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September 24, 2010

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

Dear Mr. Casey,

AT&T Florida welcomes the opportunity to participate in the Commission's Lifeline Working Group established pursuant to Chapter 2010-190, Laws of Florida. At the conclusion of the first working group meeting held August 18, 2010, the Staff invited participants to submit any further comments that the participants may have. Accordingly, AT&T Florida submits the following comments/responses.

AT&T Florida's responses are directed to the following questions that appeared in the working group notice and were discussed at the August 18th meeting.

1. How should an eligible subscriber's personal identifying information be shared?
2. Should an eligible subscriber's personal identifying information be used by an ETC for marketing purposes?
3. What should be the obligations of each party with respect to the use of an eligible subscriber's personal identifying information?

AT&T Florida's response to items 1-3:

The essential question as clarified at the workshop is how agencies can or should share customer information with eligible telecommunications carriers (ETCs). As a result of Chapter 2010-190, Chapter 364.10 (3)(h)1 allows agencies that provide benefits to eligible Lifeline subscribers, the commission, and the Office of Public Counsel (OPC) to exchange sufficient information with the appropriate ETCs that elect to provide Lifeline service. The information may include a person's name, date of birth, service address, and telephone number so that the ETC can identify and enroll an eligible person in the Lifeline and Link-Up programs. AT&T believes that use of the customer information in this manner for purposes of enrolling an eligible person in the Lifeline and Link-Up programs is appropriate. However, AT&T believes that pursuant to Chapter 364.107 Florida Statutes, all customer information remains confidential for purposes of determining eligibility and enrollment in the programs, and therefore can not be used by ETCs for marketing purposes, unless authorized by the customer.

4. What procedures should be implemented to increase enrollment and verify eligibility in these programs?

There was discussion at the working group meeting regarding the implementation of some sort of data base to be put into place to eliminate the occurrence of "double dipping," and fraud. As discussed at the meeting, AT&T filed comments to the FCC on July 15, 2010 (WC Docket No. 03-109) regarding AT&T's Lifeline reform proposal that would accomplish these ends, as well as

assist the FCC in reaching its goal to increase participation by both consumers and providers by greatly simplifying the program. AT&T believes that streamlining the operation of the Lifeline program is especially essential if the FCC intends to modify the program to include a mechanism to support the affordability of broadband services. AT&T's Lifeline reform proposal achieves three major objectives. First, it would place, appropriately, the responsibility for determining and verifying consumer eligibility for this public assistance program on the public-sector (in this case, state agencies). Second, it would simplify and standardize many administrative requirements of the program in a way that may encourage more providers to participate and thus enhancing customer choice. Third, and most importantly, it would establish a national personal identification number (PIN) database, administered by USAC, which would significantly reduce the potential for error, waste, fraud, and abuse. Additionally, rather than assigning to ETCs the primary responsibility to increase enrollment, we should rely on the agencies that have day-to-day contact with consumers with low-incomes to publicize the availability of Lifeline among the target population. AT&T also filed a notice of ex-parte communications regarding its various meetings with members of the FCC Wire line Competition Bureau and various members of the Federal-State Joint Board on Universal Service. The purpose of these meetings was to discuss AT&T's publicly filed proposal mentioned above to create a National Lifeline PIN Database. The attached materials were used during the course of the discussion and provide additional detail regarding AT&T's National Lifeline PIN database proposal.

In addition to responding to the above questions in the original working group notice, AT&T provides the following comments based on the discussion at the workshop. Section 364.10(3)(h)3 states that by December 31, 2010, each state agency that provides benefits to persons eligible for Lifeline service shall undertake, in cooperation with the Department of Children and Family Services, the Department of Education, the Commission, the Office of Public Counsel, and telecommunication companies designated as ETCs providing lifeline services, the development of procedures to promote Lifeline participation. AT&T does not believe that this language precludes non-ETCs from participating in the working group. AT&T would welcome as much input as possible to assist in new and creative ways to implement and increase enrollment in the Lifeline program. AT&T would suggest that quarterly meetings of the working group would be appropriate. Prior to the meetings, it would be helpful if the staff solicited the working group members for any items they may want to place on the upcoming agenda for discussion by the group. Additionally, to assist in Lifeline outreach, it may be useful to invite various organizations or agencies that interact with consumers that are eligible for the Lifeline program as guest speakers to the working group. This may enable the ETCs to understand how to better reach this group of customers for purposes of education and implementation of the Lifeline program.

Sincerely,



Mary Sue Quinn
Area Manager - Regulatory

Attachment



Jamie M. (Mike) Tan
Director
Federal Regulatory

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August 11, 2010

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

*In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45;
In the Matter of Lifeline and Link-Up, WC Docket No. 03-109.*

Dear Ms. Dortch:

On August 5th, Beth Fujimoto, Mary Henze, and I (all of AT&T Inc.), met with Irene Flannery, Elizabeth McCarthy, Cindy Spiers, Rebekah Bina, and Jamie Susskind of the Wireline Competition Bureau regarding the above-referenced dockets. Attending the meeting via telephone were Joint Board Staff members Kay Marinos, Karl Henry, Natelle Deitrich, John Ridgway, Vicki Helfrich, Kerri DeYoung, Christine Aarnes, Brad Ramsay, Joel Shifman, Lori Kenyon, Jing Liu, Kathy Hagans, Denise Parish, and Earl Poucher.

