



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



December 2020

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List of Acronyms

CAF-II	Connect America Fund Phase-II
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
OPC	Office of Public Counsel
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
SSI	Supplemental Security Income
USAC	Universal Service Administrative Company

I. Executive Summary

The Florida Lifeline Assistance report is prepared pursuant to the requirements found in Section 364.10, Florida Statutes (F.S.). 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 choose to receive monthly wireless minutes and/or measured data service from certain wireless providers.¹ This report presents Lifeline participation data from July 2019 through June 2020, and evaluates procedures put in place to strengthen and streamline the Lifeline program.

On April 21, 2016, The Federal Communications Commission (FCC) released a Lifeline Modernization Order, which established a singular Lifeline eligibility determination system conducted by the Universal Service Administrative Company (USAC), known as the National Verifier. 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. As of March 24, 2020, Florida Lifeline customer eligibility verification is conducted solely through the National Verifier.

As of June 30, 2020, there were 371,180 Florida households participating in the Lifeline program. This equates to approximately one of every 23 Florida households.² The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 17 percent of SNAP participants subscribe to Lifeline. Using SNAP participation as a proxy for the number of Lifeline eligible households results in an estimate of only 17 percent of eligible Florida households are receiving Lifeline assistance as of June 2020.³ Most of the reduction in this year's participation rate is attributed to the decline in subscribership from one company.

“*Stay Connected Florida*” was the slogan for Florida’s 2020 Lifeline Awareness Week, held on September 14-18. This year’s Lifeline Awareness Week continued efforts to increase awareness and enrollment in the Lifeline program.

¹ Such wireless Lifeline services generally include a free cellphone, but the distribution of wireless equipment is not part of the program.

² Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households July 2020: 8,580,271, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed September 16, 2020, p. T-2.

³ Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/service-programs/access/StandardDataReports.asp>, accessed October 20, 2020.

II. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. Initially the goal of the program was to ensure that all Americans had the opportunities and security that phone service brings. Over time, 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 measured voice or broadband service from certain wireless carriers. Such wireless services generally include a free cell phone, but the distribution of wireless equipment is not part of the program. As discussed further in Section IV, in order to provide Lifeline services to consumers, a company must be designated as an eligible telecommunications carrier (ETC) by the FPSC or the FCC.

The FPSC has oversight over the Florida Lifeline program pursuant to Section 364.10, F.S. However, the Lifeline program is one of the federal Universal Service Fund (USF) programs, which also includes the high-cost, rural healthcare, and schools and libraries programs. Lifeline is available to eligible low-income households in every state and territory, as well as federally recognized Tribal lands.

The federal USF provides funding for the Lifeline program. The rules affecting the Lifeline program are established by the FCC; however, the FCC has designated USAC, an independent not-for-profit corporation, 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 USF programs. Additionally, in 2016, the FCC directed USAC to develop and administer a National Verifier that would determine customer eligibility. This was to be implemented in all states and territories by December 2019.⁴ In Florida, the soft launch of the National Verifier began in December 2019, and was fully launched in March 2020. The National Verifier is discussed in more detail in Section V.

Eligibility

Consumers can qualify to participate in the Lifeline program either through program-based or income-based eligibility standards. Program-based eligibility is determined by a customer's enrollment in specific qualifying programs. Customers can qualify for the Lifeline program in Florida by enrollment in any one of the following programs:

- SNAP
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Veterans or Survivors Pension Program

⁴ 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, accessed on September 14, 2020.

- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy, and National School Lunch Program

Consumers whose total household income is less than 135 percent of the Federal Poverty Guidelines are eligible to participate in the Lifeline program under the income-base standard. The Federal Poverty Guidelines are updated annually by the U.S. Department of Health and Human Services.⁵ Consumers can enroll in the Lifeline program through the income-based eligibility by providing qualifying documentation. Prior to Florida's transition to the National Verifier this documentation was provided to the customer's provider of choice or in some cases through the Office of Public Counsel (OPC). Now customers must provide this documentation by uploading it to the National Verifier portal or mailing it to the Lifeline Support Center. OPC ceased verifying consumer income eligibility in April 2020; however, it still processed 2,286 applications between July 2019 and April 2020.

Application Process

The National Verifier was created in part to streamline the eligibility verification process. Prior to the National Verifier, Florida consumers could apply for Lifeline directly with an ETC, through a coordinated enrollment process when applying for SNAP or Medicaid with the Florida Department of Children and Families (DCF), or through OPC when applying based upon income. Since its implementation, however, all applications are now processed through the National Verifier. There are several methods for applying through the National Verifier:

- Through USAC's website using the National Verifier consumer portal
- In person with certain ETCs using the National Verifier service provider portal
- By mailing their application to USAC's Lifeline Support Center
- Through ETC websites that have access to the National Verifier

Once applications are received they are validated through available automated eligibility data sources. Applications are checked to confirm identity, verify that the consumer is not already a Lifeline participant, and to ensure compliance with all program rules. If a customer's eligibility cannot be validated through these checks, they can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Upon completion of the application process, the individual is either determined qualified for the Lifeline benefit or is required to submit more information. Those that qualify must then contact an ETC in their area to enroll in the Lifeline program.

