BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. UNDOCKETED

LIFELINE WORKING GROUP
MEETING.

PROCEEDINGS: WORKSHOP

TAKEN AT THE
INSTANCE OF: The Staff of the Florida
Public Service Commission

DATE: Thursday, December 5, 2013

TIME: Commenced at 10:03 a.m.
Concluded at 10:53 a.m.

PLACE: Betty Easley Conference Center
Hearing Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: LINDA BOLES, CRR, RPR
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FLORIDA PUBLIC SERVICE COMMISSION
PARTICIPATING (via telephone):

Susan Fennell - NEFCOM
Debbie Finley - NEFCOM
Louvinia Holton - NEFCOM
Wesley Norman - NEFCOM
Robin Enkey - Budget PrePay, Inc.
Lakisha Taylor - Budget PrePay, Inc.
J.D. Johnson - DCF
Vijay Muniswami - DCF
Jay Bradbury - Cox Communications
Leslie McLaughlin - Cox Communications
Jerry Levis - Cox Communications
Faye Sprull - Cox Communications
Alexandria Davis - Cox Communications
Rhonda Thomas - T-Mobile
Ryan Taylor - FairPoint
Ann Morrison - FairPoint
Tim Loken - Windstream
Kristen Boon - ITS Telecommunications, Inc.
Stephen Athanson - TracFone/SafeLink
Jorge Chamizo - TracFone/SafeLink
Jennifer Lautenschleger - TDS
Melissa Marks - Wide Open West (Formerly Knology)
Jody Williams - Windstream Communications

PARTICIPATING (in person):

De O'Roark - Verizon
Becki Edmonston - Verizon
Susan Berlin - Sprint/Assurance Wireless
Marsha Rule - Virgin Mobile/Assurance Wireless
Greg Follensbee - AT&T
Tracy Hatch - AT&T
Tom McCabe - TDS
David Konuch - FCTA
Adam Teitzman - PSC
Susan Berlin - Assurance Wireless
Harvey Spears - CenturyLink
Susan Masterton - CenturyLink
Christie Pontis - CenturyLink
Lisa Steffens - OPC
Catherine Beard - PSC
Curtis Williams - PSC
Beth Salak - PSC
Adam Teitzman - PSC
Bob Casey - PSC
Benjamin Legaspi - PSC
MR. CASEY: Well, good morning, everybody. I'd like to welcome you to the meeting of the Lifeline Work Group. We'll go ahead and take appearances in just a minute. Well, we can start. We can go around the table here, and please state your name and the company you'll be representing so the court reporter can get it down. And then after we do the ones here, we'll do the ones on the phone.

MR. McCABE: Tom McCabe with TDS Telecom.

MR. SPEARS: Harvey Spears with CenturyLink.

MS. PONTIS: Christie Pontis, CenturyLink.

MS. MASTERTON: Susan Masterton, CenturyLink.

MR. O'ROARK: De O'Roark with Verizon.

MS. BERLIN: Susan Berlin with Sprint on behalf of Virgin Mobile and Assurance Wireless.

MR. HATCH: Tracy Hatch with AT&T.

MR. FOLLENSBEE: Greg Follensbee with AT&T Florida.

MR. KONUCH: Dave Konuch, FCTA.

MS. BEARD: Catherine Beard, PSC.

MS. SALAK: Beth Salak, PSC staff.

MR. TEITZMAN: Adam Teitzman with staff.

MR. CASEY: I'm Bob Casey with staff.

MR. WILLIAMS: Curtis Williams with the PSC.
staff.

**MS. STEFFENS**: Lisa Steffens, Office of Public Counsel.

**MS. RULE**: Marsha Rule, Rutledge, Ecenia for Virgin.

**MS. JOHNSON**: J. D. Johnson with Department of Children and Families.

**MR. CASEY**: Okay. Could you repeat who's with the Department of Children and Families?

**MS. JOHNSON**: J. D. Johnson.

**MR. CASEY**: Thank you. Who else do we have on the --

**MS. SPRULL**: Faye Sprull with Cox -- Faye Sprull with Cox Communications.

**MR. CASEY**: Could you spell --

**MS. ENKEY**: Robin Enkey and Lakisha Taylor with Budget PrePay.

**MR. CASEY**: Who else do we have on the phone?

**MR. BRADBURY**: Jay Bradbury with Cox Communications.

**MR. CHAMIZO**: Jorge Chamizo with TracFone Wireless. Good morning.

**MR. ANTHANSON**: Stephen Anthanson, TracFone Wireless.

**MR. MUNISWAMI**: Vijay Muniswami, DCF IT.

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MS. BOON: Kristen Boon with ITS Telecommunications.

MS. FENNELL: Susan Fennell with NEFCOM.
MS. THOMAS: Rhonda Thomas with T-Mobile.
MS. MORRISON: Ann Morrison with FairPoint.
MR. TAYLOR: Ryan Taylor with FairPoint.
MR. CASEY: Anyone else on the line?

What I'm going to ask is anybody participating by phone, could you please send me an email with your name and the company you're representing so we can make sure to get it in the -- get it for the court reporter.

Thank you.

There's four issues we'd like to talk -- go ahead.

SPEAKER: I'm sorry. Can you repeat what your name is, please, so we can make sure we send the email to the correct person?

MR. CASEY: Right. This is Bob Casey at the PSC. That's Bob Casey, C-A-S-E-Y. My email is Bcasey@psc.state.fl.us.

SPEAKER: Thank you.

MR. CASEY: That way I'll make sure everybody gets on the list that's participating.

We have four items we'd like to discuss today.

The first item consists of the Florida Department of

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Children and Families interface.

To give you just a little background, on February 6th of last year, as everybody knows, the FCC Lifeline Reform Order was issued. In one of those paragraphs, paragraph 98, it says, "We first amend Section 54.410 of the Commission's rules to require all ETCs, prior to enrolling a new subscriber in Lifeline, to access state or federal social services eligibility databases, where available, to determine a consumer's program-based eligibility." And, of course, that paragraph, that sentence followed through into the federal rules.

On September 13th, TracFone made an ex parte filing with the FCC in response to a request for a status update on how they're coming with state databases in Lifeline. TracFone included a fact sheet which identified on a state-specific basis the states where access to databases are available, when such access became available, access costs, and the Lifeline qualifying programs included in each state's database. Now the fact sheet lists Florida as having 25 ETCs at that time, with only three ETCs or 12% of all Florida ETCs utilizing the database.

