



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



December 2023

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List of Acronyms

ACP	Affordable Connectivity Program
C.F.R.	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
Mbps	Megabits per second
NARUC	National Association of Regulatory Utility Commissioners
NCPW	National Consumer Protection Week
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company
U.S.C.	United States Code
USF	Universal Service Fund

Executive Summary

The Florida Lifeline Assistance report is prepared pursuant to the requirements in Section 364.10(2)(g), 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 by offering 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. This report presents Lifeline participation data from July 2022 through June 2023, and evaluates procedures put in place to strengthen the Lifeline program.

As of June 30, 2023, there were 300,229 Florida households participating in the Lifeline program. This represents approximately 1 of every 30 Florida households.¹ The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 18 percent of SNAP participants subscribe to Lifeline as of June 2023.² Using SNAP participation as a proxy for the number of Lifeline eligible households suggests that there continues to be significant growth opportunities for Lifeline enrollment. However, it should be noted that only carriers that have been designated as an eligible telecommunications carrier (ETC) are permitted to provide the Lifeline discount. If a customer's preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers.

"Stay Connected Florida" was the slogan for Florida's 2023 Lifeline Awareness Week, held on September 11-15. This year's Lifeline Awareness Week continued efforts to increase awareness and enrollment in the Lifeline program.

¹ Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households, released on July 11, 2023, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed on October 6, 2023, p. 3, Households 8,975,766.

² Florida DCF, Access Florida: Standard Data Reports, <https://www.myflfamilies.com/services/public-assistance/additional-resources-and-services/ess-standard>, accessed on October 6, 2023.

I. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. The Lifeline program would later be codified with the passage of the Telecommunications Act of 1996. Initially, the program goal was to ensure that all Americans had the opportunity and security that basic phone service provides. In 2016, that goal was expanded by the Federal Communications Commission (FCC) to include broadband service.

One of the principles of the universal service program as described in the Telecommunications Act of 1996 is that consumers in all regions of the Nation, including low-income consumers and those in rural or high cost areas, should have reasonably comparable access to telecommunications and information services at rates that are reasonably comparable to those charged in urban areas.³ The federal Lifeline program supports the goal of universal service by providing a monthly discount for services to qualifying households, thereby ensuring that low-income households have access to modern communications networks capable of providing voice and broadband service.⁴

Qualifying households can receive up to a \$9.25 discount on their monthly phone or broadband bills from wireline service providers that have been designated as ETCs. Alternatively, consumers can choose to receive monthly wireless minutes and/or measured data service from designated wireless ETCs. Although some of Florida's wireless ETCs offer a free cell phone along with Lifeline service, the distribution of wireless devices is not funded by the Lifeline program.

Support for the Lifeline program comes from the federal Universal Service Fund (USF), which also provides funding for 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 rules governing the Lifeline program are established by the FCC; however, the FCC has designated the Universal Service Administrative Company (USAC), an independent not-for-profit corporation, as the program's administrator. USAC is responsible for data collection, maintenance, support calculation, and disbursement of support for the Lifeline program along with other federal USF programs. USAC also administers the National Verifier, which determines customer eligibility for the Lifeline discount. The FPSC has oversight over the Lifeline program in Florida pursuant to Section 364.10, F.S.

A. 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

³ 47 U.S.C. § 254(b)(3).

⁴ FCC, Third Report and Order, WC Docket No. 11-42, FCC 11-42, released on April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed on October 6, 2023.

enrollment in specific qualifying programs that were selected by the FCC. Customers can qualify for the Lifeline program by being enrolled in any one of the following programs:

- SNAP
- Medicaid
- Federal Public Housing Assistance
- Supplemental Security Income
- Veterans or Survivors Pension Program
- 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 can participate in the Lifeline program under the income-based standard. The Federal Poverty Guidelines are updated annually and can be found in Appendix A. Consumers can enroll in the Lifeline program through income-based eligibility by providing qualifying documentation to the National Verifier.

B. Application Process

Consumers have several methods by which they can apply to receive Lifeline benefits:

- 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

Eligibility is validated by the National Verifier through available automated eligibility data sources. Applications are checked to confirm identity, verify that the consumer is not already a Lifeline participant, and ensure compliance with all program rules. If eligibility cannot be validated through automated sources, customers can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Those that qualify must then contact a participating provider in their area to enroll in the Lifeline program.

In Florida, USAC's National Verifier is connected to the Florida Department of Children and Families (DCF) database to confirm customer eligibility through SNAP and Medicaid. Nationally, the National Verifier is also connected to the U.S. Department of Housing and Urban Development and the U.S. Department of Veterans Affairs.⁵ When both federal and state

⁵ USAC, Eligibility Verification, <https://www.usac.org/lifeline/national-verifier/eligibility-verification/>, accessed on October 6, 2023. Florida also benefits from both a federal and state connection for Medicaid verification.

databases are used to confirm eligibility, USAC estimates that the automated eligibility pass rate is 68 percent nationwide.⁶

C. Minimum Service Standards

To be eligible for USF support, ETC's are required to provide broadband access that meets minimum service standards established by the FCC, unless they are granted forbearance from this obligation. These standards are reviewed annually through an FCC update mechanism to ensure that Lifeline customers continue to receive viable service options as technology improves.⁷ The minimum service standards include:

- 1,000 minutes per month of mobile voice
- 4.5 gigabytes per month of mobile broadband
- Fixed broadband speed of 25 megabits per second (Mbps) downstream and 3 Mbps upstream, with 1.28 terabytes per month of data usage

D. Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.⁸ If there are two households residing at one address and each desire to participate in the Lifeline program, each applicant must complete USAC's Household Worksheet form. This form is used to demonstrate that each applicant is living in a separate economic unit and not sharing income or living expenses (bills, food, etc.) with another resident.⁹

To prevent waste in the program, 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.¹⁰ The NLAD conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving Lifeline service. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

E. Non-Usage Rule

In general, wireless ETCs offer Lifeline service for no additional cost beyond the support provided by the universal service program. While customers can elect to purchase additional minutes or data usage at their discretion, the program pays ETCs to provide a basic level of service.

⁶ USAC, National Verifier Annual Report and Data, released on January 31, 2023, <https://www.usac.org/wp-content/uploads/lifeline/documents/nv/reports/National-Verifier-Annual-Report-January-2023.pdf>, accessed on October 6, 2023, p. 7.

⁷ FCC, Public Notice, WC Docket No. 11-42, DA 23-621, released on July 29, 2023, <https://docs.fcc.gov/public/attachments/DA-23-621A1.pdf>, accessed on October 6, 2023.

⁸ 47 C.F.R. § 54.409(c).

⁹ USAC Household eligibility pre-screening tool, www.lifelinesupport.org, accessed on October 6, 2023.

¹⁰ FCC, Report and Order, WC Docket No. 11-42, FCC 12-11, released on February 6, 2012, <https://docs.fcc.gov/public/attachments/FCC-12-11A1.pdf>, accessed on October 6, 2023.

