

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 ETCs. Although some of Florida's wireless ETCs offer a free cell phone along with Lifeline service, the distribution of wireless devices is not funded by the Lifeline program.

Support for the Lifeline program comes from the federal Universal Service Fund (USF), which also provides funding for 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 rules governing the Lifeline program are established by the FCC; however, the FCC has designated the Universal Service Administrative Company (USAC), an independent not-forprofit corporation, as the program's administrator. USAC is responsible for data collection, maintenance, support calculation, and disbursement of support for the Lifeline program along with other federal USF programs. USAC also administers the National Verifier, which determines customer eligibility for the Lifeline discount. The FPSC has oversight over the Lifeline program in Florida pursuant to Section 364.10, F.S.

A. 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

³ 47 U.S.C. § 254(b)(3).

⁴ FCC, Third Report and Order, WC Docket No. 11-42, FCC 11-42, released on April 27, 2016, <u>https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf</u>, accessed on October 7, 2024.

enrollment in specific qualifying programs that were selected by the FCC. 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

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 and can be found in Appendix A. Consumers can enroll in the Lifeline program through income-based eligibility by providing qualifying documentation to the National Verifier.

B. Application Process

Consumers have several methods by which they can apply to receive Lifeline benefits:

- 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

Eligibility is 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 automated sources, customers can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Those that qualify must then contact a participating provider in their area to enroll in the Lifeline program.

In Florida, USAC's National Verifier is connected to the Florida Department of Children and Families (DCF) database to confirm customer eligibility through SNAP and Medicaid. Nationally, the National Verifier is also connected to the U.S. Department of Housing and Urban Development and the U.S. Department of Veterans Affairs.⁵ When both federal and state

⁵ USAC, Eligibility Verification, <u>https://www.usac.org/lifeline/national-verifier/eligibility-verification/</u>, accessed on September 18, 2024.

databases are used to confirm eligibility, USAC estimates that the automated eligibility pass rate is 64 percent nationwide.⁶

C. Minimum Service Standards

To be eligible for USF support, ETC's are required to provide broadband access that meets minimum service standards established by the FCC, unless they are granted forbearance from this obligation. These standards are reviewed annually through an FCC update mechanism to ensure that Lifeline customers continue to receive viable service options as technology improves.⁷ The current minimum service standards include:

- 1,000 minutes per month of mobile voice
- 4.5 gigabytes per month of mobile broadband
- Fixed broadband speed of 25 megabits per second (Mbps) downstream and 3 Mbps upstream, with 1.23 terabytes per month of data usage

D. Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.⁸ 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 income or living expenses (bills, food, etc.) with another resident.⁹

To prevent waste in the program, 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.¹⁰ This 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.

E. Non-Usage Rule

In general, wireless ETCs offer Lifeline service for no additional cost beyond the support provided by the universal service program. While customers can elect to purchase additional minutes or data usage at their discretion, the program pays ETCs to provide a basic level of service.

⁶ USAC, National Verifier Annual Report and Data, released on January 31, 2024, <u>https://www.usac.org/wp-content/uploads/lifeline/documents/nv/reports/2024-national-verifier-annual-report-and-data.pdf</u>, accessed on September 18, 2024, p. 7.

⁷ FCC, Public Notice, WC Docket No. 11-42, DA 23-621, released on July 30, 2024, <u>https://docs.fcc.gov/public/</u> <u>attachments/DA-24-740A1.pdf</u>, accessed on September 18, 2024.

⁸ 47 C.F.R. § 54.409(c).

⁹ USAC Household eligibility pre-screening tool, <u>www.lifelinesupport.org</u>, accessed on September 18, 2024.

¹⁰ FCC, Report and Order, WC Docket No. 11-42, FCC 12-11, released on February 6, 2012, <u>https://docs.fcc.gov/</u> <u>public/attachments/FCC-12-11A1.pdf</u>, accessed on September 18, 2024.

To address potential waste that could occur if support is received for cell phones that are no longer functional or that may have been owned by a customer who is now deceased, the FCC has established rules regarding support for Lifeline connections with no usage. Specifically, if an ETC does not assess or collect a monthly fee from the customer over and above the support received from USF, the Lifeline customer must use the Lifeline-supported service at least once every 30 days. Usage is defined by the FCC as the customer completing one of the following:

- Completing an outgoing call or using data
- Sending a text message
- Buying minutes or data to add to the subscriber's service plan
- Answering an incoming call (calls from the customer's Lifeline service provider, Lifeline service customer's agent, or representative do not apply)
- Responding to direct contact from the customer's Lifeline service provider to confirm the subscriber wants to continue receiving Lifeline service

If the Lifeline customer does not use their service for 30 consecutive days (non-usage), the ETC must give the customer a 15-day notice that if they do not use the service in a further 15 days, their service will be terminated. ETCs must de-enroll those Lifeline customers who do not meet the usage requirement within the final 15-day grace period. Consumers de-enrolled from the Lifeline program for non-usage may reapply at any time by submitting an application to USAC.

