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February 27, 2015

Mr. Bob Casey
Florida Public Service Commission
Division of Regulatory Analysis
Public Utility Systems Supervisor
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Dear Mr. Casey:

AT&T Florida appreciates the opportunity to submit the following comments subsequent to the Florida Public Service Commission (Commission) staff's Lifeline working group meeting held on January 21, 2015. AT&T Florida's responses are directed to the following questions that appeared in the working group notice and were discussed at the January 21st meeting.

1. The Florida Department of Children and Families Web Services Interface which verifies participation in the Medicaid, Temporary Assistance for Needy Families, and Supplemental Nutrition Assistance Programs. 47 C.F.R. §54.410(c)(1)(i)(A) states:

If the eligible telecommunications carrier can determine a prospective subscriber's program-based eligibility for Lifeline by accessing one or more databases containing information regarding enrollment in qualifying assistance programs ("eligibility databases"), the eligible telecommunications carrier must access such eligibility databases to Determine whether the prospective subscriber qualifies for Lifeline based on participation in a qualifying assistance program;

Has each ETC obtained access to the DCF portal? If not, why?

AT&T does not currently utilize the DCF portal. As noted in a prior workshop, it does not appear that AT&T is required by the 47 CFR 54.410(c) to use the portal. The portal requirement appears in 54.410(c)(1)(i)(A). However, the beginning of 54.410(c)(1) states:

Except in states where a state Lifeline administrator or other state agency is responsible for the initial determination of a subscriber's program-based eligibility, when a prospective subscriber seeks to qualify for Lifeline service



using the program based criteria set forth in 54.409(a)(2), (a)93), or (b), an eligible telecommunications carrier: . . (emphasis added)

The Commission and the Department of Children and Families are “state agencies” that make the initial determination of program-based eligibility. Thus, it does not appear that use of the portal is required by 54.410(c)(1)(i)(A).

AT&T has contacted DCF and is in the process of reviewing the requirements and specifications of DCFs portal. AT&T will determine if it will utilize the DCF portal subsequent to its analysis. However, it should be noted that the DCF portal is not a web based access portal, it is a machine-to-machine application programming interface (API), which requires state specific modifications to AT&T’s internal systems and on-going maintenance and programming changes.

2. The National Lifeline Accountability Database (NLAD) – How is it working? What are the problems? Are you receiving complaints from consumers that NLAD is providing incorrect information?

AT&T has received various customer complaints from consumers regarding NLAD. Some of the NLAD errors that generate customer complaints include the following:

- Duplicate subscriber -Subscriber in this transaction is a duplicate of another subscriber;
- Duplicate address - The primary address in this transaction matches the primary address of another subscriber;
- Validation Error
 - Subscriber failed third-party identity verification
 - Subscriber name or SSN4 could not be validated.

AT&T is not the appropriate entity to respond to the customer inquiries, the complaints should be addressed by NLAD. AT&T believes it would be beneficial to the end user if NLAD had the ability to handle customer service related calls.

3. TDM to IP transition – What will happen to Lifeline? When?

FCC Commissioner Mignon Clyburn recently gave a speech entitled, “Reforming Lifeline for the Broadband Era,” in which she outlined five principles describing her visions for how to reform and modernize the Lifeline program to help put broadband within reach for consumers without broadband at home. See <http://www.fcc.gov/document/commissioner-clyburn-remarks-american-enterprise-institute> (November 12, 2014). Commissioner Clyburn’s reform principles included:



1. Get the most bang for the universal service buck
2. Remove providers from the determination of customer eligibility
3. Encourage broader provider participation
4. Leverage efficiencies from existing programs and institute coordinated enrollment
5. Establish public-private partnerships and coordinated outreach efforts

AT&T believes that Commissioner Clyburn's principles are a good starting point for discussions on how to effectively modernize the Lifeline program for the all-IP world. AT&T urges interested parties to support the need for reform and participate in the dialogue on Commissioner Clyburn's proposals.

4. What is the status of Incumbent Local Exchange Company request to FCC to make provision of Lifeline voluntary?

In this proceeding, AT&T has suggested that the Commission should allow incumbent wireline Lifeline providers to choose whether to participate in the Lifeline program, arguing that wireline telephone companies are no longer the dominant provider of voice services. (FCC 12-11, ¶ 503)

In a December 18, 2014 Report & Order, for price cap ILECs, the FCC has granted forbearance from the current requirement that all ETCs offer voice service throughout their study areas irrespective of whether the ETC receives any federal high-cost support, in low cost areas and in certain other geographic areas where an unsubsidized competitor offers voice and a broadband service that meets the FCC's public interest obligations. However, Lifeline obligations remain throughout the ILEC's study area:

Based on our consideration of the relevant statutory framework and the record before us, we now conclude that it is in the public interest to forbear, pursuant to section 10 of the Communications Act of 1934, as amended (the Act) from enforcing a federal high-cost requirement that price cap carriers offer voice telephony service throughout their service areas pursuant to section 214(e)(1)(A) in three types of geographic areas: (1) census blocks that are determined to be low-cost,¹¹² (2) all census blocks served by an unsubsidized competitor, as defined in our rules, offering voice and broadband at speeds of 10/1 Mbps to all eligible locations,¹¹³ and (3) census blocks where a subsidized



competitor – i.e., another ETC – is receiving federal high-cost support to deploy modern networks capable of providing voice and broadband to fixed locations. They will remain obligated, however, to maintain existing voice service unless and until they receive authority under section 214(a) to discontinue that service. They also will remain subject to the obligation to offer Lifeline service to qualifying low income households throughout their service territory.

5. How will each Florida ETC perform the required 2014 Lifeline customer recertifications? Will the recertifications be accomplished in person, in writing, by phone, by text message, by email, or otherwise through the Internet? Did your ETC elect to have USAC conduct the 2014 annual recertification of your Lifeline customers?

AT&T Florida will perform its own Lifeline recertifications. The recertifications will be accomplished in writing to the end user.

6. Any other ideas to streamline the Lifeline enrollment process for both the applicant and ETC?

FCC Commissioner Mignon Clyburn's recent speech entitled, "Reforming Lifeline for the Broadband Era," outlined five principles describing her vision for how to reform and modernize the Lifeline program. See <http://www.fcc.gov/document/commissioner-clyburn-remarks-american-enterprise-institute> (November 12, 2014).

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AT&T believes that Commissioner Clyburn's principles are a good starting point for discussions on how to effectively modernize the Lifeline program for the all-IP world,



including how to streamline enrollment. AT&T urges interested parties to support the need for reform and participate in the dialogue on Commissioner Clyburn's proposals.

In the near term, the enrollment and eligibility process in FL could be improved if it is unified and streamlined for consumers and providers.

If you have any questions concerning this matter please call me to discuss. I can be reached at 850-577-5553.

Sincerely,

A handwritten signature in blue ink that reads "MaryRose Sirianni".

MaryRose Sirianni
External Affairs Manager
AT&T Florida