To address potential waste that could occur if support is received for cell phones that are no longer functional or that may have been owned by a customer who is now deceased, the FCC has established rules regarding support for Lifeline connections with no usage. Specifically, if an ETC does not assess or collect a monthly fee from the customer over and above the support received from USF, the Lifeline customer must use the Lifeline-supported service at least once every 30 days. Usage is defined by the FCC as the customer completing one of the following:

- Completing an outgoing call or using data
- Sending a text message
- Buying minutes or data to add to the subscriber's service plan
- Answering an incoming call (calls from the customer's Lifeline service provider, Lifeline service customer's agent, or representative do not apply)
- Responding to direct contact from the customer's Lifeline service provider to confirm the subscriber wants to continue receiving Lifeline service

If the Lifeline customer does not use their service for 30 consecutive days (non-usage), the ETC must give the customer a 15-day notice that if they do not use the service in a further 15 days, their service will be terminated. ETCs must de-enroll those Lifeline customers who do not meet the usage requirement within the final 15-day grace period. Consumers de-enrolled from the Lifeline program for non-usage may reapply at any time by submitting an application to USAC. Recent waivers relating to the FCC's non-usage rules are discussed in Chapter II.

II. Federal Communications Commission Activities

A. Affordable Connectivity Program

On December 31, 2021, the FCC launched the Affordable Connectivity Program (ACP).¹¹ The ACP provides a discount of up to \$30 per month toward Internet service for households that are eligible. Those eligible can also receive a one-time credit of up to \$100 to purchase a connected device, provided they contribute between \$10 and \$50 toward the cost of purchase. Enrollment in the ACP is open for households with at least one member qualifying under the following criteria:

- Income is at or below 200 percent of the federal poverty guidelines
- Participates in certain assistance programs, such as Lifeline, SNAP, Medicaid, Federal Public Housing Assistance, Supplemental Security Income, or Supplemental Nutrition Program for Women, Infants, and Children
- Participates in Tribal specific programs, such as Bureau of Indian Affairs General Assistance or Food Distribution Program on Indian Reservations
- Is approved to receive benefits under the free and reduced-price school lunch program or the school breakfast program, including through the United States Department of Agriculture Community Eligibility Provision
- Received a Federal Pell Grant during the current award year
- Meets the eligibility criteria for a participating provider's existing low-income program

The ACP allows consumers to choose the service plan that best meets their needs, without early termination fees if they change providers. Participants can gain broadband access regardless of credit status or prior debt with a broadband provider. Only one monthly service discount and device credit is allowed per household.¹² While the ACP is distinct from the Lifeline program, wireless ETCs frequently utilize the ACP to provide broadband service to their Lifeline customers. Funding for the ACP program is expected to exhaust by April of 2024.¹³

B. Phase Out of Voice-Only Support

On April 27, 2016, the FCC released its Lifeline Modernization Order.¹⁴ 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.

¹¹ FCC, News Release, released on January 4, 2022, <https://docs.fcc.gov/public/attachments/DOC-378908A1.pdf>, accessed on October 6, 2023.

¹² USAC, Affordable Connectivity Program, <https://www.affordableconnectivity.gov/>, accessed on October 6, 2023.

¹³ Testimony of FCC Chairwoman Rosenworcel before the Senate Appropriations Subcommittee, <https://www.fcc.gov/document/chairwoman-rosenworcel-house-appropriations-subcommittee>, accessed on October 6, 2023.

¹⁴ FCC, Third Report and Order, WC Docket No. 11-42, FCC 16-38, released on April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed on October 6, 2023.

In the Order, the FCC established a timeline to gradually phase out 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 was reduced to \$7.25 per Lifeline customer. Support for voice-only Lifeline service was scheduled to be completely phased out on December 1, 2021. However, the FCC has delayed the complete phase out of voice-only Lifeline support several times.

Pursuant to its most recent Order, support for voice-only Lifeline services will continue to be available through November 30, 2024.¹⁵ In this Order, the FCC stated this year’s pause is due in part to the need for additional time to carefully consider the impact of the ACP on Lifeline subscribers’ use of their Lifeline benefit.

In addition, the FCC has concerns about how the elimination of voice-only support will affect the 350,000 Lifeline participants that continue to subscribe to a voice-only plan, and whether this population will be able to retain an affordable voice service plan.¹⁶ Broadband services that include a voice service will continue to be eligible to receive Lifeline support after the new phase-out date. Table 1 outlines the FCC’s revised phase down schedule.

Table 1
Lifeline Support Transition 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 11/30/24	\$5.25	\$5.25	\$9.25	\$9.25
After 11/30/24	\$0	\$0	\$9.25	\$9.25

Source: FCC, Order (DA 23-589)

The 2016 Lifeline Modernization Order included an exception to the complete phase-down of voice-only support in census blocks where there is only one Lifeline provider. On June 2, 2021, the FCC released a public notice identifying the census blocks eligible to continue receiving the \$5.25 support amount for voice-only Lifeline service.¹⁷ The list of eligible census blocks will be evaluated annually by the FCC. If a census block is determined to be served by more than one Lifeline provider, the discount will be discontinued on December 1st of that year.

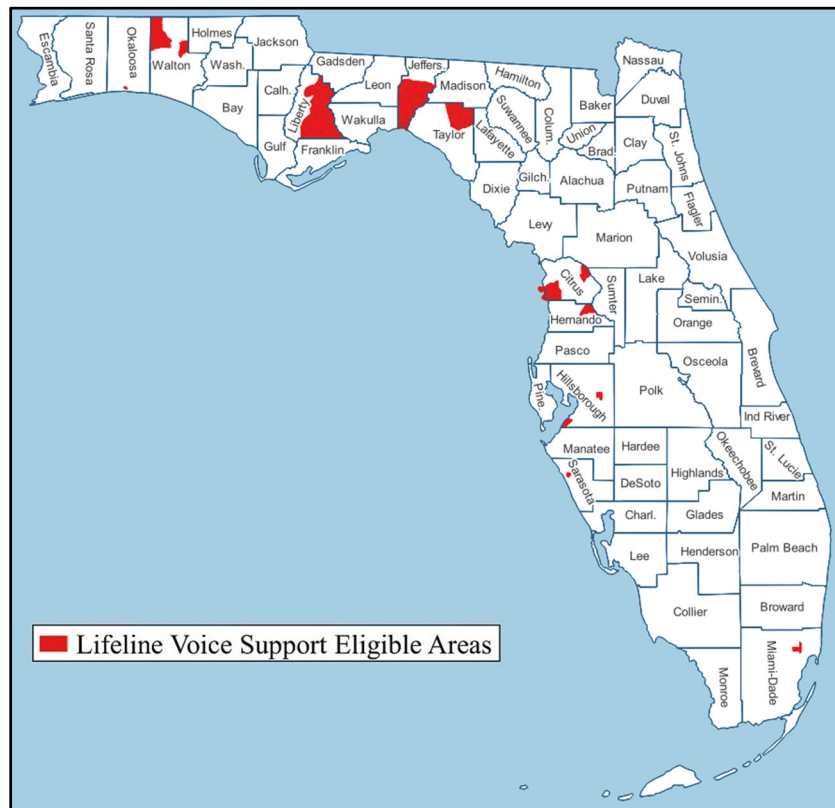
In Florida, 4,389 census blocks qualify for the continued voice-only support. The FCC has not updated the census block data since the complete phase-down of voice-only support was postponed. Figure 1 highlights the areas eligible to continue receiving voice-only support at this time.