Eleven days after that filing, the FCC called us asking us for a conference call. And, of course, we
thought it was going to be about the interim waiver that
was in effect. We found out otherwise. They asked us
why Florida ETCs are not on this, using this state
database, this portal over at DCF for eligibility. And,
of course, we gave them a number of theories: That they
were coming out with a national database, and companies
didn't want to go to the state database if a federal
database is coming out. We said, "Well, some companies
think it's going to cost too much. The smaller
companies can't afford it." And the FCC's reply was
basically, "It's the law. They have to do it. No ifs,
ands, or buts."

And we're kind of in the middle here. The FCC
is getting on us because the ETCs have not enrolled in
the portal with DCF. And basically we want to know why.
You know, why aren't the ETCs doing it? And that's
going to be the first question here. What is each ETC's
plan and timetable for obtaining access to the DCF
portal?

Who wants to start?

MR. HATCH: Why is everybody looking at me?

MS. SALAK: You're on a corner.

MR. CASEY: And please, please state your
name.

MR. HATCH: This is Tracy Hatch with AT&T.
The rule says what it says, but I would direct you to the beginning of the rule. There's a statement in the very beginning of (c) where it says, "Initial program-based eligibility determination," which is under 410 -- or it's 410(c). It says, "Except in states where a state Lifeline administrator or other state agency is responsible for the initial determination."

And so if you take that statement, then the "must use the portal" doesn't apply because then that drops you over into (2), which is where there isn't a state doing the initial determination. We basically are operating under the assumption that you guys are the agency doing the initial determination because you do it, you scrub it, you send it to us as essentially whoever is on list that we get from you has been determined to be eligible.

Now, granted, the way this rule is structured doesn't cover all possible scenarios, and so you end up in this hybrid gray area where what applies and what doesn't. But that "except" language, if you accept the fact that you're the administrator doing the initial determination, basically takes us out of having to use the portal. It doesn't say we can't obviously for whatever reason, but it doesn't indicate that we have to use the portal. And I'm not sure in the context of the
conversation with the FCC why they're thinking we should
have to do the portal other than perhaps they're not
looking at all possible combinations of what behaviors
the ETCs are doing.

MR. CASEY: Believe me, we have talked to the
FCC a number of times about the two different situations
at DCF.

MR. HATCH: Yeah.

MR. CASEY: The initial one where people go
through and apply for one of their programs and ask for
Lifeline, and then this portal instance.

MR. HATCH: Right.

MR. CASEY: And we separated them and told
them that. And they believe that the portal should be
used by all ETCs that are not -- that don't get
applications from DCF applications.

MR. HATCH: I understand. That's not what the
rule says.

MR. CASEY: Okay. That's just an
interpretation.

MR. HATCH: No, I understand.

MR. CASEY: Right.

MS. SALAK: Have you presented that
interpretation to the FCC?

MR. HATCH: I don't know. Well, the problem
is really -- I don't know if any other state has -- or whether our FCC folks have talked to them about this. I just don't know. But our folks seemed a little caught short when all of the sudden you're asking the hard question "Why aren't you using the portal?" And the answer was, "We didn't know we needed to." So I'm assuming they haven't, but I haven't asked them that question.

**MR. CASEY:** And there's copies of that TracFone filing over here, if anybody needs it, which lists different states and the number of ETCs they have and the number participating in the portals on there.

**MR. ANTHANSON:** This is Stephen Athanson at TracFone. I would caution -- you know, in examining that table, we've had to make several factual corrections to the numbers, and at this point we really cannot stand behind the numbers of ETCs using the databases in the various states. The table was really not adequately researched before it was submitted. So I would add that caution. We have had to make at least two corrections to the FCC about numbers that were contained in that table.

**MR. CASEY:** Right. Thank you. And for -- we're just using this table for Florida. And it had 25 ETCs, which was correct at the time, and three ETCs
using the portal or using the DCF portal, which was correct.

MR. ANTHANSON: Okay.

MR. CASEY: But the other, the other states, I realized you did some additional filings to correct that.

MR. ANTHANSON: That's correct.

MR. CASEY: What company wants to go next?

MR. McCABE: I'll go next because it'll be quick. I just echo Tracy's comments.

MR. CASEY: Your name and company?

MR. McCABE: Oh, I'm sorry. Tom McCabe. I'll just echo Tracy's comments.

MR. SPEARS: What company are you with?

MR. McCABE: With TDS Telecom.

MS. SALAK: Your -- the part that said that you were caught unaware or the part that says you agree with his interpretation?

MR. McCABE: Unaware.

MS. SALAK: And so you haven't taken a look at it at all?

MR. McCABE: (Nods negatively.)

MS. SALAK: And I assume that the FCC has contacted no one except -- TracFone, you obviously had a conversation. But no one else has had a conversation.
with the FCC?

    MS. MASTERTON: I mean, I can say that our federal people have not had, have not been contacted by the FCC. We brought this issue to them. They had not heard about it before that.

    MS. SALAK: Okay.

    MS. MASTERTON: This is Susan Masterton with CenturyLink.

    MR. HATCH: I assume they haven't come to us about this issue; otherwise, I probably would have heard about it.

    MS. SALAK: Okay.

    MR. CASEY: What I think is happening is TracFone is very proactive with the state databases. They've been around to different states trying to encourage them to use or create state databases. And the FCC was actually asking for a status update -- how are you doing on this -- and that's, that was the result of, the filing was a result of that.

    MS. MASTERTON: But TracFone put that information together? In other words, it didn't come from, you know, the Commission. It was TracFone did that research?

    MR. CASEY: TracFone did that based on the information they had at the time. And as they said,
they corrected two of the states. I believe it's two of
the states.

    MS. MASTERTON: I mean, I'll speak for
CenturyLink. I mean, we were caught unawares and we're
looking into it. We're looking into it both how to do
it and what it would take for us to be able to do it,
and also some of the legal issues surrounding it. And
so we don't have a final answer on either one of those,
but we are exploring it.

    MR. O'ROARK: This is De O'Roark with Verizon.
We're in very much the same boat as CenturyLink. I have
not done the research on the rule or looked at the
argument that Tracy just made, and I will. As you know,
we've asked for contact information at DCF. The last
time I checked we have not synced up with them.

    I can tell you that in at least one other
state, as I understand it, the way this works is once
you get whatever log-in information you need, you can go
to the DCF website and at least check on a onesie/
twosie (phonetic) basis, does this person qualify or
not? I now understand that there may be more involved
with the Florida DCF website. So we are still looking
into that. Once we talk to them and get a better sense
of what may be involved in making it a
machine-to-machine connection, which I understand may be
required, we can get back to you on, you know, whether
we can do it, will do it, can do it. But right now
we're still investigating.

