

Northeast Florida Telephone Company
Lifeline Work Group Meeting
Post-Workshop Comments

January 15, 2014

Northeast Florida Telephone Company (NEFCOM) provides the following written comments as requested at the December 5, 2013 Lifeline Work Group Meeting. The comments address NEFCOM's concerns with the Florida Department of Children and Families (DCF) database portal to verify a customer's eligibility to participate in Lifeline.

As Susan Fennell indicated during the Lifeline Work Group Meeting, NEFCOM has an agreement with DCF dated May 2012. The company had been actively pursuing the use of the DCF portal to verify a Lifeline applicant's eligibility. However, based on our discussions with DCF, it was NEFCOM's understanding that a machine to machine interface would be required between DCF and NEFCOM. This would also require programming that NEFCOM does not have the expertise to perform. NEFCOM obtained estimates to outsource the programming and was given a range of \$7,500 to \$10,000 to set up the interface.

While NEFCOM does believe there is value in being able to access the DCF portal to verify a Lifeline applicant's eligibility, the company questions the method chosen to establish the interface. Affiliates of NEFCOM operating in other states that have established a state-wide database are able to verify eligibility by calling into an automated phone system. As an example, the Pennsylvania Department of Public Welfare (DPW) has established a statewide database that can be easily accessed by ETCs providing Lifeline service. At the time the company signed a non-disclosure agreement with DPW, the company was assigned a company ID and password. The company calls the Lifeline verification number at DPW and logs in. After that, the company is simply required to enter the customer's social security number. The system will indicate whether the person with that social security number is qualified under one of their programs. It is my understanding that no costs were incurred by the ETCs in having this automated system established.

The most economical and efficient solution for small ILECs would be to work through the Florida Public Service Commission (PSC) to verify eligibility rather than having each small ILEC establish a separate interface with DCF. With the progress that USAC is making with its National Lifeline Accountability Database and Lifeline Recertification programs, it may be that only a temporary solution is needed. While USAC is not currently planning to perform the initial verifications for Lifeline applicants, it is the logical next step to the Recertification process they do currently have in place. NEFCOM did not sign up for USAC's Recertification program last year, but the company does intend to opt in for the 2014 recertification.