¹⁵FCC, Order, WC Docket No. 11-42, DA 23-589, released on July 7, 2023, <https://docs.fcc.gov/public/attachments/DA-23-589A1.pdf>, accessed on October 6, 2023.

¹⁶ Ibid.

¹⁷ FCC, Public Notice, DA 21-640, <https://docs.fcc.gov/public/attachments/DA-21-640A1.pdf>, accessed on September 19, 2023.

Figure 1
Areas in Florida Eligible for Continued Voice-Only Lifeline Support



Source: FCC, Shape file by Census Tracts

C. Lifeline Rule Waivers

On August 30, 2023, Hurricane Idalia struck Florida’s Gulf Coast causing damage to power lines, homes, buildings, and infrastructure, resulting in over 300,000 residents throughout the region losing power. To mitigate the disruption to affected Lifeline consumers, the FCC on its own motion ordered that the Lifeline non-usage, recertification, and reverification requirements for subscribers residing in the affected disaster areas be waived through November 30, 2023.¹⁸

D. Lifeline Support for Domestic Abuse Victims

On February 17, 2023, the FCC released a Notice of Proposed Rulemaking seeking to implement certain provisions in the Safe Connections Act that support survivors of domestic abuse.¹⁹ The FCC sought comment on whether the Lifeline program or the ACP would be an appropriate means for providing eligible survivors with emergency communications support for up to six months. The FCC released an order approving eligibility for survivors in November 2023.²⁰

¹⁸ FCC, Order, WC Docket No. 21-450, DA 23-805, released on September 1, 2023, <https://www.fcc.gov/document/fcc-waives-usf-broadband-program-rules-response-idalia>, accessed on October 6, 2023.

¹⁹ FCC, Notice of Proposed Rule Making, WC Docket No. 22-238, FCC 23-9, released on February 17, 2023, <https://docs.fcc.gov/public/attachments/FCC-23-9A1.pdf>, accessed on October 6, 2023.

²⁰ FCC, Report and Order, WC Docket No. 22-238, FCC 23-9, released on November 16, 2023, <https://docs.fcc.gov/public/attachments/FCC-23-96A1.pdf>, accessed on November 17, 2023.

III. Florida Public Service Commission Activities

A. Prevention of Waste, Fraud, & 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.

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.

B. Lifeline Promotion Process

In 2007, Florida implemented the Lifeline Electronic Coordinated Enrollment Process. This process involved a computer interface between the FPSC and DCF to process Lifeline applications for people who were approved for the Medicaid and SNAP programs. Prior to the National Verifier, customers identified through this process would be automatically considered eligible and enrolled in Lifeline service by a selected ETC. However, since eligibility is now determined only by the National Verifier, this process is used as a promotional tool for the Lifeline program and has been renamed the “Lifeline Promotion Process.”

The Lifeline Promotion Process provides information to Medicaid and SNAP participants interested in receiving the Lifeline discount. This process requires the DCF client to first indicate an interest in receiving the Lifeline discount and choose an ETC. The selected ETC then contacts the customer to determine if they have already been approved for the Lifeline program through the National Verifier. If the customer has been approved, the ETC will provide the customer with the Lifeline discount. For those customers who have not yet applied for Lifeline, the ETC or the FPSC sends instructions on how to apply through the National Verifier. Between January and November 2023, the FPSC sent 19,231 such letters to eligible households.

C. Lifeline Promotion Activities

Promotional activities in 2023 featured National Lifeline Awareness Week and National Consumer Protection Week, and 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 (NARUC) and the FCC to promote National Lifeline Awareness Week and educate consumers on the nationwide application process through the National Verifier. The national effort also ensures that low-income families and individuals are aware of the Lifeline program and understand the eligibility requirements. The shared goal is for all eligible households to be enrolled and receive Lifeline program benefits.

The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with consumers. For the past few years, the FPSC has held both virtual and in-person Lifeline events to accommodate many of Florida's senior and community centers that continue to operate with restrictions.

1. National Lifeline Awareness Week

NARUC and the FCC have designated the first week after Labor Day in September each year as National Lifeline Awareness Week. "*Stay Connected Florida!*" was the slogan for Florida's 2023 Lifeline Awareness Week, September 11-15. In addition to increasing awareness among eligible citizens, Lifeline Awareness Week continued educating residents about the discount on voice and broadband services. This year, Florida's outreach focused on senior and community centers and area agencies on aging in Nassau, Columbia, St. Lucie, and Sarasota Counties. Lifeline information is also available on the FPSC's website.²¹

2. National Consumer Protection Week

National Consumer Protection Week (NCPW), March 5-11, 2023, provided a good opportunity for Lifeline outreach activities. An annual Federal Trade Commission consumer education campaign, NCPW encourages consumers to take advantage of their consumer rights. For more than a decade, the FPSC has joined government agencies, advocacy organizations, and private sector groups nationwide to highlight NCPW.

Chairman Andrew Fay recognized the 25th Annual NCPW by highlighting Lifeline, and the importance of sharing educational information to help consumers. For NCPW 2023, the FPSC met with consumers in Bay, Duval, and Leon Counties. A virtual meeting was also held with a housing authority in Pasco County.

3. Older Americans Month

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. "*Aging Unbound*" was this year's theme. The FPSC partnered with centers in Clay, Lake, and Leon Counties to meet with seniors in-person and distribute information on Lifeline and utility bill reduction strategies. A virtual meeting was also held with a housing authority in Collier County.

4. 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 617 state public libraries and branches via e-mail in 2023. Following the Campaign, many libraries request additional hard copies of FPSC publications throughout the year.

²¹ FPSC, Lifeline Assistance Webpage, <https://www.psc.state.fl.us/lifeline-assistance-program>, accessed October 6, 2023.

5. 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. Each month, the FPSC sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele. The FPSC continues to conduct in-person and virtual monthly meetings or train-the-trainer events to promote Lifeline.

Every four months, 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. Helping Hands named in 2023 include: Hendry County State Housing Initiative Partnership (SHIP) Program, Bay County Council on Aging, and the Okeechobee County SHIP Program.

6. Lifeline Partners

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Appendix B 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.