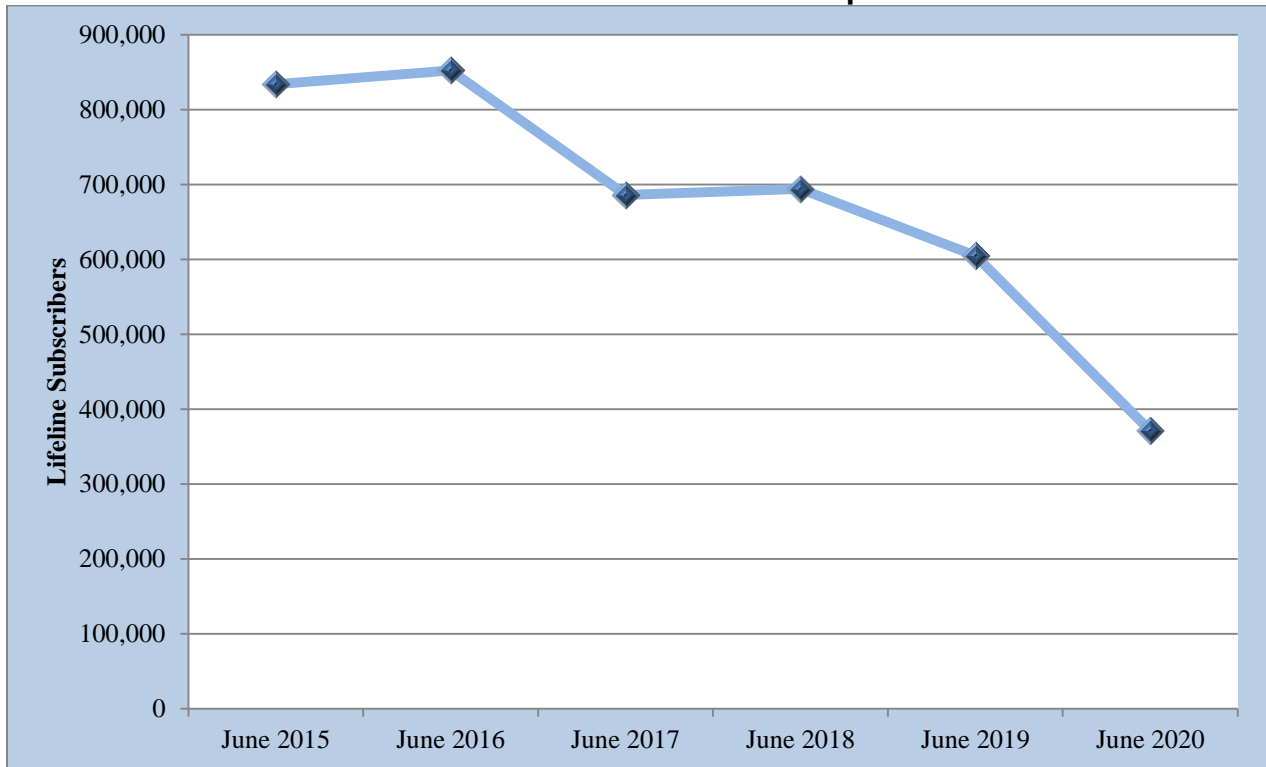
⁵ The 2020 Federal Poverty Guidelines are shown in Appendix A.

III. Lifeline Participation

Participation

There were 371,180 subscribers enrolled in Lifeline as of June 30, 2020, which is a 38.62% percent decrease from the number of subscribers last year. Figure 1 shows the number of Lifeline subscribers from June 2015 through June 2020. Eighty-one percent of the decline was attributed to a significant drop in subscribership by Assurance Wireless.

Figure 1
Florida Lifeline Subscribership



Source: Industry Responses to FPSC Data Requests (2015-2020)

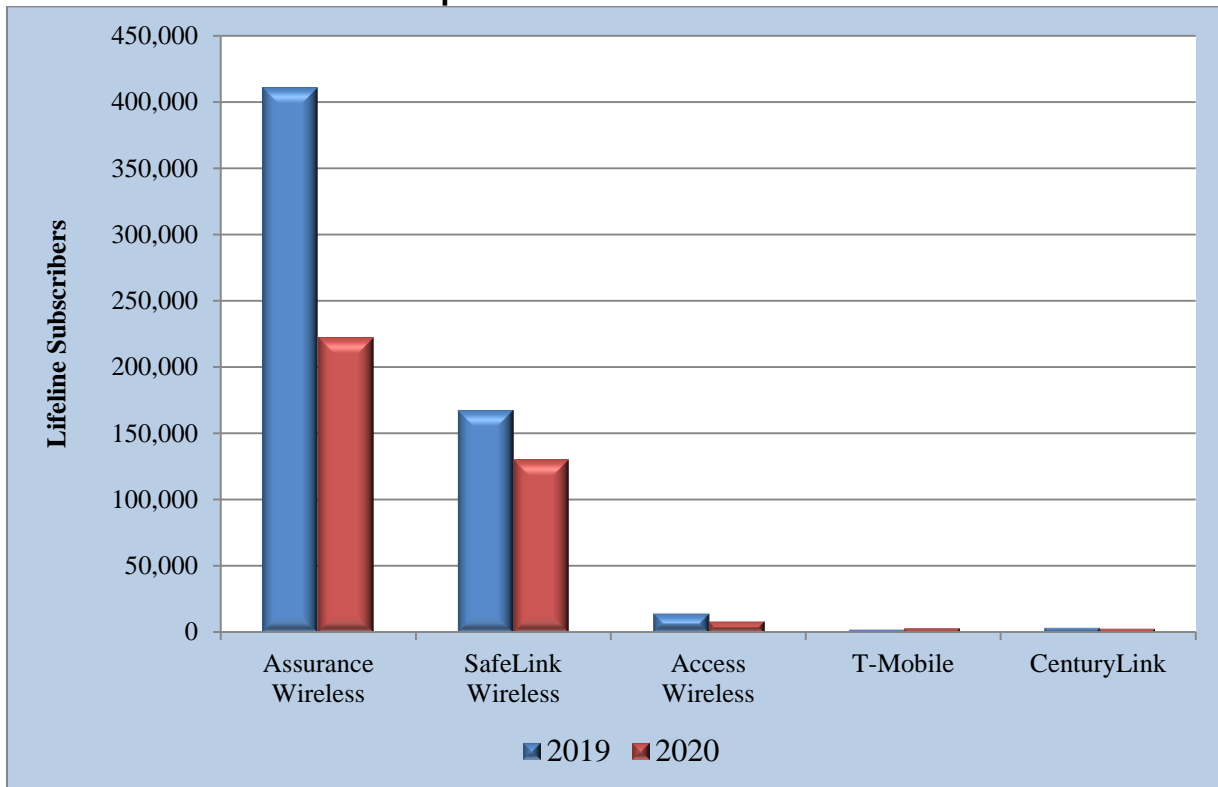
Assurance Wireless noted that in order to comply with the FCC non-usage rules, a significant number of customers were de-enrolled in September 2019. This rule requires ETCs that provide free service to de-enroll customers that don't use their service within a 30-day period. While such ETCs provide Lifeline service for free to eligible customers, the ETC receives funding from USAC.

This year there was an overall decline in Lifeline subscribership. However, five ETCs (T-Mobile, Phone Club, ITS, Smart City and Frontier of the South) experienced an increase in the number of Lifeline customers.

Since the implementation of the National Verifier in Florida, subscribership has remained consistent for the most part. However, with only three months of analyzed data and several Lifeline program waivers in place due to the COVID-19 pandemic, it's uncertain what impact the National Verifier will have on Florida's subscribership.

Figure 2 shows the five Florida ETCs with the most Lifeline subscribers for June 2019 and 2020. These ETCs represent 99 percent of Lifeline subscriber participation in Florida. For 2020, Assurance Wireless remains the ETC with the highest number of Lifeline subscribers, even after its record reduction of 189 thousand Lifeline subscribers in Florida. Such dramatic shifts in subscribership are uncommon. SafeLink Wireless experienced a similar reduction of 114 thousand Lifeline subscribers between 2017 and 2018.

