BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. UNDOCKETED

IN RE: INITIATION OF
RULEMAKING TO AMEND RULE
25-4.0665, F.A.C., LIFELINE
SERVICE, AND TO REPEAL RULE
25-4.113, F.A.C., REFUSAL OR
DISCONTINUANCE OF SERVICE BY
COMPANY.

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PROCEEDINGS: STAFF RULE DEVELOPMENT WORKSHOP
DATE: Wednesday, January 21, 2015
TIME: Commenced at 1:32 p.m.
Concluded at 2:56 p.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
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
J.D. Johnson - DCF
Keisha Johnson - Smart City Telecom

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 Harvey - PSC
Charlie Beck - PSC
Lisa Steffens - OPC
Catherine Beard - PSC
Curtis Williams - PSC
Beth Salak - PSC
Rosanne Gervasi - PSC
Kelsey Watry - PSC
Adam Teitzman - PSC
Leslie Ames - PSC
Bob Casey - PSC
MS. GERVASI: Let's go ahead and get started. It's a couple of minutes after 1:30. We'll begin by reading the notice of the workshop.

This time and place has been noticed for an undocketed staff rule development workshop on the initiation of rulemaking to amend Rule 25-4.0665, Lifeline service, and to repeal Rule 25-4.113, refusal or discontinuance of service.

My name is Roseanne Gervasi, I'm with the Commission legal staff, and with me are Bob Casey and Beth Salak of the telecommunications division. And also Kelsey Watry is with me. She's a legal intern and law student at FSU. And on behalf of all of us, we welcome you here. We're glad you're here today. Your participation is very helpful to us in formulating a good recommendation, a good draft of a Lifeline rule to recommend for the Commission's consideration and proposal. And we welcome those of you on the telephone as well.

We have in the back of the room on the table by the door some handouts, most of which you probably have. There's the notice of the workshop, the draft rules. And we also have AT&T's comments and specific rule suggestions, and what you may not
have are the specific suggestions of Cox Florida Telecom. They also sent in some pre-workshop type comments, and they are on the table for you, if you'd like to grab a copy of those. Everything but the Cox comments are also available on the Commission's website. For those of you listening in, if you click on the notice of workshop on the Commission's website, there is a hyperlink to the materials.

Let's go ahead and move into a staff overview of the rules. We reopened rulemaking on the Lifeline rule primarily to amend our rule to be consistent with the subscriber eligibility determinations and certification requirements set forth by the FCC in their rules on the matter. The federal rules are contained in Title 47, Section 54 of the CFR, from Section 54.400 and continuing on through 54.417. And as most of you probably know, this is not the first rule workshop that we have had with respect to the Lifeline rule. After the last workshop that we held back in September of 2012 we thought it prudent to hold off on rulemaking on the rule until the FCC ruled on our request for rule waiver of certain provisions of the federal Lifeline rules specifically governing subscriber
certification forms, and we have since received a favorable ruling from the FCC waiving those requested rule provisions. So that ruling is reflected in this latest draft of the Lifeline rule.

AT&T responded to our notice of rule development and requested the workshop today, so we are here specifically to hear from AT&T, but also to hear from any other interested persons.

And just a small thing to say about Rule 25-4.113, which is kind of traveling together with the Lifeline rule, that has to do with refusal or discontinuance of service, and we are looking to repeal that to be consistent with the 2011 changes to Chapter 364. We have it here with the Lifeline rule because we considered moving certain language from the discontinuance of service rule and placing it in the Lifeline rule, but we've since removed that draft language from the Lifeline rule simply because Section 364.10(2)(d) specifically, the Lifeline statute, requires an eligible telecommunications carrier -- it says that they may not refuse to connect, reconnect, or provide Lifeline service because of unpaid toll charges or non-basic charges other than basic local telecommunications service. So we didn't think it
was necessary to repeat that in the rule, but we still are looking to repeal that section.

One thing I forgot to mention is to please be aware that the microphones on the table are live, and please don't have any cell phones near the, near the mikes. And if you want to converse outside of the public purview, you need to either mute your mike or move away from the table. Do we have anything else to add to the overview, staff overview?

We'd like to go ahead and take appearances from those of you in the room, and you don't have to come up to the table to just state your name. We can, we can get your, your name from back there. But if you want to give comments during the course of the workshop, we will ask you to come to the table for that. So I guess we'll start around the table here and then move to the rest of the room.

**MS. KHAZRAEE:** Sandy Khazraee, CenturyLink.

**MR. McCABE:** Tom McCabe, TDS Telecom.

**MR. HATCH:** Tracy Hatch with AT&T.

**MS. SIRIANNI:** Maryrose Sirianni, AT&T.

**MR. O'ROARK:** De O'Roark, Verizon.

**MS. GERVASI:** Okay.

**MS. BEARD:** Catherine Beard, PSC.
MR. TEITZMAN: Adam Teitzman with the Commission.

MS. AMES: Leslie Ames, PSC.

MR. WILLIAMS: Curtis Williams, Commission.

MS. FINLEY: Debbie Finley, NEFCOM.

MS. NOBLES: Debbie Nobles, NEFCOM.

MS. EDMONSTON: Becky Edmonston, Verizon.

MS. STEFFENS: Lisa Steffens, OPC.

MS. HARVEY: Lisa Harvey, staff.

MR. BECK: Charlie Beck, staff.

MS. GERVASI: Thank you. Okay. We will move into your comments and suggestions. Before we go -- and we do want to go paragraph by paragraph to see if there are specific suggestions or comments on the language. But before we do that, let me ask if anybody has a desire to give some general comments before we do that. Well, I'll ask those in the room first. And then those of you on the telephone, I probably should have asked you to also give us your names so that we can get your appearances as well. Could you go ahead and do that?

MR. BRADBURY: Yes.

MS. GERVASI: I don't know how many -- thank you.
MR. BRADBURY: For Cox Communications, Jay Bradbury, Martin Corcoran.

MS. JOHNSON: Keisha Johnson, Smart City.

MS. GERVASI: Anybody else on the phone?

MS. JOHNSON: Yeah. JD Johnson, Department of Children and Families.

MS. GERVASI: Thank you.

MR. BAILEY: Sam Bailey with iWireless.

MS. GERVASI: Thank you. Anybody else?

Okay. Thanks. We will take comments of those who are present first, and then we will move to telephone to see if anybody wants to participate by phone by giving comments or suggestions.

Does anybody have any general comments about the rule draft? Going once -- anybody on the phone? Okay. So we will move into specific paragraphs. And we are recording this. We've got the court reporter here, so I just want to remind you to -- that we can only have one person speaking at a time, to please speak clearly, and before you give your comments, each time please state your name and who you represent at least the first time that you speak.

Okay. So moving to paragraph (1) of the draft Lifeline rule, and this is the paragraph that
sets forth who, who is eligible to receive the
service. Does anybody have any comments about
paragraph (1)? Anybody on the phone? Okay.

    MR. CASEY: Let me interrupt just for a
second here.

    MS. GERVASI: Uh-huh.

    MR. CASEY: I know Cox did submit comments on
(1)(c) about the income eligibility being 135 for
everyone less than a million lines, and they wanted --

    MR. BRADBURY: Yeah. I was trying to catch
up. Yeah, this is Jay Bradbury at Cox. Yeah. Let me
try to catch up.

    MR. CASEY: Okay.

    MS. GERVASI: Thank you.

    MR. BRADBURY: Paragraph, yeah, so paragraph
(1) incorporates that. Yeah. What we're concerned
about here is the present rule allows all carriers to
provide Lifeline to customers who meet the 150 percent
poverty guideline rules. The rewrite changes that and
allows only those with over a million lines to do that.
The rest of us can only do the federal 135. The
comments we submitted were to change that such that all
carriers could enroll people who were at or below the
150 percent poverty guidelines.

    MR. CASEY: Okay. Jay, the 150 percent is
required by statute. That requires local exchange companies in Florida to use the 150 percent if they have over one million access lines. Now, since the FCC came out with Order 1211, all ETCs must use income criteria to establish eligibility. Now, the problem is they only require 135 percent. Florida law requires 150 just for local exchange companies over a million lines. So that's why we had to differentiate them.

Now, a carrier, small carrier, if they want to use 150 percent, they can go ahead and do that. The minimum is 135. But if they want to use 150, that's more of a benefit to the consumer and they can surely go ahead and do that.

**MR. BRADBURY:** We don't think the way you've written this rule, that that is allowed.

**MR. CASEY:** Okay.

**MR. BRADBURY:** We think the way the rule reads to us is that only those with a million can do the 150. If you're less than a million, you can only do the 135. The old rule clearly stated that we had the option, if it were less than a million lines, to do the 150.

**MR. CASEY:** And how would you suggest changing that or modifying that?

**MR. BRADBURY:** In our comments we had revised
language for that. In (b) you simply change it to read, "The subscriber's household income is at or below 150 percent of the federal poverty income guidelines," and then you strike (c).

MR. CASEY: Okay. We'll take a look at that.

MR. BRADBURY: Thank you.

MR. CASEY: Thank you.

MS. GERVASI: And then I know AT&T had a comment with respect to paragraph (2), and their suggestion is to make that (d) of paragraph (1). And I think we agree with that, that that is one of -- that will enumerate persons who are eligible. So we will make that, make that clear so that paragraph (2) will become (d), and then instead of -- and it'll be shorter, too. Instead of saying all of that, we'll just say that, "The subscribers who live on federally recognized Tribal lands and receive benefits from one of the following Bureau of Indian Affairs programs," and then enumerate one, two, and three are eligible, and I think that is cleaner. So thank you for that suggestion.

Any other suggestions with respect to paragraph (2), (1) or (2), which will now be all (1)? And so we will renumber when we do the next draft, but we'll keep using the same numbers for now.
just for clarity purposes.

**MS. SIRIANNI:** Well, I'm not really sure -- this is Maryrose Sirianni with AT&T -- I'm not sure if this fits in (1) or (2), but AT&T's proposed revisions, we actually suggest a new paragraph (2) on page 5 at the top which clarifies that only one Lifeline discount per household is allowed, and that's consistent with the FCC rule that requires, only allows one per household. So --

**MR. HATCH:** Yeah. The concern there is if you look at the Florida Commission rule in isolation, it could be misled because there's this FCC requirement that you can only get one per household. But if you read this, it doesn't mention that. So you think you're entitled here but all of the sudden you're not because that's not mentioned here. That's the only concern.

**MS. GERVASI:** Well, and I understand that. Go ahead.

**MS. KHAZRAEE:** Sandy with CenturyLink. We had questions about that addition though because if they fill out an IEH, they're actually -- I'm not sure if it hinges on the word "household," so we weren't really sure. But there could be two folks living in the same address that if they filled out the IEH could
both be qualified, right, if they claim that they're independently --

MS. GERVASI: Two separate households that live under --

MR. CASEY: Two separate households.

MS. KHAZRAEE: Economically independent, yes.

MS. SIRIANNI: And that's true.

MS. KHAZRAEE: And then our second issue, and this may just be us not understanding what this was trying to say, we wanted to make sure this isn't doing away with the ability to transfer benefits. Because CenturyLink does participate in that process where a customer who already has qualified for Lifeline, already has a Lifeline benefit but then decides they want to change carriers doesn't have to go through the whole process anymore. They can just change, you know, transfer the benefit from that previous company to the new one they want to go to.

MS. GERVASI: Thank you. We questioned whether it's necessary to put that in there, and that's -- because of the fact that it's in the FCC rules and it -- wouldn't it be duplicative? Don't all the ETCs have to comply with not just our rule but also the FCC rules?

MR. HATCH: Yes.
MS. GERVASI: You know.

MR. CASEY: It's in two place, 54.409(c) requires one per household. Okay? 54.410(d)(2)(i), you know, says it must be on all the applications, which it is.

MR. HATCH: Yeah. Well, yes.

MR. CASEY: And we can go through a bunch of them and say, well, this isn't in our state rule. Should we put it in?

MR. HATCH: Your rule could reference the FCC rules or you could just bring all the FCC's rules that apply down here, you know, and this is picking and choosing something in the middle, and that's just kind of where we are.

MS. GERVASI: Well, they all apply though, the FCC rules.

MR. HATCH: Correct, they all do. There's no question about that.

MS. GERVASI: Okay.

MR. HATCH: But if you take the Florida rules in isolation, they're not complete and not accurate in the sense that it omits pieces that are important out of the FCC's rules. That's the point.

MR. CASEY: And JAPC sometimes tell us, no, you're duplicating a federal rule. You can't do that.
MR. HATCH: If that's true, then a lot of things go away.

MS. GERVASI: Well, some of them may have to, yeah. And I don't know that we want to be in the position of deciding which of the FCC rules are important or not, you know.

MR. HATCH: And I understand that. I understand that, too. It's just --

MS. GERVASI: Okay. Thank you.

MR. HATCH: One of my folks with a particular bent to want this in there said, why don't you throw that in? I said, okay, I'll throw that in.

MS. GERVASI: Thank you. Anybody on the phone have any comments on paragraph (2), or (1) through (2)?

And we will move on to paragraph (3). We didn't get any pre-workshop comments on this paragraph. I don't know if anybody has anything to say about it, accepting Form PSC/TEL 157.

MS. KHAZRAEE: Sandy Khazraee with CenturyLink. We just would like to ask consideration for perhaps adding the IEH into this form, making it part of it.

MS. SALAK: Is that part of your CenturyLink form now?
MS. KHAZRAEE: I believe it is.

MS. SALAK: Is that part of AT&T's form?

MR. HATCH: I don't have any idea.

MS. SIRIANNI: I'm not sure. I'd have to check.

MR. CASEY: Could you send us a copy of that so we can see what it looks like?

MS. KHAZRAEE: Uh-huh.

MR. CASEY: Appreciate it.

MS. SALAK: It's not a requirement; right?

MS. KHAZRAEE: No, it is not, and it's something that we do follow up with the customer if we need it. But if it was already there and they'd already filled it in, we wouldn't have to go back to them. That's the only thought. But, no, it's -- you're right, it's not, it's not required to do with every -- because not everybody is going to need to fill out an IEH.