II. Federal Communications Commission Activities

A. Affordable Connectivity Program

On December 31, 2021, the FCC launched the Affordable Connectivity Program (ACP) which offered discounts of up to \$30 per month toward Internet service for eligible households.¹¹ Participants could also receive a one-time credit of up to \$100 to purchase a connected device. Because no additional funding was provided by Congress, the ACP ended on June 1, 2024.¹² ACP providers were encouraged to raise awareness about the Lifeline program among its customers.

B. Phase Out of Voice-Only Support

On April 27, 2016, the FCC released its Lifeline Modernization Order.¹³ This Order was primarily established to modernize the Lifeline program by including broadband as a supported service and establishing the National Verifier. In the Order, the FCC also established a timeline to gradually phase out support for voice-only services to make the program broadband-focused. Support for voice-only Lifeline service was scheduled to be completely phased out on December 1, 2021. However, the FCC has delayed the complete phase out of voice-only Lifeline support several times. In its most recent Order, the FCC stated that support for voice-only Lifeline services will continue to be available through November 30, 2025.¹⁴ The FCC noted that this extension is partly due to the ongoing reliance of Lifeline subscribers on voice services. Currently, there are 275,000 Lifeline households that continue to subscribe to a voice-only qualifying plan. Standalone broadband plans or bundled broadband and voice plans will continue to be eligible for Lifeline support after the new phase-out date. Table 1 outlines the FCC's revised phase down schedule.

Effective Dates	Voice	Broadband & Broadband / Voice
From 12/1/19 to 11/30/20	\$7.25	\$9.25
From 12/1/20 to 11/30/25	\$5.25	\$9.25
After 11/30/25	\$0	\$9.25

Table 1Lifeline Support Transition Schedule

Source: FCC, Order (DA 23-589)

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,

¹¹ FCC, News Release, released on January 4, 2022, <u>https://docs.fcc.gov/public/attachments/DOC-378908A1.pdf</u>, accessed on October 7, 2024.

¹² FCC, Public Notice, released on March 4, 2024, <u>https://docs.fcc.gov/public/attachments/da-24-195A1.pdf</u>, accessed on September 17, 2024.

¹³ FCC, Third Report and Order, WC Docket No. 11-42, FCC 16-38, released on April 27, 2016, <u>https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf</u>, accessed on October 7, 2024.

¹⁴ FCC, Order, WC Docket No. 11-42, DA 24-642, released on July 3, 2024, <u>https://docs.fcc.gov/</u> <u>public/attachments/da-24-642A1.pdf</u>, accessed on September 17, 2024.

the FCC released a public notice identifying the census blocks eligible to continue receiving the \$5.25 support amount for voice-only Lifeline service.¹⁵ The list of eligible census blocks will be evaluated annually by the FCC, and if a census block is determined to be served by more than one Lifeline provider, the discount will be discontinued on December 1st of that year.

In Florida, 4,389 census blocks qualify for the continued voice-only support. The FCC has not updated the census block data since the complete phase-down of voice-only support was postponed. Figure 1 highlights the areas eligible to continue receiving voice-only support at this time.

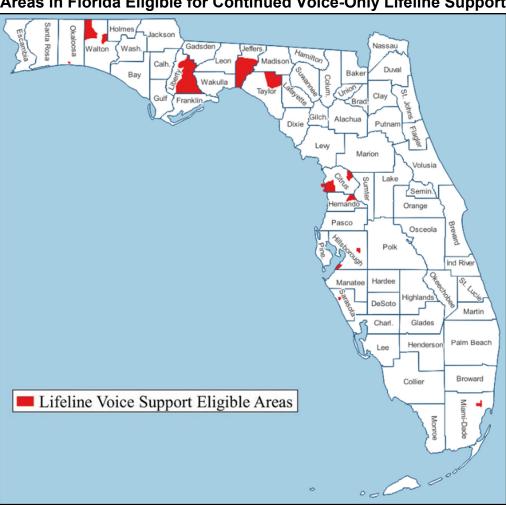


Figure 1 Areas in Florida Eligible for Continued Voice-Only Lifeline Support

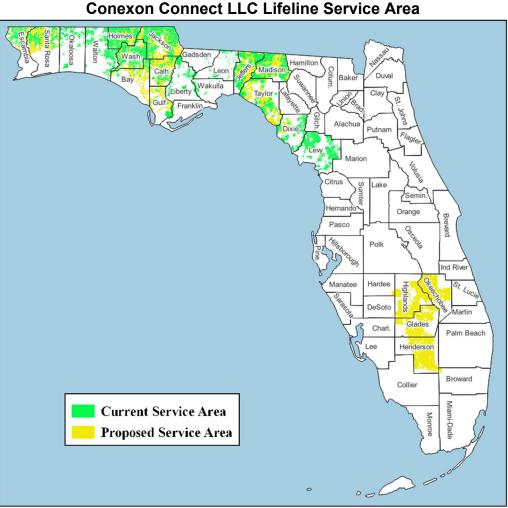
Source: FCC, Shape file by Census Tracts

¹⁵ FCC, Public Notice, DA 21-640, <u>https://docs.fcc.gov/public/attachments/DA-21-640A1.pdf</u>, accessed on September 20, 2024.