Figure 2
Top Five Florida Lifeline ETCs



Source: Industry Responses to 2020 FPSC Data Requests

Figure 3 compares how many households were enrolled in Lifeline with the estimated number of eligible households, using SNAP participation as a proxy for eligibility. Lifeline subscribership decreased by 233,513 between June 2019 and June 2020. At the same time, the number of Lifeline eligible households increased by 610,821.⁶

As a result, the participation rate as of June 2020 was 17.25 percent. This represents a drop of 22 percentage points compared to 2019. Most of the reduction in this year's participation rate is attributed to the decline in subscribership discussed above.

Historically, this report has cited SNAP eligible household data as reported by the U.S. Department of Agriculture. At the time of this report, June 2020 SNAP participation data is unavailable from the U.S. Department of Agriculture. Furthermore, the data that is available for

⁶ Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/service-programs/access/StandardDataReports.asp>, accessed October 20, 2020.

2020 may include participation in other food assistance programs not related to the SNAP program.⁷ The Florida DCF also collects this information and reports more current data that only includes SNAP eligible households. Figure 3 has been updated to include historical SNAP participation data for years reported prior to June 2020 using this new source.⁸

Figure 3
Lifeline Participation Rate in Eligible Florida Households

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
Jun-15	833,426	2,040,236	40.85%
Jun-16	852,255	1,747,684	48.76%
Jun-17	685,864	1,690,899	40.56%
Jun-18	694,647	1,655,134	41.97%
Jun-19	604,693	1,540,682	39.25%
Jun-20	371,180	2,151,503	17.25%

Source: Florida DCF, Access Florida: Standard Data Tables

The continued need for Lifeline outreach is demonstrated by the number of households that 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.

Transitional Lifeline

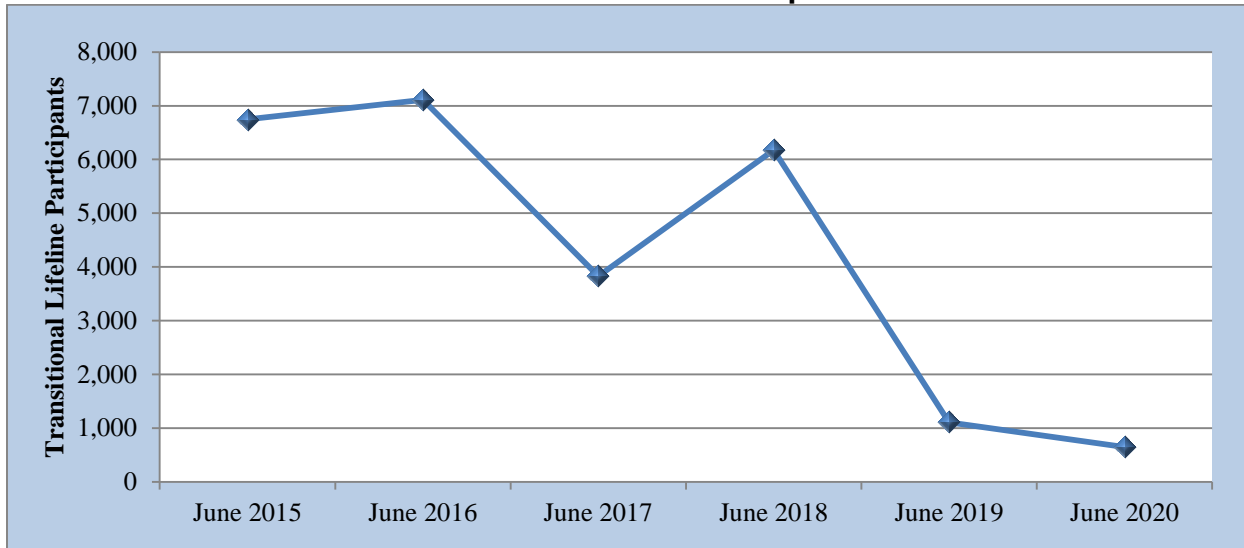
Transitioning from the Lifeline program usually occurs when a customer’s socio-economic status has improved, thus advancing them beyond the qualifying eligibility criteria. As required by Section 364.105, F.S., customers who no longer qualify for Lifeline are eligible to receive a 30 percent discount 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 2015 through June 2020. Transitional Lifeline participation decreased by 457 subscribers from 2019 to 2020.

⁷ The U.S. Department of Agriculture reported that its data shows that some states incorrectly combined Pandemic Electronic Benefits Transfer (P-EBT) and SNAP participation in their monthly reports. P-EBT is a supplemental benefit for households with children who have temporarily lost access to free or reduced-price school meals due to pandemic-related school closures.

⁸ Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/service-programs/access/StandardDataReports.asp>, accessed October 20, 2020.

It should be noted, to comply with Section 364.105, F.S., instead of providing a 30 percent discount, TracFone offers its former Lifeline customers at least a 30 percent increase on the customer's chosen prepaid service card. Transitional Lifeline customers participating in this manner are not tracked by TracFone and, therefore, not included in Figure 4.

Figure 4
Transitional Lifeline Participation



Source: Industry Responses to FPSC Data Requests (2015-2020)

IV. Lifeline Providers

State commissions have been granted the authority to designate carriers as ETCs by Congress if they meet certain requirements.⁹ Conversely, ETC designation may be rescinded by a state commission should a company fail to 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.¹⁰ 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.¹¹

Currently, the FPSC only evaluates wireline ETC applications, while wireless ETC applications are evaluated by the FCC.¹² Figure 5 shows the 16 companies that were ETCs and participated in the Lifeline program in Florida as of June 30, 2020. On December 17, 2019, the FPSC revoked Tele Circuit Network Corporation’s ETC status and CLEC certificate, due to the use of wireless technology for its Lifeline customers, in violation of its wireline ETC designation.¹³ Appendix B provides Lifeline enrollment figures for each ETC between 2017 and 2020.

Figure 5
ETCs Participating in Florida

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

Source: Industry Responses to 2020 FPSC Data Requests

⁹ Section 214(e)(2) of the Telecommunications Act of 1996.

¹⁰ 47 Code of Federal Regulations (CFR) §54.101(a).

¹¹ 47 CFR §54.201(h).

¹² 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.

¹³ FPSC, Docket No. 20190193-TX, Order No. PSC-2019-0526-FOF-TX, Initiation of show cause proceeding against Tele Circuit Network Corporation for apparent violation of Order Nos. PSC-05-0361-PAA-TX and PSC-11-0419-PAA-TX, issued December 17, 2019.