MS. SALAK: Right. And so a multitude of customers won't need that form, so it would just be another page for them to fill out.

MS. KHAZRAEE: Uh-huh. True.

MR. BAILEY: What about having -- this is Sam from iWireless. What about having a Spanish copy?

MR. CASEY: A Spanish copy of the application
or the rules?

   MR. BAILEY: The rules -- well, the
   application.

   MR. CASEY: We do have Spanish and Creole on
   our website.

   MR. BAILEY: Okay.

   MR. CASEY: And also on the OPC, I believe.

   MS. STEFFENS: We don't have Creole, just
   Spanish and English.

   MR. CASEY: Okay. On OPC's website they have
   Spanish and English.

   MR. BAILEY: Okay.

   MR. BRADBURY: This is Jay Bradbury at Cox.
   I have a question, are we going to review the
   applications themselves later in this process?

   MS. GERVASI: Yes.

   MR. BRADBURY: Okay.

   MS. GERVASI: Yes, we will.

   MR. BRADBURY: Thank you.

   MS. GERVASI: Paragraph (4), this is with
   respect to Form PSC/TEL 158, the online application.
   Any comments to paragraph (4)?

   MR. BRADBURY: Again, Jay Bradbury at Cox.
   We suggest that the addition of the phrase "using
   coordinated enrollment process" into this paragraph
because the Form 158 is the online form and that is only used when coordinated enrollment is involved. In other words, I won't get this form in the mail. You know, it'll come through the PSC process.

**MS. GERVASI:** Thank you. I see that suggestion.

**MS. KHAZRAEE:** And Sandy again. Do we need to have something in here that indicates not only did they submit the form but they passed NLAD?

**MS. GERVASI:** Did you hear that?

**MR. CASEY:** No, I didn't. I'm sorry.

**MS. KHAZRAEE:** That's okay. Do we need to have something in here as well that not only says they electronically submitted the form but they passed NLAD, because we get it and then they don't pass NLAD, we can't enroll them and we don't enroll them.

**MR. CASEY:** What you're suggesting is --

**MS. SALAK:** Where did you want that added?

**MS. KHAZRAEE:** I actually don't yet have a suggestion. I just wanted to see is that something you would want to think about or is there someplace else where that -- I didn't see it somewhere else, but I may have missed it. I know there's --

**MR. BRADBURY:** This is Jay at Cox. Tracy, doesn't that appear in your comments later on about --
MR. HATCH: Sort of, yeah.
MS. SIRIANNI: Yeah.
MR. BRADBURY: -- it not being, eligibility not being established until the NLAD is passed?
MR. HATCH: Yes.
MS. KHAZRAEE: So that may do it for me.
MS. GERVASI: Okay. Thank you.
MR. CASEY: We'll get to that.
MS. GERVASI: Okay. Paragraph (5), allowing customers to send in their applications and documentation using mail or fax or electronically. Any thoughts on that?
Paragraph (6).
MR. BRADBURY: Again, Jay at Cox. This is another paragraph where we had suggested the addition of the phrase "when the coordinated enrollment process is utilized." The reason for that is this is where we're talking about the exception is where you've got "receive the waiver."
MS. GERVASI: Right.
MR. BRADBURY: The waiver really only applies if the coordinated process is utilized. If the customer has submitted an application directly to an ETC, we are still obligated to retain that application.
MS. GERVASI: I see. And so you're
suggesting this to say, "exceptions to these requirements when the coordinated enrollment process is utilized are as follows."

    MR. BRADBURY: Correct.

    MS. SALAK: Well, we have exceptions for every process that the State does, it's just not the coordinated enrollment. So it would have to be broader than that. Exception as for OPC, us, when it comes to our website, and coordinating, we can call that coordinating enrollment. That's actually us processing it, so.

    MS. GERVASI: And those exceptions would still apply.

    MS. SALAK: The waiver applies to all, everything, Florida does, the State does.

    MS. GERVASI: Okay. So it's not just the coordinated enrollment process.

    MR. CASEY: No, it's OPC, too. OPC is included in the waiver.

    MS. STEFFENS: Correct.

    MR. BRADBURY: This is Jay. I'm going to display my ignorance. As an ETC, how do I receive an OPC processed application? Is it not through the PSC's website?

    MR. CASEY: Lisa Steffens is here from OPC.
Lisa, could you come up to the table and go over what happens, how they can -- how you can give it to them?
And this is Cox Communications.

**MS. STEFFENS:** Good afternoon. There is a link on the PSC's website that if someone is income eligible, they can link right to our website or our phone number. We get applicants that call our 1-800 number to receive them by mail or we send them via fax or email. So there are places they can access our application.

**MS. GERVASI:** Thank you.

**MR. BRADBURY:** How does the ETC receive it after you've processed what the subscriber submits to you?

**MS. STEFFENS:** They don't. They receive an electronic report every week that has the pertinent information -- name, address, birth date, last four of social -- and those are all ones that we approve and those go out once a week.

**MR. BRADBURY:** Okay. And that's part of the -- isn't the email from the PSC?

**MS. STEFFENS:** No.

**MR. CASEY:** The PSC is only program based.

**MR. BRADBURY:** Okay.

**MS. STEFFENS:** We only process --
MR. BRADBURY: I guess this may, this may be an area where, at least I'm unfamiliar with how it works and Cox may have been missing something here.

MS. STEFFENS: I think I've spoken to -- are you Sam?

MR. CASEY: No. Sam is --

MR. BRADBURY: No, I'm Jay.

MS. STEFFENS: Oh, okay. Yes, I believe I've spoken to someone before about this.

UNIDENTIFIED SPEAKER:

MS. McLAUGHLIN: Lisa, you and I have spoken. This is Leslie.

MS. STEFFENS: Hi there.

MS. McLAUGHLIN: And I believe we do not, we do not reach the threshold of the required number.

MS. STEFFENS: That is correct.

MS. McLAUGHLIN: That's my understanding from what you and I have spoken about.

MS. STEFFENS: That's correct. Right. So if you do income-based applications, you do them on your own. We don't process them.

MR. BRADBURY: Okay. So we're processing all income-based ourselves?

MS. STEFFENS: That is correct.

MR. BRADBURY: Is that what I'm hearing?
MS. STEFFENS: Yes.

MR. BRADBURY: Okay. That's fine. Our application is set up to do that, so we can.

MR. BAILEY: Yeah. I'm on the phone as well. This is Sam from iWireless. Yeah.

MS. STEFFENS: You and I have spoken.

MR. BAILEY: We've talked about trying to get it more automated.

MS. STEFFENS: Yes. At the moment we do not do iWireless either.

MR. BRADBURY: All right. So, so there's a threshold that we've not met. Okay. Thank you. Thank you, Leslie.

MS. GERVASI: Okay. Let's move on then to paragraph (7).

MS. SIRIANNI: This is Maryrose Sirianni with AT&T. And this is the area that I think somebody was alluding to earlier that AT&T does. In paragraph (7), go down to lines 22 through 24, we propose that the effective date of the credit is actually when NLAD confirmation is received. That goes back to what Sam was speaking about in the previous section.

So what we suggest is that it reads basically that "upon completion of initial enrollment, eligible telecommunications carriers
that invoice their subscribers shall credit the subscriber's bill for Lifeline assistance as of the subscriber's enrollment date and not the email notification from the Commission." And the subscriber's enrollment date to us is subsequent to the time that we get the NLAD confirmation.

**MR. O'ROARK:** This is De O'Roark with Verizon. We're generally okay with that. We actually, in our process, give the credit a little bit sooner. It when the -- the customer's signature date. As long as that language could be revised to, you know, no later than, I think that would accommodate the way we both do it.

**MR. HATCH:** That's fine.

**MS. SIRIANNI:** Yes, that's fine.

**MS. GERVASI:** No later than the subscriber's enrollment date?

**MR. O'ROARK:** Yes.

**MR. CASEY:** How are we going to get around the statute, 60 days?

**MR. HATCH:** The question is what's the 60 days measured from?

**MS. SALAK:** Right. And it says when the customer gives us their information.

**MR. CASEY:** When you receive notice from the FLORIDA PUBLIC SERVICE COMMISSION
Office of Public Counsel or proof of eligibility from the consumer.

**MR. HATCH:** Proof of eligibility doesn't exist until it comes back from NLAD. That's the proof of eligibility. That's the problem. And that's, you know, the real problem is, is that this statute predates the whole new regime, the FCC and NLAD. So in a sense you have a choice statutorily to make. Do you want to say specifically the way you have interpreted, strictly interpreted 364.10, or do you want to reconcile it with the new requirements of the FCC where we can't enroll them before we've got NLAD confirmation? You have to reconcile that.

Now, as a matter of law, you could reinterpret that date to be the NLAD date as the enrollment eligibility. The customer's eligibility -- the proof of customer's eligibility is the NLAD confirmation. And you can still -- if you do it that way, then you can still comply with the 60 days.

**MS. SALAK:** So is there any time, time that you have to have, say you get the information from coordinated enrollment or you get it from OPC or wherever you get it and they've been determined to be eligible on the consumer state side, so is there any
guidelines from the FCC telling you how long you have to get that to NLAD?

**MR. HATCH:** Not to my knowledge. There may be, but I'm not aware of it.

**MR. BRADBURY:** The FC -- excuse me. This is Jay Bradbury. The FCC's rule on NLAD enrollment is first in wins the customer. So we're all incented when we get something from the State to enroll in the NLAD immediately. Because if during that same period of time some other carrier is dealing with that subscriber and gets eligibility for them and enrolls them in the NLAD, then, then I am dead in the -- you know, then the first carrier is dead in the water. So while there's no stated time, we're all incented to act quickly.

**MS. SALAK:** Can you tell me how long it takes you to get your information to NLAD after you get the notice?

**MR. CASEY:** Do you do it weekly or daily or biweekly, monthly?

**MR. BRADBURY:** Again, I can only speak for Cox. We actually look at the PSC's website on a daily basis. After that it may take us several days to actually accomplish what needs to be done with the NLAD, because if there is some error in the NLAD, we will attempt to work that with the consumer to get it
corrected. Let's say there's a third-party identification error, a duplication error where we need to send an IEH form, or some problem with the address, we will try to resolve all of those. So it may be a number of days between that. It could be 48 hours or less, but it could also run longer. Other carriers may have different processes.

**MS. SALAK:** CenturyLink, how long does it take you?

**MS. KHAZRAEE:** We generally download from the Commission's website once a week, and then it's within, I would say, 48 hours. Probably sooner, but within 48 hours we've taken care of the ones we've downloaded. So unless we get some -- you know, the ones that kick back, they failed, that's a different story.

**MS. SIRIANNI:** Are you looking at us?

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

**MS. SIRIANNI:** We download daily. This is Maryrose Sirianni with AT&T. We download daily in order then from that time period to send to NLAD. It's usually generally within several days.

**MS. SALAK:** And so it's my understanding that, according to NLAD, they do the dips, runs real-time so that once you get it in, you're going to know something immediately.
I didn't ask you. I'm sorry. I didn't mean to leave you out.

MR. O'ROARK: No, no, I've got you outflanked over here. De O'Roark with Verizon. I don't know the answer. I'd have to check on the logistics of that.

MS. SALAK: Okay. Well, I guess what I'm curious is if we gave you more than the 20 days on the coordinated enrollment, it sounds like you'd still need 60 days. You're going to know within -- you should know within a certain amount of time. I mean, the 60 days is statutory. The 20 days is not. But that's just one that we have to help us process. So I don't understand why we're missing the 60 days yet. I mean, if you're told no in NLAD, obviously the answer is no.

MS. KHAZRAEE: So, I mean -- this is Sandy. We don't have a problem with the 60 days here. What happens though is what was described this morning where something fails NLAD. We send a letter to the customer, we tell them this is the information we need, we can't process your Lifeline request until we receive it, and then we never hear back from them. So clearly we've missed the 60 days. But in our eyes they didn't qualify, so it's on them, it's not on us.

MS. SIRIANNI: Beth, let me, let me just make sure that it's clear. When we get the downloads daily
from the Commission staff, we then send them to the vendor because we do use an outside vendor. I think everybody knows that. And so within several days from the downloads they're sent to the vendor. But there is a contract time period that is in the contract with the vendor that they're required to then send it to NLAD. That contract, that contract period that's in the contract, I'm not sure if it's confidential or not, so I -- but it can -- based on that time period, it could be longer, but generally they are sent to NLAD, you know, within several dates, but the contract does allow more time. And I'll check when we get back if I can give you more information on that. I just don't know because I don't have the contract and I don't hold the contract.

MR. HATCH: I haven't read it, but the question whether that's a proprietary number or not, I don't know.

MS. SIRIANNI: And let me just say, because our contractor doesn't just do Florida. They do, they do, you know, all 22 states plus anyplace else. So, I mean, I'm just saying that it's the reason that the time frame in the contract is longer is because it's not just one state they're doing. I mean, they're handling all of the states, so. But I'll check into
that and then I'll get back to you, you know, specific time frames.

MS. SALAK: I think we're going to have a comment opportunity, too.

MS. SIRIANNI: Okay. Okay.

MS. SALAK: So as much information as you can give us on that the better.

MR. McCABE: Yeah. I don't think that we have an issue with sending them out in 60 days. I mean, we typically, when we receive it from the Commission, we process it that day. But now with the other process that's now in place, I don't know what time lag gets built into that, but I'm sure it's --

MS. SALAK: Uh-huh. So you think you can meet the 60 days? Do you meet the 60 days now?

MR. O'ROARK: As far as I know. What I'm told is that we don't have an issue with the rule as you've drafted it.

MS. SALAK: So you're going to check into your contract to see what type of information you can get back for us?

MS. SIRIANNI: Yes. Yes.

MR. HATCH: Yes, we will.

MS. SALAK: Thank you.

