

A REPORT TO THE  
Governor  
President of the Senate  
Speaker of the House of Representatives

FLORIDA

**LIFELINE**

ASSISTANCE

Number of Customers  
Subscribing to Lifeline Service  
and the Effectiveness of  
Procedures to Promote Participation

PREPARED BY

The Florida Public Service Commission

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PREPARED BY  
The Florida Public Service Commission  
Office of Telecommunications  
Office of Consumer Assistance & Outreach

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## Table of Contents

I.	Executive Summary .....	1
II.	Background .....	2
III.	Program Support and Customer Eligibility.....	3
IV.	Carrier Eligibility .....	5
V.	Subscribership and Participation Rates.....	7
	A. Lifeline .....	7
	B. Transitional Lifeline.....	10
	C. Lifeline Coordinated Enrollment Process .....	11
VI.	Regulatory Actions Impacting Florida’s Lifeline Program .....	12
	A. Federal Communications Commission.....	12
	B. Florida Public Service Commission.....	16
VII.	Lifeline Assistance Promotion, Pursuant to Section 364.10, F.S. ....	19
VIII.	Effectiveness of Procedures to Promote Participation.....	27
IX.	Conclusion .....	28

## List of Figures

Figure 1. 2013 U.S. Poverty Guidelines .....	4
Figure 2. Florida Lifeline Subscribership .....	7
Figure 3. USAC Low Income Florida ETC Disbursements .....	7
Figure 4. Lifeline Participation Rate in Eligible Florida Households for 2010-2013 .....	8
Figure 5. Lifeline Net Enrollment and Year-to-Year Net Growth Rate .....	9
Figure 6. Six Florida ETCs with the largest number of Lifeline customers in June 2013 .....	10
Figure 7. AT&T, Verizon, and CenturyLink Transitional Lifeline Participants .....	10
Figure 8. Recertification of Florida Lifeline Subscribers .....	13

## **List of Acronyms**

CFR	Code of Federal Regulations
CLEC	Competitive Local Exchange Carrier
DCF	Department of Children and Families
DEO	Department of Economic Opportunity Florida
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
LAAWG	Lifeline Across America Working Group
ILEC	Incumbent Local Exchange Carrier
NARUC	National Association of Regulatory Utility Commissioners
NASUCA	National Association of State Utility Consumer Advocates
OPC	Office of Public Counsel
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
THA	Tallahassee Housing Authority
USAC	Universal Service Administrative Company
USF	Universal Service Fund

## I. Executive Summary

The Florida Lifeline program is part of the federal Universal Service Program designed to enable low-income households to obtain and maintain basic local telephone service in accordance with Section 364.10, Florida Statutes, (F.S.). The Lifeline program offers qualifying households a minimum \$9.25 discount on their monthly phone bills, or a free Lifeline cell phone and monthly minutes from certain wireless providers.

This report presents Lifeline participation data for the July 2012 through June 2013 program year, and evaluates procedures put in place to strengthen the Lifeline program. As of June 30, 2013, 918,245 eligible customers participated in the Florida Lifeline program. Six companies accounted for 98.5 percent of Florida Lifeline customers.

Lifeline assistance participation includes the involvement of the Florida Public Service Commission (FPSC), the Florida Department of Children and Families (DCF), the Florida Office of Public Counsel (OPC), the Florida Department of Education (DOE) and other state agencies that provide benefits to persons eligible for Lifeline service.<sup>1</sup> According to the U.S. Department of Agriculture Report, “*Supplemental Nutrition Assistance Program: Number Of Households Participating, ending June 30, 2013,*” Florida had the highest number of households in the nation participating in the Supplemental Nutrition Assistance Program (SNAP), with 1,952,890 households. SNAP continues to be the largest qualifying program for Lifeline assistance in Florida. Based upon the growth in SNAP participants, the Lifeline eligible households grew by 4.8 percent compared to 2012 data. The FPSC anticipates that Lifeline enrollment will continue to grow based on the current economic conditions.

*Stay Connected, Florida!* was the slogan for Florida’s 2013 Lifeline Awareness Week, September 9-15. In addition to increasing awareness among eligible citizens, this year’s Lifeline Awareness Week also aimed to educate residents on the Federal Communications Commission (FCC) rule changes to limit benefits to one per eligible household and require annual recertification to continue the benefit. FPSC Chairman Ronald A. Brisé kicked off the week by hosting an event with the Tallahassee Housing Authority at the Springfield Community Center. As in past years, the FPSC’s Lifeline Awareness Week aimed to increase awareness among citizens who receive assistance from public benefits programs or who are income eligible.

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<sup>1</sup> Section 364.10(2)(g)1, Florida Statutes, requires each state agency that provides benefits to persons eligible for Lifeline service to undertake, in cooperation with the Department of Children and Families, the Department of Education, the Florida Public Service Commission, the Office of Public Counsel, and eligible telecommunications carriers providing Lifeline services, the development of procedures to promote Lifeline participation.

## II. Background

By December 31 each year, the FPSC is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program.<sup>2</sup> This report is prepared pursuant to the requirements contained in Section 364.10, F.S.

The FCC Lifeline Reform Order<sup>3</sup> continues to have a major impact in the Florida Lifeline program. The Order requires eligible telecommunication carriers (ETCs) to document the eligibility of those consumers seeking to qualify for Lifeline under program-based criteria. However, if ETCs can access state or federal databases to make determinations about consumer eligibility for Lifeline, the FCC does not require ETCs to obtain a new subscriber's documentation of his or her participation in a qualifying program. The ETC can simply note the name of the state or federal database used to confirm participation.

In Florida, if an applicant uses the electronic Lifeline coordinated enrollment process<sup>4</sup> to apply for Lifeline, the process will confirm for the ETC whether the applicant is currently participating in the Medicaid, SNAP or Temporary Cash Assistance (TCA)<sup>5</sup> programs. If a program other than Medicaid, SNAP, or TCA, is used for certification, the customer must provide documentation of participation from the administering agency, which could be the Florida Department of Education (free school lunch program), the Social Security Administration (Supplemental Security Income), a county-level agency (Low-Income Home Energy Assistance Plan or Section Eight Housing), or the Bureau of Indian Affairs for documentation. However, current data shows that over ninety percent of Florida applicants using the Lifeline Coordinated Enrollment Process use Medicaid, SNAP, or TCA for eligibility.

If a Lifeline applicant chooses to apply for Lifeline directly with an ETC, the ETC can access a DCF web services interface<sup>6</sup> to confirm program participation for Medicaid, SNAP, and TCA. In Florida, certification and verification can be accomplished using this process if the applicant, in the case of certification, or an existing Lifeline customer, in the case of recertification, participates in the Medicaid, SNAP, or TCA programs which are administered by the DCF.

The FCC Lifeline Reform Order also calls for the creation of a national eligibility database for certification and program participation verification of Lifeline applicants.<sup>7</sup> The database will confirm, at least initially, enrollment in the three most common national programs through which consumers qualify for Lifeline (*i.e.*, Medicaid, SNAP, and Supplemental Security Income).

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<sup>2</sup> Section 364.10(2)(h), F.S.

<sup>3</sup> See order FCC 12-11, released February 6, 2012; 27 FCC Rcd at 6714-22, paras. 129-148; 47 C.F.R. § 54.410(f).

<sup>4</sup> The Lifeline coordinated enrollment process was set up by the FPSC and DCF to allow an applicant for Medicaid, SNAP, or Temporary Cash Assistance (TCA) to request and receive Lifeline assistance after approved for the DCF program.

<sup>5</sup> Nationally known as Temporary Assistance for Needy Families (TANF).

<sup>6</sup> The Web services interface allows Florida ETCs a secure gateway into the DCF computer to verify that a Lifeline customer is participating in the SNAP, Medicaid, or TCA programs administered by DCF. The ETC enters the person's first and last name, date of birth, and last four digits of the person's social security number. The DCF computer responds as to whether the person currently participates in one of the DCF programs without identifying the program because of confidentiality.