During this past year, a major merger and a proposed acquisition have taken place. Both transactions could have a potential impact on the Lifeline program. First, in April 2020, T-Mobile and Sprint completed their merger. As part of the approval of the merger, Sprint was required to sell off most of its subsidiaries that offer prepaid services. Assurance wireless, which was the subsidiary that Sprint provided Lifeline service through, was not required to be sold, and remains in operation as a subsidiary of T-Mobile. Second, on September 14, 2020, Verizon announced its intention to acquire TracFone Wireless and become the prepaid leader in the U.S. The transaction must first receive approval from the FCC, with an expected close date to occur in the second half of 2021. Because the purchase does not affect TracFone's operations and Verizon states that it will be keeping TracFone's employees, it appears that the impact on Florida Lifeline customers may be minimal.

Also during this reporting year, Viasat Carrier Services, Inc. (Viasat) was announced as one of the winners of the FCC's Connect America Fund Phase-II auction (CAF-II). The CAF-II auction awards High-Cost funding for deployment of voice and broadband service in select census blocks throughout the nation. The FCC designated Viasat as an ETC in selected areas in Florida, Alabama, California, and West Virginia on September 18, 2019.¹⁴ The FPSC had previously denied Viasat's petition for ETC designation in 2018, citing a lack of jurisdiction and directed it to the FCC.¹⁵ Viasat's service is provisioned through Voice over Internet Protocol and broadband services using geostationary-satellite orbit technologies.

As a condition of Viasat's ETC designation, it must offer service in at least 40 percent of its designation ETC service territory by December 2022, with 20 percent increases in each subsequent year.¹⁶ This includes offering Lifeline service. For this reporting year, Viasat did not provide Lifeline services due to needed upgrades of its internal systems. Viasat has indicated that the upgrades are currently being conducted and it anticipates meeting the first service deployment obligation by the December 2022 deadline.¹⁷

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, but they experienced an increase in bundled service from 7.0% to 16.6% and from 0.3% to 10.8%, respectively. By comparison, wireless ETCs meet their Lifeline obligation predominantly through the provision of broadband connections. Wireless ETCs experienced an increase in bundled service from 0.9% to 32.2%. Appendix C provides greater detail of Lifeline subscriptions by service type for each carrier.

¹⁴ 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 16, 2020.

¹⁵ FPSC, Order No. PSC-2018-0531-PAA-TX, Docket No. 20180180-TX, Application for limited designation as an eligible telecommunications carrier (ETC) with request for expedited consideration by Viasat Carrier Services, Inc., issued November 13, 2019.

¹⁶ FCC, Connect America Fund Phase II Auction (Auction 903), <https://www.fcc.gov/auction/903>, accessed September 16, 2020.

¹⁷ FPSC Staff Email Correspondence with Viasat on September 15, 2020, with Eric Baulesh.

**Figure 6
Lifeline Subscription by Service Type
(As of June 2020)**

Carrier Type	Voice	Broadband	Bundled
Wireless	8.0%	59.9%	32.1%
Incumbent Wireline	79.2%	4.2%	16.6%
Competitive Wireline	84.8%	4.4%	10.8%

Source: USAC Disbursements Florida

All the wireless ETCs in Florida are meeting the minimum FCC standards by offering at least 1,000 minutes or 3 GB of data to Lifeline subscribers. It should be noted that wireless carriers frequently offer some voice or data along with the service that meets the FCC’s standard. Figure 7 outlines different basic Lifeline services offered by Wireless ETCs in Florida and how they qualify with the federal standards.

Apart from T-Mobile’s plan, each wireless ETC offers a Lifeline plan paid by the 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 discount towards any plan that T-Mobile offers. T-Mobile’s least expensive plan would cost Lifeline consumers \$12.75, after the Lifeline discount, and provide unlimited voice minutes, but does not include a data component.

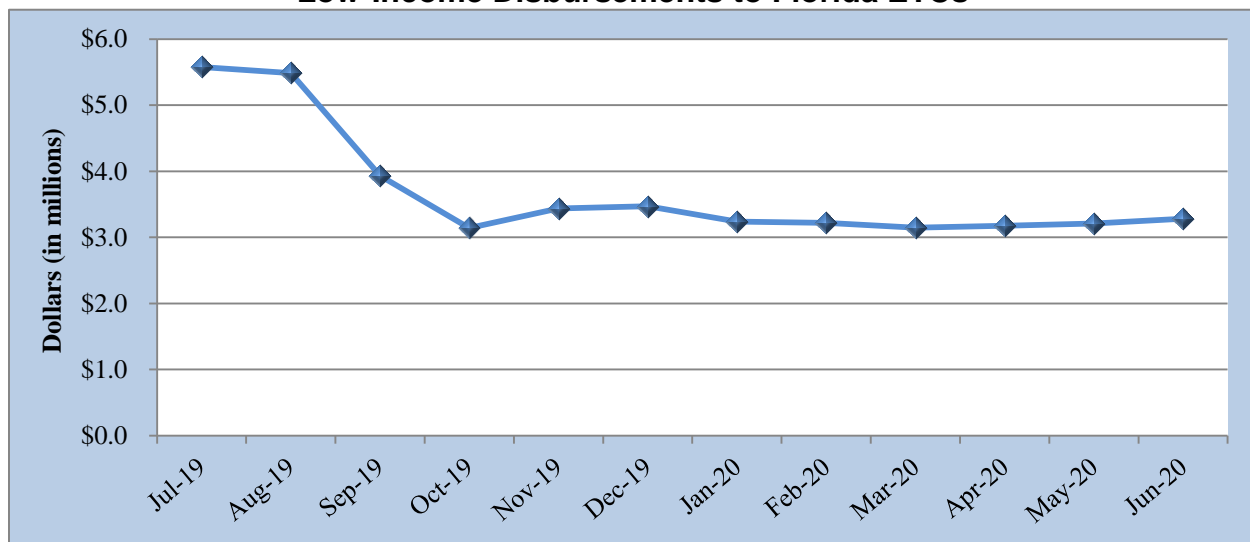
**Figure 7
Wireless Service Standard Met by Service Type
(As of September 2020)**

Wireless ETC	Minimum Standards Met	Voice	Data
Access Wireless	Voice	1,000 Minutes	50 MB
Access Wireless	Data	250 Minutes	3 GB
Assurance	Data	350 Minutes	3 GB
SafeLink	Voice	1,000 Minutes	1 GB
SafeLink	Data	350 Minutes	3 GB
T-Mobile	Voice	Unlimited	No Data

Source: Wireless ETC’s websites

Figure 8 reflects USAC Lifeline disbursements to Florida ETCs between July 2019 and June 2020. The total amount disbursed during this 12-month period was \$44,309,196, with an average of \$3.7 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 2019-June 2020

Prior to August 15, 2016, competitive carriers could offer Lifeline discounted service through a resale agreement with an ETC. 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. Petitions for wireless ETC designation in 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
Pending Florida Wireless ETC Designations at FCC
(As of August 2020)

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

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. This Order was primarily established to modernize the Lifeline program by including broadband as a supported service, designating minimum service standards for Lifeline services, and establishing the National Verifier. Implementation of this Order continues to have an impact on the federal Lifeline program.