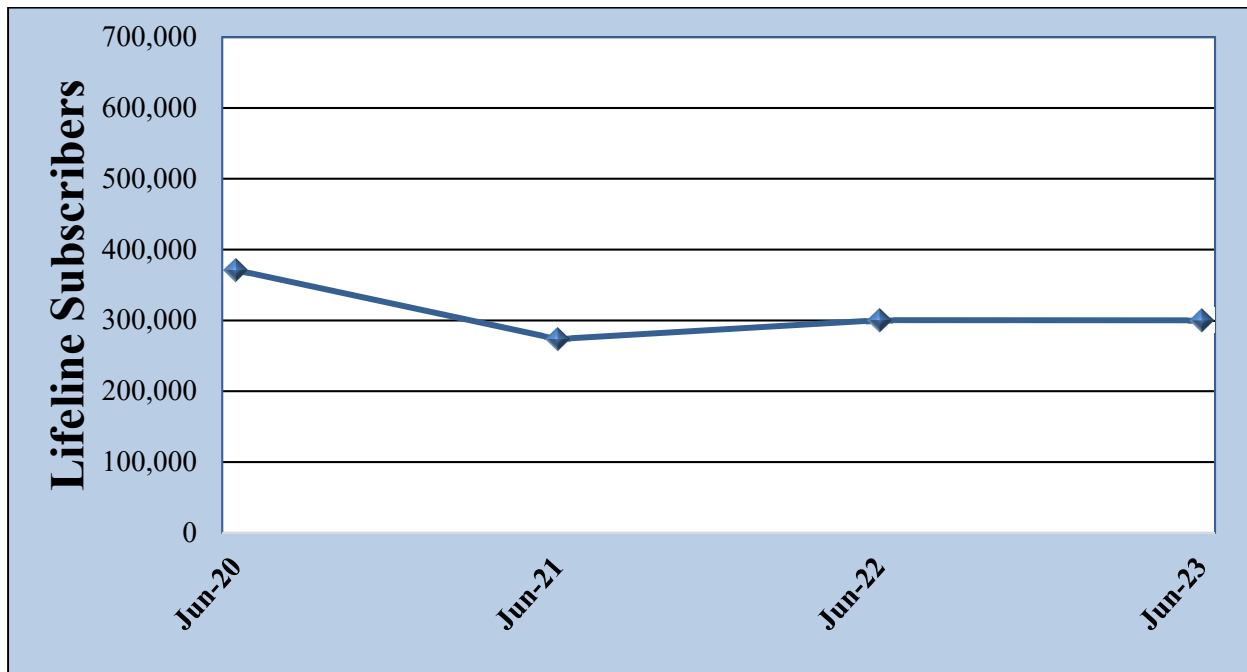
IV. Lifeline Participation

A. Participation

There were 300,229 subscribers enrolled in Lifeline as of June 30, 2023. During the 2022-2023 reporting period, Lifeline subscribership decreased by 56, which represents a less than one percent decrease from the number of subscribers the previous year. All but three companies experienced a loss in Lifeline subscribers, which was attributed by some of these companies to the continued transition of customers to wireless service. The ETCs that experienced Lifeline subscriber growth in 2023 were SafeLink Wireless, Blue Stream Fiber (ITS) and Frontier Communications of the South.

Figure 2 shows annual Lifeline subscribership for June 2020 through June 2023. A drop in subscribers was observed in June 2021, which can be attributed to the FCC’s COVID waiver expiring. After the initial drop in 2021, subscribership has remained relatively constant.

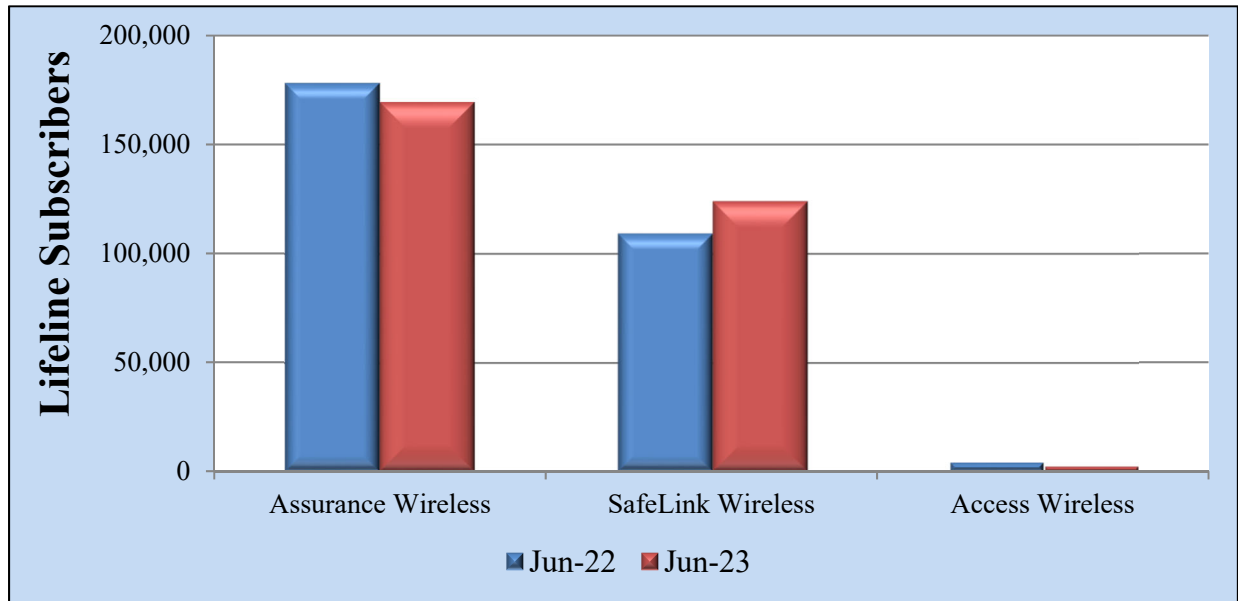
Figure 2
Florida Lifeline Subscribership
(For Fiscal Years 2020-2023)



Source: Industry Responses to FPSC Data Requests (2020-2023) and USAC

Figure 3 shows the three Florida ETCs with the most Lifeline subscribers for June 2022 and 2023. Assurance Wireless remains the ETC with the highest number of Lifeline subscribers, with a decrease of 8,673 Lifeline subscribers in Florida from June 2022 to June 2023. SafeLink Wireless, the second largest Lifeline provider, had an increase of 14,798 Lifeline subscribers. For fiscal year 2022-2023, these two largest Lifeline providers represented more than 97 percent of the Florida Lifeline market.

**Figure 3
Top Three Florida Lifeline ETCs**



Source: Industry Responses to 2023 FPSC Data Requests

Table 2 compares the number of households enrolled in Lifeline with the estimated number of Lifeline eligible households based upon SNAP participation. Using SNAP participation as a proxy for the number of Lifeline eligible households suggests there are still significant growth opportunities for Lifeline enrollment. However, it should be noted that only carriers that have been designated as an ETC are permitted to provide Lifeline. If a customer’s preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers. This is especially true when a customer is required to pay an early contract termination fee to make such a switch.