<sup>7</sup> A single nationwide database will be deployed and the physical infrastructure, connections, and all related components will be located in a single location (or several locations to establish sufficient redundancy).



### **III. Program Support and Customer Eligibility**

The Florida Lifeline program is part of the federal Universal Service Program designed to enable low-income households to obtain and maintain basic local telephone service as outlined in Section 364.10, F.S. Under the FCC rules, there were previously four tiers of monthly federal Lifeline support until June 1, 2012. In 2012, the FCC Lifeline and Link-Up Reform Order replaced the first three tiers of support with a flat \$9.25 credit per month.<sup>8</sup> The current \$9.25 maximum reimbursement from the Universal Service Administrative Company (USAC) to a participating Lifeline carrier is for wireline or wireless customers. The remaining tier of support, available only to eligible subscribers living on tribal lands, provides an additional credit up to \$25.00 per month. This amount is limited so that the credit does not bring the basic local residential rate below \$1.00 per month.

Transitional Lifeline Assistance requires that ETCs offer former Lifeline customers a 30 percent discount off the residential basic local service rate. The customers are eligible to receive the discount for one year from the date the customer ceases to be qualified for Lifeline.<sup>9</sup>

#### Program-Based

Eligibility for Lifeline in Florida can be determined by customer enrollment in any one of the following programs:<sup>10</sup>

- Food Assistance (SNAP)
- Medicaid
- Federal Public Housing Assistance (Section 8)
- Supplement Security Income (SSI)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Cash Assistance (TCA)
- National School Lunch Program (NSLP) - Free Lunch
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy and National School Lunch Program (NSLP)

#### Income-Based

In addition to the program-based criteria, customers with annual incomes up to 150 percent of the Federal Poverty Guidelines may be eligible to participate in the Florida Lifeline program. Section 364.10(2)(a), F.S., provides that each local exchange telecommunications company that has more than 1 million access lines and is an ETC shall provide Lifeline applicants, who meet an income eligibility test of up to 150 percent of the Federal Poverty Guidelines with Lifeline service. The U.S. Department of Health and Human Services made a

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<sup>8</sup> The first tier of federal support was a \$6.50 for the federal subscriber line. The second tier was a \$1.75 monthly credit available to all subscribers. The third tier was one-half the amount of additional state support up to a maximum of \$1.75. Because Florida carriers provided a \$3.50 credit, Florida Lifeline subscribers received a total monthly credit of \$13.50.

<sup>9</sup> Section 364.105, F.S.

<sup>10</sup> Rule 25-4.0665(1) and (2), Florida Administrative Code.

decision to increase the 2013 Federal Poverty Guidelines, as shown in Figure 1 below.<sup>11</sup> The OPC certifies customer eligibility under the income test for customers requesting to be enrolled in the Lifeline program for those local exchange telecommunications companies designated as ETCs that have more than one million access lines as described above. The OPC also does income certification for wireless ETCs who have filed a notice of election to do so with the FPSC.<sup>12</sup>

Figure 1 shows the monthly and yearly total household incomes at 150% of the Federal Poverty Guidelines necessary to qualify for Lifeline.

**Figure 1. 2013 U.S. Poverty Guidelines**

<b>Household size (number persons)</b>	<b>2013 U.S. Poverty Guidelines Total Household Annual Income</b>	<b>150% of U.S. Poverty Guidelines Total Household Monthly Income</b>	<b>150% of U.S. Poverty Guidelines Total Household Annual Income*</b>
1	\$11,490	\$1,436	\$17,235
2	\$15,510	\$1,939	\$23,265
3	\$19,530	\$2,441	\$29,295
4	\$23,550	\$2,944	\$35,325
5	\$27,570	\$3,446	\$41,355
6	\$31,590	\$3,949	\$47,385
7	\$35,610	\$4,451	\$53,415
8	\$39,630	\$4,954	\$59,445
*For families with more than 8 persons, add \$6,030 for each additional person to the yearly amount.			

Source: Department of Health and Human Services, Federal Register Notice, January 24, 2013

<sup>11</sup> Department of Health and Human Services, Annual Update of the Department of Health and Human Services Poverty Guidelines. See Federal Register Notice, January 24, 2013.

<sup>12</sup> See Section 364.10(2)(a), F.S.

## IV. Carrier Eligibility

Section 54.201(b) of the Code of Federal Regulations (CFR) provides that a state commission shall, upon its own motion or upon request, designate a common carrier that meets certain requirements as an ETC<sup>13</sup> in a non-rural service area. Section 54.201(c) of the CFR provides that a state commission may, as long as the request is consistent with the public interest, convenience, and necessity, designate one or more common carrier(s) as ETC(s) in a rural service area.<sup>14</sup>

To qualify as an ETC, a common carrier must offer services that are supported by federal universal service support mechanisms, either using its own facilities or a combination of its own facilities and another carrier's resold service,<sup>15</sup> and the carrier must advertise the availability of such services and charges using mass media. Additionally, a company applying and qualifying for designation as an ETC must demonstrate good management and legitimate business practices to successfully administer the Lifeline program, ensuring that granting them ETC status is in the public interest to the citizens of Florida. In 2011, the FCC took a technology neutral approach and determined that ETCs can use any platform to provide voice service.

As of June 30, 2013, twenty-four companies had ETC status in Florida and participated in the Lifeline Program:

- BellSouth Telecommunications, LLC, d/b/a AT&T Florida (AT&T)
- Budget Prepay, Inc. d/b/a Budget Phone
- Cox Florida Telecom, LP
- dPi Teleconnect, LLC/d/b/a Unity Telecom, LLC
- Embarq Florida, Inc. d/b/a CenturyLink
- Express Phone Service, Inc.
- GTC, Inc. d/b/a FairPoint Communications
- FLATEL, Inc.
- Frontier Communications of the South, LLC
- Global Connection Inc. of America
- i-wireless d/b/a Access Wireless
- ITS Telecommunications Systems, Inc.
- Knology of Florida, Inc., d/b/a WOW
- Northeast Florida Telephone Company d/b/a NEFCOM
- Nexus Communications, Inc. d/b/a Nexus Communications TSI, Inc.
- Smart City Telecommunications LLC, d/b/a Smart City Telecom
- Sun-Tel USA, Inc.

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<sup>13</sup> Florida House Bill 1231, the Florida 2011 Legislature, removed the FPSC authority to designate ETC wireless telecommunication providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

<sup>14</sup> A state commission also has the authority to rescind the ETC status of any ETC designated by it that does not follow the requirements of the Lifeline Assistance program.

<sup>15</sup> Those services supported by Universal Service include the following: (1) voice grade access to the public switched network or its functional equivalent, (2) minutes of use for local service provided at no additional charge to end users, (3) toll limitation to qualifying low-income consumers, and (4) access to the emergency services 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.

- Quincy Telephone Company d/b/a TDS Telecom/Quincy Telephone
- T-Mobile South LLC d/b/a T-Mobile Wireless
- Tele Circuit Network Corporation
- TracFone Wireless, Inc. d/b/a SafeLink Wireless
- Verizon Florida, LLC
- Virgin Mobile USA, L.P. d/b/a Assurance Wireless
- Windstream Florida, Inc.

## V. Subscribership and Participation Rates

### A. Lifeline

The number of subscribers enrolled in Lifeline was 918,245 as of June 30, 2013, an 11.35 percent decrease from the number of June 30, 2012 subscribers. Figure 2 shows the number of Lifeline subscribers from June 2010 through 2013. In 2013, the 11.35 percent drop in subscribership is largely attributable to new FCC rules requiring annual recertification, with many customers not responding to the ETCs' recertification requests and being removed from the program as a result.

