BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. UNDOCKETED

LIFELINE WORKING GROUP MEETING

PROCEEDINGS: LIFELINE WORKING GROUP MEETING

DATE: Wednesday, January 21, 2015

TIME: Commenced at 10:32 a.m.
Concluded at 11:30 a.m.

PLACE: Florida Public Service Commission
Room 105, Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

REPORTED BY: LINDA BOLES, CRR, RPR
Official FPSC Reporter
(850) 413-6734
APPEARANCES

BY PHONE:

Jay Bradbury – Cox Communications
Leslie McLaughlin – Cox Communications
Martin Corcoran – Cox Communications
Rhonda Thomas – T-Mobile
Ann Morrison – FairPoint
Tim Loken – Windstream
Jorge Chamizo – TracFone/SafeLink
Harvey Spears – CenturyLink
Caryl Gilstrap – CenturyLink
Abby Matari – FLATEL/Zing Wireless
Sam Bailey – i-wireless

IN PERSON:

Debbie Nobles – NEFCOM
Debbie Finley – NEFCOM
De O’Roark – Verizon
Becki Edmonston – Verizon
Tracy Hatch – AT&T
Maryrose Sirianni – AT&T
Tom McCabe – TDS
Sandy Khazraee – CenturyLink
Lisa Steffens – OPC
Catherine Beard – PSC
Curtis Williams – PSC
Beth Salak – PSC
Adam Teitzman – PSC
Leslie Ames – PSC
Bob Casey – PSC
Mark Long – PSC
J.D. Johnson – DCF
Leah McCarthy – DCF
MR. CASEY: Okay. We can go ahead and get started. I think everybody is here or on the phone. I'll take appearances in just a moment.

This is a meeting of the Lifeline Working Group. One thing I'd like to let the people here know is that the microphones on the table are live. Please make sure that no phones are near the mikes. And if conversation needs to be taken offline, please either mute the mike or move away from the table. Okay. We are not -- this is not going to be on TV, not being recorded. We do have a court reporter here. Are you disappointed?

MR. McCABE: I wouldn't have showered, if I had known.

MR. CASEY: We do have a court reporter here. So let's get started by taking appearances here first at the Commission. We'll start to my left.

MS. SALAK: I'm Beth Salak. I'm with the Commission.

MS. BEARD: Catherine Beard with the Commission.

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

MS. EDMONSTON: Becky Edmonston with Verizon.

MS. BOLES: Linda Boles, court reporter.
MS. KHAZRAEE: Sandy Khazraee, CenturyLink.

MR. McCABE: Tom McCabe, TDS Telecom.

MR. HATCH: Tracy Hatch, AT&T.

MS. NOBLES: Debbie Nobles, NEFCOM.

MS. FINLEY: Debbie Finley, NEFCOM.

MS. STEFFENS: Lisa Steffens, OPC.

MR. TEITZMAN: Adam Teitzman with the Commission.

MR. CASEY: And, of course, I'm Bob Casey. Could we take appearances on the telephone, please.

MR. CHAMIZO: Jorge Chamizo from TracFone Wireless.

MS. MATARI: Abby Matari from Zing Wireless.

MR. BRADBURY: Jay Bradbury, Cox Communications.

MR. CORCORAN: Martin Corcoran, Cox Communications.

MS. GILSTRAP: Caryl Gilstrap, CenturyLink.

MS. MORRISON: Ann Morrison, Fairpoint.

MR. BAILEY: Sam Bailey, iWireless.

MR. LOKEN: Tim Loken, Windstream.

MR. CASEY: Anybody else?

Okay. I'm going to ask you to do me a favor. For those people on the telephone, could
you please send me an email after the meeting to make sure we get you down in the -- for the court reporter and I get the spelling right? And my email address is Bcasey, that's B-C-A-S-E-Y, @psc.state.fl.us. I appreciate it. That'll help us out.

Okay. We might as well go right into the issues, if anybody doesn't have anything else, questions or anything.

Number one, the Florida Department of Children and Families Web Services Interface which verifies participation in Medicaid, Temporary Assistance for Needy Families, and Supplemental Nutrition Assistance Program states that, "If an eligible telecommunications carrier can determine a subscriber's program-based eligibility for Lifeline by accessing one or more databases containing information regarding enrollment in qualifying assistance programs, 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."

To give you a little history on this, we were approached by the FCC about a year and a half ago, I think it was, which kind of surprised us. They asked
for a conference call. So we're on the conference call, ready to talk, and we said, well, we're here. What do you need? Well, your state has a qualifying Lifeline database for programs. We want to know why all your ETCs are not using it. It's federal law that they have to use it. And we were kind of stunned and surprised. We were just, well, you know, we'll find out, we'll ask.

So at the last work group meeting in December of 2013 we asked, and there were a number of explanations. So we're here to update it, you know. Is everybody on this database now with DCF? Because what's going to happen now when the FCC comes to us again and says how come all your ETCs are not on it, we're going to say, okay, these are the ones that are on it, these are the ones that are not on it. It's your rule. You go after them.

So where can we start? Who wants to start?

MR. HATCH: Why does he look at me?

MR. CASEY: You started off the last one.

MR. HATCH: Yeah, I did.

UNIDENTIFIED SPEAKER: Come on, Tracy.

MR. CASEY: You were great. They didn't even know who it was. They knew I picked you.

MR. HATCH: The short, sweet answer is not
much has changed for us. We still have some serious fundamental problems with building a single state solution when this is really a national issue. And that's -- I know that some discussions have occurred on this with the FCC. I don't know what the -- where they are or where they're going or anything like that. I just don't know.

So the answer is we are not -- we have not built to a portal is the answer to your question. As to whether we will is still an open question.

**MS. SALAK:** But you have not approached DCF at all?

**MR. HATCH:** No. No. For us, there isn't any real point unless we absolutely have to build to the portal. And until we have to do that, you know, there's no really -- no real reason to do that.