**Table 2
Lifeline Participation Rate in Eligible Florida Households**

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
June 2019	604,693	1,540,682	39.25%
June 2020	371,180	2,151,503	17.25%
June 2021	273,641	1,882,842	14.53%
June 2022	300,285	1,590,216	18.88%
June 2023	300,229	1,658,694	18.10%

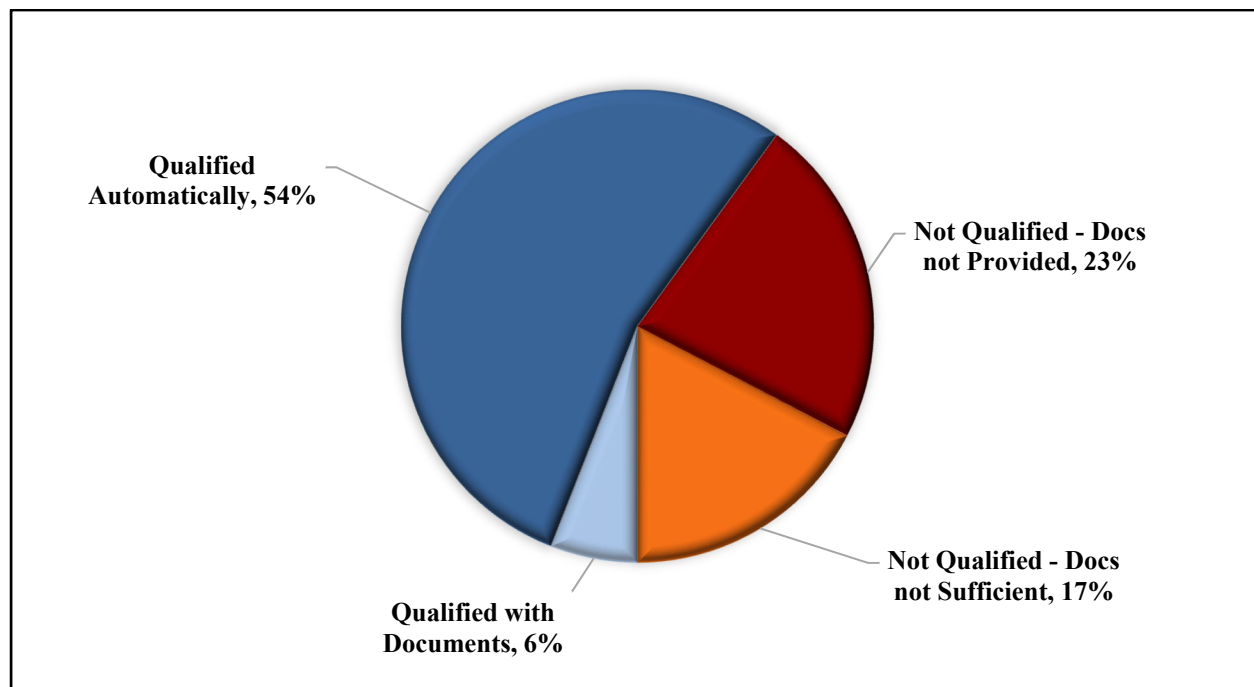
Source: Florida DCF, Access Florida: Standard Data Tables

While there was a minimal decrease in subscribership during fiscal year 2022-2023, the number

of Lifeline eligible households increased by 68,478.²² As a result, the participation rate as of June 2023 declined slightly to 18.10 percent. The current participation rate in the Lifeline program in Florida compared to the number of Lifeline eligible households demonstrates the continued need for Lifeline outreach.

For the first half of fiscal year 2022-2023, the National Verifier received 712,477 applications from Florida. Figure 4 illustrates that 60 percent of all applications qualified for Lifeline. Most of the applications, 54 percent, were approved by USAC automatically by verifying consumers eligibility through databases of qualifying programs. In Florida, these databases include those managed by DCF and other federal agencies. Among the 40 percent of applications that were not approved, 23 percent did not provide any documents to support their applications within 45 days.

Figure 4
National Verifier Qualification Results in Florida



Source: USAC Lifeline Program Data (3Q 2022 to 4Q 2022)

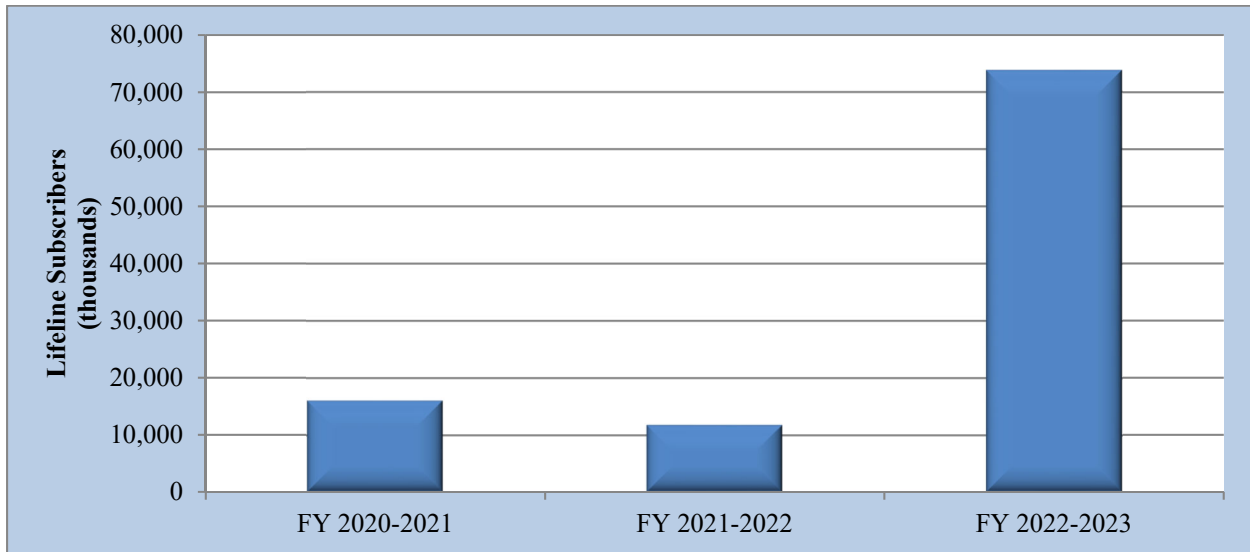
B. Transitional Lifeline

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 one year. For example, a former Lifeline customer with a \$25 phone bill would receive a \$7.50 monthly discount for one year.

²² Florida DCF, Access Florida: Standard Data Reports by Caseload, <https://www.myflfamilies.com/services/public-assistance/additional-resources-and-services/ess-standard>, accessed on October 6, 2023.

Figure 5 represents the average monthly number of Transitional Lifeline customers of Florida ETCs from fiscal year 2020-2021, through fiscal year 2022-2023. This fiscal year, the average number of monthly customers receiving the Transitional Lifeline benefit was 73,784, which represents a significant increase over the previous year. Most of that increase in Transitional Lifeline, according to Assurance Wireless, can be attributed to the expiration of the FCC’s COVID waiver. The COVID waiver permitted customers that no longer qualified for Lifeline assistance to remain enrolled in the program.

Figure 5
Average Monthly Transitional Lifeline Participants
(For Fiscal Years 2020-2023)



Source: Industry Responses to FPSC Data Requests (2020-2023)

Rather than offer a transitional discount, to comply with Section 364.105, F.S., SafeLink offers its former Lifeline customers a 30 percent discount on the customer’s chosen prepaid wireless service rates for at least one-year after termination of their Lifeline benefits. SafeLink does not track Transitional Lifeline customers participating in this manner and, therefore, is not included in Figure 5.