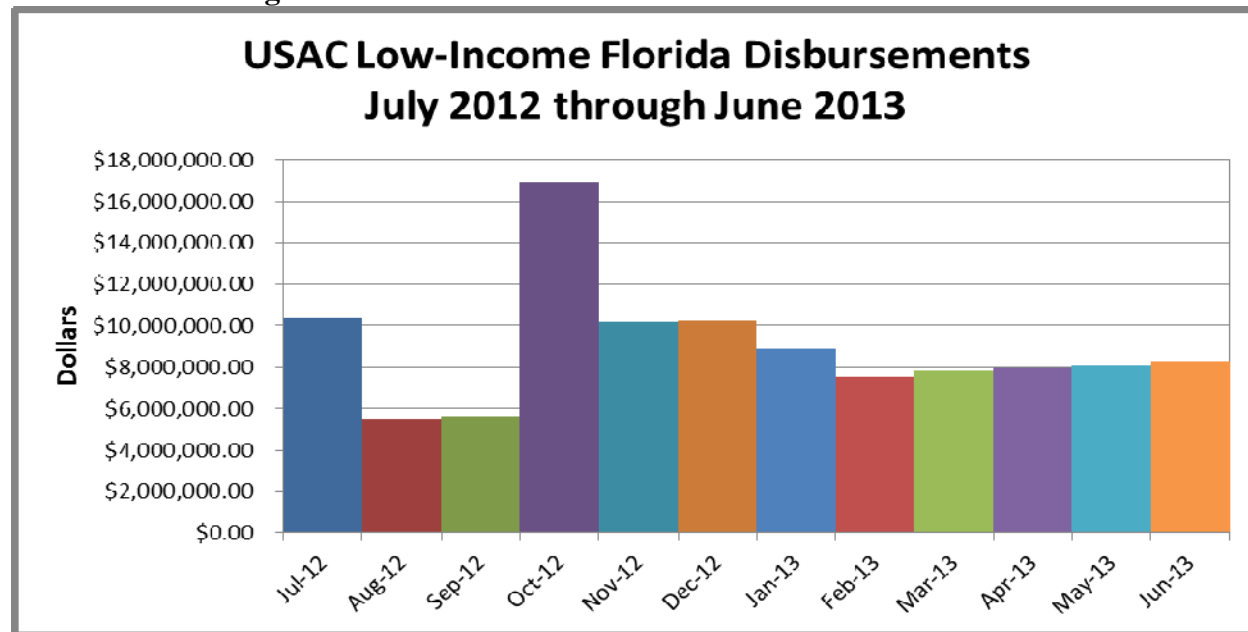
**Figure 2. Florida Lifeline Subscribership**

	June 2010	June 2011	June 2012	June 2013	% Net Loss 2012-2013
Subscribers	642,129	943,854	1,035,858	918,245	-11.35%

Source: Industry responses to FPSC data requests (2010-13)

Figure 3 reflects the Universal Service Administrative Company (USAC)<sup>16</sup> Lifeline disbursements to Florida for the 12-month period ending June 2013, totaling \$107,537,790, an average of \$8,961,483 per month over the period. These dollars enabled Florida citizens qualifying for Lifeline benefits to receive discounted monthly bills with a current minimum credit of \$9.25, or a free Lifeline wireless phone with up to 250 free monthly minutes from certain wireless providers.

**Figure 3. USAC Low Income Florida ETC Disbursements**



Source: USAC Disbursements Florida June 2013

<sup>16</sup> The Universal Service Administrative Company (USAC) is an independent, not-for-profit corporation designated by the Federal Communications Commission as the administrator of the Universal Service Fund. USAC collects contributions from telecommunications carriers and administers support programs designed to help communities across the country secure access to affordable telecommunications services.

The FCC Lifeline Reform Order required USAC to move low-income disbursements to payments based on actual subscriber counts as opposed to projected payments by October 2012. As of October 31, 2012, all Low Income Program payments are based on actual support rather than based on projections made by USAC. ETCs operating in multiple areas were allowed the opportunity for a phase-in transition to payment on actual support claims earlier than the month the FCC ultimately established as the deadline for payments to be made based only on actual support claims. This approach enabled the carrier to stagger the transition month so that it does not experience an extremely low cash flow in one month. As can be seen in Figure 3, disbursements dropped in September 2012, followed by the actual reimbursements being paid in October 2012, with relatively level disbursements from those months forward.

Figure 4 shows Lifeline participation rates in eligible Florida households from June 2010 through June 2013. As of June 2013, the participation rate was 47 percent, a decrease of 15.5 percent over the previous year. One of the main factors which led to the decrease in participation was the FCC mandated recertification of each Lifeline customer to determine whether he or she still qualified to receive Lifeline benefits. This resulted in de-enrollment in 2013 of 350,817 Florida Lifeline customers, 348,804 of which lost their Lifeline benefit because they failed to respond to the ETCs.

The number of Florida households eligible for Lifeline increased by over 88,000 from 2012 to 2013. Florida was the largest SNAP recipient in the United States in June 2013, with 1,952,890 households receiving SNAP benefits. Since all SNAP recipients are eligible for Lifeline, the number of Lifeline-eligible households in Florida demonstrates the continued need for the Lifeline program.

**Figure 4. Lifeline Participation Rate  
In Eligible Florida Households for 2010-2013**

Year	Lifeline Enrollment	Eligible Households	% Participation Rate
June 2010	642,129	1,422,837	45.1%
June 2011	943,854	1,690,512	55.8%
June 2012	1,035,858	1,864,183	55.6%
June 2013	918,245	1,952,890	47.0%

Sources: U.S. Department of Agriculture data figures are as of September 2013

Figure 5 represents the historic and current enrollment figures for the Lifeline program listed by each of the ETCs. As of June 30, 2013, the total Lifeline enrollment in Florida was 918,245 households. Florida had a 11.35 net percentage decrease in enrollment as of June 30, 2013, over the previous year.

**Figure 5. Lifeline Net Enrollment and Year-to-Year Net Growth Rate**

ETCs	June 2009	June 2010	Net Growth Rate	June 2011	Net Growth Rate	June 2012	Net Growth Rate	June 2013	Net Growth Rate
SafeLink	393,036	396,114	0.80%	447,379	12.90%	430,048	-3.90%	490,828	14.13%
Assurance				286,866		428,830	49.50%	323,014	-24.68%
AT&T	126,090	126,114	0.02%	122,849	-2.60%	102,363	-16.70%	44,796	-56.24%
CenturyLink	39,855	41,593	4.40%	39,524	-5.00%	35,154	-11.10%	22,179	-36.91%
i-wireless/ Access								12,450	100.00%
Verizon	20,916	23,681	13.20%	22,307	-5.80%	18,496	-17.10%	11,327	-38.76%
Windstream	4,807	5,517	14.80%	6,249	13.30%	6,775	8.40%	5,176	-23.60%
FairPoint	2,777	3,093	11.40%	2,446	-20.90%	2,146	-12.30%	1,437	-33.04%
T-Mobile				70		232	231.40%	1,373	491.81%
Global Connection						594	100.00%	789	32.83%
Budget Phone	1,134	3,099	173.30%	2,912	-6.00%	1,399	-52.00%	776	-44.53%
NEFCOM	837	769	-8.10%	795	3.40%	804	1.10%	712	-11.44%
TeleCircuit						1,497	100.00%	637	-57.45%
TDS Telecom	845	920	8.90%	811	-11.80%	728	-10.20%	582	-20.05%
Knology d/b/a WOW	695	959	38.00%	761	-20.60%	751	-1.30%	516	-31.29%
Flatel	2,279	1,888	-17.20%	2,845	50.70%	1,469	-48.40%	304	-79.31%
Frontier	179	159	-11.20%	157	-1.30%	174	10.80%	114	-34.48%
ITS Telecom	124	147	18.50%	178	21.10%	190	6.70%	112	-41.05%
Nexus	1,038	333	-67.92%	201	-39.60%	132	-34.30%	69	-47.73%
Cox Telecom								41	100.00%
Smart City	20	18	-10.00%	23	27.80%	33	43.50%	21	-36.36%
Sun-Tel				434		1,065	145.40%	13	-98.78%
dPi/Unity	588	1,273	116.50%	169	-86.70%	31	-81.70%	0	-100.00%
Express	2,275	3,923	72.40%	1	-100.00%		-100.00%	N/A	N/A
Absolute						89	100.00%	N/A	N/A
Verizon Wireless <sup>17</sup>	66	18	-72.70%	17	-5.60%	26	52.90%	N/A	N/A
Easy Telephone		376		0	-100.00%	4	100.00%	N/A	N/A
American Dial Tone	2,862	18,127	533.40%	1,903	-89.50%		-100.00%	N/A	N/A
Midwestern	107	153	43.00%	16	-89.50%		-100.00%	N/A	N/A
Non-ETC Reseller	18,073	13,664	-24.40%	4,941	-63.80%	2,828	-42.80%	979	-65.38%
<b>Total</b>	<b>618,774</b>	<b>642,129</b>	<b>3.80%</b>	<b>943,854</b>	<b>47.00%</b>	<b>1,035,858</b>	<b>9.70%</b>	<b>918,245</b>	<b>-11.35%</b>