**MS. SALAK:** So you don't have any cost estimates or anything like that?

**MR. HATCH:** As far as I know -- there may be some. They may have done some at some point. Because I know that after the last workshop, MaryRose told them to go pull that stuff because you had made -- there was a discussion about how to find it, and I think we relayed that information. Whether they pulled it or not or looked at it or did any financial assessment, I
do not know. But it's a much bigger problem than just
the financial and building the machine-to-machine
interface. Certainly we're capable.

MS. SALAK: But you said that you have had
discussions on the federal level?

MR. HATCH: As far as I know, that has been
discussed. I don't know what the contents of those
discussions -- whether it was a specific discussion or
in the context of other things, I don't know.

MS. SALAK: Can you find out and put it in
your comments?

MR. HATCH: Maybe, maybe not. The answer is
I don't know. It depends on what the nature of the
discussions are. They may not tell me and they may not
want them divulged.

MS. SALAK: Can you file them confidentially?

MR. HATCH: Probably not.

MR. CASEY: I know at the last work group
meeting you mentioned that you had some problems with
the interpretation of it. Are you still having a
problem with the interpretation of the rule?

MR. HATCH: The answer to that is yes. And
the problem with the interpretation has to do with
looking at it with a view of is it mandatory or is it
optional, and that's kind of where we started the last
time. We didn't think it was mandatory. You, of course, have informed us that it's mandatory and the FCC apparently believes that it's mandatory, but we'll see. We still hold that opinion, but it's not really worth going through. I mean, it's --

**MR. BRADBURY:** This is Jay Bradbury at Cox. I'll just follow Tracy since I was a participant last time also. As we learned last time, there actually is not a web portal access to this database. There is only an application programming interface machine-to-machine capability. That is extremely expensive and cost-prohibitive.

We also don't believe that the rules as they are written require us to have it. I've got -- we have a two-page set of talking points that we'd be willing to submit to the staff after the meeting that addresses that, but basically the rule, Parts A and Parts B, are "if" statements separated by an "or." We are compliant with Part B. That doesn't mean that we are not compliant with Part A.

The state provides 90 percent of all the enrollments that we do. The other 10 percent we do under Part B, we receive all the documentation from the subscriber. We're rule compliant.
MR. CASEY: Okay. Jay, could you send me those talking points after the meeting? We'd like to --

MR. BRADBURY: I'd be happy to do so.

MR. CASEY: All right. And, again, we're just saying what the FCC told us. They slapped our hand saying why aren't your ETCs on this database, so.

MS. SALAK: May I ask, you said it was cost-prohibitive. Did you do a -- did you price it out?

MR. BRADBURY: We haven't done any specific pricing, but we know what we did in terms of the NLAD. We don't even use an API with the NLAD because it's cost-prohibitive. We use a batch process with them through their secure web portal. But just what we had to do to modify ourselves internally, even to do that approached a half a million dollars. Doing something just for the State of Florida --

MR. CORCORAN: Ain't gonna happen.

MR. BRADBURY: -- would probably cost us more than the reimbursement that we would receive for the next two years.

MS. SALAK: And it ain't gonna happen.

MR. CASEY: And it ain't gonna happen. We got that little comment. That must have been Marty.
Is that Marty?

**MR. CORCORAN:** It is.

**MR. CASEY:** Yeah. Okay. You are now down on the court record here.

**MS. KHAZRAEE:** Sandy Khazraee with CenturyLink. We are not participating. We do not plan to participate. We did have internal discussions after the last session when we found out it was machine to machine. I do not know whether we actually did a cost study, but I will find out and let you know after this meeting.

We basically have the same issues that the others do. We're in 37 states as an ILEC and an ETC, and it is not what we think of as a prudent use of our resources, the IT resources, the programming, the money to build 37 different interfaces, and especially given that the DCF portal doesn't even capture all of the Lifeline eligible population in Florida. It's only three of the programs granted, and probably the three with the highest percentage of subscribers, but it does not capture them all. So we at this point do not plan to participate in that.

**MR. CASEY:** Okay. Just for your information, we do keep track of how many people come in using
programs and what type of programs, and over 90 percent of the ones that we come in are through DCF programs.

    MS. SALAK: What percentage is it for CenturyLink?

    MS. KHAZRAEE: I would bet it's pretty close. Yeah. We get some folks that come to us directly. We get a few from OPC. We've had a few, you know, we've had some through National School Lunch. But I'd say probably 90 percent come through DCF, but it's not 100 percent.

    MS. SALAK: How many do you think, how many do you think apply directly with CenturyLink?

    MS. KHAZRAEE: I do not know that percentage. Caryl, I doubt you've got that percentage at the top of your head either, do you?

    MS. GILSTRAP: No. But I would agree it's real close to the 90/10; 90 percent DCF, 10 percent other.

    MR. CASEY: How about other companies? Tom, do you know?

    MR. McCABE: TDS Telecom, our position is no different than the rest of them. We have not used the portal and we don't intend to. I mean, we've got limited resources. You know, we're involved in -- you know, we're trying to acquire companies and things of
that nature and trying to deal with our IS (phonetic) folks focusing on those issues that are a lot more important to the company than, than this would be.

I thought at the last meeting a while back though that DCF was going to be looking into an Internet-based arrangement that we would be able to access through that as opposed to a machine-to-machine arrangement, because I don't see us doing a machine-to-machine arrangement.

MR. CASEY: JD, are you on the phone, by chance?

MS. JOHNSON: I'm sitting right here.

MR. CASEY: Oh, JD, I didn't see you over there. I'm sorry.

Has anything --

MS. JOHNSON: We had a discussion yesterday, and we are looking into a web service based program. So they're -- but they did advise that we try to do it all as one group so we can keep the cost down for everybody. So they're investigating that now and will get that back to us.

MR. CASEY: Very good. Very good.

Go ahead.

MS. NOBLES: This is Debbie Nobles, and we did provide some cost estimates previously, and they
were probably way understated because we actually don't have in-house resources that are even knowledgeable enough to determine what would be required to do this.

Also, also filed in my comments, just like we were just saying that we do this in a number of other states where we do access DCF's or the comparable state service that, that oversees these programs, but we've had to -- we have never had to incur any costs to do that, and it has always been something that's been easily accessible, very user-friendly for us, makes it very easy for us to do this.