V. Lifeline Providers

Congress has granted state commissions the authority to designate carriers as ETCs if they meet certain requirements.²³ Conversely, state commissions may rescind ETC designation should a company fail to follow the Lifeline program requirements. In instances where a state commission lacks jurisdiction to grant ETC status, the FCC may make the designation.²⁴

To qualify as an ETC, a telecommunications carrier must offer services supported by federal USF program.²⁵ The services can be provided either using its own facilities or a combination of its own facilities and another carrier's resold service, and they must advertise the availability of such services and charges. A company applying for designation as an ETC must demonstrate good management and legitimate business practices to successfully provide Lifeline service.²⁶

When the Telecommunications Act of 1996 was initially implemented, all ETCs were eligible to participate in the high-cost program and were required to offer Lifeline services. Since then, the FCC has revised its rules to allow companies to request ETC designation to participate in the Lifeline program only and forgo participation in the high-cost programs. Currently, the FPSC only evaluates ETC applications from wireline telecommunication carriers. Applications by wireless carriers in Florida are evaluated by the FCC.²⁷

A. Recent ETC Designations

The most recent ETC designations in Florida were approved between 2019 and 2022. Each of the six companies that were granted ETC status sought to participate in the federal high-cost program, which required buildout obligations and offering Lifeline in the underserved areas they were designated.

Among these six companies, four – Bright House, Conexon, Viasat, and Mediacom – are new ETCs in Florida. The remaining two, CentryLink and Windstream, were existing ETCs that expanded their previously established ETC service areas. A map of these recent ETC designations can be found in Figure 6.

Bright House began offering Lifeline services in January 2022, while both Viasat and Conexon began offering Lifeline services in December 2022. All other newly designated ETCs are obligated to offer service to no less than 40% of their designated service areas by the conclusion of 2024, with full deployment within their designated areas anticipated by the conclusion of 2027.²⁸

²³ 47 U.S.C. § 214(e)(2).

²⁴ 47 U.S.C. § 214(e)(6).

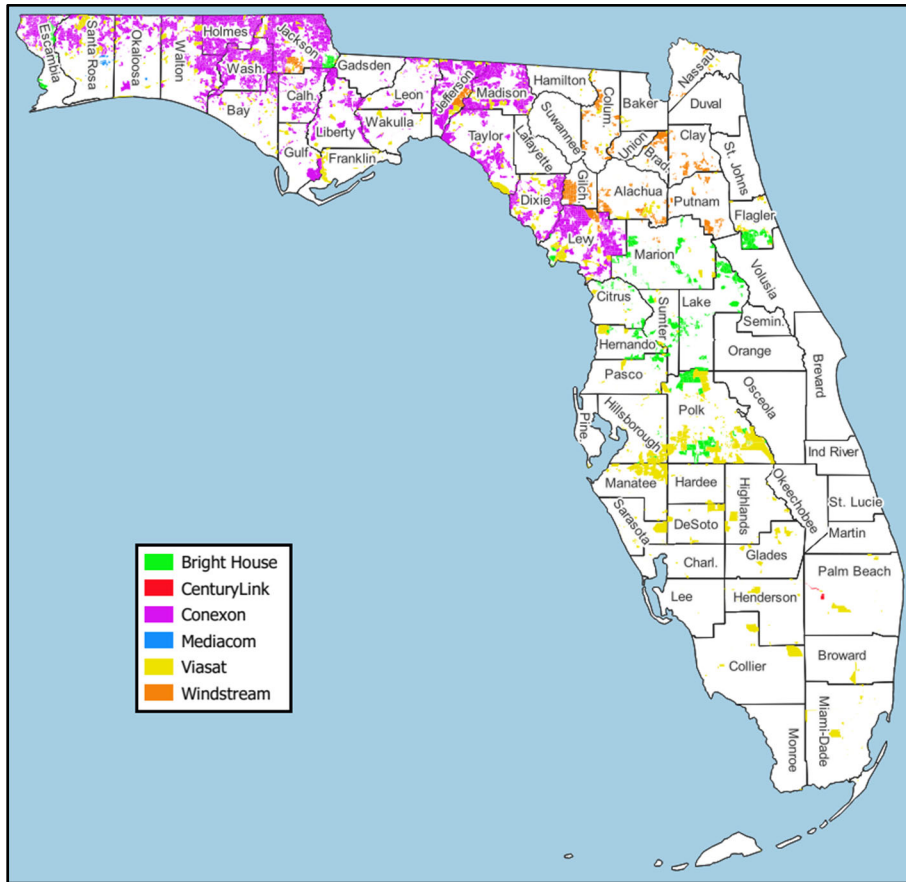
²⁵ 47 C.F.R. § 54.101.

²⁶ 47 C.F.R. § 54.201(h).

²⁷ In 2011, the Florida Legislature passed HB 1231, removing FPSC authority to designate wireless ETC providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

²⁸ FCC, Public Notice, DA 21-1287, released October 14, 2021, <https://docs.fcc.gov/public/attachments/DA-21-1287A1.pdf>, accessed October 6, 2023.

**Figure 6
Map of Recent ETC Designations**



Source: USAC Census Data

Table 3 identifies the 17 ETCs that offer Lifeline service in Florida as of June 30, 2023. Additional enrollment data for ETCs between 2020 and 2023 can be found in Appendix C.

**Table 3
ETCs Offering Lifeline in Florida**

Access Wireless (i-wireless)	Conexon Connect*	Smart City Telecom
Assurance Wireless (T-Mobile)	Frontier Communications of the South	TDS (Quincy Telephone Com.)
Blue Stream Fiber (ITS)	Frontier Florida, LLC	Windstream
Bright House* (Charter)	NEFCOM (Northeast Florida Telephone Co.)	WOW! (Knology of Florida, Inc.)
CenturyLink	Phone Club Corporation	Viasat*
Consolidated Communications (GTC)	SafeLink Wireless (TracFone / Verizon)	

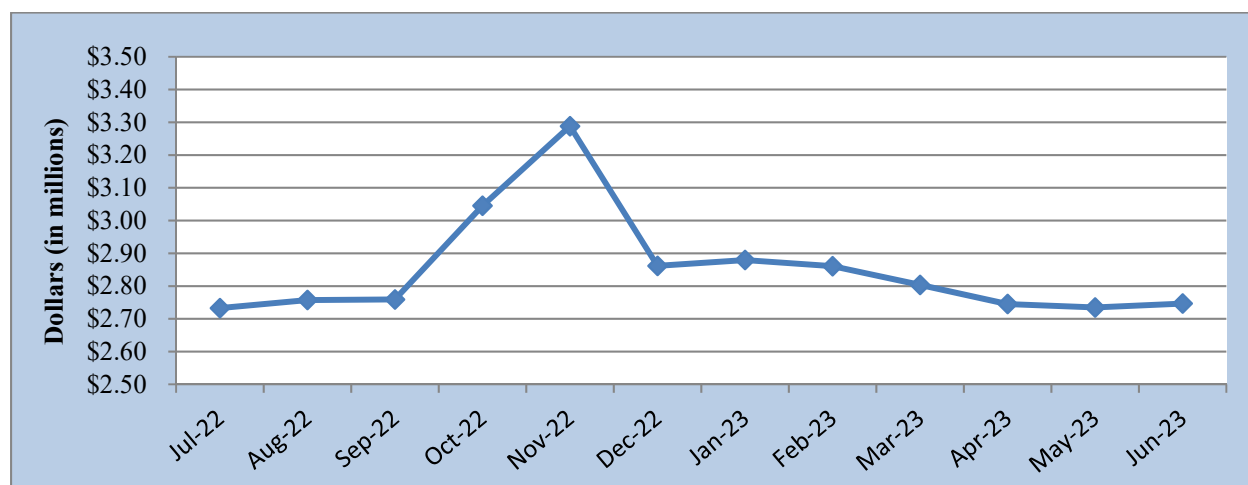
Source: Industry Responses to 2023 FPSC Data Requests