Sources: FPSC data requests (2009-2013). Note: Those companies showing N/A for 2013 no longer are Lifeline Providers in Florida as of 6-30-2013.

Figure 6 shows the six Florida ETCs with the largest number of Lifeline customers in June 2013, which represents 98.5 percent of the total Lifeline customer participation.

**Figure 6. Six Florida ETCs with the Largest Number of Lifeline customers in June 2013**

Company	June 2013 Customer Participation
SafeLink Wireless	490,828
Assurance Wireless	323,014
AT&T	44,796
CenturyLink	22,179
i-wireless	12,450
Verizon	11,327
Total	904,594

Source: Industry responses to 2013 FPSC data requests

## B. Transitional Lifeline

In accordance with Section 364.105, F.S., current Lifeline customers who no longer meet eligibility criteria and are removed from Lifeline service may be eligible to receive a 30 percent discount on the residential basic local service rate for a period of one year after ending Lifeline service. For example, a former Lifeline customer with a phone bill that includes a \$25.00 basic rate would receive a \$7.50 monthly discount for one year. Transitioning from Lifeline service means that the consumer's socio-economic status may have improved, and the customer may have advanced beyond the qualifying eligibility criteria.

Figure 7 presents data on Transitional Lifeline customers for AT&T, Verizon, and CenturyLink for June 2009 through June 2013. The large increase in the number of Transitional Lifeline participants in 2013<sup>18</sup> is attributable to customers being de-enrolled from the Florida Lifeline program due to the FCC requirements to recertify Lifeline customers. These former Lifeline participants may elect to receive Transitional Lifeline benefits up to one year.

**Figure 7. AT&T, Verizon, and CenturyLink Transitional Lifeline Participants for June 2009-2013**

Year	AT&T, Verizon, and CenturyLink/Embarq Participants
June 2009	3,996
June 2010	3,710
June 2011	3,118
June 2012	3,566
June 2013	33,294

Source: Industry responses to FPSC data requests (2009-2013)

<sup>18</sup> AT&T reported 32,783; CenturyLink reported 488; and Verizon reported 23.



### **C. Lifeline Coordinated Enrollment Process**

Implementation of the Lifeline coordinated enrollment process has been a major success. The FPSC began formally tracking the number of Lifeline applications filed via the Lifeline coordinated enrollment process in April 1, 2007, and cumulative Lifeline coordinated enrollment applications as of June 30, 2013, totaled 520,461 over the 6 year period.

The coordinated enrollment process requires the DCF client to indicate an interest in receiving the Lifeline discount. The applicant then identifies a telephone service provider from a drop-down box on the application and answers applicable questions. Once determined to be eligible for SNAP, Medicaid, or TCA, DCF forwards the necessary information for Lifeline enrollment which the FPSC places on the FPSC's secure Web site for retrieval by the appropriate ETC. The coordinated enrollment process includes all attestations and certifications from subscribers required by the FCC.

All ETCs are required to enroll the subscriber in the Lifeline program as soon as practicable, but no later than 60 days from the receipt of the FPSC's automatic e-mail notification. In addition, upon completion of initial enrollment, the ETC is required to credit the subscriber's bill for Lifeline service as of the date the ETC received the FPSC's e-mail notification as required in 25-4.0665(10)(b), F.A.C.

ETCs are required to provide the FPSC, within 20 calendar days of receiving the FPSC's e-mail notification, the names, addresses, telephone numbers, and the date of the application for any misdirected applications; any applications for customers currently receiving Lifeline service; or any rejected applicants, including the reason(s) the applicants were rejected as shown in Rule 25-4.0665, Florida Administrative Code (F.A.C). The information filed by the ETCs is confidential and exempt from the public records requirement; however, the information contained in the response is disclosed to the Commission, pursuant to the criteria set forth in Section 364.107(3)(a)(4), F.S.

## **VI. Regulatory Actions Impacting Florida's Lifeline Program**

Key actions by the FPSC, and FCC occurred during the July 1, 2012 through June 30, 2013 period. A discussion of these initiatives is presented below.

### **A. Federal Communications Commission**

#### **1. Lifeline Recertification**

In the Lifeline Reform Order, the FCC adopted a set of uniform recertification procedures that all ETCs must perform annually to verify the ongoing eligibility of their Lifeline subscribers.<sup>19</sup> To comply with the annual requirement for 2013, all ETCs and state Lifeline administrators must recertify the eligibility of their Lifeline subscriber base as of June 1, 2013, by the end of 2013, and report the results to USAC by January 31, 2014. Subscribers failing to respond to recertification efforts must be de-enrolled from Lifeline.

ETCs have the option of recertifying subscribers in one of two ways. The first is to verify program or income-based eligibility where an ETC can query the available database to confirm the subscriber's continued eligibility. In the absence of a database, the ETC must recertify the continued eligibility of a subscriber in writing, by phone, by text message, by e-mail, by Interactive Voice Response, or otherwise through the Internet using an electronic signature. If an ETC is unable to recertify a subscriber, the subscriber is offered transitional Lifeline benefits at 70 percent of the local telecommunications service rate for one year.<sup>20</sup>

#### **2. 2012 Recertification of Florida Lifeline Subscribers**

As explained in the requirements for Lifeline recertification, subscribers failing to respond to recertification efforts must be de-enrolled from Lifeline. The following Figure 8 shows the number of subscribers claimed by Florida ETCs in May 2013 was 1,030,390, and the number of subscribers not responding for recertification was 348,804. The number of subscribers who responded that they are no longer eligible for Lifeline benefits was 2,013. As a result of the 2012 recertification process, 350,817 customers or 34.05 percent were de-enrolled from the Florida Lifeline program.<sup>21</sup>

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<sup>19</sup> See Lifeline Reform Order, 27 FCC Rcd at 6714-22, paras. 129-148; 47 C.F.R. § 54.410(f).

<sup>20</sup> Section 364.105, F.S. Discounted rate for basic service for former Lifeline subscribers.

<sup>21</sup> Numbers recorded by ETCs on FCC Form 555, November 2012, OMB 3060-0819, Annual Lifeline Eligible Telecommunications Carrier Certification Form.