We have not made any plans to connect to DCF through their portal. We have talked about alternatives, because I think one of the, one of the things that also was discussed at the last workshop was whether the Public Service Commission, who does have access to the portal, could be used as some sort of an interface, at least for the smaller companies, where the costs would really be very considerable based on the number of customers that would even be qualifying for Lifeline.

As a go-around, kind of a workaround program for that we were thinking of setting up a computer within our business office. And if
customers came in and they qualified for Lifeline under one of those programs, we would walk them through the steps of sitting down at the computer, logging into the Commission's website, and having everything done that way. We do have a lot of walk-in traffic, so this would probably take care of a number of our customers. Other folks that apply online obviously have access to a computer, and we would prefer to refer them to the Florida Public Service Commission's website and have them apply using the form -- I think it's 158 -- the online application if they qualify under one of those programs. And then that way we sort of meet the requirement without us actually having to spend the money to connect directly to DCF.

MR. CASEY: So it's a very streamlined process on the PSC website.

MS. NOBLES: Yes, it looks like it is.

MR. CASEY: They can apply, and our computer actually does a query over at DCF to verify that that person is actually on the program they said they are. So they're automatically qualified if they come back.

MS. NOBLES: Yeah. And that's the way we were looking at it is if the customer has walked into the office, they don't have to perform really any extra
steps. They would have to fill in an application regardless. So sitting them down at the computer and having them do it there would be, would work just as well. Now we can do that, the size company we are.

    **MR. CASEY:** Would you mind if I shared the cost? Is that okay?

    **MS. NOBLES:** Oh, no. Yeah, not at all. Not at all.

    **MR. CASEY:** Okay. The comments that we received from NEFCOM would be $36,290 to set it up initially; an additional $3,500 needed for hardware.

    **MR. O'ROARK:** De O'Roark with Verizon. We may be in a bit different position than the other companies because we are undertaking a similar project in another state and expect to connect to their portal next month. And so it may be that work done on that project could help us here in Florida. Like the others, we have not connected to the DCF portal. We're not connected today. We have reached out to the IT department at DCF and were told that they were swamped with the Affordable Care Act and that they would get back to us, and they haven't gotten back to us.

    Obviously, as Jay Bradbury said, it's a machine-to-machine interface. You've got to get requirements from DCF so that you can build to the
portal, and we don't have those requirements. So we've kind of been stuck. But it's something that we're willing to look at and perhaps pursue, but we've got to get the information.

**MR. CASEY:** JD, do you have any idea how long in the future it would be before you look at a web -- or internet-based instead of machine-to-machine?

**MS. JOHNSON:** We had -- like, yesterday we had a conversation with IT, and they're trying to get us someone to figure out how long it's going to take because they are doing the Affordable Care Act and that's top priority right now. And so they are trying to figure out how we can get you guys in there quickly, but they are working on it. And I've been corresponding with your staff back and forth.

**MR. O'ROARK:** With Kevin?

**MS. JOHNSON:** Yes. Uh-huh.

**MR. O'ROARK:** Okay. Good.

**MR. CASEY:** Okay. Other companies like to comment on this on the phone maybe?

**MR. BAILEY:** Hi. This is Sam Bailey with iWireless. Similar to the Verizon guy there, we definitely would be interested in looking into it. I know we've reached out in the past and kind of gotten similar feedback. So we would, we would definitely be
eager to learn more about it.

MR. CASEY: Okay. We'll keep you updated on it as it progresses, as DCF progresses.

MR. BAILEY: Okay.

MR. CASEY: JD, would you keep me informed?

MS. JOHNSON: Yes.

MR. CASEY: Or Beth informed.

MS. SALAK: Us informed.

MS. JOHNSON: Are you short timing it?

MR. CASEY: How could you tell? October this year I'll be retired.

Okay. Any other comments?

Okay. Let's go on to number two then.

The National Lifeline Accountability Database, how is it working? Are you having any problems with it? Are you receiving complaints from consumers that NLAD is providing incorrect information?

I just received three complaints on it yesterday and today from consumers saying, hey, they rejected me because they say I have multiple phones. I only have one phone. And so we have to send those complaints on.

And are you, are the companies taking people off that are no longer eligible? Are you taking them off NLAD within the 24-hour period
that's required? Do you know that, if you're doing that?

MR. McCabe: I don't have an answer on that, but we've had the same issue with regard to customer complaints. Being told that they're duplicate, they get upset over that. They also don't understand why they have to provide any of their identity. They don't understand the whole process. And that's been the biggest issues that we've had, but it's duplicate.

Ms. Khazraee: Sandy Khazraee with CenturyLink. We're having issues with TPIV failures, we're having address duplicates, subscriber duplicate issues, and I actually have a person on the phone who can probably answer your question as far as CenturyLink.

Caryl, I know we've talked about it, but I'd rather you answer the question. So when we have a customer who's no longer either our customer or they are no longer our Lifeline discounted customer, that is a real-time process removing that from their, their account and having that update NLAD; correct? It's real-time.

Ms. Gilstrap: Correct. In fact, its automated process, we do use the API. So once the order processes, the account is de-enrolled from NLAD.
MS. KHAZRAEE: But we do, we do get complaints, we have issues. And Caryl actually gave me some, some specific examples when we were preparing for this where -- okay. First of all, TPIV failures. So --

MR. CASEY: Could you, could you say what TP --

MS. KHAZRAEE: Third-party verification.

MR. CASEY: Okay. Just for the record.

MS. KHAZRAEE: Right. It's part of USAC verification. And I got educated on this yesterday. Caryl, correct me if I say anything wrong. It uses a LexisNexis database, which actually seems to be a credit check database. So we sometimes have Lifeline customers who are not in that database because they don't have credit, they've never probably tried to get credit, and so it doesn't find anything for those customers.

We also have -- and it uses date of --

name, date of birth, and the last four of the Social Security number. That's specifically what it's checking against.