MS. KHAZRAEE: And then on (7), paragraph (a)
on, specifically on line 13, and this is just a semantics issue, but it says, "The eligible telecommunications carrier, informing the eligible telecommunications carrier that Lifeline assistance plan applications are available for retrieval from processing." Technically we don't retrieve applications. We retrieve the specific data field of information, so --

**MS. SALAK:** You're correct.

**MS. KHAZRAEE:** I just thought we could change that wording. And, I'm sorry, I don't have a suggestion.

**MR. CASEY:** To just information or data?

**MS. KHAZRAEE:** Somebody from CenturyLink who's not here today can provide that in written comments.

**MS. GERVASI:** Okay.

**MS. SIRIANNI:** I mean, it's data.

**MR. CASEY:** Data or information?

**MS. SIRIANNI:** Data or information.

**MR. CASEY:** Just put it in comments what your suggestion is.

**MR. HATCH:** Tough decision.

**MR. CASEY:** If that's the hardest decision we've got to make today --

MS. GERVASI: Okay. Well, so we're still on (7). We didn't get any pre-workshop comments on subparagraphs (c) or (d). I don't know if anybody has any comments on either of those.

MR. BRADBURY: This is Jay at Cox again. Not particularly on those, but we did make comments about, you know, you've got, you've got that 60-day statutory thing there, but you've got a number of other things there. 20 days here, 30 days there. I'd like to see them all be consistent, say, at 30 days. And, again, those were in our comments.

MS. GERVASI: Are you looking -- yeah. Are you looking at subparagraph (e), (7)(e)? I see your suggestion.

MR. BRADBURY: (7)(b) -- (7), yeah -- (b) is 60 days, (e) is 20 days. Yeah. There's 30 days at (10). There's just a number of places where there are different days. If they can be consistent, it would be easier on all of us.

MS. SALAK: We'll look at it, but I can tell you that there was a difference between the 20 and the 30 because there's a different process. By the time you get it, it's -- they're eligible and you know it
and you don't have to review it yourself. But that's -- we'll certainly look at it. What do you think?

MR. BRADBURY: And, again, with the NLAD we do have to review it ourselves again. It has to go to the NLAD before it's, before it's done.

MR. O'ROARK: And, Beth, De O'Roark with Verizon. Let me clarify what I just said. Although we're okay with the rule as drafted, we're also okay with the way that AT&T proposes to amend it, so. We're okay either way.

MS. SALAK: Okay. Thank you.

MS. SIRIANI: Well -- and this Maryrose Sirianni with AT&T again. And I, now that we're jumping to (e), AT&T proposes 40 days to the 20 days that's in the current rule. And as Mr. Bradbury states, you know, these rules were put into place prior to the NLAD process being in place, and so there is some time added to the process to, to get through to completion. So, you know, I think he proposes 30 days, we propose 40. Y'all said you would look at it.

MS. SALAK: We will. I just -- it'll probably be based on what we hear about NLAD.

MR. BAILEY: Yeah. This is Sam from iWireless. I would definitely concur with that. I
mean, by the time we have to reach -- if we have to reach out to the customer again to complete an IEH from, just, you know, it all takes time.

MS. SALAK: So how long is the -- how long in general is your customer waiting to get their credits for their free service?

MR. BAILEY: I mean, normally, you know, it doesn't take long at all. But it's just when we have to, you know, getting the information when we have to reach back out to the customer, you know, and then we don't get ahold of them, you know, we kind of put it in hold and then try to call them again and mail them a letter, you know, just trying to get ahold of them, it just, you know, it takes time to get all that information if it's not complete.

MS. SALAK: So just to throw an idea out, and it's not a great one, but what would -- how would you feel if we put a new date in there that says when you have to have it to NLAD by? That way we know that you're processing. And if you run into trouble, I mean, we do understand -- I'm empathetic, I don't know about Bob here, but I'm empathetic.

MR. HATCH: Yeah, he's not going to be here much longer.

MS. SALAK: That's right. But we're not
going to wait until Bob leaves to finish the rule. So it's just another idea that --

MR. HATCH: It's a thought.

MS. SIRIANNI: It's a thought. This is Maryrose. The only hold back I have is that I just need to check, I mean, because our contract has a certain number of days.

MR. HATCH: Sending it to NLAD might be -- yeah.

MS. SIRIANNI: Yeah. I don't know, you know, if we have a rule requirement that is less than the days that we have in our contract, I don't know that they're going to go and redo a contract just because Florida put a rule in place that's less than the number of days that we allow in the contract for the vendor to get it. It doesn't mean that we wouldn't do it in the shorter amount of days, which I'm sure we already probably do, than what the contract says, but that's the only issue that I have.

MR. CASEY: Could you put it in your comments, the suggested date?

MR. HATCH: Sure.

MS. SIRIANNI: Yes.

MR. CASEY: That it would go to NLAD within so many days?
MS. SIRIANNI: Yes. And I'll address that. I just wanted you to know that, you know, because we have a contract that's out there that serves all the states and Florida puts a rule in, then it causes issues.

MR. BRADBURY: This is Jay at Cox. I can go to the NLAD today. I may not get approval from the NLAD for three weeks from now because there was some error, I have to reach the customer, and the customer doesn't respond to me. But I have gone to the NLAD.

MS. SALAK: Right. But right now there's no requirement when you have to go to NLAD and so it's -- and I understand your issue about if you're really in the market and you want to complete. But there are others who aren't as excited about the market, so.

MR. CASEY: And that would be for your initial check, I think, wouldn't it?

MS. SALAK: Right.

MR. CASEY: Yeah. You'd go to NLAD within so many days for your initial check. So if it's rejected, you know, that's another story.

MS. SALAK: That'd be -- right.

MR. McCABE: Yeah. I mean, at some point in time with the rule, you know, you've got a rule in place, but if the customer doesn't fulfill his
MR. CASEY: Exactly. We understand.

MS. SIRIANNI: Right. And actually do you consider that -- you know, once we get a rejection back from NLAD and we send something to the customer, I mean, we still would try to make that time frame. But at what point? When we get a rejection back and they don't respond, I mean, then are we no longer held accountable for that time frame? Is it just using good judgment? I mean --

MS. SALAK: We can put dates followed, if you want to. I mean, I, I--

MS. SIRIANNI: No. I just was throwing it out for discussion purposes because it does raise an issue, I mean, in, I think, our mind if we get a rejection and we try to reach out to the customer and, you know, they aren't getting back to us, then no longer is it under the requirement of the time frames that you have because it's out of our hands.

MS. SALAK: Uh-huh.

MR. McCABE: I think it's awfully hard though to pinpoint a rule that tight.

MS. SIRIANNI: Yeah.

MR. McCABE: Because you could have -- you know, it might be three weeks when one person gets back
to you and it might be six weeks when another. So, I mean, having 30 days or 60 days at that point in time, I mean, it's, you know, it really becomes, you know, a matter of common sense.

MS. SIRIANNI: Yeah. I certainly would not want a timeframe. I mean, I was thinking more in the sense that if you got a rejection, then it kind of falls outside of that.

MS. SALAK: I'm going to have to talk to the attorneys about the 60 days and how we can interpret it or not interpret it, so I can't give you an answer.

MS. SIRIANNI: No. It was really just to kind of, as a discussion because it's something that kind of comes up, you know, what to do with those outliers.

MS. SALAK: I understand. I just, I don't have the answers.

MR. BRADBURY: This is Jay. Again, under (7)(e), in 20 days we have to make a report about what's happening with those outliers. At that point they would be a rejected applicant.

MS. SALAK: If we were to give you a time for the NLAD, I'm sure the timeframes would change to reflect that, I would imagine.

MR. BRADBURY: I just think trying to give us

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a requirement to go to the NLAD is a micromanaging process.

    MS. SALAK: All right. I mean, our rule can just say --

    MR. BRADBURY: Because we have no incentive not to go to the NLAD. There's no reason to sit on, to sit on a potential customer.

    MR. CASEY: And we agree with you, but there are some companies out there that will sit on it.

    MR. BAILEY: Hey, this is Sam from iWireless. So the purpose of this, you guys -- just in general for (7)(e) is that you guys just want a response back of any subscribers that have been rejected?

    MR. CASEY: Correct.

    MR. BAILEY: I'm just trying to make sure. Okay.

    MR. CASEY: We want to let the customer know. A lot of times they will put the wrong telephone company on here, and we send letters to those people when the rejection says that.

    MS. SALAK: Which is number one -- for number one we send letters. We don't for the others.

    MR. BAILEY: Okay.

    MS. SALAK: So where are we?
MS. GERVASI: (7)(f), unless anybody has anything more to say about (e).

Should we move on to (8)? And (8) simply says, "An eligible telecommunications carrier shall not impose additional certification requirements on the subscribers beyond those which are required by this rule or by Title 47," et cetera, of the FCC rules, various FCC rules. I'm wondering if we should also include the requirements of Section 364.10(2)(a) just to be comprehensive.

MR. HATCH: I didn't bring 364 unfortunately. What does that say?

MS. SIRIANNI: I did.

MR. CASEY: Each local exchange company telecommunications --

MR. HATCH: I printed it out yesterday. I just didn't bring it today.

MR. CASEY: Yeah. But has more than one million lines and designated as an ETC shall --

MR. HATCH: That's the one I printed yesterday. No wonder I didn't have it.

MS. GERVASI: And part of the reason I thought about adding that is because in the next paragraph, paragraph (9), I think this is a paragraph that AT&T suggests can be stricken because it's
redundant.

MR. HATCH: Yeah. It's -- what's required in (9) is picked up in (8) essentially.

MS. GERVASI: And I think if we include 364, reference to 364.10(2)(a) in (8), then we could get rid of (9) and have (8) encompass everything that would have otherwise been in both paragraphs. And I don't know if Public Counsel has any concerns about that because paragraph (9) specifically refers to Public Counsel.

MS. STEFFENS: No.

MS. GERVASI: Okay.

MR. HATCH: I'm not sure that that adds anything, Roseanne. And the only reason I say that, and I didn't bring it with me, that's a volume that someone else has for the moment, but the eligibility criteria that are in 54.409 and all the rest of the cites there I think pick up both program as well as income eligibility. So those references gather up the OPC stuff, which is why we wanted to strike it as redundant. So I'm not sure what adding 364.10 -- is it (2)(a) or (3)(a)? It's (3)(a) in the rule but it's --

MS. GERVASI: (2)(a). (3)(a) was a typo.

MR. HATCH: Oh, okay. I didn't check that one obviously.
MS. SIRIANNI: So are we talking about the federal that includes -- is that what you're saying?

MR. HATCH: Yeah. If you look at the rule cite, the FCC rules in (a) essentially describes all the eligibility, where all the eligibility criteria are. Income eligibility is part of that. Program eligibility is also a part of that. But when you add Public Counsel and income eligibility separately, it's just redundant to what's already described in (a).

MR. CASEY: And I believe that's what Roseanne is suggesting, you eliminate (9).

MS. GERVASI: Yeah.

MR. HATCH: Yes. But then she also wants to add in 364.10(2)(a).

MS. GERVASI: Only because it references specifically the Office of Public Counsel, whether that's necessary or not. Maybe not.

MR. HATCH: I'm not sure that it is. I mean, just because the Office of Public Counsel does the income eligibility, I'm not sure that the rule requires that it be mentioned to pick up the income eligibility.

MS. SALAK: Because income-based is referenced --

MR. HATCH: It's already in the FCC's rules.
Now who actually does it, I think, is irrelevant to the FCC's rules.

**MS. GERVASI:** Uh-huh.

**MR. HATCH:** I'm not sure that it matters, but --

**MS. GERVASI:** Okay.

**MS. KHAZRAEE:** And this is Sandy. I'm fine with the language that's here in paragraph (8). I just want to confirm that if we have customers that fail NLAD and we have to go back and ask them to prepare an IEH or give us a copy of their driver's license or social security or something in order to prove they're not a duplicate, that is not going to be considered asking them for additional certification requirements.

**MR. CASEY:** No. Because those certification requirements in the federal rules require that.

**MS. KHAZRAEE:** Okay.

**MR. CASEY:** And they failed it. Yeah.

**MS. KHAZRAEE:** I just wanted to be clear.

Thanks.

**MR. CASEY:** If they didn't give it to you upfront, then it's their failure.

**MS. GERVASI:** Okay. So we're considering deleting paragraph (9).

**MR. HATCH:** Okay. Anyway for what it's
worth, my two cents.

**MS. GERVASI:** Yeah. Paragraph (10), again we have a time deadline here to provide written notice to a customer within 30 days of receipt of the application providing the reason for rejection.

**MS. SIRIANNI:** This is Maryrose with AT&T again. Basically the change here makes the time for enrolling subscribers who directly apply with the ETC, make the timeframe the same as the time in the previous rule, the 40 days.

**MR. CASEY:** There were two changes to this. One was the 30 to 40 days that AT&T suggested, and then the other is that you only want to cover applicants who directly file with the ETC.

**MS. SIRIANNI:** That -- you are correct, Bob, and that does suggest that. But I will say that, you know, our vendor does send denial letters to the customers who come through the coordinated process. So, I mean, we do do it. It's just -- the suggestion is because, you know, those customers who apply directly through us, we would, we would send those. But then when we send the spreadsheet back to you all since they applied through your process, it seemed logical that that's where they would get the letter. But, like I said, our vendor does send the letter to
them. We're just trying to put the duty of who does what based with where it comes from.

**MR. CASEY:** So do we really need to apply for Lifeline assistance directly with the ETC?

**MS. SIRIANNI:** I mean, that's our suggestion to do that, but, you know, we understand that you are not thrilled about that language, I guess, to say the least.

**MS. SALAK:** I just don't know if we have any power to do it.

**MS. SIRIANNI:** Okay. Well, and, like I said, we do send the denial letter, but we were just trying to put the work where it starts and that's where the letter would come from since they apply through that process, but --

**MR. O'ROARK:** De O'Roark with Verizon. Is the concern that if the request comes through the coordinated process, AT&T is not the entity that sends the letter but AT&T's vendor?

