

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Lifeline Service - Lifeline Workgroup)
Meeting)
_____)

UNDOCKETED

FILED: September 23, 2010

Post-Meeting Comments of Virgin Mobile

Virgin Mobile USA, L.P. (“Virgin Mobile”) hereby submits the following comments as a follow-up to the August 18, 2010, meeting of the Lifeline Workgroup.

I. Introduction

Virgin Mobile is a facilities-based carrier under Section 214(3) of the Communications Act of 1934, as amended, and has been designated as an Eligible Telecommunications Carrier (“ETC”) in Florida. Virgin Mobile provides Lifeline telecommunications services to eligible customers through its Assurance Wireless branded prepaid wireless service.

Pursuant to Senate Bill (“SB”) 814, now codified in § 364.10(3)(h)3., Fla. Stat., Virgin Mobile is a member of the Lifeline Workgroup established therein to:

Discuss how eligible subscriber information in subparagraph 1. will be shared, the obligations of each party with respect to the use of that information, and the procedures to be implemented to increase enrollment and verify eligibility in these programs.

The information listed in subparagraph 1. of § 364.10(3)(h)3., Fla. Stat., includes the name, date of birth, service address and telephone number of persons eligible for Lifeline or Link-Up programs.

Virgin Mobile understands the purpose of the Lifeline Workgroup to be twofold: to identify means of increasing enrollment in Lifeline programs and to ensure eligible customers receive only one Lifeline discounted service, while maintaining the confidentiality of customer information.

II. Discussion

Virgin Mobile appreciates the Florida Public Service Commission (“FPSC” or “Commission”) taking the initiative to convene the first meeting of the Lifeline Workgroup, and found the discussion at the August 18 meeting to be productive. As a next step, Virgin Mobile concurs with the suggestion made at the conclusion of the meeting that administrators of the various state and federal public assistance programs that serve customers eligible for Lifeline service be invited to a meeting of the Workgroup to provide their input on how ETCs can appropriately and most effectively reach out to these customers to promote the availability of Lifeline service. Such input will provide a basis for developing appropriate means of increasing awareness of and enrollment in Lifeline programs, while at the same time protecting confidential personal information of eligible persons.

A Centralized Database

Virgin Mobile believes the administration of the Lifeline program would be significantly improved by the establishment of a centralized database that ETCs could use to verify customer eligibility, which could lead to increased and sustained participation. In order to increase and maintain enrollment in Lifeline programs, it is necessary to simplify the application process to the extent possible, while recognizing the need to ensure that only eligible persons receive such service.

Implementation of a centralized database would improve the administration of and participation in the Florida Lifeline program by standardizing and streamlining eligibility verification procedures. It would also increase Lifeline retention rates because it would eliminate the need for established customers to take affirmative steps to periodically verify their

eligibility for Lifeline services. Finally, a centralized database would identify consumers who already receive Lifeline service from another ETC, decreasing the likelihood that a customer could receive Lifeline services from more than one provider.

Under existing procedures, customers self-certify Lifeline eligibility and then are subject to periodic verification of their ongoing eligibility. A centralized database would allow ETCs to initially confirm a customer's eligibility and determine the customer's continued eligibility by periodically checking the database.

The database could be compiled from data provided by state agencies that administer programs that qualify customers for Lifeline. The creation, population and administration of such a database is a topic for further discussion among the Workgroup and the relevant agencies.

Customer Outreach

The national Lifeline participation rate remains around 30% of the eligible customer base, demonstrating the need for additional customer outreach efforts. Virgin Mobile recognizes that informing eligible customers of the availability of Lifeline services, and of their choices among carriers and service offerings, while respecting customer privacy and maintaining the confidentiality of customer-specific information presents challenges. Providing information to ETCs that would allow them to directly market their services to eligible customers raises concerns regarding the obligation of state agencies to maintain the confidentiality of personal information. Conversely, allowing or requiring state agencies to provide eligible customers information about Lifeline services from specific carriers adds yet another responsibility to these already over-burdened agencies. There are also concerns with agencies inadvertently promoting one carrier or service over another.

Virgin Mobile believes this topic requires further discussion and investigation, and the suggestion to invite administrators of various state and federal assistance programs to the next Workgroup meetings is a good next step in the discussion. An understanding of such administrators' responsibilities and viewpoints is essential to formulating an appropriate means of outreach to eligible customers to increase overall Lifeline enrollment.

III. Conclusion

Virgin Mobile appreciates the opportunity to provide these comments and looks forward to continuing to work with the FPSC and the other Workgroup members to address issues related to Lifeline services.

Respectfully submitted.

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