C. Conexon Amended ETC Petition

On May 10, 2024, Conexon Connect LLC filed a petition with the FCC to amend its ETC designation for Florida.¹⁶ The amended petition seeks to provide Lifeline-only service in additional areas. Previously, the FCC granted Conexon ETC designation in Florida in the areas for which it was authorized to receive high-cost support. Since then, Conexon has expanded its fiber network throughout the State of Florida. As a result, it is now requesting Lifeline-only ETC designation in its newly expanded areas. This petition is pending with the FCC. Figure 2 below shows Conexon's current Lifeline service area and the area for which it is seeking to expand its ETC designation.

Figure 2



Source: FCC, US Census Bureau Shapefile

¹⁶ Conexon Connect LLC, Amended ETC Petition to FCC, WC Docket No. 09-197, filed on May 10, 2024, <u>https://www.fcc.gov/ecfs/document/1051023581374/1</u>, accessed on September 20, 2024.

D. Lifeline Rule Waivers

In 2024, Florida was struck by Hurricanes Helene and Milton, causing significant power outages, communication network failures and damage to homes. In response, the FCC temporarily waived Lifeline program non-usage, recertification, and reverification requirements for subscribers residing in the affected disaster areas.¹⁷ These waivers will continue through November 30, 2024 for areas affected by Hurricane Helene and December 15, 2024 for areas affected by Hurricane Milton. Additionally, the FCC waived the Lifeline eligibility requirements for those participating in Federal Emergency Management Agency's Individuals and Households Program (IHP) due to Hurricane Helene through April 2, 2025 and Hurricane Milton through April 10, 2025.¹⁸ New Lifeline Subscribers through IHP will be permitted to continue in the Lifeline program for up to twelve months from the date of their enrollment.¹⁹ These waivers aim to ensure that Lifeline customers maintain access to emergency communications services, while also enabling ETCs to provide Lifeline service to otherwise non-eligible disaster victims as recovery efforts continue.

E. Lifeline Support for Domestic Abuse Victims

In November 2023, the FCC released an Order adopting rules implementing the Safe Connections Act of 2022.²⁰ The Order was established to protect survivors of domestic violence by ensuring they have access to reliable, safe and affordable connectivity. Under these rules domestic violence survivors can participate in the Lifeline program if they provide proof of a line separation request and demonstrate financial hardship. Survivors can confirm their financial hardship either by submitting documentation showing participation in a qualifying program or by self-certifying to their participation. Qualifying programs include the existing Lifeline eligibility programs or the Safe Connections Act specific categories outlined below:

- Household income at or below 200% of the Federal Poverty Guidelines;
- Enrollment in the Special Supplemental Nutrition Program for Women, Infants, and Children;
- Enrollment in the Free and Reduced-Price School Lunch or Breakfast program; or
- Receipt of a Federal Pell Grant in the current award year.

The FCC's rules implementing these changes were delayed until August 29, 2024, pending final approval from the Office of Management and Budget.²¹

¹⁷ FCC, Orders, WC Docket No. 11-42, DA 24-1025, released on October 1, 2024, <u>https://docs.fcc.gov/public/</u> <u>attachments/DA-24-1025A1.pdf</u>, accessed on October 2, 2024; and DA 24-1059, released on October 9, 2024, <u>https://docs.fcc.gov/public/attachments/DA-24-1059A1.pdf</u>, accessed on October 11, 2024.

¹⁸ FCC, Orders, WC Docket No. 11-42, FCC 24-107, released October 2, 2024, <u>https://docs.fcc.gov/public/</u> attachments/FCC-24-107A1.pdf, accessed on October 15, 2024; and FCC 24-108, <u>https://docs.fcc.gov/public/</u> attachments/FCC-24-108A1.pdf, accessed on October 15, 2024.

¹⁹ Ibid, par. 9.

²⁰ FCC, Report and Order, WC Docket No. 22-238, FCC 23-9, released on November 16, 2023, <u>https://docs.fcc.gov/</u><u>public/attachments/FCC-23-96A1.pdf</u>, accessed on September 17, 2024.

²¹ FCC, Public Notice, released on August 29, 2024, <u>https://docs.fcc.gov/public/attachments/DA-24-881A1.pdf</u>, accessed on September 17, 2024.

III. Florida Public Service Commission Activities

A. Recent ETC Designations

Following statutory revisions in 2011, the FPSC lacked authority to address applications for ETC designation from non-wireline carriers. However, in 2024 the Florida Legislature amended Section 364.10, F.S., expanding the FPSC's jurisdiction specifically to grant ETC designation to wireless carriers for Lifeline purposes only. As a result, the FPSC approved twelve wireless company applications for Lifeline-only ETC designation in 2024. These recent Lifeline ETC designations, listed below, can offer Lifeline service throughout Florida. The FPSC anticipates that the additional competition will provide eligible consumers more choice in carriers, increase promotional activity, and improve Lifeline subscribership.

- Air Voice Wireless, LLC d/b/a AirTalk Wireless
- American Broadband and Telecommunications Company LLC
- Amerimex Communications Corp d/b/a SaftyNet Wireless
- Boomerang Wireless, LLC d/b/a enTouch Wireless
- DISH Wireless L.L.C. d/b/a Gen Mobile
- FLORIDA TERRACOM INC. d/b/a MAXSIP TEL
- Global Connection Inc. d/b/a STAND UP WIRELESS
- IM Telecom, LLC d/b/a Infiniti Mobile
- Q LINK WIRELESS LLC
- Telrite Corporation d/b/a Life Wireless
- TEMPO TELECOM, LLC
- TruConnect Communications, Inc.