**MS. SIRIANNI:** That's part of it. But it's just that if that customer enrolled, coordinated enrolled, you know, and it went DCF to the Public Service Commission and then comes to us, we send that spreadsheet back to the Commission saying that they were, they were denied and that's where it originated,
and our thought was is then that's where the letter
should come from informing them of the denial, just to
kind of get things, you know, in perspective as to
where it originated, that's where. But I understand
that, you know, it is a resource issue on your side.
And I, and I did want you to know that, I mean, it is
being done today, so it's not as if it's not being
done. It's just, you know, it's one of those if we
could have everything ultimately how we would like it,
that's how we would like it.

MR. BRADBURY: This is Jay at Cox. We
likewise use a vendor. But if we're going, if we're
going to reject a customer, we would prefer to
communicate with that customer for the save
opportunity. So here we would say, you know, this
should apply regardless of which source. So happy with
the 40 days, but it shouldn't be limited to only
direct.

MS. GERVASI: Thank you. Any other comments
about that?

MS. SALAK: So I just -- AT&T, you have 22
states that are covered with this contract. So for all
those other states, too -- I mean, is it across the
board for all of them?

MS. SIRIANNI: I don't know the process for
every single state and if it differs. I believe that the vendor, you know, does this for most of them, but I can't really speak to it. I'd have to find out. I just don't know if other states have different, you know, could have different processes.

I will tell you as far as paragraph (10) goes, the amount of days to be consistent, the 40 days to be consistent with the time period that we suggested in the earlier part of the draft, that would be more urgent to us.

MR. HATCH: Than the notice issue.

MS. SIRIANNI: Than the notice issue that we asked for in this paragraph.

MS. SALAK: Prioritizing for us.

MS. SIRIANNI: Yes. Prioritizing for you.

MS. SALAK: No. I appreciate that actually.

Thank you.

MS. GERVASI: Moving on to paragraph (11). Any comments on paragraph (11)? It basically says what needs to be in the notice of impending termination. No?

Paragraph (12), I think we did get some written comments on paragraph (12).

MS. SIRIANNI: Yes.

MR. HATCH: Yes. We made, we made some
MS. SIRIANNI: We did. On paragraph (12), it starts on page 11 and goes to page 12, this is subscriber's Lifeline assistance is terminated. The current rule basically states that, that we'll reinstate as soon as practical, no later than 60 days. However, what we're suggesting is based on the FCC rules that have been put into place subsequent to this initial rule that the subscriber be treated as making a new application for Lifeline.

MR. HATCH: And then whatever that process is, it just flows back through the process the same way.

MS. SIRIANNI: Right. Just trying to put things in line with --

MS. KHAZRAEE: And CenturyLink agrees with that, would support their change there.

MS. SIRIANNI: I mean, there really is no continuation of it. It basically is that they're no longer eligible and then they reapply, and once it's verified that they're eligible, then we re-enroll. Just getting the processes straight and current.

MR. O'ROARK: Verizon would be fine with that change.

MS. SALAK: How does Cox feel about that
change?

    MR. BRADBURY: We would support that, we would support that change also.

    MS. SALAK: Okay.

    MS. GERVASI: Thank you. Paragraph (13).

    MS. SIRIANNI: Paragraph (13), AT&T -- this is Maryrose Sirianni with AT&T again. AT&T proposes to delete this paragraph. This section confuses the general ETC advertising obligations. They're in the FCC's rules with the Lifeline advertising. I mean, there's a difference between advertising that an ETC has to do and specific Lifeline advertising, so we would just suggest that this, that this be eliminated to avoid any confusion.

    MS. GERVASI: Thank you.

    MS. SALAK: Does anybody -- does everyone agree with that?

    MS. KHAZRAEE: CenturyLink agrees with that -- would support that.

    MR. O'ROARK: Verizon could support that change.

    MR. McCabe: I guess I would disagree just for the sake of disagreeing with AT&T.

    MR. CASEY: You had to throw one in there; right?
MS. SIRIANNI: Tom, go back to sleep.

MR. McCABE: We're fine.

MS. GERVASI: All right. And what about (14), because that talks about publication, too. But it basically says what the FCC rule says, doesn't it, about publicizing the availability of Lifeline in a manner reasonably designed to reach those likely to qualify as required by the FCC's rules.

MS. SIRIANNI: And actually that's one of the points is that (13) is, seems to be redundant with subsection (14) anyway as it refers to the FCC.

MR. HATCH: And there's two different advertising provisions.

MS. SIRIANNI: Right.

MR. HATCH: The second one is the correct one. The first one is a different advertising provision that's broader than the second one. The second one is specific to Lifeline.

MS. GERVASI: To the Lifeline.

MS. SIRIANNI: Right. The first one was more to ETCs generally.

MS. GERVASI: I wonder if we need either one. Since the second one is in the FCC's rules, then everybody has to do it because it's being required by the FCC. I don't know. I'm just --
MR. CASEY: It would be a duplication is what you're saying.

MS. KHAZRAEE: We thought we didn't need it, but --

MS. GERVASI: You know, we might as well air it out because JAPC might catch it and tell us we can't leave it in there. I don't know whether they would -- it's hard to say what they might or might not do, but they often frown on duplication, so --

MS. SIRIANNI: I don't think --

MS. GERVASI: Everybody would still have to do it regardless of whether it's in this rule or not is the --

MS. SIRIANNI: Right. Exactly.

MS. KHAZRAEE: Yeah. We just felt like we probably didn't need it here because we know we have to do it because it's federal, but we don't feel strongly enough to -- one way or the other.

MS. GERVASI: Okay. Thank you. Does anybody else have any comments to make on (13) or (14)?

Paragraph (15), placing an insert.

MR. BRADBURY: Is this to be on all subscribers of the ETC's bill? Are you suggesting an insert to every, every AT&T subscriber or every Cox subscriber and every Verizon subscriber once a year?
MS. SALAK: Yes.

MS. GERVASI: If they generate customer bills.

MS. KHAZRAEE: And we thank you that it says "insert or bill message." We appreciate that.

MS. SIRIANNI: Yes. Yes. Very much.

MS. KHAZRAEE: We will do bill message.

MR. CASEY: I think someone recommended that.

MS. SIRIANNI: I think it was us years ago. We did bill messages for a long time even when it--

MS. SALAK: It was like in the 2009 rulemaking.

MS. SIRIANNI: I think so.

MS. SALAK: We caught on.

MS. SIRIANNI: Or before. I'm not going to say how long I've been here. I'll give my age away.

MS. SALAK: Was that 2007 you came in?

MS. SIRIANNI: Okay. Let's just stop. It was, it was a while ago.

MS. GERVASI: Anything else on paragraph (15)?

Paragraph (16), I know AT&T had a suggestion here.

MR. HATCH: Yeah. We just -- if you're going to incorporate the rule, just incorporate the rule.
There's no point in describing the rule that you're incorporating.

MS. GERVASI: If we incorporate it at all.

MR. HATCH: If you -- well, incorporation is one thing. Repeating it wholesale is another issue.

MS. GERVASI: Yeah.

MR. HATCH: I think you can incorporate things by reference. JAPC is not going to bother you with that.

MR. CASEY: A question did come up because of the waiver that we received from the federals, from the feds. Should we put something in there about that? Because if you follow that rule --

MR. HATCH: I hadn't thought about that.

MR. CASEY: Yeah.

MS. SIRIANNI: Interesting.

MR. CASEY: And that doesn't cover the waiver, you know, the exceptions to --


You're exactly right.

MS. GERVASI: Because 417 --

MR. HATCH: I didn't even think about that one.

MS. SIRIANNI: Yeah, I hadn't either.

MR. CASEY: Well, think about it and let us
MS. KHAZRAEE: Yeah. We did note that our records would have a note that says what, what was presented not necessarily to us since we don't actually have the application. It’s not that we want that out of here. I'm just saying that was our internal conversation. We may not have all of the records, but we would know what, what you guys sent us and what program they --

MS. SALAK: Is that what the rule says? I thought that's what it did say for you to do, or the order. Something said that.

MS. SIRIANNI: You mean the waiver order or the --

MS. SALAK: No. The order order.

MS. SIRIANNI: The order order.

MS. SALAK: Yeah. You got something.

MS. KHAZRAEE: I did have a question and I didn't look this up before I came. So does the federal rule say three years or does it say three years or for as long as the subscriber receives Lifeline assistance?

MR. CASEY: It says, "For the three full preceding calendar years and provide that documentation to the Commission," and then it goes on to say, "Eligible telecommunications carriers must maintain a
documentation for as long as the subscriber receives Lifeline service from that ETC."

    MS. KHAZRAEE: Okay.

    MR. HATCH: Which could be a long time.

    MR. CASEY: Could be. You want customers to stay with you for a long time.

    MR. HATCH: Usually.

    MR. CASEY: Don't pick and choose.

    MR. HATCH: Sometimes not.

    MR. CASEY: Sometimes not, yeah.

    MS. EDMONSTON: So you're going to put wording, the waiver wording in (16)?

    MS. SALAK: We're considering it, yes.

    MR. CASEY: The suggestion was made.

    MS. SALAK: Somehow incorporating the waiver language into the rule.

    MR. HATCH: If worse comes to worse, you could always do subject to the waiver order number, follow the record.

    MR. CASEY: That's true.

    MR. HATCH: That would be short and sweet.

    MS. SIRIANI: Yeah. Just keep it short,

    MS. GERVASI: Okay. Does anybody have any other comments or suggestions with respect to any
provision of the draft Lifeline rule, because that
brings us to the end of the paragraphs.

    MR. CASEY: And on to applications.

    MS. GERVASI: And on to applications. Right.

So let's move on to applications. And I
know AT&T had some suggestions for additions.

    MS. SIRIANNI: Yes. The first -- this is
Maryrose Sirianni with AT&T again.

    Page 19 -- well, page 20 on the
application, the first change at the top, the
temporary residential address, on that one the FCC
rule requiring this verification of the temporary
address, 90 days, it never took effect because the
Office of Management and Budget rejected the rule.
So it should be deleted here to mirror the federal
rules.

    MR. CASEY: It was withdrawn, not rejected.

    MS. SIRIANNI: Well, okay.

    MR. CASEY: That was clarification I got from
the FCC.

    MS. SIRIANNI: Thank you for your correction.
Withdrawn.

    MR. CASEY: And they specifically said it
wasn't rejected, we withdrew it.

    MS. SALAK: But we still agree.
MR. HATCH: Before they could release those.

MS. SIRIANNI: Withdrawn, rejected, the point is it doesn't need to be here.

MS. SALAK: It comes out.

MS. SIRIANNI: Okay. It comes out.

MR. McCabe: Maryrose, where are you?

MS. SIRIANNI: I'm sorry.

MS. GERVASI: This is on AT&T's, attached to AT&T's comments.

MR. McCabe: Okay.

MS. SIRIANNI: It's the application for Lifeline assistance. Is this -- and I was trying to look, this is the PSC's Lifeline --

MR. CASEY: Correct.

MS. SIRIANNI: -- application.

MR. CASEY: Correct.

MR. O'ROARK: Which page?

MS. GERVASI: This is attached to AT&T's suggestions.

MS. SIRIANNI: Page 20.

MS. GERVASI: It's page 20 of AT&T's comments. Do you have a copy of that?

MR. O'ROARK: I do.

MS. GERVASI: Okay.

MR. O'ROARK: But I'm looking to see what the
change is.

MS. GERVASI: Page 20, it's one, two, three, four paragraphs down.

MS. SIRIANNI: The top on page 20, the back side of the application -- do you have that?

MR. O'ROARK: Oh, this?

MR. BRADBURY: Are we looking at the AT&T suggested strike on the temporary residential recertification?

MR. CASEY: Yes, that's correct.

MS. SIRIANNI: Go to the second page of that one.

MR. BRADBURY: Like I said, as AT&T mentions there, they never got that in place. We're still required to have the check boxes on there. The solution we've used on our applications is to say I may be required rather than I will be required. That way in the future if the, if the FCC goes back to OMB and gets their rule approved, we don't have to come back to the application.

MR. CASEY: I see no problem with that for your application.

MR. BRADBURY: I think yours would benefit from that, too. You don't want to have to change yours either later, but I can defer.
MS. SIRIANNI: Chances are -- I mean, it was withdrawn, it wasn't just rejected. They would have to kind of start all over. I think it would be a while if it were going to be reinstated.

MR. BRADBURY: They just withdrew the consideration of the rule. The rule is still there. It's not in effect.

MR. HATCH: Correct.

MS. SIRIANNI: Correct.

MR. BRADBURY: All they have to do is go back to the OMB and say I want this to become in effect. I don't think they're going to do it, but --

MS. SIRIANNI: These, these applications, are they actually part of the rule?

MR. HATCH: Yes.

MS. GERVASI: Yes.

MR. BRADBURY: Uh-huh.

MS. SIRIANNI: So you would -- okay. I wasn't sure.

MR. HATCH: Yeah. The form is part of the rule.

MS. SIRIANNI: I don't know. I'd have to -- I don't think we'd have an issue with it. But, you know, let me go back and find out and I'll file comments. So basically you're saying, Jay, to change
it to say --

    MR. BRADBURY: Change "will" to "may."

    MS. SIRIANNI: I may be required. I got you.

Okay. I'll check on that.

    And then a couple of paragraphs down, I believe somebody mentioned this earlier, it might have been you, Jay, or somebody else, that there is additional data points that the ETCs are required to provide to NLAD. So we were adding those in, the address, date of birth, last four digits.

    MS. GERVASI: The "and other information" may be considered a little too vague.

    MR. BRADBURY: Yeah. This is one of those areas -- on an ETC's application this is known as the National Lifeline Accountability Database Disclosure and Consent. In the rule there are nine items of information that we're supposed to inform the customer that we collect and send to the NLAD, and they have to initial that they understand that and that if they don't initial it, then we won't give them, give them Lifeline.

    On our applications we have that as a totally separate block. Now, I know this discussion was held between the FCC and staff probably two years ago, and the FCC agreed with the language that
you've got there now and said it was compliant, but it would not be compliant for us as an ETC.

MR. CASEY: And you were going to send us a sample application of yours, right, to see how it looks?

