



A report to the  
Governor  
President of the Senate  
Speaker of the House of Representatives

**FLORIDA**

*Lifeline*

**ASSISTANCE**

December 2019



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## List of Acronyms

CFR	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPHA	Federal Public Housing Assistance
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
NLAD	National Lifeline Accountability Database
OPC	Office of Public Counsel
RAD	Representative Accountability Database
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
SSI	Supplemental Security Income
USAC	Universal Service Administrative Company

# I. Executive Summary

This report is prepared pursuant to the requirements found in Section 364.10, Florida Statutes (F.S.). Specifically, the Florida Public Service Commission (FPSC or Commission) is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives each year on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program.

The Lifeline program is designed to enable low-income households to obtain and maintain basic telephone and broadband services. It offers qualifying households a discount on their monthly bills. Alternatively, consumers can select a free Lifeline cell phone and monthly minutes and/or measured data service from certain wireless providers. This report presents Lifeline participation data from July 2018 through June 2019, and evaluates procedures put in place to strengthen and streamline the Lifeline program.

As of June 30, 2019, there were 604,693 households participating in the Lifeline program in Florida. This equates to approximately one of every fourteen Florida households.<sup>1</sup> Lifeline assistance participation includes the involvement of the FPSC, the Florida Department of Children and Families (DCF), and the Florida Office of Public Counsel (OPC).<sup>2</sup> However, OPC has indicated that its involvement will end with the implementation of the National Income Eligibility Verifier (National Verifier) in Florida. The transition to begin implementing the National Verifier in Florida is scheduled for December 2019. The key objectives of the National Verifier are to reduce waste, fraud, and abuse; to lower costs through administrative efficiencies; and to better serve eligible beneficiaries by facilitating choice and improving the enrollment experience.

The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 40 percent of SNAP participants subscribe to Lifeline as well. Using SNAP as a proxy for Lifeline eligible households, would imply that only 40 percent of eligible Florida households are receiving Lifeline assistance as of June 2019.<sup>3</sup>

“*Stay Connected Florida*” was the slogan for Florida’s 2019 Lifeline Awareness Week, held on September 10-16. This year’s Lifeline Awareness Week continued efforts to increase awareness and enrollment in the Lifeline program.

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<sup>1</sup> Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households July 2019: 8,423,120, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed September 16, 2019, p. T-2.

<sup>2</sup> Section 364.10(2)(g)1., F.S.

<sup>3</sup> United States Department of Agriculture, Supplemental Nutrition Assistance Program: Number of Households Participating, Florida SNAP households for June 2019: 1,513,284, [https://fns-prod.azureedge.net/sites/default/files/resource-files/30SNAP\\_currHH-9.pdf](https://fns-prod.azureedge.net/sites/default/files/resource-files/30SNAP_currHH-9.pdf), accessed September 16, 2019.



## II. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. While the goal of the program was initially to ensure that all Americans had the opportunities and security that phone service brings, that goal has evolved to include broadband service. Qualifying households are eligible to receive up to a \$9.25 discount on their monthly phone or broadband bills from certain wireline service providers. Alternatively, customers may choose a free Lifeline cell phone and limited voice or broadband service from certain wireless carriers.

The FPSC has oversight over the Florida Lifeline program, in accordance with Section 364.10, F.S. However, the Lifeline program is part of the federal Universal Service Program, which also includes the high-cost, rural healthcare, and schools and libraries programs. Lifeline is available to eligible low-income households in every state, territory, commonwealth, and on Tribal lands.

The federal Universal Service Program provides funding for the Lifeline program. The rules affecting the Lifeline program are established by the Federal Communications Commission (FCC); however, the FCC has designated the Universal Service Administrative Company (USAC), an independent not-for-profit corporation, to act as the program's administrator. USAC is responsible for data collection and maintenance, support calculation, and disbursement for the Lifeline program along with other federal universal service programs.

While there are several ways to apply for Lifeline assistance in Florida, all of these methods will be transitioning to a single process administered by USAC in the near future. During 2019, consumers could apply:

- Directly with an Eligible Telecommunications Carrier (ETC) by providing documentation of participation in a qualifying program along with a Lifeline application
- While applying for Medicaid or SNAP through DCF using the electronic Lifeline Coordinated Enrollment Process
- With OPC for those who qualify through income eligibility for some ETCs

To speed the verification processes, ETCs that have agreements with DCF may access their Web Service Interface in real-time to confirm program participation for Medicaid and SNAP. The process will then confirm that the applicant is currently enrolled in one of these two programs.

In 2016, the FCC directed USAC to develop a National Verifier by 2019, which will remove carriers from the process of verifying customer eligibility.<sup>4</sup> The National Verifier has already been implemented in 33 states and five United States territories, with the remaining states and territories scheduled to be implemented by the end of 2019.<sup>5</sup> Florida has been scheduled for a “soft launch” of the National Verifier on December 1, 2019. During this soft launch period,

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<sup>4</sup> FCC 16-38, WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization, Third Report and Order, released April 27, 2016, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf), accessed on September 9, 2019.

<sup>5</sup> USAC, “National Verifier Launches,” <https://www.usac.org/li/tools/national-verifier/launches/default.aspx>, accessed August 20, 2019.

ETC's will have the opportunity to familiarize themselves with the National Verifier portal, while still being able to conduct current verification processes. Once Florida enters into "hard launch" status, use of the National Verifier becomes mandatory. At that point, ETC's and state administrators will no longer be involved in the eligibility verification process. The National Verifier is discussed in more detail in Section V.



### **III. Lifeline Eligibility and Participation**

Federal rules allow up to a \$9.25 reimbursement per Lifeline customer per month from USAC to ETCs. Consumers can qualify to participate in the Lifeline program either through program-based or income-based eligibility standards.

#### ***Program-Based Eligibility***

Customers can qualify for the Lifeline program in Florida by enrollment in any one of the following programs:

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Veterans or Survivors Pension Program
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy, and National School Lunch Program

#### ***Income-Based Eligibility***

Consumers can also qualify for the Lifeline program based on income. Specifically, a consumer whose total household income is less than 135 percent of the Federal Poverty Guidelines is eligible to participate in the Lifeline program. The Federal Poverty Guidelines are updated annually by the U.S. Department of Health and Human Services. The 2019 Federal Poverty Guidelines are shown in Appendix A. Consumers can enroll in the Lifeline program through the income-based eligibility by providing qualifying documentation to the provider of choice or in some cases through OPC. OPC only certifies consumer eligibility for certain carriers.<sup>6</sup> Between July 2018 and June 2019, OPC received 7,127 calls from potential applicants seeking assistance and processed 7,104 applications.<sup>7</sup>

While income-based eligibility is currently being determined by OPC and ETCs, this responsibility will be turned over to USAC once the National Verifier is launched in Florida as required by rules adopted by the FCC. Florida's transition to the National Verifier is anticipated to begin on December 1, 2019. Therefore, OPC has indicated that it will discontinue verifying consumer income eligibility at that time.

#### ***Participation***

The number of subscribers enrolled in Lifeline was 604,693 as of June 30, 2019, a 13 percent decrease from the number of subscribers last year. This compares to a 14 percent decline in national Lifeline subscribership for the same time period. Figure 1 shows the number of Lifeline subscribers from June 2014 through June 2019. Given that most of the Florida Lifeline market is served by wireless ETCs, it is not surprising that 97 percent of the total decline in subscribership

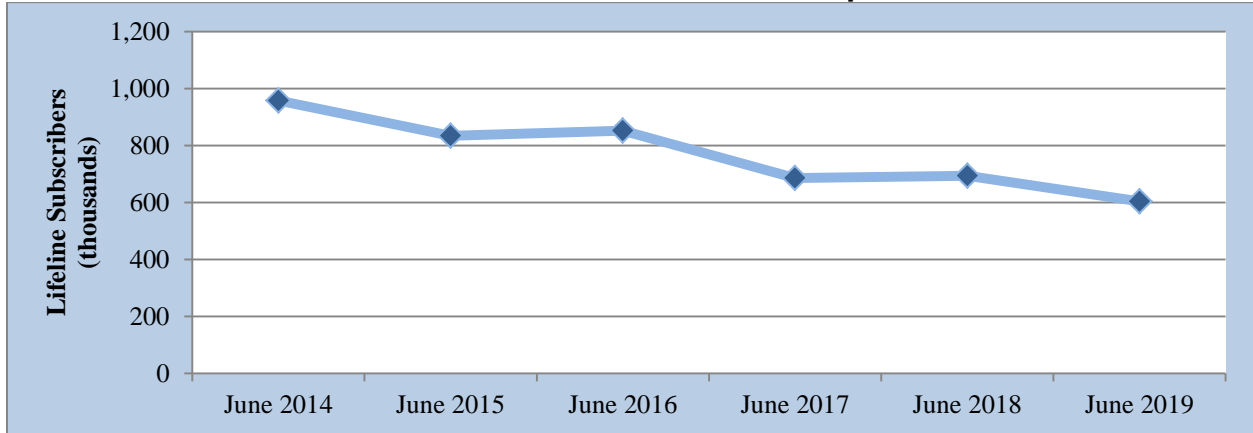
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<sup>6</sup> AT&T, CenturyLink, Frontier Communications, T-Mobile, SafeLink Wireless and Assurance Wireless.