**Figure 8. Recertification of Florida Lifeline Subscribers**

Company	Number of Lifeline Subscribers Claimed in May 2012	Number of Lifeline Subscribers Not Responding To Recertification	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-Enrolled	Percent of Lifeline Customers De-Enrolled
<b>ILECs</b>					
NEFCOM	794	209	28	237	29.85%
Smart City Telecommunications	32	8	5	13	40.63%
TDS/Quincy	733	253	1	254	34.65%
AT&T	110,035	72,473	N/A	72,473	65.86%
CenturyLink	35,263	21,934	27	21,961	62.28%
ITS Telecommunications	188	126	0	126	67.02%
Frontier	172	128	0	128	74.42%
Verizon	18,747	7,391	0	7,391	39.42%
Windstream	6,730	3,131	0	3,131	46.52%
GTC - Florida	210	108	5	113	53.81%
GTC - St. Joe	1,250	574	20	594	47.52%
GTC - Gulf Telephone	745	440	8	448	60.13%
<b>CLECs</b>					
Knology	750	480	7	487	64.93%
Unity Telecom f/k/a dPi	0	0	0	0	N/A
Absolute Home Phones	0	0	0	0	N/A
Global Connection Inc.	112	21	0	21	18.75%
Telecircuit	759	132	0	132	17.39%
Easy Telephone Services	5	4	0	4	80.00%
Budget Prepay	1,676	222	12	234	13.96%
FLATEL	1,209	547	0	547	45.24%
Sun-Tel USA	1,010	980	0	980	97.03%
Nexus Communications	0	0	0	0	N/A
Express Phone Service	0	0	0	0	N/A
<b>Wireless</b>					
ALLTEL/Verizon Wireless	29	6	0	6	20.69%
T-Mobile	248	60	0	60	24.19%
Assurance Wireless	418,253	185,877	1,900	187,777	44.90%
SafeLink Wireless	431,440	53,700	0	53,700	12.45%
<b>Total</b>	<b>1,030,390</b>	<b>348,804</b>	<b>2,013</b>	<b>350,817</b>	<b>34.05%</b>

### 3. Duplicate Lifeline Support

The FCC Wireline Competition Bureau provided guidance to eligible ETCs and state administrators regarding compliance with the one-per-household rule adopted in the Lifeline Reform Order, and reminded ETCs of their ongoing duty to prevent and eliminate duplicative

support.<sup>22</sup> Eligible consumers can only receive one Lifeline-supported service per household.<sup>23</sup> To comply with the one-per-household rule, each ETC has an ongoing duty to ensure that it provides support to only one subscriber per household.<sup>24</sup> An ETC may not serve more than one person at an address without obtaining the required certifications.<sup>25</sup> Consistent with the one-per-household rule, once an ETC determines through an examination of its records that it is providing Lifeline supported service to multiple subscribers at a single address, the ETC must provide each subscriber at that address with a one-per-household worksheet. The ETC must also inform the subscriber that he or she has 30 days to respond and provide the requested information, or the subscriber will be de-enrolled.<sup>26</sup> The ETC must de-enroll a subscriber that fails to attest that the subscriber is a member of a separate household at the address or fails to return the one-per-household worksheet.<sup>27</sup> Similarly, if a prospective subscriber seeks to obtain service at an address where the ETC is already serving a subscriber, the prospective subscriber must attest that it is part of a separate household, prior to the ETC providing Lifeline service to the new subscriber.<sup>28</sup> ETCs which have failed to take the necessary steps to prevent and eliminate intra-company duplicates may be subject to administrative action by the USAC and/or enforcement action by the FCC.<sup>29</sup>

#### **4. ETC Florida Wireless Applications submitted to the FCC and Pending as of August 2013**

As of July 1, 2011, the FPSC no longer has authority to designate wireless ETCs in the State of Florida. Wireless ETC applications for Florida are now filed directly with the FCC. As of August 9, 2013, the following 35 Florida ETC Wireless petitions were pending at the FCC:

- Airvoice Wireless, LLC
- American Broadband and Telecommunications Company
- Amerimex Communications Corp.

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<sup>22</sup> See Lifeline and Link Up Reform and Modernization et al., WC Dkt. Nos. 11-42 et al., CC Dkt. No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012) (Lifeline Reform Order or Order).

<sup>23</sup> See *id.*, 27 FCC Rcd at 6689, para. 74. The one-per-household rule is codified at 47 C.F.R. § 54.409(c). See 47 C.F.R. § 54.409(c). This rule became effective June 1, 2012. See Lifeline Reform Order, 27 FCC Rcd at 6859-60, para. 515; 77 FR 12952 (March 2, 2012), corrected by 77 FR 19125 (Mar. 30, 2012).

<sup>24</sup> See Lifeline Reform Order, 27 FCC Rcd at 6691, para. 78 (stating that an ETC must “search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at that residential address”).

<sup>25</sup> See *id.*, 27 FCC Rcd at 6719, para. 140.

<sup>26</sup> See *id.*, 27 FCC Rcd at 6720, para. 143 (noting that an ETC must provide 30 days notice to a subscriber prior to de-enrollment if the ETC has reason to believe that that subscriber is no longer eligible for Lifeline).

<sup>27</sup> See *id.*, 27 FCC Rcd at 6690-91, para. 77; 47 C.F.R. § 54.405(e)(1). The one-per-household worksheet can be found at [http://www.usac.org/\\_res/documents/li/doc/Lifeline-household-worksheet.docx](http://www.usac.org/_res/documents/li/doc/Lifeline-household-worksheet.docx).

<sup>28</sup> See Lifeline Reform Order, 27 FCC Rcd at 6691, para. 78. Subscribers must provide a certification at sign up and as part of the recertification process (for those subscribers whose eligibility is not recertified through a database) that the subscriber is compliant with the one-per-household rule. See 47 C.F.R. § 54.410(d)(3); 47 C.F.R. § 54.410(f)(2)(iii); (f)(3)(iii).

<sup>29</sup> The FCC expects that the ETCs’ subscriber information transmitted to USAC to begin the National Lifeline Accountability Database “scrubbing process” will be free of intra-company duplicates. See Lifeline Reform Order, 27 FCC Rcd at 6749, para. 215 (“The scrubbing process should begin once the FCC approves USAC’s plan and ETCs have provided their existing subscriber lists and accompanying data to either USAC or the database”).

- Assist Wireless, LLC
- Birch Communications f/k/a Now Communications n/k/a Tempo Telecom LLC
- Blue Jay Wireless, LLC
- Boomerang Wireless, LLC
- Budget PrePay, Inc.
- Cintex Wireless, LLC
- Consumer Cellular
- EZ Reach Mobile, LLC
- FedLink Wireless, LLC
- FLATEL Wireless, Inc. d/b/a ZING PCS
- Free Mobile, Inc.
- Global Connection Inc. of America
- ICON Telecom, Inc.
- Kajeet, Inc.
- Linkup Telecom, Inc.
- LTS of Rocky Mount, Inc.
- Millennium 2000 Inc.
- Nexus Communications, Inc.
- Pinnacle Telecommunications Group, LLC
- Platinum Tel Communications, LLC
- Prepaid Wireless Retail, LLC d/b/a Odin Wireless
- Q Link Wireless LLC
- TAG Mobile LLC (dPi Wireless)
- Talk N Text Wireless, LLC d/b/a TNT Wireless
- TelOps International, Inc. d/b/a AmTel
- Tele Circuit Network Corporation
- Telrite Corporation
- TerraCom
- Total Call Mobile, Inc.
- True Wireless, LLC
- Vast Companies, LLC d/b/a Vast Communications'
- You Talk Mobile – Federal, LLC

#### **5. i-wireless d/b/a Access Wireless ETC Designation by the FCC**

i-wireless was granted ETC status by the FCC by Order DA 12-934, released June 13, 2012. The company did not have Lifeline customers prior to July 1, 2012. i-wireless sought limited ETC designation solely for the provision of Lifeline service and ensuring that low-income consumers have access to 911 and enhanced 911 services. The FCC conditioned the i-wireless designation by requiring approval of a compliance plan, outlining the measures that i-wireless would take to provide its Lifeline subscribers with 911 and enhanced 911 services, and implementing certification procedures and processes to prevent waste, fraud and abuse in the Lifeline program.