MR. BRADBURY: Yes, I -- yeah, I can do that.

MR. CASEY: That would help us out.

MS. SALAK: So, but back to Roseanne's question, so other information for AT&T, what did that mean?

MS. SIRIANNI: It says, "and other information may be provided." I mean, I see that no differently than if you added "may" up at the top one. I mean, if anything else is added, you don't have to go back and -- I mean --

MS. SALAK: Well, I guess one is whether JAPC will take it or not.

MS. SIRIANNI: I mean, and I can, and I can ask if there's -- and I'm not sure, to be honest with you, if there's something specific that we were thinking there, but it's kind of to me like a catchall.

MS. SALAK: But if you were a consumer filling this out, would you wonder, well, what the heck else are they going to tell them?

MS. GERVASI: And I wondered if maybe you
meant what is specified in the FCC rule where you've got that comment box off to the right, the date on which Lifeline service was initiated, the date on which it was terminated, if it's terminated later, the amount of support, all of that.

   **MR. HATCH:** I'm guessing that's what it was.

   **MS. SIRIANNI:** Yeah. And that may be because that's a lot to put in there. The customer would be kind of -- their head would be swimming.

   **MS. GERVASI:** It is. It is although just saying "and other information" I think probably would be not giving enough indication of what that might involve.

   **MS. SIRIANNI:** I mean, I think you're right because all of that information that's in that block is information that has to be provided to NLAD when we submit it to NLAD. I mean, if, you know, I don't know if anybody else has a comment on that. I mean, if we think it specifically, you know, needs to be spelled out in here.

   **MR. CASEY:** Well, the applicant wouldn't have the day which Lifeline was initiated or terminated.

   **MS. SIRIANNI:** No, they wouldn't know, they wouldn't know any of that, and I think that goes to the purpose -- thank you, Roseanne, for bringing that up...
because now that I reread it, my memory is coming back
a little -- that those things wouldn't mean anything to
the end user when they're filling out the application.

MS. GERVASI: Right.

MS. SIRIANNI: They would be kind of like,
well, what does that mean? What do I put in there?
What do I -- you know. But they are needed, they are
required for the ETC to fill that information in before
they submit it to NLAD. So that's, that's kind of,
kind of where --

MS. GERVASI: And the gentleman who was on
the phone who said you have nine things enumerated on
your application, are those the, are those included,
all of the things that --

MR. BRADBURY: In this list, I think, I think
they probably are.

MS. GERVASI: Okay. So we'll take a look at
that and see.

MR. BRADBURY: Like I say, our application
has, you know, what we believe the rule actually
requires to be on an application.

MS. GERVASI: Okay.

MR. BRADBURY: We'll get that to you.

MS. GERVASI: Thank you. Super. Are there
any other comments or suggestions to either of the
forms?

MR. CASEY: I believe -- didn't they suggest moving up some information?

MS. SALAK: AT&T.

MR. CASEY: AT&T. The statement that says, "Applicants who presently participate in the Medicaid Supplemental Nutrition Assistance Program can complete the online electronically."

MR. HATCH: Where are we?

MS. GERVASI: Page 19 of your comments.

MR. CASEY: Didn't you recommend putting it up there upfront so the customer can see it?

MS. SALAK: It's a good suggestion.

MS. SIRIANNI: Oh, I forgot about that.

MR. CASEY: And we agreed to it.

MS. SIRIANNI: There we go.

MS. SALAK: It was a great suggestion.

MR. HATCH: That was a great suggestion.

MS. SIRIANNI: Yeah, it was, wasn't it?

MS. SALAK: I thought De made it.

MR. CASEY: It came from Verizon.

MR. HATCH: That doesn't stop me from claiming credit.

MR. CASEY: It came from the Verizon guy.

Wasn't that what it was this morning, the Verizon guy?
MR. O'ROARK: That's right.

MR. BRADBURY: Okay. This is Jay again. There are two other items, one of which was mentioned on this morning's call. There is a new requirement for obtaining authorization for benefit transfers. And, again, our current application has, has a block for that. There's also a need for a block to, for the subscriber to be able to voluntarily elect toll restriction so that any deposits can be waived.

MS. GERVASI: And you're suggesting these should be added to the forms?

MR. BRADBURY: They, they should be, yes.

MR. CASEY: And we can, we can take a look at that when you send us the application.

MR. BRADBURY: Yes. Okay. I'll do that right after we get off here. I'll highlight the sections for you, too.


MR. BRADBURY: Another thought on that, our applications also have a section where the subscriber indicates what they are submitting as proof of eligibility. And I think, Bob, I think I heard y'all say that your email to us does tell us what, what program they're eligible under.
MR. CASEY: Correct.

MS. SALAK: It doesn't tell you the program.

MR. CASEY: It tells you they're eligible.

MS. SALAK: It just tells you it's eligible for those that are taken care of by DCF. It doesn't tell you which, it doesn't tell you which --

MR. BRADBURY: It doesn't say which. Okay.

MS. SALAK: And that's okay.

MR. CASEY: Because of confidentiality.

MR. BAILEY: But there is a requirement that we need to know -- this is Sam from iWireless. There is a requirement that we need to know what they are eligible under.

MR. BRADBURY: Okay. That's something we have to submit to the NLAD.

MR. BAILEY: Yeah.

MS. SALAK: DCF doesn't tell you that.

MR. CASEY: We'll take a look at that.

MR. BRADBURY: Okay. And, let's see. And the other thing, of course, is this is a program eligibility only application.

MR. CASEY: That's correct.

MR. BRADBURY: As a carrier, my application has to cover both program- and income-based, especially since I don't meet the threshold for being under the,
the income-based program that the Office of Public
Counsel runs.

    MS. GERVASI: Thank you. Anything else from
anyone?

    And I'm looking at the title Lifeline
Assistance, and we had Lifeline Assistance Plan at
one point, we had Lifeline Assistance Service. It
looks like AT&T is suggesting we just remove Plan
and call it Lifeline Assistance.

    MR. HATCH: Call it Lifeline Assistance.

    MS. GERVASI: I kind of like that. Instead
of saying plan or service, just Lifeline Assistance
because it's all general --

    MS. SALAK: We'll talk about it.

    MS. GERVASI: We'll talk about it. Okay.

Any other suggestions that anybody might want to make,
we do want to give you an opportunity to file
post-workshop comments. And in our notice of the
workshop we gave it a date by which we asked for folks
to submit comments if they couldn't make it to the
workshop. That date is February the 4th, which is two
weeks from today. Would that work for submitting
post-workshop comments?

    MR. HATCH: No.

    MS. GERVASI: Two weeks isn't long enough?
MR. HATCH: No. February the 16th is the date I have direct testimony in my arbitration due.

MR. CASEY: Okay. This morning we suggested February 27th for those.

MR. HATCH: That would work.

MR. CASEY: Would that be okay?

MR. HATCH: That would work.

MS. GERVASI: If it's okay with you guys. So February 27th for post-workshop comments. We will entertain post-workshop comments through that, through that date.

MR. McCABE: Is a transcript going to be provided?

MS. GERVASI: There will be a transcript.

MR. CASEY: There will be a transcript.

MS. GERVASI: It'll be -- we'll get a docket opened once we get the statement of estimated regulatory costs done. We've done one already, but I think it's going to need to be updated because it's been so long and we've made several more changes. But once that's done, the next step is a recommendation to the Commission, we'll have a docket opened and we will move all of this, all of this documentation into the actual docket, including the transcript. Until then it'll be filed in the undocketed file for the year.
MR. CASEY: As soon as, as soon as Linda sends it to me and it goes in the undocketed file, I'll send it on to everybody.

MS. GERVASI: Okay. That's even better.

Thank you.

MS. SIRIANNI: So the comments for both the working group and the Lifeline rules are February 27th.

MR. CASEY: February 27th.

MS. GERVASI: Very good.

MS. SALAK: If that still works.

MS. SIRIANNI: It works.

MS. GERVASI: Anything else? If not, I think we're ready to adjourn the workshop. Thank you, everybody, for participating.

(Proceeding concluded at 2:56 p.m.)
STATE OF FLORIDA    )
COUNTY OF LEON     )

: CERTIFICATE OF REPORTER

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 30th day of January, 2015.

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

FLORIDA PUBLIC SERVICE COMMISSION
FLORIDA PUBLIC SERVICE COMMISSION

AGENDA

STAFF WORKSHOP

IN RE: INITIATION OF RULEMAKING TO AMEND RULE 25-4.0665, F.A.C., LIFELINE SERVICE, AND TO REPEAL RULE 25-4.113, F.A.C., REFUSAL OR DISCONTINUANCE OF SERVICE BY COMPANY

January 21, 2015, at 1:30 p.m.
Room 105, Gunter Building (Internal Affairs Room)
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

1. Staff overview of draft rules
2. Comments and alternative suggestions from interested persons
3. Discussion of suggested changes and timeframes for next steps
4. Adjournment
25-4.0665 Lifeline Assistance Plan Service.

(1) A subscriber is eligible for Lifeline assistance service if:
(a) The subscriber is a participant in one of the following federal assistance programs:
1. Medicaid;
2. Supplemental Nutrition Assistance Program (SNAP)/Food Stamps;
3. Supplemental Security Income (SSI);
4. Temporary Assistance for Needy Families/Temporary Cash Assistance (Florida program);
5. "Section 8" Federal Public Housing Assistance;
6. Low-Income Home Energy Assistance Program; or
7. The National School Lunch Program – Free Lunch; or
(b) The subscriber’s Local Exchange Company eligible telecommunications carrier has more than one million access lines and the subscriber’s household income is at or below 150 percent of the federal poverty income guidelines.
(c) The subscriber’s Local Exchange Company eligible telecommunications carrier has less than one million access lines and, pursuant to Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.409 Consumer qualification for Lifeline, paragraph (a)(1), as amended June 28, 2012, the subscriber’s household income is at or below 135 percent of the federal poverty income guidelines.

(2) A subscriber living on federally recognized Tribal lands who does not satisfy the eligibility requirements for Lifeline assistance service in subsection (1) of this rule is nevertheless eligible for Lifeline assistance service if the subscriber receives benefits from one of the following Bureau of Indian Affairs programs:
(a) Tribal temporary assistance for needy families (TANF);
(b) National School Lunch NSL Program – Free Lunch; or
(c) Head Start.

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NOTICE OF STAFF RULE DEVELOPMENT WORKSHOP
UNDOCKETED
PAGE 4

(3) When enrolling customers in the Lifeline assistance plan under paragraph (1)(a) of this rule, eligible telecommunications carriers shall accept Form PSC/TEL 157 (2/13), entitled “Application for Lifeline Assistance,” which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission’s website at: http://www.floridapsc.com/utilities/telecomm/lifeline/LifelinePDFs/ApplicationEnglish.pdf.

Eligible telecommunications carriers with less than one million access lines are not required to enroll Lifeline applicants through the income eligibility test of 150 percent or less of the federal poverty income guidelines, but may do so voluntarily.

(4) Eligible telecommunications carriers shall enroll customers for Lifeline assistance who electronically submit Form PSC/TEL 158 (6/10), entitled “Lifeline Florida On-line Application for Recipients of Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA),” which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission’s website at: https://secure.floridapsc.com/(S(l5p1gzjr1lb5swvfj2c30tyd))/public/lifeline/lifelineapplication2.aspx. Applicants who presently participate in Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Assistance for Needy Families/Temporary Cash Assistance programs can complete Form PSC/TEL 158 electronically on-line. Eligible telecommunications carriers that charge an initial connection charge must offer Link-Up service to subscribers who are eligible for Lifeline service pursuant to this rule.

(5) Eligible telecommunications carriers must allow customers the option to submit Lifeline applications and supporting documentation via U.S. Mail or facsimile, and may allow applications and supporting documentation to be submitted electronically. When enrolling customers in the Lifeline service program under paragraph (1)(a) of this rule, eligible CODING: Words underlined are additions; words in struck-through type are deletions from existing law.
telecommunications carriers shall accept Form PSC/RAD 157 (6/10), entitled "Application for Link-Up Florida and Lifeline Assistance," which is incorporated into this rule by reference and can be accessed from the Commission’s website at www.floridapse.com, by selecting "Link-Up Florida and Lifeline," then selecting "Need Discounted Phone Service?"; and then selecting "English Link-Up and Lifeline Certification Form" (also available in Spanish and Creole):

(6) Except as otherwise set forth in paragraph (6)(a)-(d) of this rule, eligible telecommunications carriers shall comply with subscriber eligibility determination and certification requirements contained in Title 47, Code of Federal Regulations, Part 54, Subpart E, Sections 54.407 Reimbursement for offering Lifeline, 54.409 Consumer qualification for Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual certifications by eligible telecommunications carriers, as amended June 28, 2012, which are incorporated into this rule by reference and are available at: [hyperlink]. These rules can also be accessed from the U.S. Government Printing Office’s website at: http://www.ecfr.gov/cgi-bin/text-idx?SID=fadabe77a9cbe6d6ba1d63b6a946ea0a&tpl=/ecfrbrowse/Title47/47cfr54.main_02.tpl

A copy of the annual certification provided to the administrator shall be filed with the Commission. Exceptions to these requirements are as follow:

(a) Section 54.407(d), regarding obtaining valid certification and re-certification forms for subscribers;

(b) Section 54.410(b)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d);

(c) Section 54.410(c)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d); and

(d) Section 54.410(e), regarding providing copies of subscriber certification forms.

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Eligible telecommunications carriers shall enroll customers for Lifeline service who electronically submit Form PSC/RAD 158 (6/10), entitled “Lifeline and Link-Up Florida Online Self Certification Form,” which is incorporated into this rule by reference and can be accessed from the Commission’s website at www.floridapsec.com, by selecting “Link-Up Florida and Lifeline,” then selecting “Apply Online.”

(7) All eligible telecommunications carriers shall participate in the Lifeline assistance plan Coordinated Enrollment Process. For purposes of this rule, the Lifeline assistance plan Coordinated Enrollment Process is an electronic interface between the Department of Children and Families, the Commission, and the eligible telecommunications carrier that allows low-income individuals to enroll in Lifeline following enrollment in a qualifying public assistance program.