B. Prevention of Waste, Fraud, & Abuse of the Universal Service Fund

The FPSC remains committed to enforcing safeguards to prevent waste, fraud, and abuse of the USF. Protecting the integrity of the Lifeline program in Florida is a priority, and the FPSC takes appropriate enforcement action when necessary. With statutory authority to grant and revoke wireline and wireless ETC designations, the FPSC actively monitors federal USF disbursements to Florida's ETC's, ensuring funds are used in compliance with state and federal regulations.

Shortly after receiving its ETC designation, Q LINK and its CEO, Issa Asad, pled guilty in federal court to defrauding the Lifeline program by submitting repeated false claims for reimbursement and retaining funds that it was not entitled to receive.²² Q LINK also provided false information about its customers and deceived the FCC about its compliance with program

²² United States Attorney's Office, Southern District of Florida, Press Release, "Nationwide Telecommunications Provider and its CEO Plead Guilty to Massively Defrauding Federal Government Programs Meant o Aid the Needy," released October 15, 2024, <u>https://www.justice.gov/usao-sdfl/pr/nationwide-telecommunications-provider-and-its-ceo-plead-guilty-massively-defrauding</u>, accessed on October 21, 2024.

rules. As a result, the FPSC initiated a show cause proceeding against Q Link for apparent violation of its ETC designation Order on November 5, 2024.²³ On December 13, 2024, the FPSC issued an order revoking Q Link's ETC designation effective January 12, 2025.²⁴ Q Link was required to notify its Lifeline customers that they would have to seek an alternative Lifeline provider.

C. Lifeline Promotion Process

The Lifeline Promotion Process is a computer interface connecting the FPSC, DCF and Florida ETC's to provide information to Medicaid and SNAP participants interested in the Lifeline discount. This process requires the DCF applicant to first express an interest in receiving the Lifeline discount and select an ETC. The selected ETC then contacts the customer to determine if they have already been approved for the Lifeline program through the National Verifier. If the customer has been approved, the ETC provides the Lifeline discount. For those customers who have not yet applied for Lifeline, the ETC or the FPSC sends instructions on how to apply using the National Verifier. Between January and November 2024, the FPSC sent 53,807 such letters to eligible households. The FPSC mailed 23,187 total letters in 2023.

D. Lifeline Promotion Activities

Promotional activities in 2024 featured National Lifeline Awareness Week and National Consumer Protection Week, along with 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 (NARUC), and the FCC to promote National Lifeline Awareness Week and educate consumers on the nationwide application process through the National Verifier. The national effort also ensures that low-income families and individuals are aware of the Lifeline program and understand the eligibility requirements. The shared goal is for all eligible households to be enrolled and receive Lifeline program benefits. The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with consumers.

1. National Lifeline Awareness Week

NARUC and the FCC have designated the first full week in September after Labor Day each year as National Lifeline Awareness Week. "*Stay Connected Florida!*" was the slogan for Florida's 2024 Lifeline Awareness Week, September 8-14. In addition to increasing awareness among eligible citizens, the FPSC continued educating residents about the Lifeline discount on voice and broadband services, as well as the program's household and recertification requirements. This year, Florida's outreach focused on senior and community centers in Northeast Florida. Lifeline information is also available on the FPSC's website.²⁵

²³ FPSC, Docket No. 20240146-TP, Order No. PSC-2024-0479-PAA-TP, issued November 21, 2024.

²⁴ FPSC, Docket No. 20240146-TP, Order No. PSC-2024-0495-FOF-TP, issued December 13, 2024.

²⁵ FPSC, Lifeline Assistance Webpage, <u>https://www.psc.state.fl.us/lifeline-assistance-program</u>, accessed on October 7, 2024.

2. National Consumer Protection Week

National Consumer Protection Week (NCPW), March 3-9, 2024, provided a good opportunity for Lifeline outreach activities. An annual Federal Trade Commission consumer education campaign, NCPW encourages consumers to take advantage of their consumer rights. For more than a decade, the FPSC has joined government agencies, advocacy organizations, and private sector groups nationwide to highlight NCPW.

Chairman Mike La Rosa recognized the 26th Annual NCPW by raising awareness of the FPSC's free energy efficiency and water conservation resources to help protect consumers when making choices that affect their bottom line. During NCPW, the FPSC met with consumers in Orange, Leon, and Broward Counties to share information on Lifeline and other Commission materials for consumers. A virtual meeting was also held with a senior organization in Orange County.

3. Older Americans Month

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. *"Powered by Connection"* was this year's theme. The FPSC partnered with centers in Holmes, Washington, Hillsborough, Orange, Brevard, and Duval Counties to meet with seniors in-person and distribute information on Lifeline and utility bill reduction strategies. A virtual meeting was also held with a senior organization in Lee County.

4. 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 548 state public libraries and branches via e-mail in 2024. Following the Campaign, many libraries request additional hard copies of FPSC publications throughout the year.