State Defined Eligibility Criteria

Prior to the implementation of the FCC's 2016 Lifeline Modernization Order, states that mandated Lifeline support, such as Florida, could establish its own qualification criteria. Thus, a state could have different state income eligibility standards from the FCC or include additional state qualifying programs. However, in 2016, the FCC amended its rules resulting in the elimination of that provision.¹⁸ The FCC stated that it made this change to simplify the administration of the Lifeline program and establish eligibility criteria that do not vary from state to state.¹⁹

Section 364.10(2), Florida Statutes, currently contains a conditional poverty qualifier that exceeds the FCC's threshold of 135 percent of the Federal Poverty Guidelines. Specifically, wireline ETCs with more than a million access lines are required to provide Lifeline service to customers whose income is 150 percent or less of the Federal Poverty Guidelines.

No wireline carriers have had more than a million access lines since 2016.²⁰ Wireless ETCs were given more flexibility in that they "may" provide Lifeline services at the 150 percent threshold. It is unlikely that any wireless ETC is currently qualifying customers using this expanded criterion because those customers would not qualify for reimbursement from USAC.

Minimum Service Standards

In the 2016 Lifeline Modernization Order, the FCC required all ETC's to provide a discount for broadband access that meets the FCC's 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 USF 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.²¹ The current minimum service standards that became effective December 1, 2019 are:

¹⁸ FCC, Third Report and Order, FCC 16-38, WC Docket No. 11-42, released April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed September 23, 2020, par. 212.

¹⁹ Ibid, par. 215.

²⁰ FPSC, Report on the Status of Competition in the Telecommunications Industry as of December 31, 2019, <http://www.floridapsc.com/Files/PDF/Publications/Reports/Telecommunication/TelecommunicationIndustry/2020.pdf>, accessed on September 25, 2020, Figures 2-5 and 2-6.

²¹ 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 4, 2020.

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

Lifeline Program Voice-Only Support Phase Out

The 2016 Lifeline Modernization Order gradually phases out support for voice-only services to further the FCC’s goal of transitioning to a broadband-focused Lifeline program. On December 1, 2019, the support provided for voice-only services was reduced to \$7.25 per Lifeline customer. Support for fixed and mobile voice Lifeline service will continue to be phased out throughout 2021, and will be completely phased out by 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
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)

The FPSC filed comments regarding this matter in the FCC’s 2017 Fourth Report and Order and Notice of Proposed Rulemaking.²² 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. 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.

The impact of the voice-only support phase out appears to have affected the service offerings of wireless Florida ETCs, causing those ETCs to shift away from voice-only service offerings.²³ In order to receive the full reimbursement of \$9.25, ETCs are required to invest in infrastructure that satisfies evolving service standards and supports broadband or bundled voice and broadband service offerings. A barrier to entry may exist for smaller companies wishing to become ETCs, while the declining support offered to already established ETCs may result in them exiting the market once voice-only support is fully phased out.

²² 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 4, 2020.

²³ Appendix C.

National Lifeline Eligibility Verifier

As a part of the FCC's 2016 Lifeline Modernization Order, in an effort to fight waste, fraud and abuse in the Lifeline program the FCC directed USAC to develop a national Lifeline eligibility verifier. The purpose of the National Verifier is to determine initial subscriber eligibility, conduct annual recertification, populate a national database consisting of Lifeline customers, and provide support payments to providers serving these customers. Throughout 2019, USAC conducted quarterly launches that transitioned states and U.S. territories into the National Verifier.

On December 31, 2019, USAC completed their final launch, encompassing all 50 states, as well as all U.S. territories into the National Verifier. Upon inception into the National Verifier, states entered a soft launch period in which usage of the National Verifier was encouraged, but was not mandatory, to determine customer eligibility for the Lifeline program. During the soft launch period, carriers were still able to determine customer eligibility using previously acceptable processes. Upon entering hard launch status, use of the National Verifier to determine eligibility becomes mandatory. On March 24, 2020, Florida entered hard launch of the National Verifier.

New Lifeline customers may apply for the Lifeline program through the National Verifier online, or by mailing a physical copy of the application which can be found on the National Verifier portal website.²⁴ Disabled individuals may call the USAC Lifeline Support Center hotline to receive assistance in filling out an application by phone.²⁵ For all other questions regarding the Lifeline program, customers are encouraged to visit the Lifeline support website, or call the USAC National Verifier hotline.²⁶

While ETCs have the ability to assist customers in applying through the National Verifier, that ability is somewhat limited. ETCs have the ability to check the status of National Verifier applications for customers after they have been submitted. ETCs may also assist customers with their applications; however, this must be done in person as the National Verifier computer interface does not allow for remote assistance.

ETCs have expressed displeasure using the system, citing issues with their ability to effectively assist customers with applications, as well as National Verifier portal operational issues.²⁷ USAC has actively addressed and worked toward rectifying issues throughout 2020, and continues to keep state regulators and stakeholders informed on improvements through monthly conference calls and webinars.

USAC Interface with Florida DCF Database

The FPSC facilitated an informal meeting between DCF and USAC to begin discussion regarding the implementation of the National Verifier in Florida. The 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. The DCF database would provide USAC with verification that a customer is a participant in a qualifying program without actually revealing the program itself or any other customer information. Once a customer

²⁴ USAC, National Verifier, <https://nationalverifier.servicenowservices.com/lifeline>, accessed September 4, 2020.

²⁵ USAC, Lifeline Support Center Hotline, 1-800-234-9473.

²⁶ USAC, Lifeline Support Website, <https://www.lifelinesupport.org/>, accessed September 4, 2020.

²⁷ 2020 Lifeline Report Data Request Responses.

is verified as a qualifying program participant through this process, they are enrolled in the Lifeline program with no need for any further documentation. At the time of this report, DCF and USAC are close to finalizing an agreement establishing the interface.