(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing the eligible telecommunications carrier that Lifeline assistance plan applications are available for retrieval for processing.

(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline assistance plan as soon as practicable, but no later than 60 days from the receipt of the e-mail notification. Upon completion of initial enrollment, eligible telecommunications carriers that invoice their subscribers shall credit the subscriber’s bill for Lifeline assistance as of the date the eligible telecommunications carrier received the e-mail notification from the Commission.

(c) The eligible telecommunications carrier shall maintain a current e-mail address with the Commission, which the Commission will use to inform the eligible telecommunications carrier of the Commission’s Lifeline secure website address and that new Lifeline assistance plan applications are available for retrieval for processing.

(d) The eligible telecommunications carrier shall maintain with the Commission the names, e-mail addresses and telephone numbers of one primary and one secondary company.

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representative who will manage the user accounts on the Commission's Lifeline secure website.

(e) Within 20 calendar days of receiving the Commission's e-mail notification that the Lifeline assistance plan application is available for retrieval, the eligible telecommunications carrier shall provide a facsimile response to the Commission via the Commission's dedicated Lifeline assistance facsimile telephone line at (850)717-0108, or an electronic response via the Commission's Lifeline secure website, identifying the customer name, address, telephone number, and date of the application for:

1. Misdirected Lifeline assistance plan applications;
2. Applications for customers currently receiving Lifeline assistance; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.

In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may file the information with the Office of Commission Clerk.

(f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications carrier in accordance with paragraph (8)(e) of this rule is confidential and exempt from Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this rule, the information filed by the eligible telecommunications carrier will be presumed necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)4., F.S.

For Lifeline applicants who do not use On-line enrollment or simplified certification enrollment, the eligible telecommunications carrier must accept Public Assistance eligibility determination letters, including those provided for food stamps, Medicaid, and public housing lease agreements, as proof of eligibility for Link-Up and Lifeline enrollment.

(8) An eligible telecommunications carrier shall not impose additional certification.

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requirements on subscribers beyond those which are required by this rule or by Title 47, Code
of Federal Regulations, Part 54, Subpart E, Sections 54.409 Consumer qualification for
Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual
certifications by eligible telecommunications carriers, as amended June 28, 2012. Eligible
telecommunications carriers must allow customers the option to submit Link-Up or Lifeline
applications via U.S. Mail or facsimile, and may allow applications to be submitted
electronically. Eligible telecommunications carriers must also allow customers the option to
submit copies of supporting documents via U.S. Mail or facsimile.
(9) If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline assistance
under the income test set forth in Section 364.10(3)(a), F.S., an eligible telecommunications
carrier shall not impose any additional certification requirements on the subscriber. Eligible
telecommunications carriers shall only require a customer to provide the last four digits of the
customer’s social security number for application for Lifeline and Link-Up service and to
verify continued eligibility for the programs as part of the annual verification process.
(10) An eligible telecommunications carrier must provide written notice to a customer within
30 days of receipt of the application providing the reason for a rejected Lifeline application
and the contact information for the customer to obtain information regarding the application
denial. All eligible telecommunications carriers shall participate in the Lifeline service
Automatic Enrollment Process. For purposes of this rule, the Lifeline service Automatic
Enrollment Process is an electronic interface between the Department of Children and Family
Services, the Commission, and the eligible telecommunications carrier that allows low-income
individuals to automatically enroll in Lifeline following enrollment in a qualifying public
assistance program.
(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing
the eligible telecommunications carrier that Lifeline service applications are available for
CODING: Words underlined are additions; words in struck through type are deletions from
existing law.
(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline service program as soon as practicable, but no later than 60 days from the receipt of the e-mail notification. Upon completion of initial enrollment, the eligible telecommunications carrier shall credit the subscriber's bill for Lifeline service as of the date the eligible telecommunications carrier received the e-mail notification from the Commission.

d) The eligible telecommunications carrier shall maintain a current e-mail address with the Commission, which the Commission will use to inform the eligible telecommunications carrier of the Commission’s Lifeline secure website address and that new Lifeline service applications are available for retrieval for processing.

e) Within 20 calendar days of receiving the Commission’s e-mail notification that the Lifeline service application is available for retrieval, the eligible telecommunications carrier shall provide a facsimile response to the Commission via the Commission’s dedicated Lifeline service facsimile telephone line at (850)413-7142, or an electronic response via the Commission’s Lifeline secure website, identifying the customer name, address, telephone number, and date of the application for:

1. Misdirected Lifeline service applications;
2. Applications for customers currently receiving Lifeline service; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.

In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may file the information with the Office of Commission Clerk.

CODING: Words underlined are additions; words in struck through type are deletions from existing law.
(f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications carrier in accordance with paragraph (9)(e) of this rule is confidential and exempt from Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this rule, the information filed by the eligible telecommunications carrier will be presumed necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)4.; F.S.

(11) When an eligible telecommunications carrier provides a subscriber with notice of impending termination of Lifeline assistance pursuant to Section 364.10(1)(e), F.S., the notice shall contain the telephone number the subscriber may call to obtain more information about the subscriber’s Lifeline assistance from the eligible telecommunications carrier. Notices of impending termination of Lifeline assistance provided by local exchange companies shall also inform the subscriber of the availability of discounted residential basic local telecommunications service, as set forth in Section 364.105, F.S. An eligible telecommunications carrier shall not impose additional verification requirements on subscribers beyond those which are required by this rule.

(12) If a subscriber’s Lifeline assistance is terminated and the subscriber subsequently presents proof of Lifeline eligibility, the eligible telecommunications carrier shall reinstate the subscriber’s Lifeline assistance as soon as practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of the date on which the eligible telecommunications carrier reinstates the subscriber’s Lifeline assistance, the subscriber’s bill shall be credited for Lifeline assistance as of the date the eligible telecommunications carrier received the proof of continued Lifeline eligibility. If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline service under the income test set forth in Section 364.105(3)(a), F.S., an eligible telecommunications carrier shall not impose any additional

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(13) Eligible telecommunications carriers must advertise the availability of Lifeline assistance using media of general distribution, as required by Title 47, U.S. Code, Part I, Section 214(c)(1) Provision of universal service, Eligible telecommunications carriers, subparagraph (B), 2011 edition of the Telecommunications Act of 1996, which is incorporated into this rule by reference and which is available at: (hyperlink). An eligible telecommunications carrier must provide written notice to a customer within 30 days of receipt of the application providing the reason for a rejected Lifeline application, and providing contact information for the customer to get information regarding the application denial.

(14) Eligible telecommunications carriers shall publicize the availability of Lifeline assistance in a manner reasonably designed to reach those likely to qualify for the assistance, as required by Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.405 Carrier obligation to offer Lifeline, paragraph (b), as amended March 2, 2012, which is incorporated into this rule by reference and which is available at: (hyperlink). An eligible telecommunications carrier must provide 60 days written notice prior to the termination of Lifeline service. The notice of pending termination shall contain the telephone number at which the subscriber can obtain information about the subscriber's Lifeline service from the eligible telecommunications carrier. The notice shall also inform the subscriber of the availability, pursuant to Section 364.105, F.S., of discounted residential basic local telecommunications service.

(15) If the eligible telecommunications carrier generates customer bills, the eligible telecommunications carrier must also place an insert in the subscriber's bill or a message on the subscriber's bill at least once each calendar year advising subscribers of the availability of Lifeline to those who qualify for the assistance. If a subscriber's Lifeline service is terminated and the subscriber subsequently presents proof of Lifeline eligibility, the eligible Telecommunications Carrier must restore Lifeline service.

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telecommunications carrier shall reinstate the subscriber's Lifeline service as soon as
practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of
the date on which the eligible telecommunications carrier reinstates the subscriber's Lifeline
service, the subscriber's bill shall be credited for Lifeline service as of the date the eligible
telecommunications carrier received the proof of continued Lifeline eligibility.

(16) Each eligible telecommunications carrier shall maintain accurate records detailing how
the consumer demonstrated his or her eligibility for at least 3 years, and for as long as the
subscriber receives Lifeline assistance from that eligible telecommunications carrier. All
eligible telecommunications carriers shall provide current Lifeline service company
information to the Universal Service Administrative Company at www.lifelinesupport.org so
that the information can be posted on the Universal Service Administrative Company's
consumer website.

(17) Eligible telecommunications carriers must advertise the availability of Lifeline service to
those who may be eligible for the service. At a minimum, if the eligible telecommunications
carrier publishes a directory, the eligible telecommunications carrier must include in the index
of the directory a notice of the availability of Lifeline service. If the eligible
telecommunications carrier generates customer bills, the eligible telecommunications carrier
must also place an insert in the subscriber's bill or a message on the subscriber's bill at least
once each calendar year advising subscribers of the availability of Lifeline service.

(18) Eligible telecommunications carriers may not charge a service deposit in order to initiate
Lifeline service if the subscriber voluntarily elects toll blocking or toll control. If the
subscriber elects not to place toll blocking or toll control on the line, an eligible
telecommunications carrier may charge a service deposit.

(19) Eligible telecommunications carriers may not charge Lifeline subscribers a monthly
number portability charge.

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Eligible telecommunications carriers offering Link-Up and Lifeline service must submit quarterly reports to the Commission no later than 30 days following the ending of each quarter as follows: First Quarter (January 1 through March 31); Second Quarter (April 1 through June 30); Third Quarter (July 1 through September 30); Fourth Quarter (October 1 through December 31). The quarterly reports shall include the following data:

(a) The number of Lifeline subscribers, excluding resold Lifeline subscribers, for each month during the quarter;
(b) The number of subscribers who received Link-Up for each month during the quarter;
(c) The number of new Lifeline subscribers added each month during the quarter;
(d) The number of transitional Lifeline subscribers who received discounted service for each month during the quarter; and
(e) The number of residential access lines with Lifeline service that were resold to other carriers each month during the quarter.

Rulemaking Authority 120.80(13)(d), 350.127(2), 364.0252, 364.10(2)(3)(j) FS. Law
Implemented 364.0252, 364.10, 364.105, 364.183(1) FS. History–New 1-2-07, Amended 12-6-07, 6-23-10.______.
25-4.113 Refusal or Discontinuance of Service by Company.

(1) As applicable, the company may refuse or discontinue telephone service under the following conditions provided that, unless otherwise stated, the customer shall be given notice and allowed a reasonable time to comply with any rule or remedy any deficiency:

(a) For non-compliance with or violation of any state or municipal law, ordinance, or regulation pertaining to telephone service.

(b) For the use of telephone service for any other property or purpose than that described in the application.

(c) For failure or refusal to provide the company with a deposit to insure payment of bills in accordance with the company's regulations.

(d) For neglect or refusal to provide reasonable access to the company for the purpose of inspection and maintenance of equipment owned by the company.

(e) For noncompliance with or violation of the Commission's regulations or the company's rules and regulations on file with the Commission, provided 5 working days' written notice is given before termination.

(f) For nonpayment of bills for telephone service, including the telecommunications access system surcharge referred to in subsection 25-4.160(3), F.A.C., provided that suspension or termination of service shall not be made without 5 working days' written notice to the customer, except in extreme cases. The written notice shall be separate and apart from the regular monthly bill for service. A company shall not, however, refuse or discontinue service for nonpayment of a dishonored check service charge imposed by the company, nor discontinue a customer's Lifeline local service if the charges, taxes, and fees applicable to dial tone, local usage, dual-tone multifrequency-dialing, emergency services such as "911," and relay service are paid. No company shall discontinue service to any customer for the initial nonpayment of the current bill on a day the company's business office is closed or on a day.

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preceding a day the business office is closed.

(g) For purposes of paragraphs (e) and (f), "working day" means any day on which the
company's business office is open and the U.S. Mail is delivered.

(h) Without notice in the event of customer use of equipment in such manner as to adversely
affect the company's equipment or the company's service to others.

(i) Without notice in the event of hazardous conditions or tampering with the equipment
furnished and owned by the company.

(j) Without notice in the event of unauthorized or fraudulent use of service. Whenever service
is discontinued for fraudulent use of service, the company may, before restoring service,
require the customer to make, at his own expense, all changes in facilities or equipment
necessary to eliminate illegal use and to pay an amount reasonably estimated as the loss in
revenues resulting from such fraudulent use.

(2) In case of refusal to establish service, or whenever service is discontinued, the company
shall notify the applicant or customer in writing of the reason for such refusal or
 discontinuance.

(3) Service shall be initiated or restored when the cause for refusal or discontinuance has been
satisfactorily adjusted.

(4) The following shall not constitute sufficient cause for refusal or discontinuance of service
to an applicant or customer:

(a) Delinquency in payment for service by a previous occupant of the premises, unless the
current applicant or customer occupied the premises at the time the delinquency occurred and
the previous customer continues to occupy the premises and such previous customer shall
benefit from such new service.

(b) Delinquency in payment for service by a present occupant who was delinquent at another
address and subsequently joined the household of the customer in good standing.

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existing law.
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(c) Delinquency in payment for separate telephone service of another customer in the same
residence.

(d) Failure to pay for business service at a different location and a different telephone number
shall not constitute sufficient cause for refusal of residence service or vice versa.

(e) Failure to pay for a service rendered by the company which is not regulated by the
Commission.

(f) Failure to pay the bill of another customer as guarantor thereof.

(g) Failure to pay a dishonored check-service charge imposed by the company.

(h) When service has been discontinued for proper cause, the company may charge a
reasonable fee to defray the cost of restoring service, provided such charge is set out in its
approved tariff on file with the Commission.

Rulemaking Authority 350.127, 427.704(8) FS. Law Implemented 364.03, 364.19, 364.604,
427.704 FS. History- Revised 12-1-68. Amended 3-31-76, 10-25-84. 10-30-86, 1-1-91, 9-16-
92, 1-7-93, 1-25-95, 7-5-00. Repealed

CODING: Words underlined are additions; words in struck-through type are deletions from
existing law.
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Service company information to the Universal Service Administrative Company at www.lifelinesupport.org so that
the information can be posted on the Universal Service Administrative Company's consumer website.