The purpose of the meeting was to discuss AT&T's proposal to create a National Lifeline PIN Database, described generally in AT&T's recent, publicly-filed comments and replies in the above-referenced dockets. In addition, we attempted to address various questions posed by the staff regarding the type and magnitude of costs that might be incurred in the creation of such a database. The attached materials were provided to the Commission for distribution to the Joint Board staff in advance of this discussion.

In accordance with Section 1.1206(b) of the Commission's rules, this letter and the attached materials are being filed in the above-referenced dockets via the Commission's Electronic Comment Filing System. Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Tan".

Attachment

Cc: (via electronic mail)

Irene Flannery, FCC
Elizabeth McCarthy, FCC
Cindy Spiers, FCC
Rebekah Bina, FCC
Jamic Susskind, FCC
Kay Marinos, Public Utility Commission of Oregon
Karl Henry, Indiana Utility Regulatory Commission
Natelle Dietrich, Missouri Public Service Commission
John Ridgway, Iowa Utilities Board
Vicki Helfrich, Mississippi Dep't of Information Technology
Kerri DeYoung, Massachusetts Dep't of Telecommunications & Cable
Christine Aarnes, Kansas Corporation Commission
Brad Ramsay, NARUC
Joel Shifman, Maine Public Utilities Commission
Lori Kenyon, Regulatory Commission of Alaska
Jing Liu, Washington Utilities and Transportation Commission
Kathy Hagans, Office of Ohio Consumers' Counsel
Denise Parrish, Wyoming Office of Consumer Advocate
Earl Poucher, Office of the Public Counsel (Florida)

National Lifeline PIN Database Proposal

FUNDAMENTAL CONCEPTS

Lifeline PIN Database is intended to be used to answer two questions:

- Is the Consumer eligible for Lifeline?
- Is the Consumer already receiving Lifeline discounts?

Lifeline PIN Database is not intended to be integrated or reconciled with state or provider databases

Lifeline PIN Database would contain minimal consumer information

States assume responsibility for determining consumer eligibility/assigning PINs

BASIC OPERATION

Step 1. USAC creates database of PINs with secure web interface

- a) Database designed to accommodate as many as 30 million records with about 5-8 data fields per record
- b) When initiated by USAC, database contains only PINs with empty data fields
- c) Empty data fields will be populated by:
 - States, with minimal identifying consumer info (i.e., name, date of birth)
 - Service providers, with their own SPIN

Step 2. USAC allocates blocks of PINs to states (to state-identified entity)

- a) PIN format could be coded to denote state or other information (e.g., lifeline, tribal)

Step 3. State-identified entity receives PINs

- a) States assign PINs to eligible consumers
- b) When assigning PIN, states populate PIN-record with specified consumer information
 - Minimal identifying information sufficient for distinguishing those with similar names (e.g., DOB, last 4 digits of SSN, etc.)
- c) When PIN is assigned it displays as “activated” in database (i.e., it turns Green)

Step 4. Consumer interested in enrolling in Lifeline contacts service provider of choice

- a) Consumer provides service provider with
 - their assigned PIN
 - specified identifying information called for in fields

Step 5. Service provider checks USAC database

- a) Service provider determines whether PIN provided
 - i. Is “activated” (i.e., assigned to eligible consumer)
 - ii. Is not yet marked as “in use” (i.e., that it is still Green)

- iii. That the consumer's identifying information matches with PIN-record
- b) If i-iii are all true,
 - Service provider establishes Lifeline discount on consumer's account
 - Service provider enters carrier-specific identification (e.g., a SPIN) into PIN-record
 - When service provider accepts a PIN, the PIN is marked "in use" (e.g., turns from Green to Red)
- c) If any of i-iii are not true,
 - Service provider cannot establish Lifeline discount on consumer's account

Step 6. USAC reimburses service providers based on number of PIN-records populated with their SPIN

FREQUENTLY ASKED QUESTIONS

Q. How would the PIN database work with states that have already created databases or other eligibility processes?

A. The proposal does not supplant what states have already done, it compliments them. States, for example, could add a PIN assignment step to their current processes and no longer need to be concerned about managing duplicative discounts (e.g., states would not need to bash subscriber lists together)

Q. What happens if a customer becomes ineligible for Lifeline?

A. We recognize that there are many implementation details that would need to be worked out before the system became operational. However, we believe that if a customer became ineligible, the state entity responsible for assigning the PIN, could re-access the USAC database and "deactivate" that consumer's PIN. The USAC database would then automatically alert the Service Provider/SPIN associated with the PIN to turn off Lifeline discounts.

Q. Would this system eliminate self-certification to Service Providers?

A. Yes, however, it does not necessarily eliminate self-certification as a proof of eligibility option. Consumers could instead self-certify to a state entity responsible for assigning PINs.

Q. Does a national database present customer privacy concerns?

A. This proposal would actually improve the protection of consumer privacy. Today consumers must often present sensitive income-related documentation (e.g., tax forms, check stubs, divorce decrees) to service provider service representatives. The Lifeline PIN database will contain very little consumer information, and no income-related information. Access would be secure and

restricted to authorized state entities and service providers. All sensitive information will remain with the state entity that determines eligibility.

Q. How would this proposal help combat waste, fraud, and abuse?

A. One of the primary benefits of the Lifeline PIN database is the role it could play in reducing both duplicative discounts and fraudulent Form 497 filings. Service providers will be able to determine whether a customer's PIN is already "in use" and the system will not allow PINs to be used twice. The direct reimbursement by USAC, based on SPINs entered in the database, means that only providers with valid Lifeline consumers will be reimbursed. In addition, because the eligibility determinations would be made by a public entity, not by private service providers, the process will likely be more consistent and rigorous.