5. 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. The FPSC continues to conduct in-person and virtual monthly meetings or train-the-trainer events to promote Lifeline.

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 2024 include: L. Claudia Allen Senior Center and Marion Senior Services.

6. Lifeline Partners

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

IV. Lifeline Providers

Congress has granted state commissions the authority to designate carriers as ETCs if they meet certain requirements.²⁶ 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, the FCC may make the designation.²⁷ To qualify as an ETC, a telecommunications carrier must offer services supported by federal USF program.²⁸ The services can be provided either using its own facilities or a combination of its own facilities and another carrier's resold service, and they must advertise the availability of such services and charges. A company applying for designation as an ETC must demonstrate good management and legitimate business practices to successfully provide Lifeline service.²⁹

When the Telecommunications Act of 1996 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. Table 2 identifies the seventeen ETCs that offer Lifeline service in Florida as of June 30, 2024. We note that Tracfone also offers Lifeline through several brands in Florida (SafeLink, Straight Talk, Total Wireless, and Walmart Family Mobile). Additional details can be found in Appendix C which provides Lifeline enrollment figures for each ETC between 2021 and 2024.

Table 2
ETCs Offering Lifeline in Florida
(As of June 30, 2024)

Access Wireless (i-wireless)	Frontier Communications of the South	TDS (Quincy Telephone Co.)
Assurance Wireless (T-Mobile)	Frontier Florida, LLC	TracFone (Verizon)
Blue Stream Fiber (ITS)	NEFCOM (Northeast Florida Telephone Co.)	Windstream / Kinetic
CenturyLink	Phone Club Corporation	WOW! (Knology of Florida, Inc.)
Consolidated Communications (GTC)	Smart City Telecom	Viasat
Conexon Connect	Spectrum (Bright House)	

Source: Industry Responses to 2024 FPSC Data Requests

While Mediacom received ETC designation in Florida from the FCC in 2021, it has not begun offering Lifeline service in Florida. Mediacom's ETC designation authorizes the company to participate in a federal high-cost program. This designation requires expanding its network into

²⁶ 47 U.S.C. § 214(e)(2).

²⁷ 47 U.S.C. § 214(e)(6).

²⁸ 47 C.F.R. § 54.101.

^{29 47} C.F.R. § 54.201(h).

specific rural areas and providing Lifeline assistance.³⁰ Per the requirements of this program, Mediacom has begun building out in Bay, Gulf, Okaloosa, and Santa Rosa counties, and plans to offer Lifeline service to no less than 40 percent of these areas by the end of December 2024.³¹

A. Funding Distributions

Only carriers that have been designated as an ETC can be reimbursed for the Lifeline discount from the USF. Figure 3 reflects the monthly USAC Lifeline disbursements to ETCs in Florida during the reporting period. The total amount disbursed during these 12 months was \$27.67 million, with an average of \$2.3 million per month. This is a decrease from the average of \$2.85 million per month last year. These amounts include prior period support corrections. The monthly disbursements to Florida ETCs peaked at \$2.68 million in July 2023 as Lifeline subscribership gradually decreased throughout the reporting period.

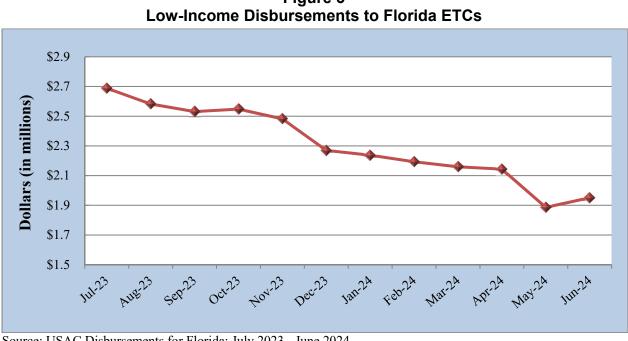


Figure 3

Source: USAC Disbursements for Florida: July 2023 - June 2024

B. Lifeline Service Obligations by Technology

ETCs can meet their Lifeline service obligations either through offering voice, broadband, or a combination of both services. Table 3 shows the percent of Lifeline subscription by service type and by type of underlying carrier. Currently, wireline providers meet their Lifeline obligation predominantly through the provision of voice services. Wireless ETCs primarily offer bundled

³⁰ FCC, High-Cost ETC Designation Order, DA-663, https://docs.fcc.gov/public/attachments/DA-21-663A1.pdf, released on June 8, 2021, accessed on August 26, 2024.

³¹ Mediacom Petition, WC Docket No. 09-197 https://www.fcc.gov/ ecfs/document/10106152312768/1, accessed on August 28, 2024. See also, FCC, Public Notice – Milestone Deadlines, DA 21-1287, released on October 14, 2021, https://docs.fcc.gov/public/attachments/DA-21-1287A1.pdf, accessed on August 28, 2024.

services that meet the federal standards for both voice and broadband. Florida's sole satellite ETC, Viasat, had no Lifeline customers as of June 2024.