17. Eligible telecommunications carriers must advertise the availability of Lifeline service to those who may
be eligible for the service. At a minimum, if the eligible telecommunications carrier publishes a directory, the
eligible telecommunications carrier must include in the index of the directory a notice of the availability of Lifeline
service. If the eligible telecommunications carrier generates customer bills, the eligible telecommunications carrier
must also place an insert in the subscriber's bill or a message on the subscriber's bill at least once each calendar year
advising subscribers of the availability of Lifeline service.

18. Eligible telecommunications carriers may not charge a service deposit in order to initiate Lifeline service if
the subscriber voluntarily elects toll-blocking or toll-control. If the subscriber elects not to place toll-blocking or toll
control on the line, an eligible telecommunications carrier may charge a service deposit.

19. Eligible telecommunications carriers may not charge Lifeline subscribers a monthly number-portability
charge.

20. Eligible telecommunications carriers offering Link-Up and Lifeline service must submit quarterly reports
to the Commission no later than 30 days following the ending of each quarter as follows: First Quarter (January 1
through March 31); Second Quarter (April 1 through June 30); Third Quarter (July 1 through September 30); Fourth
Quarter (October 1 through December 31). The quarterly reports shall include the following data:

(a) The number of Lifeline subscribers, excluding resold Lifeline subscribers, for each month during the
quarter;

(b) The number of subscribers who received Link-Up for each month during the quarter;

(c) The number of new Lifeline subscribers added each month during the quarter;

(d) The number of transitional Lifeline subscribers who received discounted service for each month during the
quarter; and

(e) The number of residential access lines with Lifeline service that were resold to other carriers each month
during the quarter.

Rulemaking Authority: 120.80(1)(b), 350.127(2), 364.025; 364.10(2)(3)(i) FS. Law Implemented 364.025; 364.10, 364.105,
364.183(1) FS. History--New 1-2-07, Amended 12-6-07, 6-23-10._______.
ATTACHMENT A

25-4.0665 Lifeline Assistance Plan Service.

(1) A subscriber is eligible for Lifeline assistance service if:
(a) The subscriber is a participant in one of the following federal assistance programs:
1. Medicaid;
2. Supplemental Nutrition Assistance Program (SNAP)/Food Stamps;
3. Supplemental Security Income (SSI);
4. Temporary Assistance for Needy Families/Temporary Cash Assistance (Florida program);
5. “Section 8” Federal Public Housing Assistance;
6. Low-Income Home Energy Assistance Program; or
7. The National School Lunch Program – Free Lunch; or
(b) The subscriber's Local Exchange Company eligible telecommunications carrier has more than one million access lines and the subscriber's household income is at or below 150 percent of the federal poverty income guidelines.
(c) The subscriber's Local Exchange Company eligible telecommunications carrier has less than one million access lines and, pursuant to Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.409 Consumer qualification for Lifeline, paragraph (a)(1), as amended June 28, 2012, the subscriber's household income is at or below 135 percent of the federal poverty income guidelines. Eligible telecommunications carriers with less than one million access lines are not required to may enroll Lifeline applicants through the income eligibility test of 150 percent or less of the federal poverty income guidelines, but may do so voluntarily.

(2) A subscriber living on federally recognized Tribal lands who does not satisfy the eligibility requirements for Lifeline assistance service in subsection (1) of this rule is nevertheless eligible for Lifeline assistance service if the subscriber receives benefits from one of the following Bureau of Indian Affairs programs:
(a) Tribal temporary assistance for needy families (TANF);
(b) National School Lunch NSL Program – Free Lunch; or
(c) Head Start.

(3) When enrolling customers in the Lifeline assistance plan under paragraph (1)(a) of this rule, eligible telecommunications carriers shall accept Form PSC/TEL 157 (2/13), entitled “Application for Lifeline Assistance,” which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission's website at:

http://www.floridapsc.com/utilities/telecom/lifeline/LifelinePDFs/ApplicationEnglish.pdf

Eligible telecommunications carriers with less than one million access lines are not required to enroll Lifeline applicants through the income eligibility test of 150 percent or less of the federal poverty income guidelines, but may do so voluntarily.

(4) Eligible telecommunications carriers shall, using the Coordinated Enrollment Process, enroll customers for Lifeline assistance who electronically submit Form PSC/TEL 158 (6/10), entitled “Lifeline Florida On-line Application for Recipients of Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA),” which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission's website at:

https://secure.floridapsc.com/efs(15p1gzjri1h5xwvf2c30tyd))/public/lifeline/lifelineapplication2.aspx

Eligible telecommunications carriers that charge an initial connection charge must offer Link-Up service to subscribers who are eligible for Lifeline service pursuant to this rule.

(5) Eligible telecommunications carriers must allow customers the option to submit Lifeline applications and supporting documentation via U.S. Mail or facsimile, and may allow applications and supporting documentation to be submitted electronically. When enrolling customers in the Lifeline service program under paragraph (1)(a) of this rule, eligible telecommunications carriers shall accept Form PSC/TEL 157 (6/10), entitled “Application for Link-Up Florida and Lifeline Assistance,” which is incorporated into this rule by reference and can be accessed from the Commission's website at www.floridapsc.com, by selecting “Link-Up Florida and Lifeline,” then selecting
"Need Discounted Phone Service?"—and then selecting "English Link-Up and Lifeline Certification Form"—(also available in Spanish and Creole).

(6) Except as otherwise set forth in paragraph (6)(a)-(d) of this rule, eligible telecommunications carriers shall comply with subscriber eligibility determination and certification requirements contained in Title 47, Code of Federal Regulations, Part 54, Subpart E, Sections 54.407 Reimbursement for offering Lifeline, 54.409 Consumer qualification for Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual certifications by eligible telecommunications carriers, as amended June 28, 2012, which are incorporated into this rule by reference and are available at: [hyperlink]. These rules can also be accessed from the U.S. Government Printing Office’s website at: http://www.ecfr.gov/cgi-bin/text-idx?SID=fadabe77a92611067f6b01466a0a&tpl=/ecfrbrowse/Title47/47cfr54_main_02.tpl. A copy of the annual certification provided to the administrator shall be filed with the Commission. Exceptions to these requirements, when the Coordinated Enrollment Process is utilized, are as follow:

(a) Section 54.407(d), regarding obtaining valid certification and re-certification forms for subscribers;
(b) Section 54.410(b)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d);
(c) Section 54.410(c)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d); and
(d) Section 54.410(e), regarding providing copies of subscriber certification forms.

Eligible telecommunications carriers shall enroll customers for Lifeline service who electronically submit Form PSC/TEL-158 (6/10), entitled "Lifeline and Link-Up Florida On-line Self-Certification Form," which is incorporated into this rule by reference and can be accessed from the Commission’s website at www.floridapsc.com, by selecting "Link-Up Florida and Lifeline," then selecting "Apply On-line."

(7) All eligible telecommunications carriers shall participate in the Lifeline assistance plan Coordinated Enrollment Process. For purposes of this rule, the Lifeline assistance plan Coordinated Enrollment Process is an electronic interface between the Department of Children and Families, the Commission, and the eligible telecommunications carrier that allows low-income individuals to enroll in Lifeline following enrollment in a qualifying public assistance program.

(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing the eligible telecommunications carrier that Lifeline assistance plan applications are available for retrieval for processing.
(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline assistance plan as soon as practicable, but no later than 630 days from the receipt of the e-mail notification. Upon completion of initial enrollment, eligible telecommunications carriers that invoice their subscribers shall credit the subscriber’s bill for Lifeline assistance as of the date the eligible telecommunications carrier received the e-mail notification from the Commission.
(c) The eligible telecommunications carrier shall maintain a current e-mail address with the Commission, which the Commission will use to inform the eligible telecommunications carrier of the Commission’s Lifeline secure website address and that new Lifeline assistance plan applications are available for retrieval for processing.
(d) The eligible telecommunications carrier shall maintain with the Commission the names, e-mail addresses and telephone numbers of one primary and one secondary company representative who will manage the user accounts on the Commission’s Lifeline secure website.
(e) Within 360 calendar days of receiving the Commission’s e-mail notification that the Lifeline assistance plan application is available for retrieval, the eligible telecommunications carrier shall provide a facsimile response to the Commission via the Commission’s dedicated Lifeline assistance facsimile telephone line at (850) 717-0108, or an electronic response via the Commission’s Lifeline secure website, identifying the customer name, address, telephone number, and date of the application for:
1. Misdirected Lifeline assistance plan applications;
2. Applications for customers currently receiving Lifeline assistance; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected. In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may file the information with the Office.
of the Commission Clerk.

(5) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications carrier in accordance with paragraph (8)(e) of this rule is confidential and exempt from Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this rule, the information filed by the eligible telecommunications carrier will be presumed necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)(4), F.S. For Lifeline applicants who do not use On-line enrollment or simplified certification enrollment, the eligible telecommunications carrier must accept Public Assistance eligibility determination letters, including those provided for food stamps, Medicaid, and public housing lease agreements, as proof of eligibility for Link-Up and Lifeline enrollment.

(8) An eligible telecommunications carrier shall not impose additional certification requirements on subscribers beyond those which are required by this rule or by Title 47, Code of Federal Regulations, Part 54, Subpart E, Sections 54.409 Consumer qualification for Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual certifications by eligible telecommunications carriers, as amended June 28, 2012. Eligible telecommunications carriers must allow customers the option to submit Link-Up or Lifeline applications via U.S. Mail or facsimile, and may allow applications to be submitted electronically. Eligible telecommunications carriers must also allow customers the option to submit copies of supporting documents via U.S. Mail or facsimile.

(9) If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline assistance under the income test set forth in Section 364.10(3)(a), F.S., an eligible telecommunications carrier shall not impose any additional certification requirements on the subscriber. Eligible telecommunications carriers shall only require a customer to provide the last four digits of the customer’s social security number for application for Lifeline and Link-Up service and to verify continued eligibility for the programs as part of the annual verification process.

(10) An eligible telecommunications carrier must provide written notice to a customer within 30 days of receipt of the application providing the reason for a rejected Lifeline application and the contact information for the customer to obtain information regarding the application denial. All eligible telecommunications carriers shall participate in the Lifeline service Automatic Enrollment Process. For purposes of this rule, the Lifeline service Automatic Enrollment Process is an electronic interface between the Department of Children and Family Services, the Commission, and the eligible telecommunications carrier that allows low-income individuals to automatically enroll in Lifeline following enrollment in a qualifying public assistance program.

(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing the eligible telecommunications carrier that Lifeline service applications are available for retrieval for processing.

(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline service program as soon as practicable, but no later than 60 days from the receipt of the e-mail notification. Upon completion of initial enrollment, the eligible telecommunications carrier shall credit the subscriber’s bill for Lifeline service as of the date the eligible telecommunications carrier received the e-mail notification from the Commission.

(c) The eligible telecommunications carrier shall maintain a current e-mail address with the Commission, which the Commission will use to inform the eligible telecommunications carrier of the Commission’s Lifeline secure website address and that new Lifeline service applications are available for retrieval for processing.

(d) The eligible telecommunications carrier shall maintain with the Commission the names, e-mail addresses and telephone numbers of one primary and one secondary company representative who will manage the user accounts on the Commission’s Lifeline secure website.

(e) Within 20 calendar days of receiving the Commission’s e-mail notification that the Lifeline service application is available for retrieval, the eligible telecommunications carrier shall provide a facsimile response to the Commission via the Commission’s dedicated Lifeline service facsimile telephone line at (850) 413-7142, or an electronic response via the Commission’s Lifeline secure website, identifying the customer name, address, telephone number, and date of the application for:
1. Misdirected Lifeline service applications;
2. Applications for customers currently receiving Lifeline service; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.
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In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may file the information with the Office of Commission Clerk.

(6) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications carrier in accordance with paragraph (9)(e) of this rule is confidential and exempt from Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this rule, the information filed by the eligible telecommunications carrier will be presumed necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)(4), F.S.

(11) When an eligible telecommunications carrier provides a subscriber with notice of impending termination of Lifeline assistance pursuant to Section 364.10(1)(c), F.S., the notice shall contain the telephone number the subscriber may call to obtain more information about the subscriber’s Lifeline assistance from the eligible telecommunications carrier. Notices of impending termination of Lifeline assistance provided by local exchange companies shall also inform the subscriber of the availability of discounted residential basic local telecommunications service, as set forth in Section 364.105, F.S. An eligible telecommunications carrier shall not impose additional verification requirements on subscribers beyond those which are required by this rule.

(12) If a subscriber’s Lifeline assistance is terminated and the subscriber subsequently presents proof of Lifeline eligibility, the eligible telecommunications carrier shall reinstate the subscriber’s Lifeline assistance as soon as practicable, but no later than 360 days following receipt of proof of eligibility. Irrespective of the date on which the eligible telecommunications carrier reinstates the subscriber’s Lifeline assistance, the subscriber’s bill shall be credited for Lifeline assistance as of the date the eligible telecommunications carrier received proof of continued Lifeline eligibility. If the Office of Public Counsel verifies a subscriber eligible to receive Lifeline service under the income test set forth in Section 364.10(3)(a), F.S., an eligible telecommunications carrier shall not impose any additional verification requirements on the subscriber.

(13) Eligible telecommunications carriers must advertise the availability of Lifeline assistance using media of general distribution, as required by Title 47, U.S. Code, Part I, Section 214(e)(1) Provision of universal service. Eligible telecommunications carriers, subparagraph (B), 2011 edition of the Telecommunications Act of 1996, which is incorporated into this rule by reference and which is available at: [hyperlink]. An eligible telecommunications carrier must provide written notice to a customer within 30 days of receipt of the application providing the reason for a rejected Lifeline application, and providing contact information for the customer to get information regarding the application denial.