<sup>7</sup> Florida Office of Public Counsel.

was among wireless providers. Wireless ETCs have attributed this decline to the implementation of the FCC’s eight page application, which they believe has been a deterrent to customers. Additionally, wireless providers face higher costs and profitability concerns as a result of the FCC’s increased Lifeline service standards adopted in 2016. By comparison, wireline ETCs continue to experience a decline that they credit to the shift in consumer demand towards wireless service. For 2019, only three carriers (T-Mobile, Phone Club and WOW!) experienced an increase in the number of Lifeline customers.

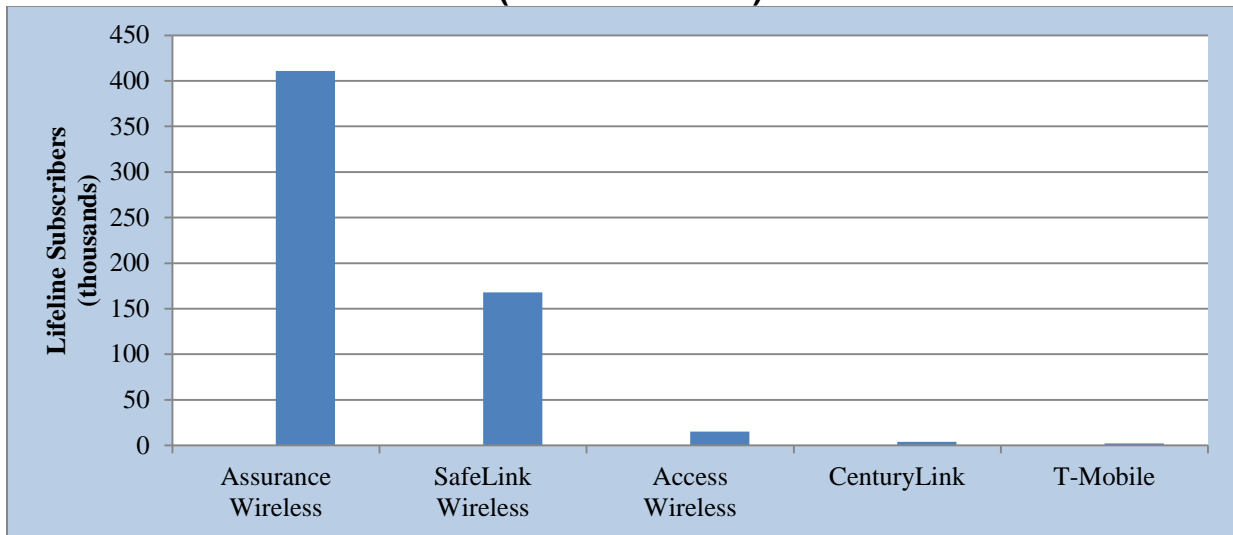
**Figure 1  
Florida Lifeline Subscribership**



Source: Industry Responses to FPSC Data Requests (2014-2019)

Figure 2 shows the five Florida ETCs with the most Lifeline subscribers as of June 2019. These ETCs represent 99 percent of Lifeline subscriber participation in Florida. For 2019, Assurance Wireless remains the ETC with the highest number of Lifeline subscribers.

**Figure 2  
Top Five Florida Lifeline ETCs  
(As of June 2019)**



Source: Industry Responses to 2019 FPSC Data Requests

Figure 3 compares how many households were enrolled in Lifeline with the estimated number of eligible households that would qualify for Lifeline, using SNAP participation as a proxy. Lifeline subscribership decreased by 89,954 households during the fiscal year ending June 2019. At the same time, the number of Lifeline eligible households decreased by 114,827.<sup>8</sup> As a result, the participation rate for 2019 was 39.96 percent. This represents a decrease of 2.7 percent compared to 2018.

**Figure 3**  
**Lifeline Participation Rate in Eligible Florida Households**

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
June 2015	833,426	2,011,166	41.40%
June 2016	852,255	1,712,005	49.80%
June 2017	685,864	1,662,374	41.30%
June 2018	694,647	1,628,111	42.67%
June 2019	604,693	1,513,284	39.96%

Source: U.S. Department of Agriculture

The continued need for Lifeline outreach is demonstrated by the number of households which are eligible to participate in the Lifeline program in Florida and the current participation rate. However, the need for greater outreach may be at odds with the changing costs associated with offering expanded Lifeline services. Some carriers have noted that with the implementation of the FCC’s 2016 Lifeline Modernization Order, it has become increasingly difficult to profitably acquire Lifeline subscribers at the current monthly support amount of \$9.25.

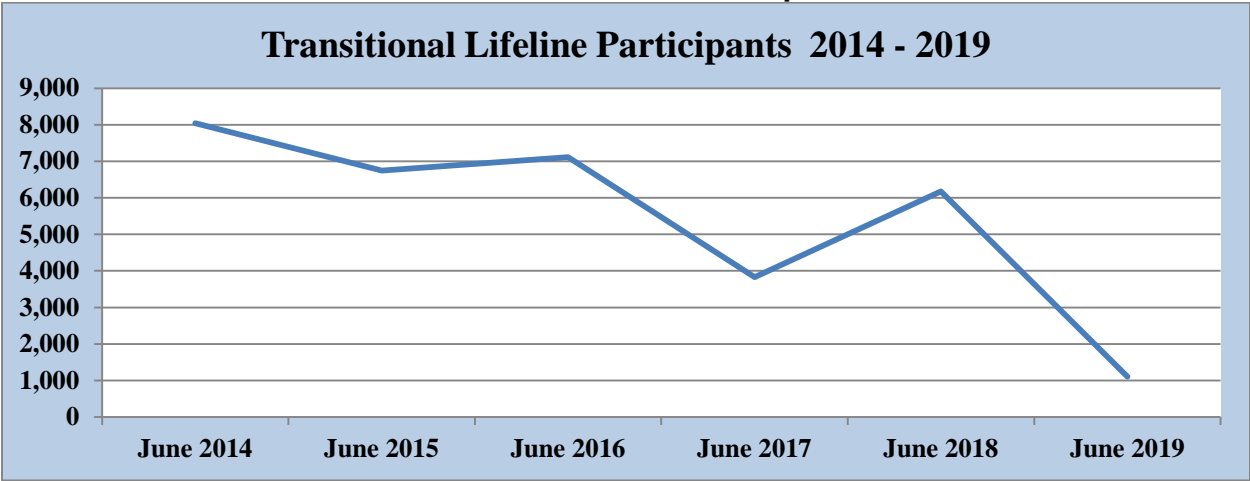
### ***Transitional Lifeline***

Transitioning from the Lifeline program usually occurs when a customer’s socio-economic status has improved, thus advancing them beyond the qualifying eligibility criteria. As required by Section 364.105, F.S., current Lifeline customers who no longer meet eligibility criteria are eligible to receive a 30 percent discount on the residential basic local service rate for a period of one year. For example, a former Lifeline customer with a \$25 phone bill would receive a \$7.50 monthly discount for one year.