(As of June 2024)						
Carrier Type Voice Broadband Bundled						
Wireless	0.6%	29.8%	69.6%			
Wireline	61.4%	11.4%	27.2%			
Satellite	0.0%	0.0%	0.0%			

Table 3Lifeline Subscription by Service Type(As of June 2024)

Source: Industry Responses to 2024 FPSC Data Requests

During the reporting period, no wireless providers offered voice-only service to new customers. As noted in Table 3, however, 0.6 percent of wireless customers received voice-only services through grandfathered plans that are no longer available to new customers. These grandfathered voice-only plans are provided by Assurance and TracFone's SafeLink brand, and represent 0.02 and 1.42 percent of their respective Lifeline customers. Appendix D provides percentage of Lifeline subscriptions by service type for each carrier.

C. Wireless Service Standards

All wireless ETCs in Florida meet the minimum FCC standards by offering either a minimum of 1,000 voice minutes or 4.5 gigabytes (GB) of data to Lifeline subscribers.³² Table 4 outlines different Lifeline services currently offered by wireless ETCs in Florida and their compliance with the federal standards. These providers offer plans at no cost to the Lifeline consumer. However, customers can elect to purchase additional voice minutes, data or upgrade their services by selecting alternate plans. By comparison, TracFone and three of its other Lifeline brands offer customers a monthly \$10.00 discount on any of its plans that offer more than 6GB of data.³³

Table 4
Lifeline Wireless Qualification Standard by Carrier
(As of September 2024)

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
TracFone's SafeLink Brand	Voice/Data	Unlimited	10 GB

Source: Industry Responses to 2024 FPSC Data Requests

³² This includes recently designated wireless ETCs identified in section A of this chapter.

³³ Specifically, TracFone, Straight Talk, Total Wireless, and Walmart Family Mobile.

V. Lifeline Participation

A. Participation

As of June 30, 2024, there were 212,243 subscribers enrolled in Lifeline in Florida. During the 2023-2024 reporting period, Lifeline subscribership decreased by 87,984, which represents a 29 percent decrease from the previous year. Florida experienced similar declines in Lifeline participation in 2020 and 2021 of 37 percent and 25 percent, respectively.

For this reporting period, 99 percent of this decline was concentrated among two wireless providers, Assurance Wireless and TracFone. These wireless providers attribute this decline to the winding down of the ACP, which led some customers who were receiving benefits for both ACP and Lifeline to switch to non-Lifeline providers once the ACP support ended.

Recent USAC data shows that after the reporting period, the 12 new wireless ETC's now serve around 71 thousand Lifeline subscribers. These wireless carriers participated in ACP, which used almost identical eligibility criteria as the Lifeline program. This suggests that some of the decline during the reporting period may have been attributed to consumers migrating from Lifeline carriers to providers offering only ACP support while the program was still funded. Figure 4 shows annual Lifeline subscribership for June 2019 through June 2024.

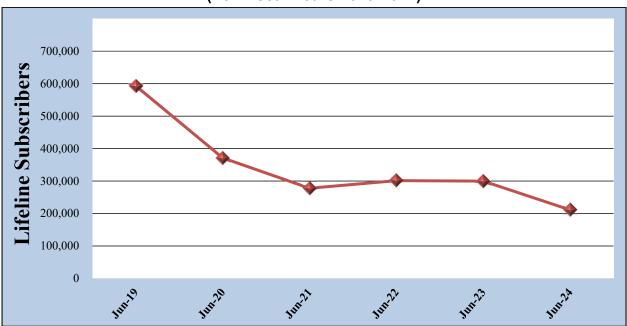


Figure 4 Florida Lifeline Subscribership (For Fiscal Years 2019-2024)

Source: USAC (Lifeline subscribers adjusted for carrier true-ups)

The three ETCs with the most Lifeline subscribers in Florida for June 2023 and 2024 are identified in Figure 5. For the last twenty years, Assurance Wireless and TracFone have been the dominate providers of Lifeline service in Florida. For this fiscal year, they represented more than

97 percent of the Florida Lifeline market. Yet both carriers have experienced significate declines in subscribership since last year. Assurance Wireless lost 31 percent of its Lifeline customers, leaving it with 116,807 customers in Florida. By comparison, TracFone lost 28 percent of its Lifeline customers, leaving it with 89,548 customers in Florida. Of the three largest Lifeline ETCs in Florida, only Access Wireless experienced subscribership growth in 2024.

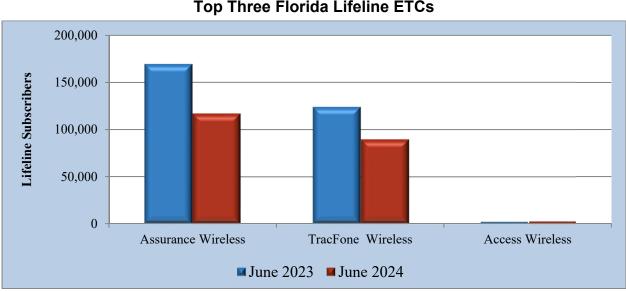


Figure 5 Top Three Florida Lifeline ETCs

Source: Industry Responses to 2024 FPSC Data Requests

Table 5 compares the number of households enrolled in Lifeline with the estimated number of Lifeline eligible households based upon SNAP participation. 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 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.