Usually the third party, the TPIV failures are because of duplicate subscribers. Duplicate address, we had one recently where it told us that
there was already a Lifeline discount at that location, so it was a customer that I think had come through the FPSC database. We had to send a letter to the customer and say we can't give you Lifeline. It says there's a duplicate address. They said, well, I'm the only -- you know, no, there's not one here. So then they have to fill out the IEH, independent economic household, form.

**MR. CASEY:** To show that there's two households at the one address?

**MS. KHAZRAEE:** Or -- and I may be getting that wrong, Caryl. So sometimes we require them to fill out the IEH which either says I'm it and we don't have another one here and I'm swearing to that, or there's two independent and that one doesn't have anything to do with me. And then --

**MS. GILSTRAP:** That's correct.

**MS. KHAZRAEE:** And then we can update NLAD if it turns out that it requires an IEH.

Caryl also tells me that address duplication sometimes happens in apartment buildings even when our customer has provided their apartment number and we have submitted that. NLAD only recognizes the street address, does not recognize the individual unit, and we have
customers fail because it didn't pick up that it
was a different apartment number.

Caryl, are there any others that just
stand out at you that you'd like to mention?

**MS. GILSTRAP:** One of the things that I've
noticed about the first issue that was brought up where
customers are not removed in a timely manner from NLAD
so it looks like they're a duplicate subscriber isn't
so much that they, the company who originally had
provided the Lifeline service didn't de-enroll them in
time, it's that they're still stuck in the duplicate
database. And once they hit a duplicate database at
some point, you can't remove them. And USAC won't
remove them until they've completed whatever their
process is. And, unfortunately, we're going through
another round of duplicate mailings because NLAD has
allowed duplicates to be entered into the database.

**MR. TEITZMAN:** Do you get a confirmation --
I'm sorry. Do you get a confirmation when you
de-enroll someone, or is there no feedback?

**MS. GILSTRAP:** Yeah. It says successful. If
you do it through API, there is no confirmation other
than the file was accepted and the row was accepted.
If you do it through manual processing, if you're just
in the app and actually keying it in, you'll get a
screen notice that says the de-enroll is successful.

**MR. CASEY:** So, Caryl -- this is Bob Casey -- let me ask you one thing. If a person showed up on the duplicates database from June of last year and they got rid of both those companies but now they want to apply with a new one, they would still be rejected, right, because they're on the duplicates database?

**MS. GILSTRAP:** Yes. Exactly. If they haven't been moved out of the duplicates database, and quite a few customers are still in that duplicates database, there's nothing we can do about it. And we have complained and complained and complained.

Now just recently with the latest round of mailings they've told us that if you find any of the customers in this list are no longer with you on Lifeline, let us know and we will de-enroll them. So that just happened in January, so this is new. But since then, it's -- they've left them in the duplicates database.

**MR. CASEY:** And that's caused --

**MS. GILSTRAP:** But that could have caused some of those errors that we were seeing in those complaints.

**MR. CASEY:** I could see where it causes a lot of problems.
MS. GILSTRAP: Yes.

MR. CASEY: Okay. Other companies like to comment or OPC?

MS. SIRIANI: Bob, this is MaryRose with AT&T. And just to kind of follow up with what others are saying, we basically feel like we're kind of stuck in the middle because we get the customers' complaints and, you know, we can't send them to NLAD for questions, you know. Our comment is maybe there needs to be some customer service that they can call there to find out, you know, like, what's the problem, because we really can't answer it at that point. So, I mean, that's something that maybe they could do that could help the customers -- on the customers' end that they would have some, you know, somewhere to go or to call. So we are getting complaints, and a lot of it has to do, you know, with the issues that they're talking about, but there needs to be somewhere where the customer can go to get answers.

MS. KHAZRAEE: And this is Sandy with CenturyLink. Caryl has also made that plea to us as well, that we do have some states where there is a state administrator who is in the middle, and it kind of takes us out of the middle. And they would love to see that in Florida. I don't know, you know, who that
would be, but, you know, I don't really think it should be us because, you know.

**MS. GILSTRAP:** This is Caryl. We see a lot of repeat add requests, Lifeline requests from the PCS [sic] file where we will see the customer come in, let's say, in October and request us to add Lifeline but they fail NLAD for either TPIV or duplicate subscriber, whatever, duplicate address. And then so we send them a letter saying I'm sorry we couldn't add Lifeline because of this error, but if you'll send us this information, then we will enroll you in Lifeline. They don't. They go back to the PCS, reapply, and then in January we get another request to add Lifeline. And it's just a vicious circle because the customer is not completing the additional information needed to get them into NLAD.

**MR. CASEY:** How has NLAD been working with the companies? Have they been responsive?

**MS. GILSTRAP:** NLAD just fails them. They don't really --

**MR. CASEY:** You don't call them up or anything?

**MS. GILSTRAP:** NLAD can't resolve the problem if the customer doesn't provide the proof needed. So if they don't complete the IEH worksheet and return it
to us, NLAD doesn't -- isn't going to accept them. And
USAC isn't really willing to work with us on that, no,
not at all. If the customer doesn't provide proof of
identity, if they just go back to your portal and
reapply and you send us a new file to add them, then
we're just hitting a vicious circle of them failing
NLAD. We tell them we need this additional
information, they don't do it, they go back to you and
reapply. And so we have no one to contact to say, hey,
your customer has to fill this out or we're never going
to be able to add them to the Lifeline program.

MR. CASEY: De, did you have something?

MR. O'ROARK: I did. De O'Roark with
Verizon. Actually overall we think the process is
working reasonably well, but we are seeing the same
problems that everybody else is with these false
positives.

One thing I understand that NLAD is going
to do is start giving us at least some of the
reasons for the rejects. Right now you've just got
a reject and you have to send a letter to the
customer saying, sorry, you're rejected. We need
proof. So -- and others probably have more detail.
But my understanding is that at least they'll tell
you, okay, there was a date of birth issue, had a
last four of the Social Security number issue, so
that at least if you know that, when you send the
letter you can be specific as to the information
that you need and maybe avoid some of the vicious
cycle problem. But, otherwise, it's pretty much
the same remarks as the others.