The National Verifier's efficiency is contingent upon the establishment of automated verification interface processes. Currently, the National Verifier is connected to the FPHA, and the federal Medicaid databases, in which all Lifeline program applicants are initially checked for eligibility. As of July 30, 2020, USAC has been able to establish eligibility verification interfaces for state qualifying programs in 19 states, and is working with the remaining states to establish interfaces, with an ultimate goal of being connected to all states by 2021.

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 applications for people 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 customer information to the FPSC. The FPSC places this information on a secure website for retrieval by the appropriate ETC.

Prior to the National Verifier, customers identified through this process would be automatically considered eligible and enrolled in Lifeline service by the ETC. However, now that eligibility is determined only by the National Verifier, ETC's must now contact the customer to determine if they have already been enrolled in the Lifeline Program through the National Verifier.

For those customers who have not yet applied for the program, ETCs will either instruct customers on where they can apply, or assist these customers with their applications in person. If a customer mistakenly identifies an ETC that does not serve the area in which they live, the FPSC sends instructions on how to apply through the National Verifier, along with a list of each ETC's contact information.

Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.²⁸ 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.²⁹

To prevent waste in the USF, the FCC created a National Lifeline Accountability Database and mandated its use to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber.³⁰ The National Lifeline Accountability Database conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is

²⁸ 47 CFR § 54.409(c).

²⁹ A household Lifeline eligibility pre-screening tool is available at www.lifelinesupport.org.

³⁰ FCC, Report and Order, WC Docket No. 11-42, released February 6, 2012, <https://docs.fcc.gov/public/attachments/FCC-12-11A1.pdf>, accessed September 25, 2020.

already receiving Lifeline service. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

Sprint's Lifeline Usage Rule Violation

On September 24, 2019, the FCC issued a News Release regarding an investigation conducted by the Oregon Public Utility Commission into whether Sprint Corporation (Sprint) has been claiming reimbursement for customers in violation of the usage requirement of the Lifeline rules.³¹ The rule is applicable to customers who receive free Lifeline service. It requires Lifeline customers to use their Lifeline service at least once in a 30-day period. ETCs are required to de-enroll customers from the program after a 15-day notification period if the usage requirement is not met.

Sprint had received Lifeline support for approximately 855,000 customers nationwide, in violation of the usage requirement. This represented nearly 30 percent of Sprint's Lifeline subscribers, and roughly 10 percent of the entire Lifeline program. Sprint accepted responsibility for the violation, stating the issue was a result of a 2017 coding error following the updated Lifeline program requirements put forth in the 2016 Lifeline Modernization Order. The FCC's investigation into the issue has concluded, resulting in a \$200 million dollar fine being assessed against Sprint, which is the largest fixed dollar amount secured by the FCC to resolve an investigation.³² T-Mobile has agreed to pay the fine for its subsidiary.

Sprint provided Lifeline service through its subsidiary Assurance Wireless. As Florida's largest wireless ETC, Assurance Wireless' de-enrollment of the corresponding Florida Lifeline customers resulted in a significant drop in Lifeline customers from September 2019 to December 2019. While the drop seemed drastic, it should be noted that these customers should not have been enrolled because of the usage requirements.

Sprint and T-Mobile Merger

On April 1, 2020, Sprint and T-Mobile completed a corporate merger that was approved by the FCC on November 5, 2019.³³ The \$26 billion transaction involved the sale of all of Sprint's prepaid wireless services to Dish Network for \$5 billion, thus creating a fourth major mobile carrier. Assurance Wireless, a subsidiary of Sprint, is Florida's largest wireless Lifeline service provider, accounting for approximately 60 percent of all Florida Lifeline customers. Commission staff has been informed that Assurance Wireless will continue to provide Lifeline service as a separate subsidiary of T-Mobile for the foreseeable future.³⁴

Verizon's Purchase of TracFone

On September 14, 2020, Verizon announced plans to purchase TracFone, Florida's second largest Lifeline ETC and the nation's largest reseller of wireless service.³⁵ Currently, about 13

³¹ FCC, News Release, released September 24, 2019, <https://docs.fcc.gov/public/attachments/DOC-359820A1.pdf>, accessed September 25, 2020.

³² FCC, News Release, released November 4, 2020, <https://docs.fcc.gov/public/attachments/DOC-367967A1.pdf>, accessed November 10, 2020.

³³ FCC, Memorandum Opinion and Order, FCC 19-103, WT Docket No 18-197, released November 5, 2019, <https://docs.fcc.gov/public/attachments/FCC-19-103A1.pdf>, accessed August 29, 2020.

³⁴ 2020 Lifeline Report Data Request Response by Assurance Wireless.

³⁵ Verizon, Verizon to Acquire TracFone, released September 14, 2020, <https://www.verizon.com/about/news/verizon-to-acquire-tracfone>, accessed September 26, 2020.

million of TracFone's 21 million customers receive resold Verizon service. Verizon intends to continue providing Lifeline service through TracFone with plans of further developing the brand, products, and distribution channels. Though the purchase has been announced, finalization is contingent upon regulatory approval and must be voted on by the FCC. Industry and state opposition could also slow the merger; however, Verizon believes the purchase should be completed by third quarter 2021.

Lifeline Rule Waivers

On March 17, 2020, the FCC released an Order suspending the usage requirement rule of the Lifeline program as a result of the COVID-19 pandemic.³⁶ The Order also suspends de-enrollment due to customer reverification non-response, halts USAC from requesting new reverification eligibility information from customers, and waives the recertification rules of the Lifeline program. A follow-up Order, released on April 29, 2020, amended the income eligibility, as well as halted all involuntary de-enrollment from the Lifeline Program.³⁷

The income eligibility rule requires customers qualifying for the Lifeline program under income eligibility documentation to provide three consecutive months of documentation proving they make at or less than 135 percent of the Federal Poverty Guidelines.³⁸ The amendment however, allows customers to provide documentation proving recent unemployment due to COVID-19, such as a notice of unemployment benefits, or notice of a successful application for unemployment benefits. While this amendment expands the pool of potential Lifeline qualified customers, the majority of Florida ETCs stated they did not see an influx of new Lifeline customers outside of ordinary trends, or that they could directly attribute to COVID-19 related unemployment.³⁹ As the COVID-19 pandemic continues, extensions to the aforementioned waivers and amendments are being considered. As of November 16, 2020, the waivers and amendments have been extended through February 28, 2021.⁴⁰

Keep America Connected Pledge

On March 13, 2020, the FCC announced a new initiative called the Keep Americans Connected Pledge (pledge), which aimed to minimize service disruptions and disconnections during the COVID-19 pandemic.⁴¹ Over 800 service providers signed this pledge nationwide. The pledge called for carriers to halt termination of service due to non-payment and late fees incurred by small businesses and customers, as well as open Wi-Fi hotspots for any American who needs them. FCC Chairman Pai encouraged service providers to go beyond the pledge in hopes that carriers would expand existing, or establish new low-income broadband programs to assist the most vulnerable Americans during this time. The pledge was extended through June 30, 2020.