    MS. JOHNSON: Bob Casey, this is J.D. Johnson
at DCF.

    MR. CASEY: Yeah, J.D. Good morning.

    MS. JOHNSON: Good morning.

    I had a conversation with Verizon this
morning, and we have made contact, we have talked about
what it would take to get in, and we're going to set up
a conference call in January because the young man is
not available at the time that we are. So we've come to
the conclusion that we should start it in January, start
the process and get you guys set up.

    MR. O'ROARK: Okay. Great. Thank you.

    MR. CASEY: What company would like to go
next? Step up to the plate.

    MS. THOMAS: Hey, Bob. This is Rhonda Thomas
from T-Mobile. I want to just echo the earlier
statements regarding the rule. And secondarily, we did
look into the database and are more than happy to look
into participating in this portal again.

    One of the barriers prior in (inaudible) was
that there was some requirement as I recall, and I'm
hoping somebody can maybe speak to this, to actually

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have the computer that would be receiving the
information physically located in the state of Florida.
And so that became a barrier for, you know, our group.

So I'm not sure if that barrier remains or if there are other barriers. But we'll -- DCF is making
the portal available for all companies to connect
regardless of where their traditional operations might exist.

MR. CASEY: Okay. J.D., could you possibly answer that? Did you understand the question?

MS. JOHNSON: No, Paul [sic] -- no, Bob. Can you state it for me again? It was kind of staticky.

MR. CASEY: Okay. It was T-Mobile. And I believe what they're asking is that they found out that a computer that ties into your portal has to be in the state of Florida. It can't be outside the state. Is that true?

MS. JOHNSON: Okay. Let me research that and I will get back with, with you on it.

MR. CASEY: Okay.

MR. MUNISWAMI: J.D., this is Vijay from DCF. I'm representing the portal utility (phonetic).

MS. JOHNSON: Yes.

MR. MUNISWAMI: I am not aware of that restriction was there in place because it's a web
service. And as long as we give you a credential and 
you come with the credentials to access that web 
service, we don't really see where you are coming from 
as long as you come with the credentials. So I don't 
know that restriction was ever in place.

MS. JOHNSON: Okay. I do see back in April 
2012 they were talking to T-Mobile about an agreement. 
I don't remember ever seeing one signed. So if I can 
get her information, we can talk with her on the phone, 
me and Vijay and my IT staff, and we can see what we can 
do.

MR. CASEY: I tell you what, I will go ahead 
and send you her information, her contact information. 
Okay?

MS. JOHNSON: That sounds great.

MR. CASEY: And get you two together.

MS. JOHNSON: Okay. Thanks.

MR. BRADBURY: Hey. This is Jay Bradbury with 
Cox Communications.

MR. CASEY: Hey, Jay.

MR. BRADBURY: I'd like to follow up on the -- 
there was a mention earlier that this is a 
machine-to-machine portal. Is that an absolute 
requirement or is this actually accessible from the web?

MR. CASEY: Could someone from DCF answer
MR. MUNISWAMI: We don't have a portal as such. Like when you, from your system you can access our web service and you can enter specific data to give it to us and ask whether that particular client is eligible on getting a public assistance benefit. We reply back and say yes or no in our response. So it is not that you come into our portal and you enter the information and get a response. It is from -- it's machine to machine, from your application communicates to the web service, provide the request, we respond back for the request to your applications.

MR. BRADBURY: Because obviously it being a machine-to-machine API connection significantly increases the cost to a carrier to access it.

MR. CASEY: Okay. How about some other companies? Can some other companies chime in?

MR. NORMAN: Yeah. This is Wesley from NEFCOM. We're basically in the same boat. We're a small company. And we looked into this and worked with DCF, and we just came to the conclusion that trying to interface machine to machine, until we're told it's absolutely required, is just, it's costly for us. If there was an actual way to just access the portal via the web with credentials, that would make it so much
simpler for us.

**MS. SALAK:** When you say it's costly -- this
is Beth Salak. When you say it's costly, what range are
you talking about? Are you talking about --

**MR. NORMAN:** I don't have a range. It's, you
know, we're a smaller company, we have a small IT staff,
so we don't have the in-house programmers per se. You
know, we, we would just -- we'd basically have to hire
somebody to set this up for us.

**MR. CASEY:** Okay. Virgin Mobile, you are on
the -- aren't you?

**MS. BERLIN:** I don't believe we are. I think
we have an agreement to access but are not accessing.

**MR. CASEY:** Uh-huh. Okay.

**MS. FENNELL:** NEFCOM also has an agreement we
signed in May of 2012, and we were actively pursuing
this. But here again, as Wesley said, we ran into some
problems.

**MR. CASEY:** Okay. I appreciate that
information. Any information you can give me would sure
help.

TracFone we know is on there. Is iWireless,
is there a representative of iWireless on the phone? I
believe they are also on there.

Okay. What other companies can give us some
information, some input?

**MS. MORRISON:** This is Ann Morrison from FairPoint. I think we're in the position where we're going to have to have conversations with DCF about, about trying to, to accomplish access. So I don't know how -- you know, I'd appreciate contact information being exchanged one way or the other so we could talk more about this.

**MR. CASEY:** Okay. What I'll do is send out the contact information to each of the 24 ETCs. We now have 24 ETCs in Florida. And we also have 35 waiting at the FCC. I don't know if you knew that or not. There's 35 wireless ETC petitions waiting at the FCC for approval for Florida.

How about some other input? Any other companies can help me out?

I guess not. Any other comments on this first item?

**MR. McCABE:** Bob, just --

**MR. CASEY:** Yeah.

**MR. McCABE:** Tom McCabe with TDS. Just out of curiosity, I mean, is -- your conversations with the FCC, is it at any cost? I mean, you're saying that, you know, companies need to get onto this portal. You know, NEFCOM mentioned that the cost is prohibitive or it's
expensive to do. I mean, I know our level of Lifeline customers, I think, have, you know, really declined quite a bit since the ETC wireless guys have gotten into, into business. I mean, if we're only getting, you know, one or two of these a month, are we going to be required to go out there and spend, you know, five, ten grand for something like this? And is, and is there any alternatives out there in terms of, you know, what would we need to do to -- would we need to go to the FCC to seek a waiver of this requirement or is that --

MR. CASEY: Well, we're hoping the results of this meeting and your input given to the FCC will help them out and they can guide us a little better.

MR. McCABE: Okay.

MR. CASEY: Especially for the smaller companies.