MR. CASEY: Okay. Tom?

MR. McCABE: The initial complaint that we've
seen more recently is providing the identity
information because customers are concerned about
identity theft, and that's become the bigger problem.

MR. CASEY: That's a balance they have to
work out, identity theft or, you know, getting on
Lifeline. That's required by law. You got to -- they
got to make the choice.

Okay. Any other comments on the telephone
maybe?

MR. BAILEY: This is Sam with iWireless. The
one thing that I would point out from the applications
from the, the PSC would be, I mean, we need to have a
valid address. We're seeing a lot of rejects from
that. I don't know if we're getting a whole lot of
complaints from it, but that would definitely be my
recommendation is just to validate the address. So,
you know, that could be -- even, even though NLAD still
does that when we get the application, if we don't have
a completed address on that subscriber, I mean, it's
going to get rejected. So -- and we have to reach back
out to the customer to go through that process again.

So my recommendation would be even to
validate the address through USPS.gov or something
like that to at least get us in -- you know, when
we get the subscriber from you guys, that we're
able to have a valid address.

MS. SALAK: You were very specific. Those
were ones coming from the PSC, meaning from our
website?

MR. BAILEY: Yeah.

MS. SALAK: Or do you mean the ones that were
routing through DCF?

MR. BAILEY: I thought it was from the --

MR. CASEY: The ETCs --

MR. BAILEY: -- website, but I'm honestly not
sure.

MR. CASEY: The emails that we send ETCs
don't differentiate whether they come through the PSC
website or DCF. All we say is that they have been
approved and validated.

MR. BAILEY: Yeah. So my recommendation is
just to give us a valid address. I mean, if the, if
the information says homeless, we're not able -- I
mean, we try to reach back out to the customer, if we
can, but we're not able to validate anything else. I
mean, we won't -- we'll have to reject that subscriber
if we don't have a valid address. And I'm not sure
that this is related to consumer complaints, but it's
definitely -- I mean, we've had issues with it.

MR. CASEY: Okay. I appreciate it, Sam.

Anybody else have comments or like to make a comment?

Okay. Let's go on to number three then.

TDM to IP transition -- what will happen to
Lifeline? Anybody know? Tracy?

MR. HATCH: I don't think anyone knows. We
clearly do not know.

MR. CASEY: You don't know?

MR. HATCH: And we didn't know before but we
really don't know now with the whole push now to
essentially declare everything under Title 2. It just
muddies up everything completely. Nobody knows what's
going to happen to Lifeline.

MR. CASEY: Okay. I know in the trials, in
the AT&T trials you had put in one of your filings that
you're going to eventually ask to, ask for ETC status
to be rescinded.

MR. HATCH: That's correct.
MR. CASEY: And by doing that, then you wouldn't be providing Lifeline; right?

MR. HATCH: That would be correct. But that would be just us going through a 214 process at the FCC, not Lifeline in general.

MR. CASEY: Right. Well, I'm looking at 2020. I'm looking down the road, you know. When you do a full IP transition, will people still be able to have Lifeline?

MR. HATCH: We don't know.

MR. CASEY: You don't know.

MR. HATCH: We don't know whether Lifeline will exist. If you regulate everything under Title 2, it's a fair -- if you get that far and it's a full Title 2 regulation, then nothing changes today. All IP is still Title 2, it's still subject to -- it becomes a telecom service and everything flows.

So either -- if you're assuming Title 2 then I don't think much is going to change. There may be individual skirmishes between carriers about should I be a Lifeline carrier or 214 and, you know, relinquish perhaps? But, in general, that won't change unless some major change happens at the FCC under Title 2.

If it isn't Title 2, then it begs the
question what will happen, and, candidly, we don't know. Obviously, you know, our intent is to essentially not become -- not be an ETC, but that's not necessarily the same as Lifeline all goes away.

    MR. CASEY: How about CenturyLink? You're going to do trials in Las Vegas?

    MS. KHAZRAEE: But -- yes. But our trial is only a business trial.

    MR. CASEY: Oh, okay.

    MS. KHAZRAEE: And it's us and CLECs and business customers. So we actually don't have any residential, therefore, no Lifeline customers involved in that trial.

    I think at this point, you know, Tracy is probably right, it's probably too early to speculate on exactly -- we don't think that, you know, we're going to say nobody could have Lifeline if we went to IP. I mean, we're going to have voice customers still, we feel sure. If you've got voice customers, you can have Lifeline customers. But, you know, I can't make any guarantee at this point that going to IP won't change anything. I just don't know.

    MR. CASEY: We're just trying to look down the road.
MS. KHAZRAEE: Yeah. I mean, but --

MR. CASEY: You know, in the future is there going to be Lifeline five years from now?

MS. KHAZRAEE: So the short answer is we don't see why we couldn't over IP, but it's not part of our trial and we don't know what the future will hold.

MR. CASEY: Would anybody else like to comment on that, TDM to IP transition and whether there will be Lifeline?

MR. CORCORAN: Are you speaking -- this is Martin. Are you speaking technically will it be provided? Certainly we can do that today at Cox.

MR. CASEY: Right.

MR. CORCORAN: I don't see that technically being a problem. I'm just wondering, listening to the other ones, it sounds more like it could be more of a regulatory battle.

MR. CASEY: A regulatory policy question.

MR. CORCORAN: Yeah.

MR. CASEY: Okay.

MR. McCABE: I would find it hard to believe that the FCC would eliminate Lifeline, because if they don't put it under Title 2, essentially they wouldn't be able to provide support to IP; therefore, Lifeline wouldn't exist. So one would certainly assume that the

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FCC is going to find some way to make a change to their procedures, I mean, just like they require, you know, universal service fees on IP, I would have to think. Otherwise, they'd just be gutting the whole program, which I find that hard to envision unless there's a complete change in administration and folks up there.

MR. CASEY: Would anybody else like to comment, have any comments? Before we leave, Tracy, this isn't on the agenda for Lifeline, but I just thought about this.

In your filing with the IP transition you state that coin phones, payphones aren't going to be able to be provided. In other words, the CLECs are --

MR. HATCH: On an IP basis there aren't any IP payphones is, I think, your question.