Figure 4 presents the number of Transitional Lifeline customers of Florida ETCs from June 2014 through June 2019. Transitional Lifeline participation decreased by 5,070 subscribers from 2018 to 2019. During 2018, AT&T provided Transitional Lifeline discounts to customers living in areas where AT&T relinquished its ETC designation in Florida. This resulted in a spike in transitional Lifeline participation in 2018. The current year decrease may be attributable to AT&T’s customers who, after a year, either no longer qualify for Transitional Lifeline or switched to another Lifeline provider.

<sup>8</sup> United States Department of Agriculture, Supplemental Nutrition Assistance Program: Households Participating, Florida SNAP households for June 2019, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>, accessed September 17, 2019.

**Figure 4  
Transitional Lifeline Participation**



Source: Industry Responses to FPSC Data Requests (2014-2019)

## IV. Lifeline Providers

Congress has granted state commissions the authority to designate carriers as ETCs if they meet certain requirements.<sup>9</sup> Conversely, a state commission also has the authority to rescind the ETC status of any ETC that does not follow the requirements of the Lifeline Program.

To qualify as an ETC, a telecommunications carrier must offer services that are supported by federal universal service support mechanisms.<sup>10</sup> The carrier must advertise the availability of such services and charges, and must provide the services either using its own facilities or a combination of its own facilities and another carrier's resold service. A company applying for designation as an ETC must demonstrate good management and legitimate business practices to successfully provide Lifeline service.<sup>11</sup>

Currently, the FPSC only evaluates wireline ETC applications, while wireless ETC applications are evaluated by the FCC.<sup>12</sup> Figure 5 shows the 18 companies that were ETCs and participated in the Lifeline program in Florida as of September 30, 2019. On May 14, 2019, two competitive wireline carriers, Cox Florida Telcom, LP and Global Connection Inc. of America had requests for relinquishment of their ETC designation in Florida approved by the Commission.<sup>13</sup> Appendix B provides Lifeline enrollment figures for each ETC between 2016 and 2019.

**Figure 5**  
**ETCs Participating in Florida Lifeline Program**

Access Wireless (i-wireless)	Phone Club Corporation
Assurance Wireless (Virgin Mobile)	SafeLink Wireless (TracFone)
AT&T Florida	Smart City Telecom
CenturyLink	TDS (Quincy Telephone Company)
Consolidated Communications	Tele Circuit Network Corp
Frontier Communications of the South	T-Mobile
Frontier Florida, LLC	Viasat Carrier Services, Inc.
ITS Fiber	Windstream Florida, LLC
NEFCOM	WOW! (Knology of Florida, Inc.)

Source: Industry Responses to 2019 FPSC Data Requests

ETCs can meet their Lifeline service obligations either through offering voice, broadband, or a combination of both services. Figure 6 shows the percent of Lifeline subscription by service type. Currently, incumbent and competitive wireline carriers meet their Lifeline obligation predominantly through the provision of voice service. By comparison, wireless ETCs meet their Lifeline obligation predominantly through the provision of broadband connections. Appendix C provides greater detail of Lifeline subscriptions by service type for each carrier.

<sup>9</sup> Section 214(e)(2) of the Telecommunications Act of 1996.

<sup>10</sup> 47 CFR. §54.101(a).

<sup>11</sup> 47 CFR. §54.201(h).

<sup>12</sup> The Florida Legislature in 2011 (HB 1231), removed the FPSC authority to designate wireless ETC providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

<sup>13</sup> Docket No. 20190058-TX, Order No. PSC-2019-0262-CO-TX, and Docket No. 20190059-TX, Order No. PSC-2019-0261-CO-TX, issued June 28, 2019.

**Figure 6**  
**Lifeline Subscription by Service Type**

<b>Carrier Type</b>	<b>Voice</b>	<b>Broadband</b>	<b>Bundled</b>
Wireless	38.4%	60.7%	0.9%
Incumbent Wireline	90.6%	2.4%	7.0%
Competitive Wireline	99.0%	0.7%	0.3%

Source: USAC Disbursements Florida as of June 2019

All of the wireless ETCs in Florida are meeting the minimum FCC standards by offering at least 1,000 minutes or 2 GB of data to Lifeline subscribers. It should be noted that wireless carriers frequently offer some voice or data with a services that meets the FCC’s service standard. Figure 7 outlines different basic Lifeline service offered by Wireless ETCs in Florida and how they qualify with the federal standards. With the exception of T-Mobile’s plan, each wireless ETC offers a Lifeline plan paid by the \$9.25 Lifeline subsidy. Customers only have to pay for additional voice minutes or data beyond those of their plan as needed. By comparison, T-Mobile’s Lifeline customers can apply their \$9.25 discount towards any plan that T-Mobile offers. T-Mobile’s least expensive plan would cost Lifeline consumers \$10.75, after the Lifeline discount, and provide unlimited voice minutes, but does not include a data component.

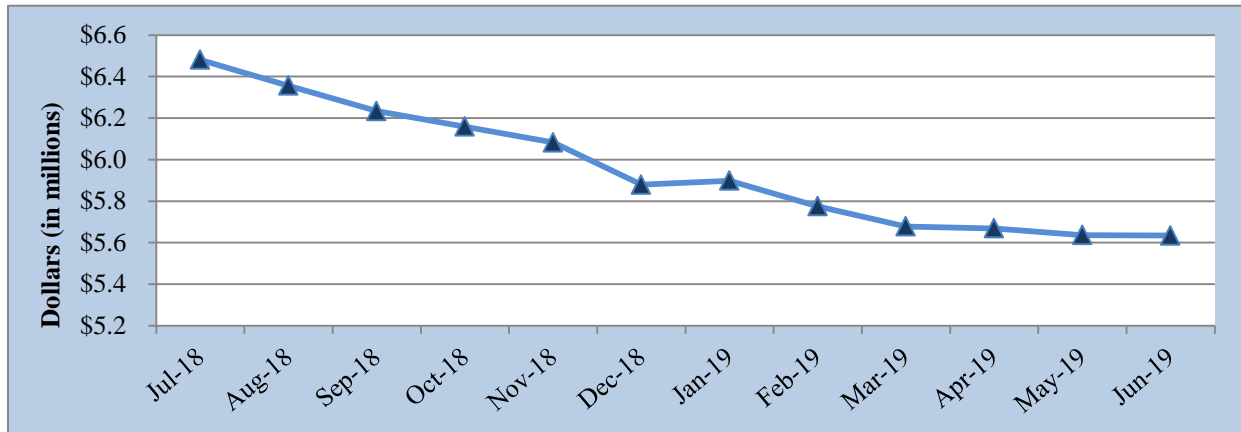
**Figure 7**  
**Wireless Service Standards Met by Service Type**

<b>Wireless ETC</b>	<b>Minimum Standards Met</b>	<b>Voice</b>	<b>Data</b>
Access Wireless	Voice	1,000 Minutes	50 MB
Access Wireless	Data	0 Minutes	2 GB
Assurance	Data	350 Minutes	2 GB
SafeLink	Voice	1,000 Minutes	1 GB
SafeLink	Data	350 Minutes	2 GB
T-Mobile	Voice	Unlimited	No Data

Source: Wireless ETC’s websites as of September 2019

Figure 8 reflects USAC Lifeline disbursements to Florida ETCs between July 2018 and June 2019. The total amount disbursed during this 12 month period was \$71,481,863, an average of \$5.9 million per month. These amounts also include prior period support corrections when errors are made.

**Figure 8**  
**Low-Income Disbursements to Florida ETCs**



Source: USAC Disbursements Florida July 2018-June 2019

Prior to August 15, 2016, competitive carriers could sell Lifeline discounted service from an ETC through a resale agreement. The ETC would receive the support from USAC, and reduce the price of service to the reseller by the corresponding amount. As part of the FCC's reforms to the Lifeline program, rules were established that eliminate Lifeline reimbursement for these resale arrangements out of concern of possible waste and abuse of program funds. As a result, some affected carriers have left the Florida market. The FCC established a process for affected carriers to become an ETC and provide Lifeline service by filing a compliance plan addressing the FCC's concerns regarding potential waste and abuse of the program. Specifically, such non-facilities based carriers must file a plan that demonstrates:

- Commitment and ability to provide the supported services throughout the designated area
- Ability to remain functional in emergency situations
- Ability to satisfy consumer protection and service quality standards
- Provision of local usage comparable to that offered by the incumbent local exchange companies

As previously mentioned, the FPSC no longer has authority to designate wireless ETCs. Wireless ETC applications for Florida are now filed directly with the FCC. Figure 9 shows the 35 Florida wireless ETC petitions pending at the FCC. Some of these companies applied with the FCC as early as June 2011. The date of each company's respective initial wireless ETC petition is included.