³⁶ FCC, Order, Lifeline and Link Up Reform Modernization, DA 20-285, released March 17, 2020, <https://docs.fcc.gov/public/attachments/DA-20-285A1.pdf>, accessed September 4, 2020.

³⁷ Lifeline and Link Up Reform and Modernization, FCC Order, DA 20-462, <https://docs.fcc.gov/public/attachments/DA-20-462A1.pdf>, accessed September 4, 2020.

³⁸ USAC, Federal Poverty Guidelines for Lifeline, https://www.usac.org/wp-content/uploads/lifeline/documents/handouts/Income_Requirements.pdf, accessed on September 1, 2020.

³⁹ 2020 FPSC Lifeline Report Data Request Responses.

⁴⁰ FCC, Order, Lifeline and Link Up Reform and Modernization, DA 20-1357, released November 16, 2020, <https://docs.fcc.gov/public/attachments/DA-20-1357A1.pdf>, accessed November 17, 2020.

⁴¹ FCC, News Release, Chairman Pai Announces Keep America Connected Pledge, released March 13, 2020, <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>, accessed September 8, 2020.

Wireless ETCs

The majority of Florida's wireless ETCs accepted Chairman Pai's challenge by relaxing data-usage requirements and offering other services at no additional cost to customers.⁴² Such services offered in excess of the pledge requirement included:

- Increased Lifeline data-usage
- Unlimited minutes for Lifeline customers
- New low-income plans with increased data and minutes

TracFone also offered Lifeline customers three free telehealth visits as part of their expanded offerings.

Wireline ETCs

Some Florida wireline ETCs provided similar expanded services for low-income customers during the pledge period.⁴³ These ETCs expanded eligibility for its low-income internet programs, as well as offered expanded or unlimited data usage for programs such as:

- Free telehealth services for 60 days
- Free Internet for new low-income customers
- Free Internet for K-12 students who did not currently have broadband access

Non-ETCs

Several non-ETC service providers that have established low-income broadband offerings in Florida also provided expanded services beyond the pledge.⁴⁴ These offerings included:

- Free Internet for new low-income customers
- Faster broadband speeds
- Increased or unlimited data usage limits

Additionally, Charter (Spectrum), offered new low-income customers with K-12 students and/or college students free broadband service up to 100 Mbps download speed throughout the June 30, 2020, extension date of the pledge.

B. Florida Public Service Commission Activities

Actions to Prevent Waste, Fraud, and Abuse of the Universal Service Fund

Florida continues to enforce safeguards to prevent waste, fraud, and abuse of the USF. 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.

⁴² Sprint, T-Mobile, TracFone.

⁴³ AT&T, Century Link, Consolidated Communications, TDS Telecom, Windstream.

⁴⁴ Charter (Spectrum), Comcast (Xfinity), Cox (Connect2Compete).

Unlawful and inappropriate federal USF 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 USF than it receives. Therefore, the FPSC monitors federal USF disbursements to Florida ETCs to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

Revocation of Tele Circuit Network Corporation's ETC Designation

Stemming from a complaint received by FPSC staff, an investigation into the service offerings of Tele Circuit Network Corporation (Tele Circuit) was launched on May 21, 2019. The complaint involved a customer that had been denied the Lifeline benefit for wireline service, but was told that the customer could receive the benefit on what was being referred to as a “wireless home-phone.” Tele Circuit’s ETC designation established Tele Circuit as a wireline ETC, capable of providing Lifeline service only using wireline technology for reimbursement from USAC.⁴⁵

Upon further investigation into Tele Circuit’s operations, staff was made aware of a pending Notice of Apparent Liability for Forfeiture from the FCC against Tele Circuit for unauthorized switching of customer’s underlying service provider and unauthorized charges being placed on customer bills, assessing a fine against the carrier of \$5.3 million dollars.

By claiming Lifeline Program reimbursement for customers receiving service through unauthorized technology, and by displaying questionable managerial capability, on November 22, 2019, Tele Circuit was ordered by the FPSC to show cause in writing as to why the company’s ETC designation and Certificate of Authority should not be revoked. Due to the company’s non-response, on December 17, 2019, Tele Circuit’s ETC designation and Certificate of Authority were revoked.⁴⁶

FPSC staff contacted former Tele Circuit Lifeline customers to ensure they did not experience any disconnections of Lifeline service. A letter was mailed that explained the outcome of the revocation Order, how that would affect their current Lifeline service, and explained the customer’s options for alternative Lifeline providers that serve the areas in which they live.

⁴⁵ FPSC, Docket No. 20080201-TX, Order No. PSC-2011-0480-CO-TX, Application for designation as an eligible telecommunications carrier by Tele Circuit Network Corporation, issued September 24, 2011.

⁴⁶ FPSC, Docket No. 20190193-TX, Order No. PSC-2019-0526-FOF-TX, Initiation of show cause proceeding against Tele Circuit Network Corporation for apparent violation of Order Nos. PSC-05-0361-PAA-TX and PSC-11-0419-PAA-TX., issued December 17, 2019.

VI. Lifeline Promotion Activities

Promotional activities in 2020 featured National Lifeline Awareness Week and National Consumer Protection Week, as well as ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline program. The FPSC works with state commissions, the National Association of Regulatory Utility Commissioners, the FCC, and the National Association of State Utility Consumer Advocates to promote Lifeline Awareness Week and educate consumers on the nationwide implementation of a consumer-friendly National Verifier by USAC.

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 2020 Lifeline Awareness Week, September 14-18.⁴⁷ In addition to increasing awareness among eligible citizens, this year’s campaign continued educating residents about the discount on voice and broadband services.

This year, the outreach effort in Florida focused on the eight senior centers in Volusia County and the Tallahassee Senior Center. With in-person events cancelled due to the COVID-19 pandemic, FPSC representatives distributed information to seniors and answered questions with the help of the senior services coordinators. Lifeline information is also readily available on the FPSC’s website.⁴⁸

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. National Consumer Protection Week, March 1-7, 2020, provided a good opportunity for Lifeline outreach activities. An annual consumer education campaign, National Consumer Protection Week encourages consumers to take advantage of their consumer rights. Chairman Gary Clark recognized the 22nd Annual National Consumer Protection Week in a video distributed on Twitter, LinkedIn, and the PSC website. Chairman Clark emphasized scam awareness, energy and water conservation, as well as Lifeline information.