MR. CASEY: Right. And what I was thinking is, well, are there going to be -- if you go all IP, will there be any coin telephone providers out there because you won't be able to supply them?

MR. HATCH: The answer is I don't know.

MR. CASEY: You don't know?

MR. HATCH: But I never thought there would be as many payphones out there as there were at one point. It boggled the mind as to how -- I mean, you
could find one on every tree and fencepost and five in
every hotel lobby. You know, they were just
everywhere, almost like slot machines in Las Vegas.

     MR. BRADBURY: Yeah. But try to find one
now.

     MR. HATCH: Yeah, exactly right. And so if
there aren't any under IP, I'm not sure that most
people would miss them because there just aren't any
now hardly.

     MR. CASEY: That's still a question to be
answered.

     MR. HATCH: That's a question to be answered.
The question becomes is if somebody invents and builds
an IP payphone, could they get an IP line and connect
it to a network and do something with it? Almost
certainly. It's probably not even a big technical
challenge if somebody is just willing to invest in it,
but that's the other question.

     MR. CASEY: Okay. I appreciate that. That
was just something --

     MR. HATCH: You know we are out of the
payphone business.

     MR. CASEY: Oh, yeah.

     MS. SIRIANNI: Or would there even be a
market for it?
MR. HATCH: Yeah. That's a whole different issue, but yes.

MR. CASEY: Okay. Number four, what's the status of the ILEC request to the FCC to make provision of Lifeline voluntary?

MR. HATCH: I think you know the answer to that. I haven't read the order, but they basically said no is what I understand. They have done some rearranging of how the ETCs are required to provide Lifeline and to whom, but as far as I know, the notion of voluntary was rejected, so -- within our footprint.

MR. CASEY: Number five, let's talk about -- did anybody else have questions?

Recertifications, which are due January 31st. How will the recertifications be accomplished: In writing, phone, text message, email, are you going to let USAC do it?

MS. KHAZRAEE: This is Sandy Khazraee with CenturyLink. So in Florida we plan to do it this year the same way we did last year, which, as you know, is where we burned the disk, Harvey brought it to you, you took it to DCF. We had our little thing worked out there. It worked really well; we got excellent results from using that method.

With regard to the question about USAC, we
did have one of our 37 states that we chose to have USAC do the audit for last year sort of to check it out, and it wasn't even a particularly large state of hours. They gave us the results on December 20th, which really put us in a time crunch trying to finish that. So we thought, you know, if we'd have done all 37 states, we'd have been in a bind getting the results that late. I do not believe we intend to use USAC this year for anything. I know we don't intend to use them in Florida. I don't think we intend to use them anywhere.

MR. CASEY: Tom?

MR. MCCABE: TDS will be doing it in writing and we'll be doing it ourselves, like we have in the past, and will not be using USAC.

MR. CASEY: AT&T?

MS. SIRIANNI: AT&T the same way as last year, in writing.

MR. CASEY: Which was?

MS. SIRIANNI: In writing.

MR. CASEY: In writing?

MS. SIRIANNI: Yes.

MR. CASEY: Okay.

MS. NOBLES: NEFCOM is also in writing. And
we had heard horror stories about USAC doing the recertification, so we have no intention of using USAC.

MR. CASEY: Okay. De?

MR. O'ROARK: I'm the outlier today.
De O'Roark with Verizon. We used USAC last year in Florida. We'll use them again this year.

MR. CASEY: Did it work out pretty well?

MR. O'ROARK: As far as I know. I didn't even ask, frankly. I just got the answer. But I'm not aware of major problems.

MR. CASEY: How about people on the phone, could you let us know?

MR. BRADBURY: This is Jay, this is Jay at Cox. We used USAC in 2014. We have not yet made our decision for what we'll do in 2015.

MR. CASEY: Okay.

UNIDENTIFIED SPEAKER: This is Frontier Communications, and we also used USAC and probably will continue with that process.

MS. SIRIANNI: One of the things -- this is MaryRose with AT&T -- and I'm just going to bring this up and maybe y'all know. One of the things that my folks were telling me is that one of the reasons that we haven't used USAC is that we were told by them that they have to do all the markets the same. So like if
you have a state that has a specific request, that they
couldn't do it. Like we have a state that's, I don't
know, Missouri has some special requests that are
different. So I guess unless we could have them do all
of them, then we'll, you know, continue to do them
ourselves so that there's not some they're doing and
some they're not. But has anybody else ran into that?

MS. NOBLES: We -- yeah. This is Debbie at
NEFCOM, and we did run into the same thing.

MS. SIRIANNI: Okay.

MS. NOBLES: And I even tried to get a
clarification from USAC. We have one study area that
crosses into two states and we do have one state that
has different requirements, and I thought it would just
be applied to that particular study area, but the
response I got back from USAC was it applies to all
study areas. It's either all or nothing.

MS. GILSTRAP: And this is Caryl with
CenturyLink. And I agree, we have the same problem.
We have 37 states and quite a few of them that have
unique state available programs that USAC would not
recognize or recertify. So we chose not to use USAC as
well.

MS. SIRIANNI: So, I mean, you know, from
AT&T's perspective, if that's something that USAC

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would, you know, would talk about or work with us, I mean, we probably would consider using them for the recertification if they would do all of them. But to have to, you know, pick and choose, then we'll continue to do it ourself. Because we do use them on some of our wireless recertifications, at least in one wireless territory I know of.

MR. CASEY: Anybody else have comments?

MS. MORRISON: Fairpoint -- excuse me -- Fairpoint has been doing recertification in writing and we plan to continue that.

MR. CASEY: Okay.

MR. LOKEN: Same for Windstream. This is Tim.

MR. CHAMIZO: TracFone does all of ours in-house as well.

MR. CASEY: You do a lot of text messaging, don't you, TracFone?

MR. CHAMIZO: Text messaging, email, voice blast, and direct mail.

MR. CASEY: Okay. Anybody else?

MR. BAILEY: Yeah, iWireless, Sam Bailey. Yeah, we do the same thing. We bring it all in-house, don't use USAC.