**Figure 9**  
**Florida Pending Wireless ETC Designation Petitions at FCC**  
**(As of August 2019)**

Airvoice Wireless (2/13)	NewPhone Wireless (9/12)
American Broadband (6/13)	Pinnacle Telecommunications (2/13)
Amerimex (2/13)	Q Link Wireless (8/15)
AmTel (1/13)	Sage Telecom Communications, LLC (8/13)
Assist Wireless (1/13)	SelecTel Wireless (8/15)
Blue Jay Wireless (5/12)	TAG Mobile (6/11)
Boomerang Wireless (8/15)	TNT Wireless (1/13)
Budget PrePay, Inc. (8/11)	Tele Circuit Network (7/12)
Cintex Wireless (5/12)	Telrite (4/12)
Consumer Cellular (4/12)	Tempo Telecom (1/14)
EZ Reach Mobile (5/12)	TerraCom (4/12)
Free Mobile, Inc. (9/12)	Total Call Mobile (4/13)
Global Connection (4/12)	True Wireless (5/12)
IM Telecom, LLC (1/16)	TX Mobile (11/12)
Kajeet (3/12)	Vast Communications (4/13)
LTS of Rocky Mount (10/12)	You Talk Mobile (2/13)
Millennium 2000 (4/13)	ZING PCS (12/12)
Mobile Net POSA (5/14)	

Source: FCC Lifeline Compliance Plans & ETC Petitions

The FCC designated Viasat Carrier Services, Inc. (Viasat) as an ETC in selected areas in Florida, Alabama, California, and West Virginia on September 18, 2019.<sup>14</sup> The FPSC had previously denied Viasat’s petition for ETC designation in 2018, citing a lack of jurisdiction and directed it to the FCC.<sup>15</sup> Viasat was one of the winning bidders for the FCC’s Connect America Fund and had to be designated as an ETC prior to receiving such support. Viasat will be providing Lifeline service to qualifying low-income customers in all authorized areas. A map of areas Viasat will be offering Lifeline service in Florida is shown in Appendix D. Viasat’s service is provisioned through Voice over Internet Protocol and broadband services through the use of geostationary-satellite orbit technologies.

<sup>14</sup> FCC Order, DA 19-925, WC Docket No.’s 09-197, Telecommunications Carriers Eligible for Universal Service Support Connect America Fund, released September 18, 2019, <https://docs.fcc.gov/public/attachments/DA-19-925A1.pdf>, accessed September 23, 2019.

<sup>15</sup> FPSC Order No. PSC-2018-0531-PAA-TX, Docket No. 20180180-TX, Application for limited designation as an eligible telecommunications carrier (ETC) to receive Connect America Fund Phase II Auction (Auction 903) support for voice and broadband services with request for expedited consideration by Viasat Carrier Services, Inc., issued November 13, 2013.



## V. Regulatory Activities and Updates

### A. Federal Communications Commission Activities

#### 2016 Lifeline Modernization Reform Order

On April 27, 2016, the FCC released its Lifeline Modernization Order, which became effective December 1, 2016. This Order was primarily established to modernize the Lifeline program by including broadband as a supported service, establish minimum service standards for supported Lifeline services, and establish the National Verifier. Implementation of this Order continues to have an impact on the federal Lifeline program. Specific changes that occurred during 2019 are discussed below.

#### **Minimum Service Standards**

In the 2016 Lifeline Modernization Order, the FCC required all ETC's to provide broadband internet access support that meets the FCC's established minimum service standards, unless they were granted forbearance from this obligation. These standards were established to determine an appropriate level of service ETCs must provide in order to receive the Lifeline support. These standards are reviewed annually through an FCC update mechanism to ensure that Lifeline customers continue to receive viable service options as technology improves.<sup>16</sup> Below are the changes in minimum service standards effective December 1, 2019:

- Mobile voice remains unchanged at 1,000 minutes per month.
- Mobile broadband usage increases to 8.75 GB per month, while speed remains at 3G.
- Fixed broadband speed increases to 20 Mbps downstream and 3 Mbps upstream while data usage remains at 1 TB per month.

The 2016 Lifeline Modernization Order gradually phases out Lifeline support for voice-only services to further its goal of transitioning to a broadband-focused Lifeline program. On December 1, 2019, the support provided for voice-only services will be reduced to \$7.25 per Lifeline customer. Support for fixed and mobile voice Lifeline service will be completely phased out on December 1, 2021. The FCC included an exception to this phase out for those census blocks with only one Lifeline provider. The Lifeline program will continue to support voice services when bundled with a broadband service. Figure 10 outlines the FCC's phase down schedule.

**Figure 10**  
**Lifeline Support Phase Down Schedule**

Effective Dates	Fixed Voice	Mobile Voice	Fixed Broadband	Mobile Broadband
Through 11/30/19	\$9.25	\$9.25	\$9.25	\$9.25
From 12/1/19 to 11/30/20	\$7.25	\$7.25	\$9.25	\$9.25
From 12/1/20 to 11/30/21	\$5.25	\$5.25	\$9.25	\$9.25
After 11/30/21	\$0	\$0	\$9.25	\$9.25

Source: FCC 2016 Lifeline Modernization Order (FCC 16-38)

<sup>16</sup> FCC, Public Notice, DA 19-704, WC Docket No. 11-42, released July 25, 2019, <https://docs.fcc.gov/public/attachments/DA-19-704A1.pdf>, accessed September 13, 2019.

The FPSC filed comments in the FCC’s 2017 Fourth Report and Order and Notice of Proposed Rulemaking to further reform the Lifeline program.<sup>17</sup> The FPSC commented that customers should have the option to continue to receive Lifeline support for voice-only service and that the FCC should eliminate its planned phase down of support for voice-only services. The FPSC noted its concern that if the only option for customers to obtain Lifeline voice service is by combining the service with broadband, the cost of the combined services may become cost prohibitive for some consumers without increasing financial support from the Lifeline program.

At the 2019 National Association of Regulatory Utility Commissioners (NARUC) Summer Policy Summit, resolutions were passed that mirror the comments of the FPSC, urging the FCC to halt its planned phase down of fixed and mobile voice support on December 1, 2019.<sup>18</sup> The resolutions also urged the FCC to completely forego their plans to ultimately eliminate voice-only Lifeline support. According to NARUC, if ETCs are unable to invest in the technologies required to provide the ever increasing minimum broadband standards, they may be forced to relinquish their ETC designations. NARUC also asserts that if voice-only ETCs opt to relinquish, many elderly and low-income individuals will be forced to purchase higher cost bundled Lifeline service from the remaining service providers.

### ***National Lifeline Eligibility Verifier***

The FCC’s Order directed USAC to develop the National Verifier to determine initial subscriber eligibility, conduct annual recertification, populate the Lifeline database and provide support payments to providers. The FCC postponed the initial launch mainly due to potential vulnerabilities that had not been resolved in accordance with the Federal Information Security Management Act of 2002. Upon resolution of these issues on June 18, 2018, a “soft launch” of the National Verifier was implemented in Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming.

The soft launch process is implemented every time new states transition to using the National Verifier. During a soft launch period, ETCs can begin using the National Verifier for eligibility determinations while continuing the use of existing eligibility determination processes. The soft launch period is intended to provide ETCs the opportunity to become familiar with the National Verifier online portal before use of the National Verifier becomes mandatory. During the soft launch period, potential Lifeline customers are not able to access the National Verifier to file their Lifeline applications online.

After the soft launch period ends, states are transitioned to “hard launch” status in which service providers will no longer be able to determine customer Lifeline program eligibility. Where available, the National Verifier will automatically verify an applicant’s participation in a qualifying program through eligibility data sources from state or federal government organizations. However, where automated eligibility data sources are not available, the National Verifier will manually process and review eligibility documentation that is either mailed or uploaded to the National Verifier portal by consumers.