*Recently Designated ETC

B. Funding Distributions

Only carriers that have been designated as an ETC can be reimbursed for the Lifeline discount from the USF. Figure 7 reflects USAC Lifeline disbursements to ETCs in Florida during fiscal year 2022-2023. The total amount disbursed during these 12 months was \$34,214,745, with an average of \$2.85 million per month. This compares to an average of \$2.75 million per month last year. These amounts include prior period support corrections. As shown in Figure 7, the monthly disbursements to Florida ETCs peaked at \$3,288,276. This peak was due to the FCC’s waiver for recertification, reverification, and non-usage requirements to address the impacts of Hurricane Ian, which resulted in more customers remaining in the Lifeline program than would have occurred otherwise.²⁹

Figure 7
Low-Income Disbursements to Florida ETCs



Source: USAC Disbursements Florida July 2022-June 2023; 2023 Industry Responses to FPSC Data Requests for companies that have not filed current USAC reimbursement requests.

C. Lifeline Service Obligations by Technology

ETCs can meet their Lifeline service obligations either through offering voice, broadband, or a combination of both services. Table 4 shows the percent of Lifeline subscription by service type and by type of underlying carrier. Currently, incumbent and competitive wireline carriers meet their Lifeline obligation predominantly through the provision of voice services. By comparison, wireless ETCs primarily offer bundled services that meet the federal standards for both voice and broadband.

SafeLink is the only wireless carrier that provides a stand-alone voice service. This legacy voice-only service, however, is not available to new customers or existing customers with voice and data plans. Customers receiving voice-only service represents about one percent of SafeLink’s customers. Appendix D provides percentage of Lifeline subscriptions by service type for each carrier.

²⁹ FCC, Order, WC Docket No. 11-42, DA 22-1063, released October 4, 2022, <https://docs.fcc.gov/public/attachments/DA-22-1063A1.pdf>, accessed October 6, 2023.

Table 4
Lifeline Subscription by Service Type
(As of June 2023)

Carrier Type	Voice	Broadband	Bundled
Wireless	0.6%	19.6%	79.8%
Incumbent Wireline	61.3%	9.4%	29.3%
Competitive Wireline	76.3%	14.9%	8.8%

Source: USAC Disbursements Florida

D. Wireless Service Standards

All wireless ETCs in Florida meet the minimum FCC standards by offering either a minimum of 1,000 voice minutes or 4.5 gigabytes of data to Lifeline subscribers. While wireless carriers only have to meet either the voice or the data standard, carriers frequently offer some voice or data along with the service that meets the FCC’s standard. Table 5 outlines different Lifeline services currently offered by wireless ETCs in Florida and how they qualify with the federal standards. Plans offered by Access Wireless, Assurance, and SafeLink are fully covered by the Lifeline subsidy, at no cost to the Lifeline consumer. Customers of these companies only have to pay for additional voice minutes or data beyond their phone plan as needed.

Table 5
Lifeline Wireless Qualification Standard by Carrier
(As of September 2023)

Wireless ETC	Minimum Standards Met	Minutes of Voice	Gigabytes of Data
Access Wireless	Voice/Data	1,000	4.5
Assurance	Voice/Data	1,000	4.5
SafeLink	Data	350	4.5

Source: ETC’s websites

Customers of Access Wireless, Assurance, and SafeLink may also combine Lifeline discounts with ACP discounts. When Lifeline customers participate in both programs, they receive unlimited voice and data services. Eligibility for this service necessitates that customers are not concurrently utilizing their ACP entitlement for alternative services, such as internet access.

E. Satellite Service Provider

In 2019, the FCC granted Viasat, a satellite broadband company, ETC status in select areas in Florida to receive high-cost support.³⁰ Viasat upgraded its network and began to offer Lifeline

³⁰ FCC, Order, WC Docket No. 10-90, DA 19-925, released on September 18, 2019, <https://docs.fcc.gov/public/attachments/DA-19-925A1.pdf>, accessed on October 6, 2023.

services in at least 40 percent of its designated service area by December 2022.³¹ It is expected to achieve comprehensive coverage of its designated service areas by the conclusion of 2025.³² The fee for Viasat's least-cost "Viasat Voice plan" is \$58.99 per month before the \$5.25 Lifeline Voice discount.³³ By comparison, Lifeline consumers can subscribe to either a broadband service for \$89.99 or a bundled voice and broadband service for \$124.99, before the \$9.25 Lifeline discount and \$30.00 ACP discount.³⁴ All of these plans also require a \$15 equipment lease fee. As of June 2023, Viasat has no Lifeline customers in Florida.

³¹ FCC, Order, WC Docket No. 10-90, DA 20-108, Released January 27, 2020, https://docs.fcc.gov/public/attachments/DA-20-108A1_Rcd.pdf, accessed October 6, 2023.

³² FCC, Public Notice, DA 22-1203, released November 17, 2022, <https://docs.fcc.gov/public/attachments/DA-22-1203A1.pdf>, accessed October 6, 2023.

³³ Viasat, Discount Advertisement, <https://www.viasat.com/content/dam/us-site/residential/documents/1740029-CAF-II-Global-One-Pager-012.pdf>, accessed on October 6, 2023.

³⁴ Viasat's broadband service includes a monthly cap of 600 GB capacity at download speeds up to 25 Mbps.

Appendix A

2023 U.S. Poverty Guidelines

Persons in Family/Household	2023 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly Income at 135% of Federal Poverty Guidelines
1	14,580.00	19,683.00	1,640.25
2	19,720.00	26,622.00	2,218.50
3	24,860.00	33,561.00	2,796.75
4	30,000.00	40,500.00	3,375.00
5	35,140.00	47,439.00	3,953.25
6	40,280.00	54,378.00	4,531.50
7	45,420.00	61,317.00	5,109.75
8	50,560.00	68,256.00	5,688.00

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, January 19, 2023, <https://www.federalregister.gov/documents/2023/01/19/2023-00885/annual-update-of-the-hhs-poverty-guidelines>, accessed on October 3, 2023.