MR. CASEY: Okay. Anyone else?
One thing I would like to make a note of is that when you submit the Form 555s this year, the FCC opened a new docket to put it in, and that's Docket 14-171. I've noticed on the FCC website a lot of companies still put them in Docket 11-42, but they're asking the companies to put the Form 555s in Docket 14-171 now so they'll all be together.

And also as a courtesy, if you would, as you send them there, send us a copy, if you would.

Okay. Number 6, any other ideas to streamline the enrollment process for both the applicant and the ETC, make life easier for the applicant and the ETC? That's what we're here for.

**MS. GILSTRAP:** This is Caryl with CenturyLink, and I'd like to see that we have some kind of personal interface, someone we can reach out to, especially when we have those circling NLAD issues where the customer applies with the PSC or the OPC and fails NLAD and then goes back and reapplies with them again. Personal contact.

**MR. CASEY:** Are you talking about personal contact with USAC or anyone?

**MS. GILSTRAP:** No, with either the PSC or with OPC.
MR. CASEY: Okay.

MS. GILSTRAP: So we can reach back out to that customer. Because, like I said, the customers are not replying to the letters that we're sending them and they're just going back and reapplying with the state agencies. So if we can have someone who will help us interact with that customer and say the only way you're going to get Lifeline is if you provide this additional information, if you complete the IEH form, if you do this, then we can resolve that problem and we don't have that continuing circling back, back into PSC, failing NLAD, back into PSC, failing NLAD, and never actually getting Lifeline.

MR. CASEY: Okay. I think that could be arranged.

MS. SALAK: How many, how many people are you talking about? How many complaints? Just a rough estimate.

MS. GILSTRAP: For example, I just looked at last week's file from the PSC, and we had five people who fell into this category from that. So every week if we have five people, that's 20 to 25 people a month that are running into this issue.

MR. CASEY: Because of failure from NLAD; right?
MS. GILSTRAP: It's failing NLAD and then never supplying the additional information needed to get into NLAD. And, like I said, USAC isn't going to resolve that problem for us. The customer has to resolve that problem, except they're not. They're just reapplying.

MS. SALAK: I thought that Sandy had mentioned earlier that the states that have administrators have been able to help, or are they --

MS. GILSTRAP: Yes, they have.

MS. SALAK: And what are they doing for you?

MS. GILSTRAP: They will actually reach out to the customer and say we need this form completed. If you, you know, complete this form, then we can submit it, you can get into NLAD, and then Lifeline can be added to your account.

MR. CASEY: That's something we'll have to --

MR. SPEARS: This is Harvey Spears.

Caryl, didn't you mention that you were communicating electronically?

MS. GILSTRAP: Yes, via email.

MR. SPEARS: Thank you.

MS. GILSTRAP: So I emailed that administrator, she reaches out to the customer, and then emails me back either the form or the information
from the form. Either way is acceptable as long as I can get the information into NLAD.

    MR. CASEY: That's something we're going to have to discuss here at the PSC.

    MR. HATCH: Beth, your phone number is 850-413 --

    MS. SIRIANNI: I was going to say, don't you have Bob's number on speed dial?

    MR. HATCH: Yeah, really.

    MR. CASEY: Bob's a short-timer, remember.

    MS. SALAK: I'll give you Bob's number.

    Sure.


    MR. CASEY: October, October 31st.

    Halloween.

    MR. HATCH: Yeah. He'll be walking out the door with Beth hanging on his leg.

    MS. SALAK: You got it.

    MS. SIRIANNI: We have Curtis's on speed dial, too.

    MR. CASEY: Again, that's something we'll have to discuss here at the PSC because we don't -- our resources are low, as you know. We've been getting shorter and shorter, less people. We get an average of 2,500 applications a week through the electronic
process. I know if CenturyLink has five, there's going
to be a lot more, and I don't know that we have the
personnel that can handle that.

**UNIDENTIFIED SPEAKER:** Hey, Bob, you could,
in your next life, you could be a contract service.

**MS. SALAK:** There you go.

**MR. HATCH:** Sounds like a wonderful business
opportunity.

**MR. CASEY:** Could be. Never know.

**MS. SALAK:** So the companies are going to pay
him, is that --

**MR. CASEY:** Yeah. There you go.

**MS. SALAK:** Okay.

**MR. CASEY:** One of my thoughts, you know, we
have this electronic application process here where we
do a dip into DCF. In the long-term I was thinking,
well, maybe we can do it into NLAD and do a dip in DCF
and then do a dip in NLAD for you, but there's no way
we could possibly do it because we don't have the
resources for the rejections. There's just no way,
unless the companies would like to, you know, finance
another 20 people for our office.

**MS. GILSTRAP:** Another thing that I noticed
about the applications that are out there from the PSC
and from OPC and even DCF, that they don't contain an
IEH form. They also don't contain a statement or some kind of attestation that says by applying I give company X permission to transfer my Lifeline benefits to company X, which is a problem. Because if I get a file from the PSC and the customer is a duplicate subscriber, I do have the opportunity to do a benefit transfer, and whoever they have Lifeline with I would remove the benefit and give it to CenturyLink. But I can't do that because that would require me actually having to call the customer and get in contact with them, which will be difficult because most people are at work during the day, and then get their permission to do the benefit transfer. But if it were on the application itself as one of the attestations, then that would solve our problem. We would already have permission.

**MS. SALAK:** As you're probably aware, we're going to be doing a Lifeline workshop on the rule this afternoon, so I'm hoping this will come up again.

**MR. BRADBURY:** Yeah. That's a very good point there. This is Jay Bradbury, Cox Communications. In point of fact, the Public Service Commission's applications are not compliant with the FCC's rules. I know the FCC has blessed them, but they're not compliant with the rules.
MR. CASEY: And could you say why? What are we missing?

MR. BRADBURY: Well, the things, several things that she mentioned there are required but not on the present, present form. The NLAD, the NLAD disclaimer is not on there. Probably what we could do is, you know, look at a compliant form versus the PSC form and you could update your forms.