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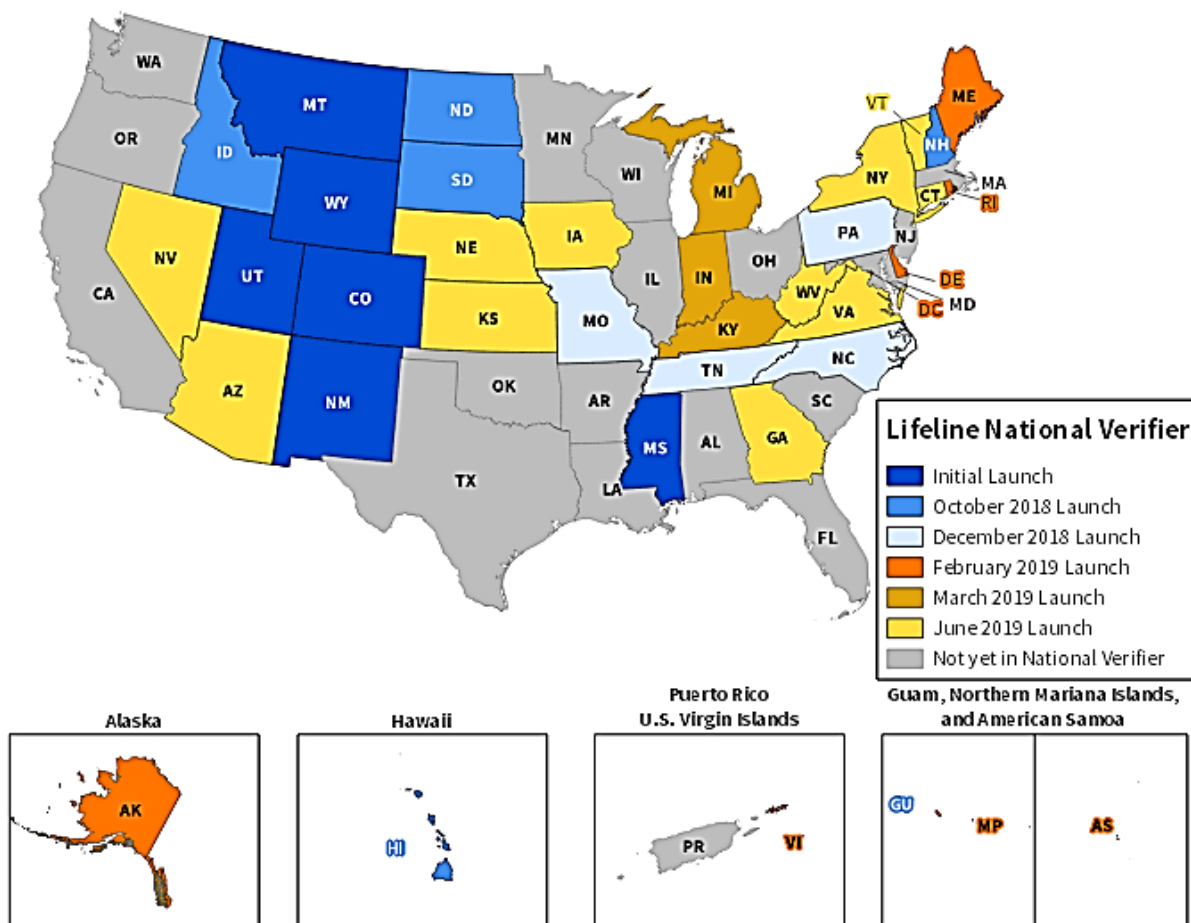
<sup>17</sup> FPSC Comments, WC Docket No. 17-287, Bridging the Digital Divide for Low-Income Consumers, filed, February 21, 2018, <https://ecfsapi.fcc.gov/file/1022171092868/FPSC%20Comments%20to%20the%20FCC.pdf>, accessed, September 13, 2019.

<sup>18</sup> NARUC, Resolution on the Lifeline National Verifier Launch and Minimum Service Standards, adopted July 24, 2019, <https://pubs.naruc.org/pub/3C86755C-FD04-1CF1-7558-180073A15B6A>, accessed September 13, 2019.

Currently, USAC attempts to verify customers with an automated verification interface with the Federal Public Housing Assistance database for all states and territories. As of September 17, 2019, USAC established connection to the federal Center for Medicare and Medicaid Services database, allowing for nationwide Medicaid verification.<sup>19</sup> Manual verification of customers is conducted by review of SNAP, SSI, Veterans Pension, Tribal Programs, or income eligibility documentation. Of the 33 states operating under the National Verifier, only 12 have managed to coordinate with USAC to establish automated verification interfaces to the databases of the qualifying programs.

USAC continues to inform stakeholders and regulators of updates and the deployment schedule for the states next in line for deployment of the National Verifier through monthly calls. Figure 11 shows the current National Verifier states.<sup>20</sup>

**Figure 11**  
**States Currently Operating Under the National Verifier**



Source: USAC

<sup>19</sup> FCC, News Release, released September 18, 2019, *Automated Connection Between Medicaid and Lifeline Database Goes Live*, <https://docs.fcc.gov/public/attachments/DOC-359731A1.pdf>, accessed September 19, 2019.

<sup>20</sup> USAC, “Lifeline National Verifier,” *National Verifier Launches*, <https://www.usac.org/li/tools/national-verifier/launches/default.aspx>, accessed September 17, 2019.

Initial delays in the implementation schedule for the National Verifier led to only six states operating under the system by the third quarter of 2018. However, after the initial launch, USAC began to expedite the rollout of the National Verifier and was able to conduct two additional launches by the end of 2018. As of June 2019, three more launches have been conducted and there are now 33 states and five U.S. territories using the National Verifier.<sup>21</sup> USAC plans to have the remaining 16 states operating under the National Verifier by the end of 2019, encompassing them in quarterly launches throughout the rest of the year. Florida is scheduled to be part of a December 1, 2019 soft launch.

It appears that the National Verifier's efficiency seems contingent upon the establishment of automated verification interface processes. USAC has been unable to establish verification interfaces in the majority of states that have been integrated into the National Verifier. Though strides are being made by USAC, it appears that if connections to Florida's qualifying program database are not established by the time Florida enters hard launch status, a continuing trend of decreasing Florida Lifeline subscribership may occur.

#### DCF, FPSC and USAC Coordination

In February 2019, the FPSC conducted an informal meeting that facilitated communication between DCF and USAC over the impending implementation of the National Verifier in Florida. This meeting established the groundwork for an automated computer interface system compliant with Florida Statutes that would allow USAC to interface with DCF's qualifying program database. Without revealing the participation program, the DCF database would be able to verify a customer is a participant in a qualifying program to USAC. Once a customer is verified as a qualifying program participant, they are enrolled in the Lifeline program with no need for any further customer documentation.

While USAC can manually review and verify all customer qualifying program documentation, it may become burdensome to applicants and could lead to further declines in subscribership. As of the time of this report, a computer matching agreement has been created between DCF and USAC and it appears that USAC's ability to query this database may be established by the time Florida enters soft launch status.

#### Lifeline Electronic Coordinated Enrollment Process

In 2007, Florida implemented the Lifeline Electronic Coordinated Enrollment Process. This process involves a computer interface between the FPSC and DCF for Lifeline applicants who currently participate in the Medicaid and SNAP programs. The coordinated enrollment process requires a DCF client to indicate an interest in receiving Lifeline assistance. The applicant then identifies a telephone service provider from a drop-down box on the application and answers applicable questions. Once a client is determined to be eligible for Medicaid and/or SNAP, DCF will forward the necessary information for Lifeline enrollment to the FPSC. The FPSC places this information on a secure website for retrieval by the appropriate ETC.

Once ETCs retrieve and process customer information from the FPSC's secure website, all rejected applications are submitted back to the FPSC. An application may be rejected if an applicant identifies the wrong ETC as their current provider or if the ETC does not provide

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<sup>21</sup> Ibid.

Lifeline assistance in the applicant's area. The FPSC sends these rejected applicants a paper application along with a list of each ETC's contact information.

After the hard launch of the National Verifier in Florida, the FPSC can continue to provide coordinated enrollment data to ETCs; however, this information will not constitute a verified application. It will provide customer information to ETCs regarding eligible customers who are interested in receiving Lifeline service, but customers will still have to complete USAC's eight page application and ETCs will be required to confirm eligibility through the National Verifier.