## **6. TracFone Florida Smartphone Project**

The TracFone Florida Smartphone Project approved by the FCC<sup>30</sup> will study the effects of Lifeline discount amounts and discounted hardware. TracFone, in partnership with Technology Goes Home, will test the effect of both discounted price and hardware cost on mobile broadband adoption and retention using four variations in its broadband service plans and one control group randomly assigned over a large, geographically diverse sample. By offering varying combinations of free or discounted hardware and \$10 or \$20 per month service, low-income customers' sensitivity to upfront and ongoing prices can be measured. By comparing the two variations in offers with the control group, which is priced at market rate, TracFone will be able to estimate the take-rate for each price point with 2 GB on data limits. Lifeline support for this project will not exceed \$915,000, with no reimbursement for non-recurring fees.

### **B. Florida Public Service Commission**

The FCC Lifeline Reform Order made major changes to the Florida Lifeline program. The FPSC has been working with the industry and other agencies to implement the FCC changes and to follow the guideline dates that the FCC issued or are still pending.

#### **1. Lifeline Work Group**

The Lifeline Work Group was created by Section 364.10(2)(g)3, F.S., and includes the FPSC, the DCF, the OPC, and each Florida ETC offering Lifeline service. Its purpose is to determine how the eligible Lifeline subscriber information 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.

A Lifeline Work Group meeting was held at the FPSC on September 19, 2012, to discuss Initiation of Rulemaking to Amend Rule 25-4.0665, F.A.C., Lifeline Service, and to Repeal Rule 25-4.113, F.A.C., Refusal or Discontinuance of Service by Company. Rule 25-4.0665, F.A.C., would be amended to require ETCs to comply with new FCC subscriber eligibility determination, eliminate Link-Up, update Lifeline application forms, eliminate quarterly reporting requirements, and clarify ETC responsibilities regarding record retention, resale of Lifeline lines, and advertising. The amended rule would also include the requirement that a subscriber's Lifeline local service may not be discontinued because of nonpayment of charges for non-basic services and toll charges which is currently contained in Rule 25-4.113, F.A.C. Consistent with the 2011 changes made to Chapter 364 F.S., Rule 25-4.113, F.A.C., would then be repealed.

#### **2. Cox Florida Telecom LP ETC Designation**

By Order PSC-12-0500-PAA-TP, issued September 28, 2012, in Docket No. 120165-TP, and Order PSC 12-0552-PAA-TP, issued October 17, 2012, in Docket No. 120175-TP, the FPSC granted ETC designation to Cox Florida Telecom LP. Cox Florida Telecom LP was approved as an ETC for the limited purpose of receiving federal universal service low income support for

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<sup>30</sup> See order FCC DA 12-2045, released December 19, 2012.

providing Lifeline service to qualified households in its non-rural and rural service territory in Florida. Cox was previously certificated as a competitive local exchange carrier (CLEC) at the FPSC and has been providing local and long distance telephone service to residential and commercial customers in the State of Florida since 2005. Cox provides service in the Pensacola, Ft. Walton Beach, and Gainesville/Ocala areas. Cox has a choice of different plans in Florida that include local telephone usage, call waiting, voicemail, and long distance.

### **3. FPSC Continued Actions to Prevent Waste, Fraud and Abuse of the Federal USF**

In 2012-2013, Florida continued at the forefront in enforcing safeguards to prevent waste, fraud, and abuse of the USF. Florida's leadership in implementing and administering the National ETC State Coordinating Group to monitor prospective and existing ETCs across the country, has enabled information sharing with all states<sup>31</sup> on a national basis. Protecting against waste, fraud, and abuse in the Lifeline program is contingent upon developing adequate safeguards to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines. The FPSC monitors monthly federal universal service funds disbursed to Florida ETCs to determine the number of Lifeline participants in Florida by month. The FPSC also monitors pending Florida ETC designations at the FCC.

The FPSC strives to protect the integrity of the Lifeline program in the State of Florida and takes appropriate enforcement action when necessary. The FPSC has statutory authority to grant landline ETC designations, and can also revoke ETC status when warranted. Unlawful and inappropriate federal USF disbursements are inconsistent with public trust and negatively impacts states like Florida, which contributes more into the USF than it receives. Florida continues to be commended by the FCC for its continued and formidable efforts to identify and eliminate fraud in the Lifeline Assistance program and Florida's efforts to end any potential fraud in the Universal Service Fund.

### **4. Comments filed with the FCC regarding the Lifeline Reform 2.0 Coalition Petition for Rulemaking to Further Reform the Lifeline Program**

On June 28, 2013, the Lifeline Reform 2.0 Coalition filed a Petition with the FCC for Rulemaking to Further Reform the Lifeline Program. On July 15, 2013, the FCC issued Public Notice DA 13-1576, seeking comments on the Coalition's Petition.

The Coalition proposes two measures in its reform package that concern the FPSC. The Coalition believes all ETCs should review a government-issued photo identification at the time of enrollment, and retain copies of identification and proof of eligibility documentation. The FPSC believes that review of a valid government-issued photo identification such as proposed by the Coalition is unnecessary in Florida when Florida's Lifeline Electronic Coordinated enrollment process is used. On September 27, 2013, the FPSC submitted comments to the FCC to encourage the FCC to consider the following:

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<sup>31</sup> The ETC State Coordinating group includes state commission members from all fifty states and the District of Columbia.

1. The Coalition should be commended for their efforts to combat waste, fraud and abuse in the Lifeline program. However, the FPSC believes a review of a valid government-issued photo identification such as proposed by the Coalition is burdensome and unnecessary in Florida when Florida's Lifeline Electronic Coordinated Enrollment process is used.
2. ETCs can easily retain the FPSC notification as proof the Lifeline applicant has been verified as eligible for participation in the Lifeline program without the need for retention of a copy of the applicant's government-issued photo identification.

#### **5. FCC Requirement to Provide Hard-Copy Certifications of Lifeline Applicants to ETCs**

FCC Order 12-11 states that ETCs must not seek reimbursement from the federal universal service fund unless the ETC has received from the state Lifeline administrator or other state agency, a copy of the Lifeline subscriber's certification form.<sup>32</sup> The Order also requires state Lifeline administrators or other state agencies that are responsible for the initial determination of a subscriber's eligibility for Lifeline to provide each ETC with a hard-copy of each of the Lifeline certification forms.<sup>33</sup>

The United States Telecom Association (US Telecom) filed for and received three consecutive waivers of this requirement on behalf of states which included Florida through February 1, 2014. The current Waiver Order states that "...if an ETC or state believes that it will be unable to come into compliance and seeks a permanent waiver from the rules, it must provide in its request for permanent relief an explanation for why such relief is appropriate."

Florida has put in place a streamlined, efficient, and verifiable Lifeline Electronic Coordinated Enrollment process that does not have the capability or necessity of printing out a hard-copy Lifeline application. This advanced process involves a computer interface between the FPSC and the DCF for Lifeline applicants who currently participate in the Medicaid, the SNAP, or the TCA program. The Florida process eliminates the need to require or maintain hard-copy Lifeline certification applications. On October 25, 2013, the FPSC filed a petition with the FCC providing a status update and request for a permanent waiver of the requirement to provide hard-copy certifications to ETCs.

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<sup>32</sup> 47 C.F.R. §54.410(b)(2)(ii), 47 C.F.R. §54.410(c)(2)(ii), and 47 C.F.R. §54.407(d)

<sup>33</sup> 47 C.F.R. §54.410(e)



## **VII. Lifeline Assistance Promotion, Pursuant to Section 364.10, F.S.**

Promotional activities in 2013 featured National Lifeline Awareness Week, National Consumer Protection Week, the Connect Florida Campaign, and ongoing “grass roots” efforts to increase awareness and enrollment in the Lifeline program.