MR. McCABE: Okay. Okay.

MS. SALAK: You can tell them about the idea we toyed with.

MR. CASEY: Yeah. We've actually talked about, the Lifeline group here has actually talked about -- the Lifeline group at the Commission has talked about maybe creating a, some input where an ETC could log in, just like they're doing now to return applications, they could log in to our website and then
have access to DCF where you could put in the name, birth date, last four digits of the Social Security, and it will pop back yes or no whether they're qualified. So that's one thing that we're looking at. Of course, that's in the early stages. We'd have to get a bunch of approval here at the PSC too.

**MS. SALAK:** And DCF.

**MR. CASEY:** And DCF, yeah. So they could actually come into our website, and we'd have something set up where they can type in the person's name, birth date, last four digits of Social Security, and get a response from DCF.

**MS. SALAK:** But I think that would only work for small numbers.

**MR. CASEY:** Right.

**MS. SALAK:** I mean, it was not meant for major batches or anything. It would just be for one, two at a time.

**MR. CASEY:** And as far as your question about are they going to make it -- well, the conversation we had, they were pretty explicit. They said, "It's the law. They have to do it," you know.

Could you -- Beth was on the call too. Maybe she can --

**MS. SALAK:** We were all, the three of us were
on the call. They were quite adamant. They were -- we
gave cost as a reason, especially for the small
companies. I mean, we gave cost as a reason. We
gave -- we did just have the major discussion about,
well, there are two different functions. There's the
actual initial application and then there's the Web
interface, and we did have that discussion.

MR. HATCH: Did anybody ask the question about
the "except in the case of" language that's in their own
rule?

MS. SALAK: We -- well, no. We were not
expecting to talk about that, so we were --

MR. HATCH: I mean, you didn't expect the
entire conversation.

MR. CASEY: We were kind of blindsided.

MS. SALAK: We did not know that would be what
we would be talking about.

MR. HATCH: I was just wondering if they even
related anything that would indicate their view of what
that rule, how the rule is structured.

MS. SALAK: No. Well, their, their view was
that that rule applied. I mean, there was, there was no
ifs, ands, and buts. It was --

MS. MASTERTON: I don't really understand --

MR. McCABE: Your process is so far, so much
farther ahead than other states that I've dealt with
that it's kind of surprising. I would have thought that
they would have been wanting to talk to you as an
eexample, not that you're not doing it right.

MS. SALAK: And we have had those
conversations, too. I mean, don't get me wrong, they
usually -- our conversations are very pleasant and
it's -- they have talked to us as an example.

MR. CASEY: And they do use us as an example,
and they have no problem with our systems. You know,
the systems are set up. You know, we've got the
original going through DCF and we've got this web
services interface where you can go in and get instant
verification where they're participating in a program.
So they like our system, it's just that the ETCs are not
using it. That's, that's what they're getting on.
They're yelling at us because the ETCs aren't using it.

MS. MASTERTON: But I don't really understand
why they're telling you how --

MS. SALAK: Because --

MS. MASTERTON: What role will you play? Do
you -- I don't think you certify Lifeline; right? I
mean, how do they -- what do they expect you to do to
make us do it? Isn't that something that's kind of
between us and the FCC? That's what I don't understand.
MS. SALAK: Well, every state program has to at a minimum follow everything that the FCC mandates.

MS. MASTERTON: Or?

MS. SALAK: Well, that's just --

MS. MASTERTON: I mean, that's what I'm trying to figure out. It seems like -- it's weird to me that they came to you instead of to us, I guess, and said to us to say, "You're not accessing it." Because you don't have any state rules or laws that require us to. You know what I'm saying? I'm just trying to figure out --

MS. SALAK: No. But every -- I'm just saying that my -- well, no. I mean, I don't know why. But as a non-attorney, it's my understanding that we have to --

MR. HATCH: But you have stayed at a Holiday Inn.

MS. SALAK: It's my understanding that at a minimum every state program has to follow all their rules. And we can go beyond them, we can add additional things.

MS. MASTERTON: Right.

MS. SALAK: But you have to -- our program has to follow theirs at a minimum.

MS. MASTERTON: Okay. I mean, I kind of understand that. It's just --

MS. SALAK: And if it's a requirement in their
rule, then at a minimum we have to follow that rule.

MR. HATCH: It just seems strange that they're beating on you and their bone to pick is with us.


MS. SALAK: I think, I think their start was to talk with us. Like, what is your understanding? What's going on in your state?

Again, we are -- huh?

MR. TEITZMAN: No. I was just going to say I don't think they took into consideration any thoughts of what kind of enforcement we could do about it. They just wanted us to get the word out that there was an issue.

MS. MASTERTON: Okay. Okay.

MS. SALAK: Right, for starters. They did ask us what we're going to do about it.

MR. HATCH: We'll have a meeting.

MR. CASEY: Well, and that's the reason we're here. We want, we want your input, you know.

MS. SALAK: Exactly.

MR. O'ROARK: So, Bob, you threw out the possibility that the Commission might establish the machine-to-machine interface with DCF.

MR. CASEY: Right.
MR. O’ROARK: Do you guys have any sense of how long that would take, when that might happen?

MS. SALAK: Well, first of all, we would have to discuss it with, with DCF. And we have had discussions with our IT people. But we haven't -- I haven't run it up the food chain here at all about doing it, so I would need to do that.

And, and then after that it would take about --

MR. LEGASPI: A few days.

MS. SALAK: A few days.

MR. CASEY: A few days.

MS. MASTERTON: Oh, really?

MR. FOLLENSBEE: But you already have your machine-to-machine connection to the portal.

MR. CASEY: We, we have --

MR. FOLLENSBEE: When the application comes to you under one of the three programs, you can go in and determine --

MR. CASEY: Right. They have set it up for us where we could actually go in because sometimes we'll get complaints and things like that that say, "I'm on food stamps and they denied me." Well, I can right there put in their name, the last four digits, and it'll instantly pop back yes or no. So they have set it up
for us. And, of course, Benjie is here with our IT folks. He's the one that set it up.

    MR. O'ROARK: I wonder if the DCF folks have any initial reaction.

    MS. SALAK: J.D.?

    MR. CASEY: J.D., I don't want to put you on the spot.

    MS. JOHNSON: Bob, like you said, we've got to have a conversation.

    MS. SALAK: Exactly.

    MR. CASEY: Right. Right.

    MS. JOHNSON: Yes. That's, that's my own initial reaction.

    MR. CASEY: Okay.