### **Duplicate Lifeline Support**

Eligible consumers can only receive one Lifeline-supported service per household.<sup>22</sup> If there are two households residing at one address and each desires to participate in Lifeline, each applicant must complete a household worksheet to demonstrate that each applicant is living in a separate economic unit and not sharing living expenses (bills, food, etc.) or income with another resident.<sup>23</sup>

The FCC directed USAC to establish a database to both eliminate existing and prevent future duplicative support.<sup>24</sup> To prevent waste in the Universal Service Fund, the FCC created a National Lifeline Accountability Database (NLAD) and mandated its use to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber. NLAD conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving a Lifeline program-supported service. Florida ETCs were operational on NLAD starting March 6, 2014. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

### **Representative Accountability Database**

USAC has developed a system known as the Representative Accountability Database (RAD) in order to validate the identities of service provider representatives that will be interfacing with the National Verifier. The voluntary registration period for the RAD began on July 29, 2019. USAC encouraged service providers to have their representatives link a RAD identification number to their NLAD accounts. Though a date for mandatory registration has yet to be announced, eventually all service providers and their respective representatives' entries into NLAD will require a RAD identification number.

Currently, any service provider representative whose NLAD or National Verifier roles include, ETC administrator, ETC analyst, ETC operations, or ETC agent must register for a RAD representative identification number. It is also recommended that anybody who directly interfaces with Lifeline customers for enrollment, assists in subscriber recertification, contracts with ETCs, or manages teams of individuals who do so should register for RAD identification numbers.

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<sup>22</sup> 47 CFR § 54.409(c).

<sup>23</sup> A household Lifeline eligibility pre-screening tool is available at [www.lifelinesupport.org](http://www.lifelinesupport.org).

<sup>24</sup> FCC 12-11, Report and Order, WC Docket No. 11-42, Lifeline Reform and Modernization, released February 6, 2012, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-12-11A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-12-11A1.pdf), accessed September 10, 2019.

## **Sprint and T-Mobile Merger**

On July 26, 2019, the United States Department of Justice (DOJ), approved a \$26.5 billion dollar bid from T-Mobile to merge with Sprint after the FCC stated it approved of the merger and would take a formal vote soon. DOJ's terms of the approval involved the sale of all of Sprint's prepaid services to Dish Network (Dish) for \$5 billion, in hopes of creating a fourth major mobile carrier. Alongside the purchase of Sprint's prepaid services, Dish would buy wireless spectrum from Sprint and T-Mobile in order to build out its wireless network. Dish would also receive a seven-year wholesale agreement with T-Mobile that enables it to resell T-Mobile wireless services alongside its newly purchased prepaid offerings under the Dish brand.

Upon completion of the sale, Sprint will be absorbed by T-Mobile, operating under that name going forward. All prepaid subsidiaries of Sprint would be absorbed by Dish Network, including Boost Mobile, Sprint prepaid, and Virgin Mobile. Virgin Mobile USA, LP d/b/a Assurance Wireless is Florida's largest wireless ETC, with over 400,000 Lifeline subscribers. FPSC staff has spoken to Sprint and has been assured that Lifeline segments of Sprint will be absorbed by T-Mobile and kept intact. It is not known if Assurance Wireless and T-Mobile will merge their Lifeline business models, or if they will be kept separate entities under T-Mobile.

As of September 3, 2019, this merger is being blocked by the lawsuit of 16 state Attorneys General and the Attorney General of the District of Columbia for its potential negative impact on competition in the wireless telecommunications industry.<sup>25</sup> The DOJ is currently communicating with the states involved in order to end the pending lawsuits that are blocking the merger.

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<sup>25</sup> California, Colorado, Connecticut, Hawaii, Illinois, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Nevada, New York, Oregon, Texas, Virginia, and Washington.

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

### **FPSC Requests Temporary Waiver of Lifeline Rules Following Hurricane Michael**

On October 30, 2018, the FPSC requested a temporary waiver of the FCC's Lifeline recertification and non-usage rules for Florida subscribers affected by Hurricane Michael. The recertification rules require Lifeline subscribers to recertify their eligibility every twelve months to continue receiving Lifeline support.<sup>26</sup> The non-usage rules require subscribers to use their phone service for 30 consecutive days or risk being de-enrolled from the Lifeline program.<sup>27</sup> The Commission's request was approved by the FCC on November 16, 2018, and a four month waiver of these federal rules was adopted.<sup>28</sup>

### **Florida ETC Designation Relinquishment**

On May 14, 2019, the FPSC approved the relinquishment of both Cox Florida Telecom, L.P. (Cox) and Global Connection Inc. of America's (Global) wireline ETC designations. In its relinquishment petition filed with the FPSC, Cox alluded to the FCC updates to minimum service standards and gradual phase-down of voice-only service as major reasons for its relinquishment. Cox also referenced the growing shift in demand for wireless ETC services and the favorable environment the FCC's changes to the Lifeline program creates for wireless carriers.<sup>29</sup> Cox was the largest competitive wireline ETC in Florida as of June 2018, and is still operating as a CLEC in Florida. As part of its relinquishment petition, Cox offered to provide its current Lifeline customers a discounted service package for one year.

Global has cancelled its Certificate of Authority to provide telecommunications service in Florida, alongside relinquishing its wireline ETC designation. The company stated in its petition that although it has made the decision to relinquish its ETC designation and cease offering wireline service, the company's organizational strategy will allow it to continue operating as a non-ETC, wireless service provider in Florida. It is unclear whether Global, now operating as Stand Up Wireless, intends to petition for a wireless ETC designation from the FCC.

### **FPSC Continues Actions to Prevent Waste, Fraud, and Abuse of the Federal Universal Service Fund**

Florida continues to enforce safeguards to prevent waste, fraud, and abuse of the Universal Service Fund. The FPSC strives to protect the integrity of the Lifeline program in Florida and takes appropriate enforcement action when necessary. The FPSC has statutory authority to grant wireline ETC designations and can also revoke ETC status when warranted. Unlawful and inappropriate federal Universal Service Fund disbursements are inconsistent with public trust and negatively impact all contributors to the fund. This is especially true for states like Florida that contribute more into the Universal Service Fund than it receives. Therefore, the FPSC monitors federal Universal Service Funds disbursed to Florida ETCs to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

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<sup>26</sup> 47 CFR S 54.405(e)(4) and 54.410(f).

<sup>27</sup> 47 CFR S 54.405(e)(3) and 54.407(c)(2).

<sup>28</sup> DA 18-1775, WC Docket No. 11-42, In the Matter of Lifeline and Link up Reform and Modernization, released November 16, 2018, <https://docs.fcc.gov/public/attachments/DA-18-1175A1.pdf>, accessed September 10, 2019.

<sup>29</sup> Petition of Cox Florida Telecom, L.P. for Relinquishment of Eligible Telecommunications Carrier Status, pp. 2-4, <http://www.floridapsc.com/library/filings/2019/02247-2019/02247-2019.pdf>, accessed September 2, 2019.





## **VI. Lifeline Promotion Activities**

Promotional activities in 2019 featured National Lifeline Awareness Week, National Consumer Protection Week, Older Americans Month, and ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline program. The FPSC works with state commissions, NARUC, the FCC, and the National Association of State Utility Consumer Advocates to promote and educate consumers on the Lifeline program.

The national effort also ensures that low-income families and individuals are aware of the Lifeline program and understand the participation requirements, including annual recertification and one discount per household. The shared goal is for all eligible households to be enrolled and receive Lifeline program benefits.

### ***National Lifeline Awareness Week***

NARUC observed Lifeline Awareness Week again in September for those states able to participate. “*Stay Connected Florida!*” was the slogan for Florida’s 2019 Lifeline Awareness Week, which was held September 9-13. In addition to increasing awareness among eligible citizens, this year’s campaign continued educating residents about the discount on voice and broadband services.

Consumer events were held in Palatka, Green Cove Springs, Flagler Beach, Eagle Lake, Lake Placid, Ocala, and Gainesville to help Florida’s eligible residents connect with the Lifeline program. Information and applications were provided to consumers interested in the program.

