

LIFELINE REFORM IMPLEMENTATION TASK FORCE: UPDATE AND ROUNDTABLE DISCUSSION

NARUC STAFF SUBCOMMITTEE ON TELECOMMUNICATIONS

NOVEMBER 13, 2016



Agenda

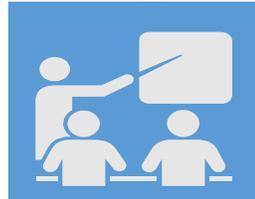
1. About the Task Force
2. December 2nd Reminders
3. Streamlined Eligibility Criteria Implementation Considerations
4. Additional Reform Implementation Considerations
5. Tracking Successful Implementation

1.

About the Task Force

Stakeholder Engagement Approach

Targeted Feedback



Individual consultations to understand each state or territory's unique circumstances

Lifeline Reform Implementation Task Force

One on one feedback sessions with a number of willing carriers on implementation considerations

Participation on NASUCA calls, requesting follow up by email on specific feedback points

Broad Interaction



Webinars and participation in conferences such as this to share and engage across all states and territories

Webinars to provide read out from targeted sessions, and seek additional feedback

Webinars reaching public and private entities engaged in Lifeline processes for consumers

Newsletters/Website



For All Stakeholders

USAC bi-weekly newsletter reveals developing decision points and implementation information

Continued updates to the USAC website to reflect the latest processes and need to know information

Information on how to reach USAC on an individual level, or to participate in stakeholder activities

States and Territories

Providers

Consumer Advocates

Lifeline Reform Implementation Task Force

Mission: To implement the changes contained in the 2016 Lifeline Modernization Order with minimum negative impact on the provision of Lifeline services to consumers.

Vision: A collaboration between the states, the Universal Service Administrative Company (USAC) and the Federal Communications Commission (FCC) in which implementation issues are identified and information is shared which can be used to effectively address implementation issues.

Task Force Goals



Coordination of State/Federal implementation efforts.

Outreach to consumers regarding changes to Lifeline service.

Communication to ETCs regarding changes in Lifeline program.

Task Force Overview

- **Co-Chairs**
 - Sue Vanicek - Nebraska
 - Susan Travis - Colorado
- **Participants**
 - 30 state members representing 18 states
 - USAC
 - FCC
- **Prioritized Topics**
 - First: Near Term Modernization
 - Broadband (BIAS)
 - Port Freeze
 - Rolling Recertification
 - Eligibility Criteria
 - Up Next: National Verifier

2.

December 2nd Reminders

Reminder! New federal Lifeline Program rules effective Dec. 2

- **Lifeline for broadband:** Customers may choose to use their Lifeline benefit on either fixed/mobile broadband internet access service (BIAS) or voice service (still only one benefit per household).
- **Changed eligibility programs:** Customers can use the Federal Veterans Pension and Survivors Benefit to prove eligibility, but can no longer use LIHEAP, TANF, National School Lunch Program, or state specific programs.
- **Minimum service standards:** Lifeline-supported voice services must provide at least 500 minutes per month; speed/usage allowance minimums apply to Lifeline-supported mobile/fixed broadband.
- **Benefit port freeze:** Customers must remain with their service provider for at least 60 days (voice) or 12 months (broadband) before they can switch their benefit to a different provider.
- **Usage and non-usage:** Texts count as usage; the non-usage period is shortened from 60 to 30 days.

Beginning in 2017 - **Rolling recertification:** Service providers must annually verify each customer's continued eligibility by the customer's service initiation anniversary date.

3.

Streamlined Eligibility Criteria Implementation Considerations

Implementation Considerations: Eligibility Criteria

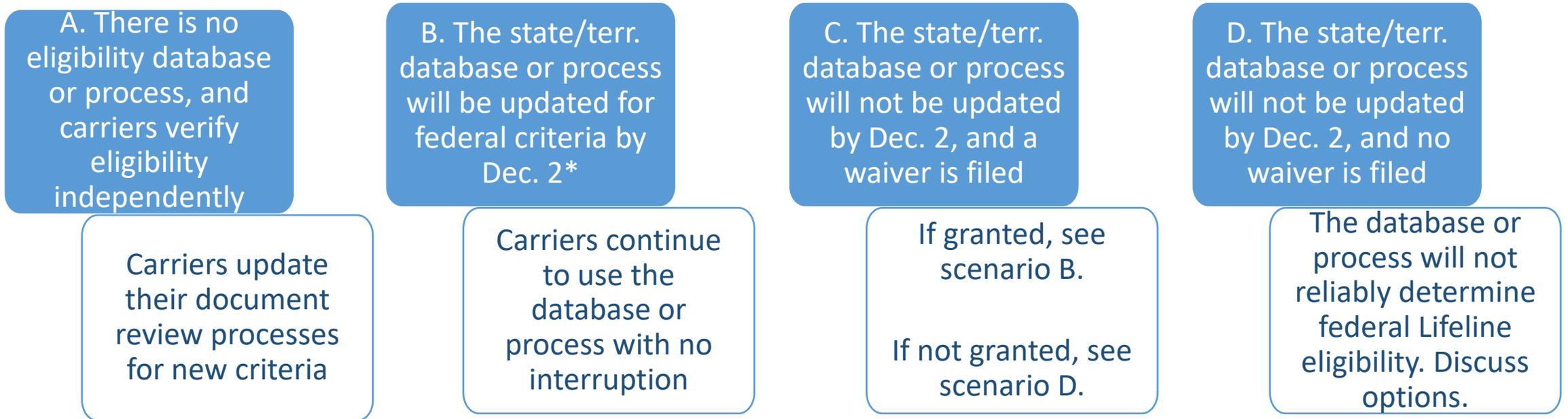
There are significant challenges with varied state/territory and federal eligibility criteria:

- Consumers may now be eligible for state/territory only, federal only, state/territory & federal, or no Lifeline
- Existing state/territory databases and processes are designed for aligned, legacy criteria only
- Where states/territories wish to align with new federal eligibility criteria, legislative processes often need time beyond December 2nd
- The Task Force discussed the FCC's desire to hear from states/territories in the form of waivers, and several have filed seeking additional time to think through these challenges
- USAC has been tracking each state/territory's circumstances, to understand how eligibility verification will work in each state as of December 2nd

Implementation Consideration: Eligibility Criteria

We believe there are four potential scenarios regarding the eligibility verification on Dec. 2.

Discussion: Are there others?



**Does not necessarily mean that the state and federal criteria are aligned. May mean the state will create dual processes.*

Implementation Considerations: Eligibility Criteria

USAC is asking states these questions:

- Does your state have a database/file which is used to determine Lifeline eligibility?
- Is Lifeline eligibility determined by the state through a state-managed process?
(e.g. state confirms the eligibility of all Lifeline consumers in the state)
- Are you planning to make changes consistent with the federal eligibility criteria by 12/2?
- Does your state plan on filing a petition for a waiver?

Implementation Considerations: Eligibility Criteria

Do we have this right?

- No state/territory database or process – carriers to modify independent document review processes
 - AK, AL, AS, CO, DE, GU, HI, IA, KY, LA, MP, MS, MT, ND, OH, OK, RI, SC, SD, VA, VI
- State/territory has database or process and filed a waiver seeking more time
 - CA, MI, MO, NY, PR, TX, UT, VT, WA, WI
- State/territory has database or process and will update it by Dec 2.
 - DC, FL, MN, OR
- Other state/territory databases or processes – Dec.2 status to be verified
 - AR, AZ, CT, GA, ID, IL, IN, KS, MA, MD, ME, NC, NE, NH, NJ, NM, NV, PA, TN, WV, WY

Implementation Considerations: Eligibility Criteria

Discussion: What other implementation challenges do we need to be talking about regarding the new federal eligibility criteria?

4.

Additional Implementation Considerations

Implementation Considerations: Broadband

Challenge	Discussion/Actions
Interaction with state Lifeline eligibility processes	<ul style="list-style-type: none">• USAC is collecting information from states/territories on whether existing eligibility databases or processes can be used by broadband providers.
Identification of Lifeline broadband providers	<ul style="list-style-type: none">• New FCC web page provides LBP applications in progress• USAC shared summary of HC carrier obligation to provide BIAS• Existing Lifeline-only voice providers must offer BIAS unless they notify FCC of desire to use the forbearance• USAC web provider search will be updated to include broadband providers

Discussion: What other implementation challenges do we need to be talking about ?

Implementation Considerations: Port Freeze

Challenge	Discussion/Actions
Exception requests for port freeze	<ul style="list-style-type: none">• Port freeze exceptions submitted to USAC by the carrier to whom the consumer wishes to transfer• USAC will carefully monitor and evaluate case by case exceptions for carrier failing to provide service
Consumer Support	<ul style="list-style-type: none">• USAC's customer service line offers Lifeline consumer support, which can be used to reach USAC directly where needed

Discussion: What other implementation challenges do we need to be talking about ?

Implementation Considerations: Rolling Recertification

Challenge	Discussion/Actions
Integration with existing state/territory recertification processes	<ul style="list-style-type: none">• Federal and state/territory recertification processes can still be performed as one, as long as recertification is completed each year by the consumer's anniversary date• Although federal recertification is not <i>required</i> in 2017 for consumers with Jan-June anniversary dates, it is not <i>prohibited</i> where states/territories would perform it anyway
Identifying consumer anniversary dates	<ul style="list-style-type: none">• NLAD will provide reports to providers of anniversary dates for monitoring recertification activities

Discussion: What other implementation challenges do we need to be talking about ?

5.

Tracking Successful Implementation

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- Discussion: What does success look like after December 2nd?

Thank you

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