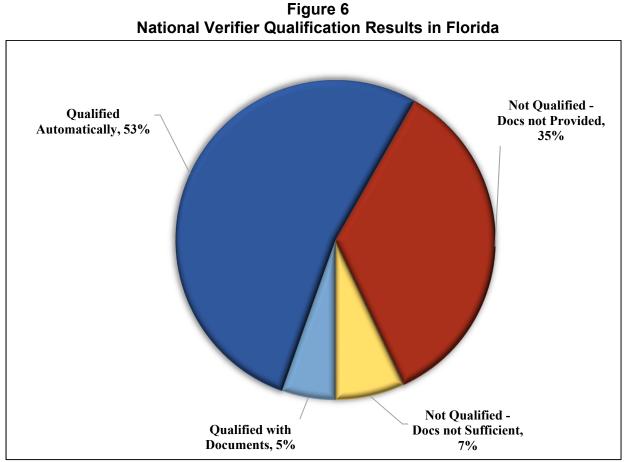
Lifeline Participation Rate in Eligible Florida Households					
Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate		
June 2020	371,180	2,151,503	17.25%		
June 2021	273,641	1,882,842	14.53%		
June 2022	300,285	1,590,216	18.88%		
June 2023	300,229	1,658,694	18.10%		
June 2024	212,244	1,661,381	12.78%		

Table 5 Lifeline Participation Rate in Eligible Florida Households

Source: Florida DCF, Access Florida: Standard Data Tables

While there was a decrease in subscribership during fiscal year 2023-2024, the number of Lifeline eligible households increased by 2,687.³⁴ As a result, the participation rate as of June 2024 declined to 12.78 percent. 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.

For fiscal year 2023-2024, the National Verifier received 1,059,341 applications from Florida.³⁵ Figure 6 illustrates that 58 percent of all applications qualified for Lifeline. Most of these applications, 53 percent, were approved by USAC automatically by verifying consumers eligibility through databases of qualifying programs. In Florida, these databases include those managed by DCF and other federal agencies. Among the 42 percent of applications that were not approved, 35 percent did not provide any documents to support their applications within 45 days.



Source: USAC Lifeline Program Data (FY 2023-2024)

³⁴ Florida DCF, Access Florida: Standard Data Reports by Caseload, <u>https://www.myflfamilies.com/services/public-assistance/additional-resources-and-services/ess-standard</u>, accessed on September 16, 2024.

³⁵ USAC Program Data, <u>https://www.usac.org/lifeline/resources/program-data/</u>, accessed on September 23, 2024.

B. 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 7 represents the average monthly number of Transitional Lifeline customers of Florida ETCs. During the 2023-2024 fiscal year, the average number of monthly customers receiving the Transitional Lifeline benefit was 74,847, which represents a slight increase over the previous year.

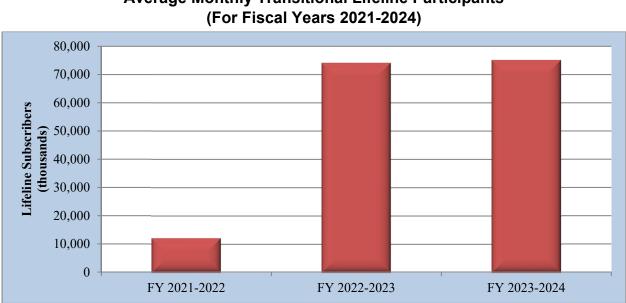


Figure 7 Average Monthly Transitional Lifeline Participants (For Fiscal Years 2021-2024)

Rather than offer a transitional discount, to comply with Section 364.105, F.S., TracFone offers its former Lifeline customers a 30 percent discount on the customer's chosen prepaid wireless service rates for at least one-year after termination of their Lifeline benefits. TracFone does not track Transitional Lifeline customers participating in this manner and, therefore, is not included in Figure 7.

Source: Industry Responses to FPSC Data Requests (2021-2024)

Persons in Family/Household	2024 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly Income at 135% of Federal Poverty Guidelines
1	15,060.00	20,331.00	1,694.25
2	20,440.00	27,594.00	2,299.50
3	25,820.00	34,857.00	2,904.75
4	31,200.00	42,120.00	3,510.00
5	36,580.00	49,383.00	4,115.25
6	41,960.00	56,646.00	4,720.50
7	47,340.00	63,909.00	5,325.75
8	52,720.00	71,172.00	5,931.00

Appendix A 2024 U.S. Poverty Guidelines

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, released on January 17, 2024, <u>https://www.federalregister.gov/</u> documents/2024/01/17/2024-00796/annual-update-of-the-hhs-poverty-guidelines, accessed on October 14, 2024.