    MS. SALAK: I mean, they are down sides to it, too. So it's not --

    MS. MASTERTON: But, I mean, it does sound like it would address the issue with each company establishing a machine-to-machine connection.

    MS. SALAK: Our real thought was for the small companies, is that those who can't afford it, those that -- I mean, that was our, our original concern was, okay, we understand there's a cost involved. We do understand that --

    MR. CASEY: Well, you know, like Tom said, if
you're only getting a couple a month, you know, something like that.

MS. SALAK: Right. Exactly. That there would be an opportunity for us to at least look at the issue and see what we could do. And, again, there were conversations among us. So then we did ask our IT support exactly, you know, what it would take.

MR. CASEY: And we are going to ask for post-workshop comments. So if the companies would, you know, include that information in the comments of why you're not signing up or why you believe you shouldn't have to sign up or different interpretations of the FCC rule, we could use all that information.

MS. SALAK: And if you could give us an estimate of how much it would cost you, that would help too actually.

MR. CASEY: Anybody else have comments on question number one or issue number one they'd like to comment on or --

MR. FOLLENSBEE: Well, the only -- the last comment you made, we probably couldn't do anything like that until January. Because we asked about trying to get through this month and they said no. They're pretty much locked down on trying to get the, our normal February release done.
MS. SALAK: Uh-huh.

MR. FOLLENSBEE: They don't have time to look at anything else. They're working on the February release with whatever we're doing across the country with our software releases. So it will be either after January -- it could be after February.

MR. O'ROARK: It sounds like we may be in the same boat since we'll be talking to DCF in January.

MS. SALAK: January. Uh-huh.

MR. O'ROARK: Of course, only then would we be able to talk to our IT folks, who I suspect, like AT&T's IT folks, are pretty busy.

MS. SALAK: I think that if there's a plan in place, that's different than saying no to do it, you know, in my mind.

MR. CASEY: Okay. Any other comments people would like to make? Your input is appreciated, believe me.

Okay. Let's go on to number two. This is another issue with the FCC. Their new rules that came out require state agencies that make initial determination of a subscriber's eligibility for Lifeline to provide each ETC with a hard copy of each of the Lifeline certifications forms.

And as you know, USTA has gotten a waiver for
the state of Florida and some other states since this
rule went into effect -- I believe it was June 1st of
last year. And there's -- the temporary waiver is in
effect right now until February 1st. So we're good
until February 1st.

The Florida Commission has filed a petition
for a permanent waiver of this rule because of the way
our system is set up where you really don't need a hard
copy verification of an application. If you receive an
email from us saying this person is eligible for
Lifeline, you know that it has gone through DCF and DCF
has certified that this person is eligible.

But I just wanted to give you a status update
on that. We have filed a permanent waiver. We hope to
hear from the FCC, of course, before February 1st.

MS. MASTERTON: Well, for some reason our
federal people thought -- this is Susan Masterton with
CenturyLink -- that they'd put it out for comment and
all. Is that not going to happen? That's what -- when
we were talking to them about this. Do you feel like
that's going to be the process, or do they do it without
that?

MR. CASEY: They haven't told us anything
about that.

MS. MASTERTON: Okay. I mean, I don't know.
**MS. SALAK:** Did they, did they put the -- the temporary ones they didn't put out for comment, did they?

**MR. FOLLENSBEE:** No, they did not.

I will let you know that yesterday USTA did file additional comments on behalf of several states. The comments for Florida basically were, "We acknowledge that you all have asked for a permanent waiver." We've said basically -- the USTA said basically if the permanent waiver is granted, you have to give a grant of the same permanent waiver to the ETCs. Just giving you a waiver doesn't relieve us of our obligation to receive the information. So basically it would be one-sided. We'd still have the obligation, even though you were relieved of providing it, we'd still have the obligation to receive it. We told them if it's not going to be granted, to please extend the waiver to August 1st to give you and the FCC more time to work out whatever is going to have to happen if they don't grant the waiver.

**MS. SALAK:** Uh-huh.

**MR. CASEY:** Now I did get a call from the FCC yesterday asking us to set up a conference call. And I asked, "Well, what about?" And --

**MS. SALAK:** We're getting smart now.

**MR. CASEY:** Yeah. It was kind of fun because
they said, "Well, some of the companies have been complaining that they're not going -- they don't get the information necessary for the national duplications database." I says, "That's what you want to talk about?" And they said, "Yeah." I says, "Well, you need to reference our May 29th filing, our permanent waiver petition, because all the information that's necessary for the national duplications database is in those."

"Oh," they said, "Oh, I guess we don't need to talk to you then." I said, "Yeah." I said, "Well, if you want to talk, just call us."

But the, but the feeling that we've gotten from the FCC is that this is almost like an administrative thing, you know, the waiver. So we're hoping that that's going to happen.

**MS. MASTERTON:** I guess that surprises me. I haven't seen the USTA comments. I thought the waiver to y'all would apply to the program, meaning, you know --

**MR. FOLLENSBEE:** We weren't sure, so we asked USTA to add in there to make sure they granted the permanent waiver to the ETCs themselves --

**MS. MASTERTON:** Okay. All right.

**MR. FOLLENSBEE:** -- since they have the obligation to receive the certification for it.

**MS. MASTERTON:** Okay. Okay.

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MR. FOLLENSBE: There might have been balance and suspend (phonetic). I think it was a good idea to say it to make sure, you know, just in case.

MS. MASTERTON: No. No. I just was trying to see what they thought because I didn't get -- until you just said that I hadn't heard that yet. Okay.

MR. FOLLENSBE: Well, I just saw it late yesterday, so. I think we got it like at about midnight last night.


MR. SPEARS: Well, we weren't up that late last night.

MR. FOLLENSBE: Well, I'm sorry.

MR. SPEARS: Our plane got in at -- got home at 11:00.

MR. FOLLENSBE: I wasn't either.

MR. CASEY: But you emailed me at 6:00.

MR. SPEARS: This morning.

MR. CASEY: This morning. Yeah, you did.

Any other companies have any questions or comments on issue number two about the hard copy requirement?

Yes.

MR. FOLLENSBE: I guess I've got a question. As a contingency, have you discussed with DCF that they
may need to put a budget request in that could be
quickly thrown out for 2014/15 just in case the FCC does
something squirrely?

    MR. CASEY: We have advised DCF and kept them
abreast of what's happening.

    MR. FOLLENSBEE: Okay.

    MS. SALAK: We've been very optimistic.

    MR. FOLLENSBEE: I know you have been.

    MR. CASEY: We've been very optimistic that
we're going to get the permanent waiver.