Appendix B

Agency, Organization, and Business Lifeline Partners

Florida Lifeline Partners	
1000 Friends of Florida, Inc.	Community Legal Services
A Caring Hand Home Care	Community Partnership Group
AARP–Florida Chapter	Corporation to Develop Communities of Tampa, Inc.
Ability Housing of Northeast Florida	Deaf & Hard of Hearing Services of NW Florida, Inc.
ACCESS Florida Community Network Partners	Disability Rights Florida
Agency for Health Care Administration	Elder Options
Agency for Persons with Disabilities	Elder Source
Aging Matters in Brevard County	Faith Radio Station and other Florida radio stations
Aging Solutions, Inc.	Federal Social Security Admin - Tallahassee District
Aging True Community Senior Services	Feeding South Florida
Aging With Dignity	First Quality Home Care
Alliance for Aging, Inc.	Florida Alliance for Information and Referral Services
America's Second Harvest of the Big Bend, Inc.	Florida Assisted Living Association
Area Agencies on Aging	Florida Association for Community Action
ASPIRE Health Partners	Florida Association of Community Health Centers
Big Bend 2-1-1 and other 2-1-1 Agencies	Florida Association of Counties
Boley Centers, Inc.	Florida Association of County Human Service Admin
Braille and Talking Book Library	Florida Association of Food Banks
Brain Injury Association of Florida, Inc.	Florida Assoc. of Housing & Redevelopment Officials
Bridges at Riviera Beach	Florida Association of the Deaf, Inc.
Bridgeway Center, Inc.	Florida Coalition for Children
Broward County Elderly & Veterans Services Division	Florida Coalition for the Homeless
Bureau of Indian Affairs Programs	Florida Council on Aging
Capital Area Community Action Agency, Inc.	Florida Deaf Services Centers Association
CARES of Florida	Florida Dep. of Business and Professional Regulation
Carrfour Supportive Housing	Florida Department of Children and Families
Catholic Charities of Central Florida	Florida Department of Economic Opportunity
Center for Hearing and Communication	Florida Department of Education
Centers for Drug Free Living	Florida Department of Elder Affairs
Centers for Independent Living	Florida Department of Revenue
Central Florida Community Action Agency	Florida Department of Veterans' Affairs
City and County Consumer Assistance Departments	Florida Developmental Disabilities Council
City and County Housing Authorities	Florida Elder Care Services
City and County Social Programs	Florida Highway Safety and Motor Vehicles
Coalition of Florida Farmworker Organizations, Inc.	Florida Home Partnership
Communities In Schools Foster Grandparent Program	Florida Hospital Association

Florida Lifeline Partners (continued)	
Florida Housing Authorities	Monroe County Social Services
Florida Housing Coalition	NAACP (Florida Associations)
Florida Housing Finance Corporation	National Church Residences
Florida League of Cities, Inc.	Nu-Hope of Highlands County
Florida Low Income Housing Associates	Nursing Homes Administrators
Florida Nurses Association	One-Stop Career Centers
Florida Office of Public Counsel	Osceola County Corrections Department
Florida Ombudsman Program	Palm Beach Community Action Agency
Florida Public Libraries	Refuge House of the Big Bend
Florida Public School Districts	Second Harvest of the Big Bend
Florida Rural Legal Services, Inc.	Seminole County Community Development
Florida Schools for the Deaf and Blind	Senior Connection Center, Inc.
Florida Senior Medicare Patrol	Senior Friendship Centers
Florida Senior Program	Senior Medicare Patrol
Florida Telecommunications Relay, Inc.	Senior Resource Alliance
Florida Voters League	Senior Solutions
Gateway Community Outreach	Seniors First
Good News Outreach	SHINE Program
Goodwill Industries of Central Florida	South East American Council, Inc.
Habitat for Humanity – Florida	Suwannee River Economic Council
HANDS of Central Florida	Tallahassee Memorial Hospital
Hemophilia Foundation of Greater Florida	Tallahassee Urban League
Hispanic Office for Local Assistance	Tampa Vet Center
HOPE Community Center	Three Rivers Legal Services, Inc.
HOPE Connection	U.S. Department of Housing and Urban Development
HOPE Partnership	United Home Care Services
League for the Hard of Hearing	United Way of Florida
Leon County School Board	Urban Jacksonville
Little Havana Activities and Nutrition Centers	Urban Leagues of Florida
Living Stones Native Circle	Wakulla County Senior Citizens Council
Marion Senior Services	Walton County Council on Aging
Miccosukee Tribe of Indians of Florida	Washington County Council on Aging
Mid-Florida Housing Partnership, Inc.	We Care-Jacksonville

Appendix C

Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETCs	June 2020	June 2021	Net Growth Rate	June 2022	Net Growth Rate	June 2023	Net Growth Rate
Wireless	Assurance Wireless	222,128	155,848	-30%	177,982	14%	169,309	-5%
	SafeLink Wireless	130,362	100,463	-23%	109,128	9%	123,926	14%
	Access Wireless	8,740	7,566	-13%	4,136	-45%	2,271	-45%
	T-Mobile	3,307	3,523	7%	3,608	2%	0*	-100%
Incumbent Wireline	CenturyLink	3,056	2,652	-13%	2,153	-19%	1,844	-14%
	Windstream	1,274	1,289	1%	1,361	6%	1,142	-16%
	Frontier Florida	1,405	1,478	5%	1,249	-15%	1,102	-12%
	Consolidated Communications	275	255	-7%	189	-26%	163	-14%
	NEFCOM	179	169	-6%	138	-18%	131	-5%
	TDS Telecom	98	88	-10%	77	-13%	68	-18%
	Blue Stream Fiber (ITS)	58	37	-36%	30	-19%	54	80%
	Frontier Com. of the South	21	19	-10%	17	-11%	32	88%
	Smart City	4	3	-25%	6	100%	6	0%
	AT&T	70	58	-17%	0*	-100%	0*	0%
Competitive Carrier	Phone Club	158	138	-13%	138	0%	138	0%
	WOW!	45	55	22%	73	33%	43	-41%
	Bright House	0*	0*	0%	0	0%	0	0%
	Conexon	0*	0*	0%	0*	0%	0	0%
	Viasat	0*	0*	0%	0*	0%	0	0%
	Total	371,180	273,641	-26%	300,285	10%	300,229	0%

Source: FPSC Data Requests 2020-2023

*Not offering Lifeline

Appendix D
Lifeline Subscription by Service Type
(as of June 2023)

	ETCs	Voice	Broadband	Bundled
Wireless	Assurance Wireless	0.00%	0.00%	100.00%
	SafeLink Wireless	1.41%	46.71%	51.88%
	Access Wireless	0.00%	0.00%	100.00%
Incumbent Wireline	CenturyLink	89.32%	2.44%	8.24%
	Windstream	14.80%	15.94%	69.26%
	Frontier Florida	70.97%	11.52%	17.51%
	Consolidated Communications	68.71%	4.29%	27.00%
	NEFCOM	22.90%	0.76%	76.34%
	TDS Telecom	27.94%	72.06%	0.00%
	Blue Stream Fiber (ITS)	7.41%	20.37%	72.22%
	Frontier Com. of the South	65.63%	15.63%	18.74%
	Smart City	16.67%	16.67%	66.66%
Competitive Carrier	Phone Club	100%	0.00%	0.00%
	WOW	0.00%	62.79%	37.21%
	Bright House	0.00%	0.00%	0.00%
	Conexon	0.00%	0.00%	0.00%
	Viasat	0.00%	0.00%	0.00%
Total		1.55%	19.44%	79.01%

Source: FPSC Data Request 2023