### ***National Consumer Protection Week and Other Community Events***

The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with consumers. This year’s National Consumer Protection Week, held March 3-9, provided a good opportunity for Lifeline outreach activities. National Consumer Protection Week is part of an annual consumer education campaign, which encourages consumers to take advantage of their consumer rights. For this year’s event, Chairman Art Graham recognized the 21<sup>st</sup> Annual National Consumer Protection Week with the importance of sharing scam awareness and energy and water conservation tips with consumers. During the week, the Commission made presentations to consumers statewide showing them how to apply for the Lifeline Assistance telephone and broadband discount program, if they qualify.

For the eighth year, the FPSC participated in a national project called Older Americans Month, celebrated each May to honor and recognize older Americans for their contributions to families, communities, and society. “*Connect, Create, Contribute*” was this year’s theme, and the Commission hosted 18 educational sessions, distributing Lifeline, conservation, and fraud prevention information at senior communities in Duval, Holmes, Charlotte, Sarasota, Leon, Palm Beach, Lake, Orange, Hillsborough, and Brevard Counties. The Commission also distributed brochures and publications at the Jacksonville Expo during the month.

Each quarter, the FPSC also names a valued partner agency or organization as a “Helping Hand” for raising public awareness about the Lifeline program, energy and water conservation, and

utility impersonation scams. Figure 12 represents the various events and locations where Lifeline information was shared in Florida as of July 2019.

**Figure 12  
FPSC Lifeline Promotion**

<b>Lifeline Events and Locations</b>	
2019 Elder Abuse & Fraud Prevention Summit	20 <sup>th</sup> Active Living–Tallahassee Senior Services
36th Annual Children’s Day–FL Museum of History	40 <sup>th</sup> Anniversary Celebration–Tallahassee Senior Center
CARES Rao Musunuru, M.D. Point Enrichment Center	Central Citrus Community Center
Chaires 15 <sup>th</sup> Anniversary Celebration–Dorothy Spence Community Center	Clermont Arts & Recreation Center
Florida Department of Agriculture and Consumer Services’ Consumer Protection Fair– The Villages	Florida Department of Agriculture and Consumer Services’ Consumer Protection–Senior Center
Florida Senior Day at the Capitol	Grandparents as Parents Meeting
Groveland Senior Center	Jacksonville Senior Expo
Lake Mary Senior Center	Lakeland Activity Center for Seniors
Louis Dinah Senior Center	Lunch & Learn–Bradfordville Community Center
Lunch & Learn–Chaires Community Center	Lunch & Learn–Ft. Braden Community Center
Lunch & Learn–Lake Jackson Community Center	Lunch & Learn–Miccosukee Community Center
Lunch & Learn–Woodville Community Center	Lutz Senior Center–Lutz
Marks Street Senior Center	Martin Anderson Senior Center – Rockledge
Mary L. Singleton Senior Center	Mid County Senior Center, Palm Springs
North County Senior Center, Palm Beach Gardens	Oaks at Riverview –Tampa
Ormond Beach Senior Activity Center & Neighborhood Dining Site	Polk City Activity Center
Renaissance Senior Center	Senior Citizens Council of Madison County
Senior Friendship Center, Inc.–Sarasota	Senior Friendship Center–Venice
Suwanee County Health & Wellness Fair–Advent Christian Village in Dowling Park	Suwanee River Economic Council
Titusville Adult Social Center	Town N’ Country Senior Center
Washington County Council on Aging–2019 Senior Citizen Expo	Woodville Community Center

Source: Florida Public Service Commission, Office of Consumer Assistance & Outreach

### ***Library Outreach Campaign***

Each year the FPSC provides educational packets, including FPSC publications and Lifeline brochures and applications in English, Spanish, and Creole to Florida public libraries across the state for consumer distribution. The FPSC’s Library Outreach Campaign reached a record-breaking 622 state public libraries and branches in 2019. The FPSC sent the materials via a CD that included a print-ready copy of FPSC brochures for easy reproduction. Following the campaign, many libraries’ requests for additional publications have been filled.

### ***Community Services Block Grant Program***

As of the end of Fiscal Year 2017, the Florida Department of Economic Opportunity discontinued tracking Lifeline subscribership. Instead, it reports achieved outcomes of the Community Service Block Grant Program through an annual report.

### ***Ongoing Lifeline Outreach***

Ensuring easy access to Lifeline information through the agencies and organizations having regular interaction with eligible consumers is crucial to the Lifeline awareness effort. The FPSC partners with many agencies year-round to make sure eligible consumers know about Lifeline and know how to apply. Additionally, the FPSC schedules and conducts two monthly community events to promote Lifeline. Each month, the FPSC also sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele.

### ***Lifeline Partners***

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Appendix E are involved in the collaborative effort to increase awareness and participation in the Lifeline program. These Lifeline Partners have continued to develop new partnerships, participate in local community events, offer training sessions, provide updates about program changes, and supply brochures and applications.



## Appendix A 2019 U.S. Poverty Guidelines

Persons in family/household	2019 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$12,490.00	\$16,861.50	\$1,405.13
2	\$16,910.00	\$22,828.50	\$1,902.38
3	\$21,330.00	\$28,795.50	\$2,399.63
4	\$25,750.00	\$34,762.50	\$2,896.88
5	\$30,170.00	\$40,729.50	\$3,394.13
6	\$34,590.00	\$46,696.50	\$3,891.38
7	\$39,010.00	\$52,663.50	\$4,388.63
8	\$43,430.00	\$58,630.50	\$4,885.88

Source: Department of Health and Human Services. Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, February 1, 2019

<https://www.federalregister.gov/documents/2019/02/01/2019-00621/annual-update-of-the-hhs-poverty-guidelines>

## Appendix B

### Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETCs	June 2016	June 2017	Net Growth Rate	June 2018	Net Growth Rate	June 2019	Net Growth Rate
Wireless	Assurance Wireless	232,481	224,282	-4%	418,874	87%	411,114	-2%
	SafeLink Wireless	405,506	346,488	-15%	232,088	-33%	167,966	-28%
	Access Wireless	179,429	89,904	-50%	31,874	-65%	14,795	-54%
	T-Mobile	762	630	-17%	1,023	62%	2,489	143%
Incumbent Wireline	CenturyLink	12,528	9,108	-27%	5,251	-42%	3,875	-26%
	Frontier Florida	3,896	3,116	-20%	2,113	-32%	1,690	-20%
	Windstream	2,436	2,004	-18%	1,546	-23%	1,332	-14%
	Consolidated Communications	526	561	7%	397	-29%	329	-17%
	NEFCOM	286	366	28%	247	-33%	221	-11%
	AT&T	11,404	7,871	-31%	123	-98%	89	-28%
	TDS Telecom	179	138	-23%	112	-19%	112	0%
	ITS Fiber	86	69	-20%	46	-33%	20	-57%
	Frontier of the South	28	26	-7%	20	-23%	19	-5%
	Smart City	11	4	-64%	3	-25%	3	0%
Competitive Wireline	Cox Telecom	689	675	-2%	556	-18%	409	-26%
	Tele Circuit	646	321	-50%	201	-37%	37	-82%
	Phone Club	n/a	148	n/a	120	-19%	143	19%
	WOW!	79	58	-27%	46	-21%	50	9%
	Global Connection	3	95	3067%	7	-93%	0	-100%
	<b>Total</b>	<b>850,975</b>	<b>685,864</b>	<b>-19%</b>	<b>694,647</b>	<b>1%</b>	<b>604,693</b>	<b>-13%</b>