**Lifeline Across America.** In 2013, the Lifeline Across America Working Group [FCC, NARUC, and National Association of State Utility Consumer Advocates (NASUCA) representatives] concentrated on the fifth annual National Telephone Discount Lifeline Awareness Week. The Group’s national effort is to ensure that low income families and individuals are aware of the Lifeline program and understand the participation requirements, including the requirement that eligible consumers may receive no more than one Lifeline discount. The FCC, continuing to review reforms that will further reduce fraud and abuse in the Lifeline program, worked with its Lifeline Across America Working Group partners and others to increase awareness among low-income consumers about the recent program reforms and participation requirements. The Lifeline Across America Working Group produced an outreach campaign to educate consumers and updated the NARUC outreach toolkit, including an eligibility screening tool, an online tool to help consumers find companies providing Lifeline discounts, a consumer’s guide, and new public service announcements, in English and Spanish). Important messages about the FCC’s program changes—requiring proof of eligibility and annual reapplication—were highlighted by the states during Lifeline Awareness Week. According to NARUC, more than twenty state public utility commissions issued press releases, received gubernatorial proclamations, released radio and television public service announcements, and published letters-to-the-editor to help promote Lifeline. Also, the technical sub-group of Lifeline Across America (FCC, NARUC, USAC, and state commission representatives) held conference calls to discuss special issues related to Lifeline program administration. The FPSC continually shares information about Florida’s Lifeline regulations and procedures, and Florida’s Lifeline Awareness Week events with the Lifeline Across America Working Group.

**National Lifeline Awareness Week (September 9-15, 2013).** *Stay Connected, Florida!* was the slogan for Florida’s 2013 Lifeline Awareness Week, September 9-15. In addition to increasing awareness among eligible citizens, this year’s Lifeline Awareness Week also aimed to educate residents on the FCC rule changes to limit benefits to one per eligible household and require annual recertification to continue the benefit. FPSC Chairman Ronald A. Brisé kicked off the week by hosting an event with the Tallahassee Housing Authority at the Springfield Community Center. Tallahassee Housing Authority provides for and assists in the procurement of “safe and sanitary housing for low-income families,” and their clients benefit from the Lifeline program. Essential grassroots support from agencies, such as Florida’s housing authorities, is imperative to reaching eligible residents. During the kickoff, Chairman Brisé focused on ways to ensure that consumers know how to enroll in Lifeline and how to reapply each year. Event participants included: State Senator Bill Montford; State Representative Alan Williams; Nick Maddox, Chairman of Leon County Board of County Commissioners; John Marks, Mayor, City of Tallahassee; J.R. Kelly, Public Counsel; Charles Milsted, AARP; and Brenda Williams, Tallahassee Housing Authority Executive Director.

Now in its fifth year, Lifeline Awareness Week events were also held throughout Florida to help seniors and low-income Floridians learn about, and apply for, the Lifeline program. The FPSC visited senior centers in Lake Worth, Palm Beach Gardens, and Lauderhill and partnered with housing authorities in Lakeland and Bartow to help Florida's residents save money on their telephone and utility bills and to share recent Lifeline rule changes. Each Lifeline Awareness Week event offered individual assistance to consumers applying for the Lifeline program. Several telecommunications companies' representatives and the OPC joined the FPSC at the senior centers and housing authority locations, and offered program information and assistance in signing up eligible residents. An FPSC article featuring the Lifeline Assistance program and the importance of Lifeline Awareness Week was featured in a recent edition of the Florida Department of Elder Affairs' *Elder Update*.

Governor Rick Scott wrote a letter supporting the invaluable service of the Florida Lifeline program designed to reach eligible Floridians helping them connect with possible job prospects, emergency and community services, and family and friends. (Governor Scott's letter follows on the next page).



**RICK SCOTT**  
GOVERNOR

September 6, 2013

Dear Friends:

It is my pleasure to welcome all attending the Florida Kick-off of National Lifeline Awareness Week.

The Lifeline program provides an invaluable service to many citizens throughout our state by offering discounts on monthly telephone bills. As of June 2012, more than one million eligible customers participated in the Lifeline program. This year's statewide events are designed to reach eligible Floridians to help them connect with possible job prospects, emergency and community services, and family and friends.

Thank you to the Florida Public Service Commission, the Office of Public Counsel, other state and federal agencies, and telecommunications companies for your dedication to providing access to local telephone services. Your commitment to promote and improve the success of the Lifeline program greatly benefits many families in Florida.

Best wishes for a successful week helping Floridians to Stay Connected!

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Scott".

Rick Scott  
Governor

**National Consumer Protection Week and Other Community Events.** The FPSC continuously seeks existing community events and new venues and opportunities where Lifeline educational materials can be distributed and discussed with citizens. National Consumer Protection Week, March 3-9, 2013, was a good backdrop for Lifeline outreach activities. National Consumer Protection Week, an annual consumer education campaign, encourages individuals to take advantage of their consumer rights. For this year's event, FPSC Chairman Brisé kicked off the week by hosting a *Love Saving Energy?* Press Conference in February to bring practical, energy saving ideas to consumers. The FPSC highlighted ENERGY STAR appliances at Mays-Munroe, a local Tallahassee appliance store. Event participants included: State Representative Alan Williams; Leon County Commissioner Mary Ann Lindley; Brenda Buchan, Florida State Department of Agricultural and Consumer Services; and Mark Munroe, owner of Mays-Munroe Appliance Store. At the press conference, these state and community leaders shared their energy saving practices, along with additional conservation tips to keep consumer energy costs down. Also during National Consumer Protection Week, the FPSC made presentations to consumers in Pembroke Pines, Hollywood, Orlando, Kissimmee, Sanford, and Belle Glade, showing them how to save money through energy and water conservation and how to sign up for the Lifeline program.

For the second year, the FPSC participated in a national project called Older Americans Month--celebrated each May to honor and recognize older Americans for the contributions they make to their families, communities, and society. *Unleash the Power of Age* was this year's theme, and the FPSC held educational sessions with Florida senior centers in Eustis, Tavares, Groveland, Leesburg, Miami, and Miami Beach. The FPSC's educational sessions showed seniors ways to conserve energy and water and highlighted the Lifeline program. In addition, the FPSC distributed brochures and publications at the Jacksonville Expo, where over 5,000 seniors attended. An FPSC article outlining the importance of Older Americans Month, the Commission's outreach activities, and the Lifeline program was featured in the January 2013 edition of the Florida Department of Elder Affairs' *Elder Update*.

Other events and locations where Lifeline information was shared include:

- Ambassadors for Aging Day
- Active Living Expo
- Earth Day at the Capitol
- Technology Lifeline Community event in Chipley
- Leroy Clemons Senior Center
- Maxwell Senior Center
- Orange Park Senior Center
- Middleburg/Wiegel Senior Center
- Florida Forest Festival
- Jacksonville Community Event
- Enoch Senior Center
- Pinellas Park Senior Center
- St. Giles Manor Senior Center
- Marianna Housing Authority
- Jackson County Senior Citizens Organization

- Gadsden County Senior Center
- Chattahoochee Senior Center
- Green Cove Springs Senior Center
- Senior Days in Lake Jackson, Miccosukee, Bradfordville, Ft. Braden, and Woodville
- Florida Department of Elder Affairs and the Big Bend Task Force's Falls Prevention Seminar
- Florida Department of Elder Affairs SAFE Homes Program Workshop
- FAMU Developmental Research School
- Community Days in the cities of Jacksonville, Pembroke Pines and Miami.

Each year the FPSC provides educational packets, including publications and Lifeline brochures and applications in English, Spanish, and Creole, to Florida public libraries across the state for consumer distribution. This year's Library Outreach Campaign increased in number from 333 to 583, to include all state public libraries and branches. Following the Campaign, many additional library requests for extra publications have been filled.