    MS. SALAK: And you've been, I won't say
pessimistic, but very guarded. Is there a reason that
you think we won't get it?

    MR. FOLLENSBEE: No. But who knows with the
FCC.

    MR. HATCH: It's the FCC. It's a comment on
experience, not on the quality of your work.

    MR. FOLLENSBEE: I think we have given up
trying to predict what they're going to do and when
they're going to do it, given some other issues we have
in front of them that have been lingering for a while.

    MR. HATCH: Yeah.

    MS. SALAK: I thought those were going to be
taken care of soon, too.

    MR. FOLLENSBEE: We don't know what taken care
of means. You just say they're going to address it in January.

MR. HATCH: We're hoping they will be addressed.

MR. FOLLENSBEE: We're optimistic that they're going to address it. We're pess -- we're cautiously optimistic what they're going to ask for in January.

MS. EDMONSTON: Has the budget been submitted already to the Legislature?

MR. HATCH: Agency budgets have already gone in.

MS. EDMONSTON: I thought so.

MR. HATCH: It's not too late to get something added, but the basic agency budgets have probably gone out.

MR. CASEY: It's our understanding it would be a major thing to have DCF have to change that.

MR. HATCH: I believe it.

MR. FOLLENSBEE: I believe it would be too.

MR. CASEY: Change the system, yeah.

MS. SALAK: Well, we didn't exactly -- in our waiver we didn't offer it as an option.

MR. HATCH: As well you should not.

MR. CASEY: Because we've had conference calls all along with the FCC about our systems and everything,
and they just finally says, "Well, just file a permanent waiver. File for a permanent waiver." I said, "Okay." And that's what we did by November 1st.

Any other comments or questions on number two?

Okay. Let's go to number three. We're interested to find out how the ETCs are going to perform the 2013 recertifications for Lifeline. You know, are they going to be in person, in writing, by phone, text message, email, through the Internet? I know there was an election to have USAC conduct them for 2013. I don't know if that's still available or not.

**MS. EDMONSTON:** Did you -- do you mean 2014?

**MR. FOLLENSBEE:** You meant 2013, this year; right?

**MR. CASEY:** This year. Yeah.

**MR. FOLLENSBEE:** Okay. AT&T did theirs by letter. It's already been done. We chose not to use USAC this year. We may decide to use them next year, but that's still up in the air. So we did ours by sending letters to all the current subscribers under Lifeline for them to recertify, and it was completed in October with whoever needed to get off the roll, got off the roll, and whoever didn't, stayed on.

**MS. BERLIN:** Assurance Wireless is in the middle of it now, and it was done by a mailed form which
could be mailed back or faxed, by phone, and via the website. So basically anybody who needs to be recertified in this area has multiple ways to get recertified.

MR. CASEY: Has different options. Okay.

MR. O'ROARK: For Verizon we used robo calls. If the customer gets a call and can go to an IVR and recertify that way. If they wanted to talk to a live person, there was also that option. If they elected not to take or respond to the robo call, then they'd get a letter telling them a number to call. And we completed our process, I believe, in September.

MS. PONTIS: CenturyLink sent out the recertification forms in writing; it was separate from the bill. They had the option to recertify via phone or mail it in. And then we also did phone blasts, and we did not use USAC.

MR. O'ROARK: Bob, I should have said we are planning to use USAC next year.

MR. CASEY: I was wondering whether USAC has the ability to do it this year with everything they're tied up with this national duplications database, if they had the manpower.

MR. FOLLENSBEE: They did have the ability because we used them for AT&T Mobility across all of our
entities in the states and Puerto Rico. So they were able to do it.

MR. CASEY: So they were able to do it?

MR. FOLLENSBEE: Yes.

MR. CASEY: Okay.

MR. BRADBURY: This is Jay --

MR. CASEY: Go ahead, Jay.

MR. BRADBURY: Yeah. Jay Bradbury at Cox. We did not have a customer base that required recertification in Florida this year.

MR. CASEY: That makes it easy.

MR. BRADBURY: We did use USAC, we did use USAC in our other states.

MR. CASEY: That makes it easy for you for Florida, huh?

MR. BRADBURY: It was, yes.

MR. CASEY: Okay. Tom?

MS. BOON: This is Kristen from ITS Telecom, and we're doing ours by letter. It's in the process right now. And then the customer can come in and recertify or mail back or fax back the letter, the form.

MR. CASEY: Thank you.

How about Tom?

MR. McCABE: TDS Telecom completed theirs on November 1st. We did via letter.
MR. CASEY: Via letter?
MR. McCABE: Yes.
MR. CASEY: Okay.
MS. SALAK: Going to use USAC?
MR. McCABE: We're not sure. It may be an option in the future.
MS. SALAK: Would anyone like to share what their results were? Were they the same as last year?
MR. FOLLENSBEE: Do not know. Sorry.
MR. HATCH: Our expert had another engagement.
MR. CASEY: As you know, we lost a third of our Lifeline customers last year because of recertification; 348,000 for Florida.
MR. FOLLENSBEE: But if we filed our November report, it would have, all these figures would have been in that. Which we do every month, don't we?
MS. SALAK: You do it quarterly.
MR. FOLLENSBEE: Quarterly? Okay. Well, when you get the January report for the fourth quarter, that will tell you.
MR. CASEY: But we can go around that by seeing what you file at USAC and what's reimbursed.
MR. FOLLENSBEE: That is true.
MR. CASEY: And then just divide it by 9.5. That's what we usually do to get a rough idea of how
many customers you have.

What other companies can give us some
information?

**MS. FENNELL:** This is Susan with NEFCOM. We
did ours by mail and then we did a few follow-up phone
calls. We have completed our recertification as of
November. Last year we actually lost about
200 customers when we did the recertification.

**MR. CASEY:** And is NEFCOM going to plan on
using USAC next year?

**MS. FENNELL:** I'm not sure. We had talked
about it. I don't know that that decision has been
completely made, but we have talked about it.

**MR. CASEY:** Okay. Thank you.

Any other companies?

**MS. WILLIAMS:** Hey. This is Jody Williams
with Windstream Communications. We have completed our
recertification for Florida, and we cut off, I guess it
was a little over a thousand customers that we lost this
year.

**MR. CASEY:** Wow. How many did you have
altogether? Do you remember?

That's okay. We'll see the figures in the 555
forms.

**MS. WILLIAMS:** We started out with a little
MR. CASEY: And what method did you use for recertification?

MS. WILLIAMS: We have done a couple of different letters and call-outs to the customers.