MS. SALAK: Certainly. Are you going to be involved in our Lifeline workshop this afternoon?

MR. BRADBURY: I will be, yes, ma'am.

MS. SALAK: Great. And then, of course, there's a comment period, too, where we ask for what language you would like to see.

MR. CASEY: We're going to request comments from the companies as a post-meeting type thing, if you could give us some written comments.

MR. BRADBURY: Sure.

MR. CASEY: And if you -- we picked a date of February 27th. Would everybody be okay with that? That's a little over a month.

MS. SIRIANNI: Are you talking about --

MS. SALAK: We're talking about this one.

MR. CASEY: For this meeting here, for the work group. Yeah. Post work group meeting comments.
MR. BRADBURY: Sure.

MR. HATCH: That's after direct and before rebuttal.

MS. SALAK: Yes, it is.

MR. CASEY: That's a whole other story.

MR. HATCH: But it fits right in the window where it might actually work for me.

MR. CASEY: Right. And you can submit those comments to me at my email address -- Bcasey@psc.state.fl.us -- up until October 31st.

MS. SALAK: I'm just going to keep that one open because you get so much stuff.

MS. KHAZRAEE: This is Sandy Khazraee with CenturyLink. And one more pie in the sky idea for, for Lifeline enrollment, and this is something that our folks have said is, you know, we ETCs shouldn't be doing the enrollment at all anyway. It's kind of like a customer who qualifies for food stamps and asks the grocery store where they go to buy their groceries to get the paperwork all together and say, oh, okay, you qualified, here's your coupon for your food stamps. I don't know where it would go. There's so many different programs that, you know, people can qualify through to get the Lifeline. And I'm not generally one who's in favor of big government, but that's just a
MR. CASEY: We'd have, we'd have two choices: Either hire a third party or increase the size of the Office of Telecommunications, both of which I don't think is going to happen.

MS. KHAZRAEE: So, anyway, just a --


MR. HATCH: Go ahead.

MS. SIRIANNI: No. Go ahead.

MR. HATCH: There's a lot of internal discussion about this idea. It's not entirely new. In fact, it's actually quite old.

MS. SALAK: Right.

MS. SIRIANNI: I think we brought it up a few years ago.

MS. SALAK: You did.

MR. HATCH: And Sandy's right, the carriers -- it just is a cumbersome process to put the carriers in. I guess the basic thought would be when they qualify for the programs today, other than the people that walk through the door, they could be accounted for, they're actually a fairly small number, anybody that goes to DCF in that process or even you could adapt OPC's program for that the same way, is they're the ones that do all the background work to
determine eligibility. They could do the NLAD dip. And at that point DCF is a social agency, their function is to provide social benefits, that's what they do. You could add essentially a telephone component as an additional benefit that they could get on their little debit cards they've been issued. Then you're out of the ETC issue, you're out of the everything. Lifeline could go on without any kinds of special carrier requirements at all, and a person walks in the door, they can pay for their phone service. Some of it would be their money, some of it would be their benefit, but we wouldn't care at that point.

**MS. SIRIANNI:** For that matter, it even, you know, takes away some of the third-party administrator, you know, that you were referring to that it, you know, is the responsibility of the agency.

**MR. CASEY:** And I'm sure --

**MS. SIRIANNI:** And I know it's pie in the sky, but, I mean --

**MR. CASEY:** It's pie in the sky. I'm sure DCF has crunch on their budget, too.

**MS. JOHNSON:** Yes. Yes.

**MS. SIRIANNI:** Absolutely. I mean, ultimately when we talk about it, I mean, really when you think about Lifeline and the type of program it is,
I mean, you know, it should belong with the rest of the social type programs. But, I mean, ultimately will we get there, you know? But I think we shouldn't stop talking about it or thinking about it, I mean, if there's ever a way, I mean.

MR. HATCH: I mean, at that point then the carriers wouldn't be submitting for reimbursement from the feds. The feds could take the money direct to DCF. Just on fraud alone you'd probably pay for the program.

MR. CASEY: Any other comments?

MR. HATCH: You wouldn't have to audit carriers, do any of that kind of stuff.

MR. CASEY: Okay.

MS. SIRIANNI: Bob's like that's after my life.

MR. CASEY: After I'm gone.

MR. HATCH: Anyway, that's a thought that's gaining some traction.

MR. CASEY: Okay. How about any other ideas to streamline the process? None? Well, if -- go ahead.

MR. BAILEY: Bob, this is Sam from iWireless. The only other thing that I would add would be the, just to have a good contact phone number, if that's possible. That way we can try to reach out to the
customer because we don't always --

MR. CASEY: A contact number for the PSC?

MR. BAILEY: The subscriber.

MR. CASEY: For the subscriber?

MR. BAILEY: Yeah. When we're getting the applications from, you know, the PSC, we want to make sure that we can reach back out to them if we need to. You know, we are seeing the similar things that, you know, with the IEH forms where we're having to reach back out to them. But I would definitely want to -- I'm in agreement that we definitely need to make sure that we're completely compliant on, you know, all of the attestations that they need to go through as well.

MR. CASEY: Okay. Now --

MR. BAILEY: But we can talk this afternoon.

MR. CASEY: When you get the email from the PSC, it includes their telephone number; right?

MR. BAILEY: Not always.

MR. CASEY: Okay.

MR. BAILEY: Yeah. And, you know, what I -- and I want to reiterate what I said earlier because I think it probably fits more down here, just having a valid address, you know, not putting homeless there or something like that. Because we, you know, it takes an extra step that we have to try to contact the customer,
and, you know, nine times out of ten we're not able to get ahold of them.

    MR. CASEY: Okay. Anybody else have some ideas? If you don't have any right now, you can always include them in your comments when you send in your comments by February 27th. Any other things you'd like to talk about Lifeline? If not, we can adjourn. Thank you very much for coming.

    (Meeting concluded at 11:30 a.m.)
STATE OF FLORIDA )
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 29th day of January, 2015.

__________________________________
LINDA BOLES, CRR, RPR
FPSC Official Hearings Reporter
(850) 413-6734