Each May, the Commission participates in Older Americans Month, a national project to honor and recognize older Americans for their contributions to families, communities, and society. “Make Your Mark” was this year’s theme, but the Commission canceled its planned 2020 educational sessions due to the COVID-19 pandemic. Also canceled in May was the Jacksonville Expo, which the Commission annually attends for consumer outreach.

⁴⁷ NARUC, Lifeline Awareness Week, <https://www.naruc.org/our-programs/national-telephone-discount-lifeline-awareness-week/>, accessed October 27, 2020.

⁴⁸ FPSC, Lifeline Assistance, <http://www.floridapsc.com/ConsumerAssistance/LifelineAssistance>, accessed on September 25, 2020.

Each quarter, the FPSC also names a valued partner agency or organization as a “Helping Hand,” for helping raise public awareness about the Lifeline program, energy and water conservation, and utility impersonation scams. Figure 11 represents the various events and locations where Lifeline information was shared in Florida as of July 2020.

**Figure 11
Commission Lifeline Promotion in Florida**

Lifeline Events and Locations	
21 st Active Living Expo–Tallahassee Senior Services	37th Annual Children’s Day–FL Museum of History
Bay County Council on Aging	Bethel Towers Senior Independent Living
Callaway Arts and Conference Center	Council on Aging - Kissimmee
Deltona Senior Center	Dixie County Senior Center
Florida Children’s Week at the Florida Capitol	Florida Senior Day at the Florida Capitol
Gilchrist Senior Service Center	Hamilton County Senior Center
Hands on Central Florida	Jim Fortuna Senior Center
Lafayette Senior Service Center	Lake Panasoffkee Senior Center
Lane Wiley Senior Center	Levy County Senior Center
Lunch and Learn – Bradfordville Community Center	Lunch and Learn – Ft. Braden Community Center
Lunch and Learn – Lake Jackson Community Center	Lunch and Learn – Miccosukee Community Center
Lunch and Learn – Milton Community Center	New Smyrna Beach Senior Center
One Senior Place – Altamonte Springs	Taylor County Senior Center
Union Congregational Church	

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 and Spanish, to Florida public libraries across the state for consumer distribution. The FPSC’s Library Outreach Campaign reached 616 state public libraries and branches in 2020. To reduce mailing and production costs, the Commission’s 2020 campaign included a cover letter, book marks, and our brochure order form. Following the Campaign, many libraries’ requests for additional publications have been filled.

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. Prior to the COVID-19 pandemic, the FPSC scheduled and conducted 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 D 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 2020 U.S. Poverty Guidelines

Persons in family/household	2020 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$12,760.00	\$17,226.00	\$1,435.50
2	\$17,240.00	\$23,274.00	\$1,939.50
3	\$21,720.00	\$29,322.00	\$2,443.50
4	\$26,200.00	\$35,370.00	\$2,947.50
5	\$30,680.00	\$41,418.00	\$3,451.50
6	\$35,160.00	\$47,466.00	\$3,955.50
7	\$39,640.00	\$53,514.00	\$4,459.50
8	\$44,120.00	\$59,562.00	\$4,963.50

Source: Department of Health and Human Services. Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, January 17, 2020

<https://www.federalregister.gov/documents/2020/01/17/2020-00858/annual-update-of-the-hhs-poverty-guidelines>

Appendix B

Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETCs	June 2017	June 2018	Net Growth Rate	June 2019	Net Growth Rate	June 2020	Net Growth Rate
Wireless	Assurance Wireless	224,282	418,874	87%	411,114	-2%	222,128	-46%
	SafeLink Wireless	346,488	232,088	-33%	167,966	-28%	130,362	-22%
	Access Wireless	89,904	31,874	-65%	14,795	-54%	8,740	-41%
	T-Mobile	630	1,023	62%	2,489	143%	3,307	33%
Incumbent Wireline	CenturyLink	9,108	5,251	-42%	3,875	-26%	3,056	-21%
	Frontier Florida	3,116	2,113	-32%	1,690	-20%	1,405	-17%
	Windstream	2,004	1,546	-23%	1,332	-14%	1,274	-4%
	Consolidated Communications	561	397	-29%	329	-17%	275	-16%
	NEFCOM	366	247	-33%	221	-11%	179	-19%
	TDS Telecom	138	112	-19%	112	0%	98	-13%
	AT&T	7,871	123	-98%	89	-28%	70	-21%
	ITS Fiber	69	46	-33%	20	-57%	58	190%
	Frontier of the South	26	20	-23%	19	-5%	21	11%
	Smart City	4	3	-25%	3	0%	4	33%
Competitive Wireline	Phone Club	148	120	-19%	143	19%	158	10%
	WOW!	58	46	-21%	50	9%	45	-10%
	Cox Telecom	675	556	-18%	409	-26%	0	0%
	Tele Circuit	321	201	-37%	37	-82%	0	0%
	Global Connection	95	7	-93%	0	-100%	0	0%
	Total	685,864	694,647	1%	604,693	-13%	371,180	-39%

Source: FPSC Data Requests 2017-2020

Appendix C
Lifeline Subscription by Service Type
(as of June 2020)

	ETCs	Voice	Broadband	Bundled	Total
Wireless	Assurance Wireless	14,872	205,533	646	221,051
	SafeLink Wireless	11,816	10,990	106,009	128,815
	Access Wireless	1,855	30	6,901	8,786
	T-Mobile	271	7	2,891	3,169
Incumbent Wireline	CenturyLink	2,938	19	121	3,078
	Frontier Florida	1,106	78	216	1,400
	Windstream	507	128	642	1,277
	Consolidated Communications	279	1	4	284
	NEFCOM	111	1	66	178
	TDS Telecom	86	0	12	98
	AT&T	71	0	0	71
	ITS Fiber	6	44	9	59
	Frontier of the South	18	0	2	20
	Smart City	1	2	0	3
Competitive Wireline	Phone Club	158	0	0	158
	WOW!	15	9	22	46
Total		34,110	216,842	117,541	368,493

Source: USAC Disbursements in Florida

Appendix D

Agency, Organization, and Business Lifeline Partners

Florida Lifeline Partners	
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.	CARES of Florida
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 Partnership Group
Community Legal Services	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
1000 Friends of Florida, Inc.	A Caring Hand Home Care

Florida Lifeline Partners (continued)	
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
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	