MR. McCABE: Bob?

MR. CASEY: Yeah.

MR. McCABE: Out of approximately 600 --

MR. SPEARS: What's your name?

MR. McCABE: Tom McCabe with TDS Telecom. Out of approximately 600 we lost 162.

MR. CASEY: How about any other companies on the phone? Could we have your input?

MS. ENKEY: This is Robin Enkey with -- sorry.

MR. CASEY: Go ahead.

MS. ENKEY: This is Robin Enkey with Budget PrePay. We're currently finalizing our recertification efforts for the year, and we reached out by letter and by phone. Like I say, we're finalizing those, and we'll have the results on our 555.

MR. CASEY: Very good.

MR. MORRIS: This is Ann Morrison for FairPoint. We're in the process of recertification in Florida, and we're using, we're doing it through mail. And we did not use USAC, and we haven't made any choices
about next year.

MR. CASEY: Okay. Any other companies?

MS. THOMAS: This is Rhonda Thomas with T-Mobile.

MR. CASEY: Okay.

MS. THOMAS: This is the Rhonda Thomas with T-Mobile. We did not choose to utilize USAC. We did send initial and subsequent letters by mail with the option to return responses by mail, fax, and scan. We did external contacts with customers failing to respond immediately by phone and by email, and our effort will wrap up in the next couple of days.

MR. CASEY: Okay. How about other companies? Is there somebody from TracFone on that could tell us what they're doing?

MR. ANTHANSON: Yes. This is Stephen Anthanson from TracFone. We're doing a, kind of a full spectrum of contact to the customer by mail, by phone blast, email, text message, and accepting recertifications in all the permitted ways. Our effort is ongoing and will continue until the deadline. We do not have any results yet.

MR. CASEY: Okay. Thank you.

How about some other companies? Any other ETCs out there that can help us out?
Okay. Any other comments here? Questions?

Okay. The last issue, any other ideas to streamline the Lifeline enrollment process for either the applicant or the ETC? We're just throwing it out there for ideas. What could we do to make it simpler, easier for the applicant, easier for you guys?

MR. SPEARS: Transfer them directly to you.

MR. CASEY: Besides having us do it.

MR. FOLLENSBEE: This is Greg Follensbee, AT&T. I'll be glad to share with you our comments we have filed with the FCC of how they ought to be doing it through the database, that no state or any ETC would need to do anything other than the database being used to do it. So we've told them there's a lot of ways they could streamline it through the FCC efforts. I'll be glad to share a copy of those comments with you all.

MR. CASEY: And this is --

MR. FOLLENSBEE: Not much that you all could do because it really needs to be driven by the FCC making changes with USAC.

MR. CASEY: Right. Are you talking about the national eligibility database, not the duplications?

MR. FOLLENSBEE: Well, yeah, that and the fact that you could streamline it by just having the money sent to us without having to send a form in to request
being reimbursed. So there's several things that AT&T has suggested that would streamline and modernize how the whole process should work. So I'll be glad to get a copy of those comments for you.

**MR. CASEY:** Have you heard anything on the progress of the national eligibility database? We heard they're running into some little bumps along the way.

**MR. FOLLENSBEE:** Well, I had heard some bumps earlier because of some issues they were dealing with -- privacy, particularly with Medicare or Medicaid. I don't know if -- I think they've worked through those to some extent. I have not heard if they're still on track to do the first test in January or not.

**MR. CASEY:** Of the eligibility database?

**MR. FOLLENSBEE:** Uh-huh. We've heard it was going to be early, but I just don't know if it's still on track.

**MR. BRADBURY:** Hey, Greg, I think you're talking about the NLAD database, not the eligibility database.

**MR. FOLLENSBEE:** You're absolutely right. I haven't heard anything about the eligibility database. I am thinking of the duplication, Mr. Bradbury. Thank you very much.

**MR. CASEY:** Thank you for the clarification.
MR. BRADBURY: You're welcome, sir.

MR. HATCH: Just like old times.

MR. FOLLENSBEE: Just like old times, Jay.

Thanks.

MR. CASEY: And I believe for the duplications database the ETCs have to have everything in and it's going to go active for Florida in February, I believe.

MR. BRADBURY: I think that's correct.

MR. CASEY: Okay. Any other comments on how we could streamline this process?

MS. MASTERTON: I mean, I don't have any. But if we're going to do written comments, we can try to see if we can, you know, if we have any ideas we could include there.

MS. SALAK: That's great. I appreciate it.

MR. CASEY: And on any, any four of these we would ask that if you have any input, please give it to us.

And as far as post-workshop comments, could they send them to either you or me?

MR. TEITZMAN: Yeah. That's fine.

MR. CASEY: Okay. I will include that in an email that goes out, because I'm going to give you the DCF contact and I'll give you some other information who you can send the comments to. How about two weeks for

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the comments?

**MS. MASTERTON:** Well, is there, is there going to be a transcript?

**MR. CASEY:** There will be a transcript.

**MS. MASTERTON:** When do you think that --

**THE COURT REPORTER:** Probably the end of next week.

**MS. MASTERTON:** Two weeks from today?

**MR. TAYLOR:** Hey, Bob. This is Ryan Taylor from FairPoint Communications. Is it possible to extend that a little bit longer just based on the holiday schedule?

**MR. CASEY:** Okay.

**MS. SALAK:** I won't be here. I don't care.

**MR. SPEARS:** She's taking a break.

**MR. FOLLENSBEE:** We want it sent to Beth in care of her hospital room.

**MR. CASEY:** Don't worry. I get payback.

**MS. SALAK:** That's right.

**MR. CASEY:** Payback is hell. Okay.

**MS. SALAK:** I'll have plenty of time to read them actually, so.

**MR. CASEY:** Yeah.

**MR. McCABE:** Bob, the difficulty is, is having enough time to look into number one.

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MR. CASEY: Uh-huh.

MS. MASTERTON: Right. If you want the final answer, I think two weeks is too soon.

MR. McCABE: Yeah.

MR. CASEY: Okay. What would you suggest? Give me a suggestion.

MR. FOLLENSBEE: January 15th would be great.

MS. MASTERTON: Exactly.

MR. FOLLENSBEE: Unless that's a weekend.

MS. MASTERTON: Yeah. That's what I had.

MS. SALAK: Is it a weekend?

MR. CASEY: January 15th is a Wednesday.

MR. BRADBURY: It's a Wednesday.

MR. FOLLENSBEE: Is that okay with you, Tracy?

MR. HATCH: I'm sorry. I'm trying to look at my calendar. What was the date?