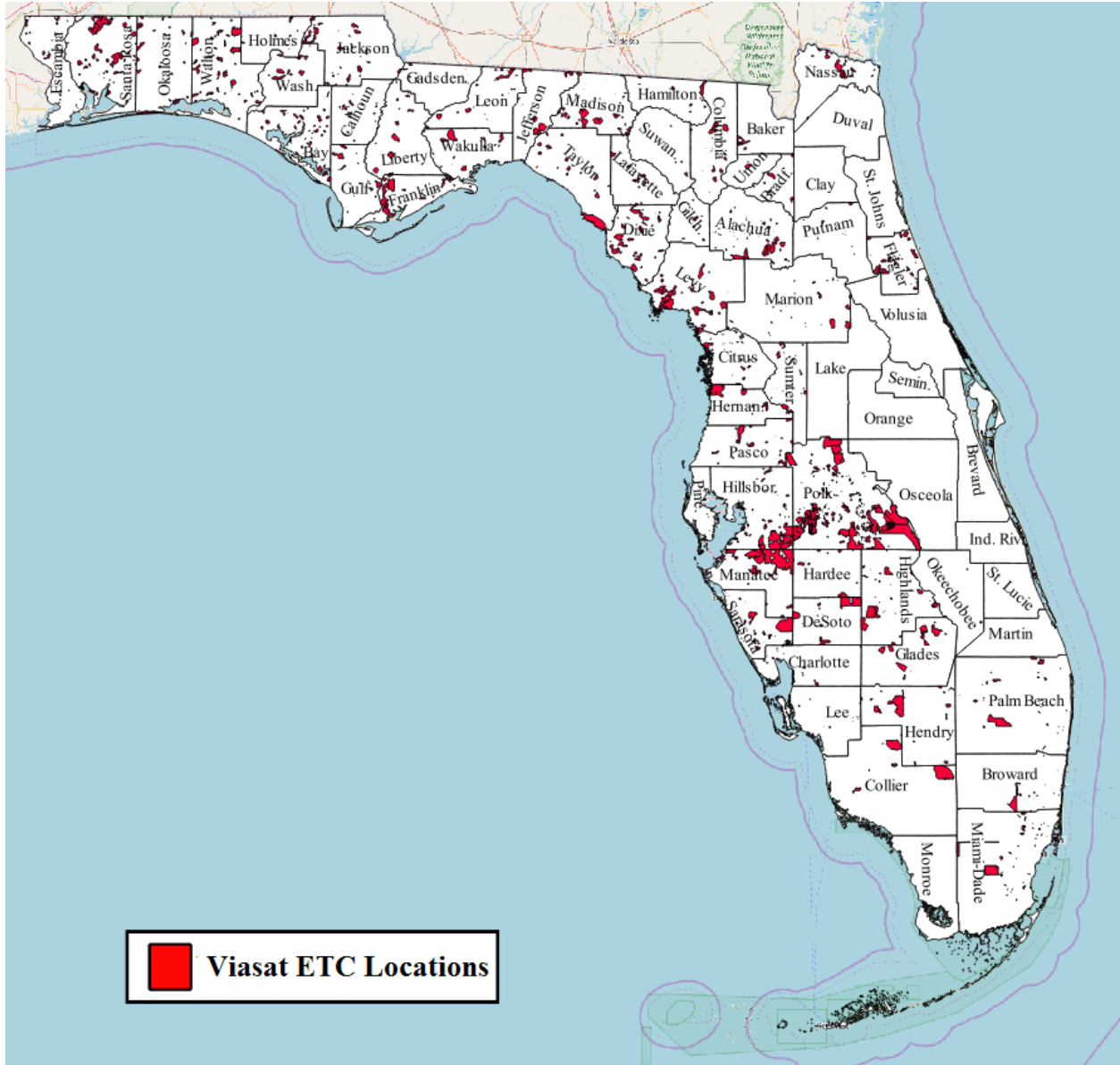
Source: FPSC Data Requests 2016-2019

**Appendix C**  
**Lifeline Subscription by Service Type**  
(as of June 2019)

	ETCs	Voice	Broadband	Bundled	Total
<b>Wireless</b>	Assurance Wireless	41,460	364,346	2,645	408,451
	SafeLink Wireless	172,965	60	570	173,595
	Access Wireless	15,517	115	0	15,632
	T-Mobile	298	7	2,184	2,489
<b>Incumbent Wireline</b>	CenturyLink	4,047	70	334	4,451
	Frontier Florida	1,569	67	22	1,658
	Windstream	1,061	56	195	1,312
	Consolidated Communications	333	0	5	338
	NEFCOM	228	4	0	232
	TDS Telecom	102	0	5	107
	AT&T	91	0	0	91
	ITS Fiber	8	1	11	20
	Frontier of the South	17	0	1	18
	Smart City	1	2	0	3
<b>Competitive Wireline</b>	Cox Telecom	461	0	0	461
	Phone Club	158	0	0	158
	WOW!	42	5	2	49
	Tele Circuit	34	0	0	34
	Global Connection	1	0	0	1
<b>Total</b>	<b>238,393</b>	<b>364,733</b>	<b>5,974</b>	<b>609,100</b>	

Source: USAC Disbursements in Florida

# Appendix D Viasat's Florida Lifeline Service Area



Source: Viasat's ETC Designation Petition before the FCC, Exhibit C



## Appendix E Florida Lifeline Partners

<b>Agencies, Organizations and Businesses</b>	
1000 Friends of Florida, Inc.	A Caring Hand Home Care
AARP–Florida Chapter	Ability Housing of Northeast Florida
ACCESS Florida Community Network Partners	Agency for Health Care Administration
Agency for Persons with Disabilities	Aging Matters in Brevard County
Aging Solutions, Inc.	Aging True Community Senior Services
Aging With Dignity	Alliance for Aging, Inc.
America's Second Harvest of the Big Bend, Inc.	Area Agencies on Aging
ASPIRE Health Partners	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.	Bridges at Riviera Beach
Broward County Elderly & Veterans Services Division	Bureau of Indian Affairs Programs
Capital Area Community Action Agency, Inc.	Carrfour Supportive Housing
Catholic Charities of Central Florida	Center for Hearing and Communication
Centers for Drug Free Living	Centers for Independent Living
Central Florida Community Action Agency	City and County Consumer Assistance Departments
City and County Consumer Assistance Departments	City and County Housing Authorities
City and County Social Programs	Communities In Schools Foster Grandparent Program
Community Legal Services	Community Partnership Group
Deaf & Hard of Hearing Services of NW Florida, Inc.	Disability Rights Florida
Elder Options	Elder Source
Faith Radio Station and other Florida radio stations	Federal Social Security Admin - Tallahassee District
Feeding South Florida	First Quality Home Care
Florida Alliance for Information and Referral Services	Florida Assisted Living Association
Florida Association for Community Action	Florida Association of Community Health Centers
Florida Association of Counties	Florida Association of County Human Service Admin
Florida Association of Food Banks	Florida Association of Housing and Redevelopment Officials
Florida Coalition for Children	Florida Coalition for the Homeless
Florida Council on Aging	Florida Deaf Services Centers Association
Florida Department of Business and Professional Regulation	Florida Department of Children and Families
Florida Department of Community Affairs	Florida Department of Economic Opportunity
Florida Department of Education	Florida Department of Elder Affairs
Florida Department of Revenue	Florida Department of Veterans' Affairs
Florida Developmental Disabilities Council	Florida Elder Care Services
Florida Highway Safety and Motor Vehicles	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

<b>Agencies, Organizations and Businesses (con't.)</b>	
Florida Office of Public Counsel	Florida Ombudsman Program
Florida Public Libraries	Florida Public School Districts
Florida Rural Legal Services, Inc.	Florida Senior Medicare Patrol
Florida Senior Program	Florida Telecommunications Relay, Inc.
Florida Voters League	Good News Outreach
Goodwill Industries of Central Florida	Habitat for Humanity – Florida
HANDS of Central Florida	Hemophilia Foundation of Greater Florida
Hispanic Office for Local Assistance	HOPE Community Center
HOPE Connection	League for the Hard of Hearing
Leon County School Board	Little Havana Activities and Nutrition Centers
Living Stones Native Circle	Marion Senior Services
Miccosukee Tribe of Indians of Florida	Mid-Florida Housing Partnership, Inc.
Monroe County Social Services	NAACP (Florida Associations)
National Church Residences	Nursing Homes Administrators
One-Stop Career Centers	Osceola County Corrections Department
Palm Beach Community Action Agency	Refuge House of the Big Bend
Seminole County Community Development	Senior Connection Center, Inc.
Senior Friendship Centers	Senior Medicare Patrol
Senior Resource Alliance	Senior Solutions
Seniors First	SHINE Program
South East American Council, Inc.	Tallahassee Memorial Hospital
Tallahassee Urban League	Tampa Vet Center
Three Rivers Legal Services, Inc.	U.S. Department of Housing and Urban Development
United Home Care Services	United Way of Florida
Urban Jacksonville	Urban Leagues of Florida
Wakulla County Senior Citizens Council	Walton County Council on Aging
Washington County Council on Aging	We Care-Jacksonville