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

Appendix B Agency, Organization, and Business Lifeline Partners

Florida Lifeline Partners (continued)					
Florida Department of Veterans' Affairs	Monroe County Community Support Services				
Florida Elder Care Services	Monroe County Social Services				
Florida Highway Safety and Motor Vehicles	NAACP (Florida Associations)				
Florida Hospital Association	National Church Residences				
Florida Housing Authorities	North Miami Foundation for Senior Citizens' Ser., Inc.				
Florida Housing Coalition	Nursing Homes Administrators				
Florida Housing Finance Corporation	Nu-Hope of Highlands County				
Florida League of Cities, Inc.	One-Stop Career Centers				
Florida Low Income Housing Associates	Osceola County Corrections Department				
Florida Nurses Association	Palm Beach Community Action Agency				
Florida Office of Public Counsel	Refuge House of the Big Bend				
Florida Ombudsman Program	Second Harvest of the Big Bend				
Florida Public Libraries	Seminole County Community Development				
Florida Public School Districts	Senior Connection Center, Inc.				
Florida Rural Legal Services, Inc.	Senior Friendship Centers				
Florida Schools for the Deaf and Blind	Senior Medicare Patrol				
Florida Senior Medicare Patrol	Senior Resource Alliance				
Florida Senior Program	Senior Solutions				
Florida Telecommunications Relay, Inc.	Seniors First				
Florida Voters League	SHINE Program				
Gateway Community Outreach	South East American Council, Inc.				
Good News Outreach	Suwannee River Economic Council				
Goodwill Industries of Central Florida	Tallahassee Memorial Hospital				
Habitat for Humanity – Florida	Tallahassee Urban League				
HANDS of Central Florida	Tampa Vet Center				
Hemophilia Foundation of Greater Florida	The Shepherd's Center of Orange Park				
Hillsborough County Community Action Program	Three Rivers Legal Services, Inc.				
Hispanic Office for Local Assistance	U.S. Department of Housing and Urban Development				
HOPE Community Center	United Home Care Services				
HOPE Connection	United Way of Florida				
HOPE Partnership	Urban Jacksonville				
League for the Hard of Hearing	Urban Leagues of Florida				
Leon County School Board	Volusia County Community Services				
Little Havana Activities and Nutrition Centers	Wakulla County Senior Citizens Council				
Living Stones Native Circle	Walton County Council on Aging				
Marion Senior Services	Washington County Council on Aging				
Miccosukee Tribe of Indians of Florida	We Care-Jacksonville				
Mid-Florida Housing Partnership, Inc.					

	ETCs	Jun-21	Jun-22	Net Growth Rate	Jun-23	Net Growth Rate	Jun-24	Net Growth Rate
Wireless	Assurance Wireless	155,848	177,982	14%	169,309	-5%	116,807	-31%
	TracFone*	100,463	109,128	9%	123,926	14%	89,548	-28%
	Access Wireless	7,566	4,136	-45%	2,271	-45%	2,705	19%
	T-Mobile	3,523	3,608	2%	0**	-100%	0**	0%
	CenturyLink	2,652	2,153	-19%	1,844	-14%	1,259	-32%
	Windstream / Kinetic	1,289	1,361	6%	1,142	-16%	810	-29%
	Frontier Florida	1,478	1,249	-15%	1,102	-12%	592	-46%
	Consolidated Communications	255	189	-26%	163	-14%	121	-26%
	NEFCOM	169	138	-18%	131	-5%	109	-17%
	Phone Club	138	138	0%	138	0%	95	-31%
line	WOW!	55	73	33%	43	-41%	71	65%
Wireline	TDS Telecom	88	77	-13%	68	-18%	51	-25%
,	Blue Stream Fiber (ITS)	37	30	-19%	54	80%	37	-31%
	Frontier of the South	19	17	-11%	32	88%	18	-44%
	Conexon	0**	0**	0%	0	0%	18	100%
	Smart City	3	6	100%	6	0%	2	-67%
	Spectrum (Bright House)	0**	0	0%	0	0%	0	0%
	AT&T	58	0**	-100%	0**	0%	0**	0%
Satellite	Viasat	0**	0**	0%	0	0%	0	0%
	Total	273,641	300,285	10%	300,229	0%	212,243	-29%

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

Source: FPSC Data Requests 2021-2024; * TracFone includes SafeLink, Simple Mobile, Straight Talk, Total Wireless, and Walmart Family Mobile brands. ** Not offering Lifeline.

	(as of June 2024)						
	ETCs	Voice	Broadband	Bundled			
Wireless	Assurance Wireless	0.02%	53.27%	46.71%			
	TracFone*	1.42%	0.02%	60.93%			
М	Access Wireless	0.00%	0.00%	100.00%			
	CenturyLink	92.37%	1.75%	5.88%			
	Windstream / Kinetic	16.17%	14.57%	69.26%			
	Frontier Florida	70.10%	14.36%	15.54%			
	Consolidated Communications	69.42%	4.13%	26.45%			
	NEFCOM	23.85%	2.75%	73.39%			
le	Phone Club	100%	0%	0%			
Wireline	WOW!	2.82%	80.28%	16.90%			
Δ	TDS Telecom	25.49%	74.51%	0.00%			
	Blue Stream Fiber (ITS)	5.41%	72.97%	21.62%			
	Frontier of the South	72.22%	22.22%	5.56%			
	Conexon	0.00%	83.33%	16.67%			
	Smart City	0.00%	50.00%	50.00%			
	Spectrum (Bright House)	0.00%	0.00%	0.00%			
Satellite	Viasat	0.00%	0.00%	0.00%			
	Total	1.50%	29.50%	69.00%			

Appendix D Lifeline Subscription by Service Type

Source: FPSC Data Request 2024; *TracFone includes SafeLink, Simple Mobile, Straight Talk, Total Wireless, and Walmart Family Mobile brands.