MR. FOLLENSBEE: January 15th.

MR. CASEY: January 15th.

MR. HATCH: That's fine.

MR. SPEARS: You'll be back from the holidays.

MR. CASEY: Okay. January 15th we're going to ask for post-workshop comments. Again, I will send that information out in the email to all the ETCs.

MS. MASTERTON: And that way we'll have the transcript.

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MR. BRADBURY: Thank you.

MR. CASEY: All right. And the transcript will -- as soon as the transcript is available, I'll be sending that out too.

Any other questions or comments on the Florida Lifeline program?

Nothing? Okay. Well, thank you very much for attending. We appreciate it. And, again, your input is really appreciated in post-workshop comments.

MS. MASTERTON: Thank you for having us.

MR. CASEY: Thank you.

(Proceeding concluded at 10:53 a.m.)
STATE OF FLORIDA   } CERTIFICATE OF REPORTER
COUNTY OF LEON   )

I, LINDA BOLES, CRR, RPR, Official Commission Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED THIS 13th day of December 2013.

LINDA BOLES, CRR, RPR
FPSC Official Commission Reporters
(850) 413-6734

FLORIDA PUBLIC SERVICE COMMISSION
Florida Lifeline Work Group Meeting
December 5, 2013

Agenda

The purpose of this meeting is for the Lifeline Working Group to discuss Florida Lifeline program issues. Specifically, staff would like to discuss:

1. The Florida Department of Children and Families Web Services Interface which verifies participation in the Medicaid, Temporary Assistance for Needy Families, and Supplemental Nutrition Assistance Programs. 47 C.F.R. §54.410(c)(1)(i)(A) states:

   a. If the eligible telecommunications carrier can determine a prospective subscriber’s program-based eligibility for Lifeline by accessing one or more databases containing information regarding enrollment in qualifying assistance programs (“eligibility databases”), the eligible telecommunications carrier must access such eligibility databases to determine whether the prospective subscriber qualifies for Lifeline based on participation in a qualifying assistance program;

What is each ETC’s plan and timetable for obtaining access to the DCF portal?

2. The status of the FCC Temporary Waiver for Florida of FCC Rules 47 C.F.R. §54.407(d), 47 C.F.R. §54.410(b)(2)(ii), 47 C.F.R. §54.410(c)(2)(ii), and 47 C.F.R. §54.410(e) which require state agencies that make the initial determination of a subscriber’s eligibility for Lifeline to provide each ETC with a hard-copy of each of the Lifeline certification forms.

3. How each Florida ETC will perform the required 2013 Lifeline customer recertifications. Will the recertifications be accomplished in person, in writing, by phone, by text message, by email, or otherwise through the Internet? Did your ETC elect to have USAC conduct the 2013 annual recertification of your Lifeline customers?

4. Any other ideas to streamline the Lifeline enrollment process for both the applicant and ETC?
September 13, 2013

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re:  WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization
     WC Docket No. 03-109 - Lifeline and Link Up
     CC Docket No. 96-45 - Federal-State Joint Board on Universal Service

NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On September 13, 2013, Javier Rosado, Senior Vice President, TracFone Wireless, Inc. ("TracFone"); and I met with Radhika Karmarkar, Deputy Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, and with Jonathan Lechter and Christopher Cook, Attorney-Advisors, Telecommunications Access Policy Division, Wireline Competition Bureau.

During the meeting, we discussed several matters regarding the federal Lifeline program supported by the Universal Service Fund ("USF"). Specifically, we briefed the attendees on the status of TracFone’s efforts to obtain access to Lifeline program-based eligibility databases in various states. As part of that discussion, we provided the attendees with a State Database Fact Sheet which identifies on a state-specific basis the states where access to databases is available, when such access became available, access costs, and the Lifeline-qualifying programs included in each state’s database. We also provided a document which indicates how many Lifeline providers (Eligible Telecommunications Carriers or “ETCs”) use those state databases in the states where access to state databases is available. Copies of these documents are attached to this letter. In addition, we discussed the progress of TracFone’s efforts to obtain access to eligibility in other states.

We also discussed certain aspects of the plans for implementing the National Lifeline Accountability Database (NLAD) by the Universal Service Administrative Company (USAC). One problem we discussed involves the requirement that ETCs provide a telephone number to the database at the time of enrollment. This requirement presents difficulties for TracFone and, presumably, other ETCs. As a mobile virtual network operator, TracFone does not have available an inventory of North American Numbering Plan telephone numbers to assign to customers. Rather, when it activates a customer, it requests that the underlying carrier on whose network the customer is to be served assign a telephone number. This method has worked well and has prevented fraudulent use of assigned numbers. Moreover, assigning a telephone number and loading the number into the NLAD database at the time of enrollment but prior to activation...
will do nothing to prevent waste, fraud and abuse of USF resources. We informed the staff that TracFone is working with USAC to attempt to find a workable resolution to this problem such as use of a single “dummy” number at the time of enrollment but that further involvement by the Commission may become necessary to rectify this problem. That dummy number would be replaced with a permanent telephone number once it was assigned. That permanent number would then be loaded into the NLAD.

Pursuant to Section 1.1206(b) of the Commission’s rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,

[Signature]

Mitchell F. Brecher
Counsel for TracFone Wireless, Inc.

Cc: Ms. Radhika Karmarker
    Mr. Jonathan Lechter
    Mr. Christopher Cook
## State Database Fact Sheet

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<td>Medicaid, SNAP, TANF, LIHEAP and Crisis intervention Prog (CIP)</td>
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### Notes:
- Working with add'l 18 states AL, AZ, CT, DC, DE, GA, KY, LA, MA, ME, MS, NH, NV, OH, PA, TN, UT, VA - Avg time 380 days
<table>
<thead>
<tr>
<th>Active DB Count</th>
<th>State</th>
<th>Wireless</th>
<th>Home</th>
<th>Total ETC's</th>
<th>ETC's utilizing database</th>
<th>% of ETC's utilizing State databases to verify eligibility</th>
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<tbody>
<tr>
<td>1</td>
<td>Michigan</td>
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<td>57</td>
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<td>39</td>
<td>47</td>
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<tr>
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<tr>
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<td>39</td>
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<tr>
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<td>25</td>
<td>3</td>
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<tr>
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<td>27</td>
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</tr>
</tbody>
</table>

**Total:** 146 Wireless, 405 Home, 551 Total ETC's, 80 ETC's utilizing database, 85% utilization

*State has not responded

FL - (TracFone, Assurance and I-Wireless)