**Connect Florida Campaign.** The Connect Florida Campaign (Campaign), established by Linking Solutions, Inc., the OPC, and AT&T in 2004, continues to increase consumer awareness and participation in Lifeline. During January 2012-December 2012, the Campaign event locations included Palm Beach County, Putnam County, Seminole County, Orange County, Hernando County, Indian River County, Escambia County, Washington County, Orange County, Miami/Dade County, and Monroe County. In addition to the larger events, campaign activities included smaller training sessions with non-profit organizations, public agencies, faith based groups, community centers, and community activities. Last year, the Campaign held 220 sessions throughout Florida.

**Community Services Block Grant Program.** The Florida Department of Economic Opportunity includes Lifeline services as an indicator in its work plan, allowing the Community Action Agencies to report on the number of clients they help to receive Lifeline services. During the October 1, 2011-September 30, 2012 reporting period, an estimated 1,592 households were signed up for Lifeline benefits through 17 Community Action Agencies, with \$128,112 in estimated benefits to clients. According to the Department of Economic Opportunity, for the reporting period cited, 17 of the 27 community action agencies provided Lifeline enrollment numbers.

**Income-Based Lifeline Applicants.** The OPC provides assistance to consumers applying for Lifeline Assistance based upon income level. During the period July 2012-June 2013, the OPC received over 45,000 calls from potential applicants seeking assistance, and processed approximately 45,175 applications. The OPC verifies income eligibility for customers of Assurance Wireless, AT&T Landline, CenturyLink Landline, SafeLink Wireless, T-Mobile Wireless, and Verizon Landline.

**Ongoing Lifeline Outreach.** Ensuring easily accessible Lifeline information through the agencies and organizations having regular interaction with eligible consumers is crucial to the Lifeline awareness effort. The Lifeline Partners (*listed in the next section*) have continued to develop new partnerships, participate in local community events, offer training sessions, provide

updates about program changes, and supply brochures and applications. The information provided in the 2003 through 2012 *Lifeline Reports* offers a detailed historical perspective and illustrates ongoing outreach efforts. Learn more about the Lifeline Partners and their valuable assistance in promoting Lifeline by visiting the FPSC's website at <http://www.psc.state.fl.us/publications/reports.aspx#tele>.

**Lifeline Partners.** The following local, state, and federal agencies, organizations, businesses, and telecommunications companies are involved in the collaborative effort to increase awareness and participation in the Lifeline program. Each month, the FPSC sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele. Additionally, the FPSC attends two community events monthly to promote Lifeline.

Lifeline Partners include these local, state, and federal agencies, organizations, and businesses:

- AARP - Florida Chapter (formerly the American Association of Retired Persons)
- Ability Housing of Northeast Florida
- ACCESS Florida Community Network Partners
- Agency for Health Care Administration (AHCA)
- Agency for Persons with Disabilities
- Alliance for Aging, Inc.
- Area Agencies on Aging
- Big Bend 2-1-1 and other 2-1-1 Agencies
- Boley Centers, Inc.
- Braille and Talking Book Library
- Brain Injury Association of Florida, Inc.
- Bureau of Indian Affairs Programs
- Capital Area Community Action Agency, Inc. (CACAA)
- Catholic Charities of Central Florida
- Centers for Drug Free Living
- Centers for Independent Living
- City and County Consumer Assistance Departments
- City and County Housing Authorities
- Communities In Schools Foster Grandparent Program
- Community Partnership Group
- Faith Radio Station and other Florida radio stations
- Federal Social Security Administration (SSA) - Tallahassee District
- Florida Alliance for Information and Referral Services (FLAIRS)
- Florida Assisted Living Association
- Florida Association for Community Action (FACA)
- Florida Association of Community Health Centers
- Florida Association of Counties
- Florida Association of County Human Service Administrators
- Florida Association of Food Banks (FAFB)
- Florida Association of Housing and Redevelopment Officials (FAHRO)

- Florida Coalition for Children
- Florida Coalition for the Homeless
- Florida Council on Aging
- Florida Department of Children and Families (DCF)
- Florida Department of Community Affairs (DCA)
- Florida Department of Economic Opportunity (DEO)
- Florida Department of Education (DOE)
- Florida Department of Elder Affairs (DEA)
- Florida Department of Revenue (DOR)
- Florida Department of Veterans' Affairs (DVA)
- Florida Developmental Disabilities Council
- Florida Elder Care Services
- Florida Home Partnership
- Florida Hospital Association
- Florida Housing Coalition
- Florida Housing Finance Corporation
- Florida League of Cities, Inc.
- Florida Low Income Housing Associates
- Florida Nurses Association
- Florida Office of Public Counsel (OPC)
- Florida Public Libraries
- Florida Public School Districts
- Florida Rural Legal Services, Inc.
- Florida Senior Medicare Patrol
- Florida Senior Program
- Florida Telecommunications Relay, Inc. (FTRI)
- Florida Voters League
- 1000 Friends of Florida, Inc.
- Habitat for Humanity – Florida
- HANDS of Central Florida
- Hemophilia Foundation of Greater Florida
- Leon County School Board
- Linking Solutions, Inc.
- Marion Senior Services
- Mid-Florida Housing Partnership, Inc.
- NAACP (Florida Associations)
- Nursing Homes Administrators
- One-Stop Career Centers (DEO)
- Seminole County Government Community Development
- Senior Resource Alliance
- Refuge House of the Big Bend
- Tallahassee Memorial Hospital (TMH) and other Florida hospitals
- Tallahassee Urban League
- Three Rivers Legal Services, Inc.

- United Way of Florida
- Urban Leagues of Florida
- U.S. Department of Housing and Urban Development (HUD)
- Washington County Council on Aging

As of June 30, 2013, twenty-four telecommunications companies had ETC status in Florida and participated in the Lifeline Program. A complete listing of the Florida ETCs participating in the 2013 Lifeline program is shown on pages 5 and 6 of the report.



## **VIII. Effectiveness of Procedures to Promote Participation**

Efforts to increase Lifeline participation can be separated into two categories, consumer outreach and enrollment process. The FPSC, in cooperation with other state and federal agencies, the OPC, ETCs, and other organizations, remains engaged in extensive outreach efforts. Because most of these efforts run concurrently, measuring the impact of any single activity on Lifeline participation is difficult. Nevertheless, outreach efforts overall are having a positive outcome and should be continued. Outreach efforts are also being expanded to include more CLEC and wireless ETCs.

The Commission continues to focus on enrollment process issues as a means of increasing participation. As previously discussed in this report, specific enrollment process initiatives include the following:

- FPSC Lifeline Coordinated Online Application Process
- FPSC/DCF Coordinated Lifeline Enrollment
- Annual Recertification Procedures
- DCF Certification/Verification Web Services Interface
- Lifeline Rulemaking Workshops
- Lifeline Work Group Meetings

## **IX. Conclusion**

As of June 30, 2013, 918,245 eligible customers participated in the Florida Lifeline program. The success of the Florida Lifeline program can be attributed to the continued partnership between the Florida Public Service Commission, the Florida Department of Children and Families, the Florida Office of Public Counsel, and agencies around the state that assist Florida low-income families.

The ETC designation of successful prepaid wireless providers, such as SafeLink Wireless and Assurance Wireless, which provide a free phone and free monthly minutes to the customer, has been a major growth factor in the Florida Lifeline program the last several years. As a result of Florida Lifeline participation, USAC Low Income disbursements for Florida ETCs for the 12-month period ending June 2013, totaled over \$107 million. These dollars enabled Florida citizens qualifying for Lifeline benefits to receive discounted monthly bills with a current credit of at least \$9.25, or a free Lifeline wireless phone with 250 free monthly minutes.

The FPSC will continue to identify and find solutions to barriers that may prevent Lifeline from achieving greater success for the benefit of Florida's low-income consumers. The FPSC will also continue its work on streamlining the Lifeline enrollment process and refining the FPSC/DCF Lifeline coordinated application procedure in Florida so that applying for the Lifeline program is easier and faster than in previous years.

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