(14) Eligible telecommunications carriers shall publicize the availability of Lifeline assistance in a manner reasonably designed to reach those likely to qualify for the assistance, as required by Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.405 Carrier obligation to offer Lifeline, paragraph (b), as amended March 2, 2012, which is incorporated into this rule by reference and which is available at: [hyperlink]. An eligible telecommunications carrier must provide 60 days written notice prior to the termination of Lifeline service. The notice of pending termination shall contain the telephone number at which the subscriber can obtain information about the subscriber’s Lifeline service from the eligible telecommunications carrier. The notice shall also inform the subscriber of the availability, pursuant to Section 364.105, F.S., of discounted residential basic local telecommunications service.

(15) If the eligible telecommunications carrier generates customer bills, the eligible telecommunications carrier must also place an insert in the subscriber’s bill or a message on the subscriber’s bill at least once each calendar year advising subscribers of the availability of Lifeline to those who qualify for assistance. If a subscriber’s Lifeline service is terminated and the subscriber subsequently presents proof of Lifeline eligibility, the eligible telecommunications carrier shall reinstate the subscriber’s Lifeline service as soon as practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of the date on which the eligible telecommunications carrier reinstates the subscriber’s Lifeline service, the subscriber’s bill shall be credited for Lifeline assistance as of the date the eligible telecommunications carrier received the proof of continued Lifeline eligibility.

(16) Each eligible telecommunications carrier shall maintain accurate records detailing how the consumer demonstrated his or her eligibility for at least 3 years, and for as long as the subscriber receives Lifeline assistance from that eligible telecommunications carrier. All eligible telecommunications carriers shall provide current Lifeline
AT&T Florida Comments on Staff Proposed Lifeline Rules

Page 4, Line 19 - Include subsection 2 as paragraph (d) to subsection 1. This would more accurately capture the universe of Lifeline eligible customers in a single provision. Renumber subsequent paragraphs as subparagraphs under the new paragraph (d). [Reference pg 3, line 19 of Workshop Notice]

Page 5, Line 2 - Insert new subsection (2) to clarify that only one Lifeline discount per household is allowed. [New Section, Not in Workshop Notice]

Page 7, Lines 19-25 - Change the effective date of the discount to the date that the customer is finally deemed eligible for a Lifeline credit which is when the customer is confirmed as eligible by the National Lifeline Accountability Database (“NLAD”) and subsequently enrolled. [Reference pg 6, lines 15-19 of Workshop Notice]

Page 8, Line 9 - Change the time allowed to inform the Commission as to those subscribers that cannot be enrolled in the Lifeline program. The implementation of the NLAD screening process has made it difficult if not impossible to comply with the current 20-day time limit for notification to the Commission of failed applications for Lifeline. The extension of the time to 40 days will allow for the NLAD process to take place. [Reference pg 7, line 3 of Workshop Notice]

Page 9, Lines 16-18 - Delete the revised subsection 9. This provision is already in the FCC’s Lifeline Rules which are included by reference in subsection 8. The FCC’s rules prohibit imposition of additional certification requirements. Inclusion of this new language is redundant. [Reference pg 8, lines 9-11 of Workshop Notice]

Page 9, Lines 22-24 - This change makes the time for enrolling subscribers who apply directly with a telecommunications carrier consistent with the treatment of a subscriber that applies through the Lifeline Coordinated Enrollment Process. [Reference pg 8, lines 15-18 of Workshop Notice]

Page 12, Lines 1-7 - This change is to clarify that Lifeline subscribers whose discounts are terminated due to failure to maintain eligibility and subsequently demonstrate eligibility are treated as new applicants. Such applications will be treated consistent with the provisions already established for new applications. [Reference pg 10, lines 17-23 of Workshop Notice]

Page 12, Lines 11-18 - Subsection 13 should be deleted. This section confuses the general ETC advertising obligation identified in 214(e) with the Lifeline advertising obligations set forth in 54.405(b). They are not the same. At best, subsection 13 is redundant with subsection 14. At worst it includes advertising obligations not required for Lifeline and which may exceed the Commission’s authority to impose under Section 364.10, Florida Statues, which is limited to
Lifeline. [Note: if subsection 13 is deleted, subsequent subsections must be renumbered—not
done here to avoid confusion.] [Reference pg 11, lines 2-6 of Workshop Notice]

Page 13, Lines 15-18: This section should be revised to clear that the Florida Lifeline record
keeping requirements conform to FCC’s Lifeline record keeping requirements set forth in Rule
54.417. [Reference pg 12, lines 6-8 of Workshop Notice]

Lifeline Application Certifications

The draft rules contained a draft of the Lifeline Application to be incorporated in the new revised
Lifeline rules. AT&T Florida has suggested certain changes to the Lifeline Application to
update and conform to the FCC’s Lifeline Rules. Because there are no line references to the
Lifeline Application, AT&T Florida included comments embedded with the proposed changes in
the draft Lifeline Applications document.
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25.4.0665 Lifeline Assistance Plan Service.

(1) A subscriber is eligible for Lifeline assistance service if:

(a) The subscriber is a participant in one of the following federal assistance programs:

1. Medicaid;
2. Supplemental Nutrition Assistance Program (SNAP)/Food Stamps;
3. Supplemental Security Income (SSI);
4. Temporary Assistance for Needy Families/Temporary Cash Assistance (Florida program);
5. "Section 8" Federal Public Housing Assistance;
6. Low-Income Home Energy Assistance Program; or
7. The National School Lunch Program – Free Lunch; or
(b) The subscriber’s Local Exchange Company eligible telecommunications carrier has more than one million access lines and the subscriber’s household income is at or below 150 percent of the federal poverty income guidelines.
(c) The subscriber’s Local Exchange Company eligible telecommunications carrier has less than one million access lines and, pursuant to Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.409 Consumer qualification for Lifeline, paragraph (a)(1), as amended June 28, 2012, the subscriber’s household income is at or below 135 percent of the federal poverty income guidelines.

(2) (d) A subscriber living on federally recognized Tribal lands who does not satisfy the eligibility requirements for Lifeline assistance service in subsection (1) of this rule is nevertheless eligible for Lifeline assistance service if the subscriber receives benefits from one of the following Bureau of Indian Affairs programs:

(a) Tribal temporary assistance for needy families (TANF);

CODING: Words underlined are additions; words in struck-through type are deletions from existing law.
(b)2. National School Lunch NSLP Program—Free Lunch; or

(e)3. Head Start.

(2) In addition to meeting the eligibility criteria in paragraph (1) of this section, an eligible low-income consumer must not already be receiving Lifeline assistance and there must not be anyone else in the subscriber's household receiving Lifeline assistance.

(3) When enrolling customers in the Lifeline assistance plan under paragraph (1)(a) of this rule, eligible telecommunications carriers shall accept Form PSC/TEL 157 (2/13), entitled "Application for Lifeline Assistance," which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission's website at: http://www.floridapsc.com/utilities/telecomm/lifeline/LifelinePDFs/ApplicationEnglish.pdf.

Eligible telecommunications carriers with less than one million access lines are not required to enroll Lifeline applicants through the income eligibility test of 150 percent or less of the federal poverty income guidelines, but may do so voluntarily.

(4) Eligible telecommunications carriers shall enroll customers for Lifeline assistance who electronically submit Form PSC/TEL 158 (6/10), entitled "Lifeline Florida On-line Application for Recipients of Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA)," which is incorporated into this rule by reference and is available at: [hyperlink]. This form can also be accessed from the Commission's website at: https://secure.floridapsc.com/S(15p1gzej11b5xvfi2c30tvd))/public/lifeline/lifelineapplication.aspx. Applicants who presently participate in Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Assistance for Needy Families/Temporary Cash Assistance programs can complete Form PSC/TEL 158 electronically on-line. Eligible telecommunications carriers that charge an initial connection charge must offer Link Up service to subscribers who are eligible for Lifeline service pursuant to existing law.
(5) Eligible telecommunications carriers must allow customers the option to submit Lifeline applications and supporting documentation via U.S. Mail or facsimile, and may allow applications and supporting documentation to be submitted electronically. When enrolling customers in the Lifeline service program under paragraph (1)(a) of this rule, eligible telecommunications carriers shall accept Form PSC/RAD-157 (6/10), entitled “Application for Link-Up Florida and Lifeline Assistance,” which is incorporated into this rule by reference and can be accessed from the Commission’s website at www.floridapsc.com, by selecting “Link-Up Florida and Lifeline,” then selecting “Need Discounted Phone Service?,” and then selecting “English Link-Up and Lifeline Certification Form” (also available in Spanish and Creole).

(6) Except as otherwise set forth in paragraph (6)(a)-(d) of this rule, eligible telecommunications carriers shall comply with subscriber eligibility determination and certification requirements contained in Title 47, Code of Federal Regulations, Part 54, Subpart E, Sections 54.407 Reimbursement for offering Lifeline, 54.409 Consumer qualification for Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual certifications by eligible telecommunications carriers, as amended June 28, 2012, which are incorporated into this rule by reference and are available at: [hyperlink]. These rules can also be accessed from the U.S. Government Printing Office’s website at: http://www.ecfr.gov/cgi-bin/text-idx?SID=fadabe77a9ebec6ba1d63b6a946ca9a&title=47&part=54&section=54.407(d, regarding obtaining valid certification and re-certification forms for subscribers.

CODING: Words underlined are additions; words in struck-through type are deletions from existing law.
(b) Section 54.410(b)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d);

(c) Section 54.410(c)(2)(ii), regarding receipt of subscriber certification forms in compliance with Section 54.410(d); and

(d) Section 54.410(c), regarding providing copies of subscriber certification forms.

Eligible telecommunications carriers shall enroll customers for Lifeline service who electronically submit Form PSC/RAD-158 (6/10), entitled "Lifeline and Link-Up Florida Online Self Certification Form," which is incorporated into this rule by reference and can be accessed from the Commission’s website at www.floridapsc.com, by selecting "Link-Up Florida and Lifeline," then selecting "Apply Online."

(7) All eligible telecommunications carriers shall participate in the Lifeline assistance plan Coordinated Enrollment Process. For purposes of this rule, the Lifeline assistance plan Coordinated Enrollment Process is an electronic interface between the Department of Children and Families, the Commission, and the eligible telecommunications carrier that allows low-income individuals to enroll in Lifeline following enrollment in a qualifying public assistance program.

(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing the eligible telecommunications carrier that Lifeline assistance plan applications are available for retrieval for processing.

(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline assistance plan as soon as practicable, but no later than 60 days from the receipt of the e-mail notification. Upon completion of initial enrollment, eligible telecommunications carriers that invoice their subscribers shall credit the subscriber’s bill for Lifeline assistance as of the subscriber’s enrollment date, the eligible telecommunications carrier received the e-mail notification from the Commission.

CODING: Words underlined are additions; words in struck through type are deletions from existing law.
(c) The eligible telecommunications carrier shall maintain a current e-mail address with the Commission, which the Commission will use to inform the eligible telecommunications carrier of the Commission’s Lifeline secure website address and that new Lifeline assistance plan applications are available for retrieval for processing.

(d) The eligible telecommunications carrier shall maintain with the Commission the names, e-mail addresses and telephone numbers of one primary and one secondary company representative who will manage the user accounts on the Commission’s Lifeline secure website.

(e) Within 20 to 40 calendar days of receiving the Commission’s e-mail notification that the Lifeline assistance plan application is available for retrieval, the eligible telecommunications carrier shall provide a facsimile response to the Commission via the Commission’s dedicated Lifeline assistance facsimile telephone line at (850)717-0108, or an electronic response via the Commission’s Lifeline secure website, identifying the customer name, address, telephone number, and date of the application for:

1. Misdirected Lifeline assistance plan applications;
2. Applications for customers currently receiving Lifeline assistance; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.

In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may file the information with the Office of Commission Clerk.

(f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications carrier in accordance with paragraph (e) of this rule is confidential and exempt from Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this rule, the information filed by the eligible telecommunications carrier will be presumed

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necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a)4.,

F.S.

For Lifeline applicants who do not use On-line enrollment or simplified certification

enrollment, the eligible telecommunications carrier must accept Public Assistance eligibility
determination letters, including those provided for food stamps, Medicaid, and public housing

lease agreements, as proof of eligibility for Link-Up and Lifeline enrollment.

(8) An eligible telecommunications carrier shall not impose additional certification

requirements on subscribers beyond those which are required by this rule or by Title 47, Code

of Federal Regulations, Part 54, Subpart E, Sections 54.409 Consumer qualification for

Lifeline, 54.410 Subscriber eligibility determination and certification, and 54.416 Annual

certifications by eligible telecommunications carriers, as amended June 28, 2012. Eligible

telecommunications carriers must allow customers the option to submit Link-Up or Lifeline

applications via U.S. Mail or facsimile, and may allow applications to be submitted
electronically. Eligible telecommunications carriers must also allow customers the option to

submit copies of supporting documents via U.S. Mail or facsimile.

(9) If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline assistance

under the income test set forth in Section 364.107(3)(a), F.S., an eligible telecommunications

carrier shall not impose any additional certification requirements on the subscriber Eligible

telecommunications carriers shall only require a customer to provide the last four digits of the

customer's social security number for application for Lifeline and Link-Up service and to

verify continued eligibility for the programs as part of the annual verification process.

(10) An eligible telecommunications carrier must provide written notice to a customer who

applied for Lifeline assistance directly with the eligible telecommunications carrier within 30

40 days of receipt of the application providing the reason for a rejected Lifeline application

and the contact information for the customer to obtain information regarding the application

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existing law.
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UNDOCKETED
PAGE 7

All eligible telecommunications carriers shall participate in the Lifeline service
Denial. For purposes of this rule, the Lifeline-service Automatic
Enrollment Process is an electronic interface between the Department of Children and Family
Services, the Commission, and the eligible telecommunications carrier that allows low-income
individuals to automatically enroll in Lifeline following enrollment in a qualifying public
assistance program.

(a) The Commission shall send an e-mail to the eligible telecommunications carrier informing
the eligible telecommunications carrier that Lifeline service applications are available for
retrieval for processing.

(b) The eligible telecommunications carrier shall enroll the subscriber in the Lifeline service
program as soon as practicable, but no later than 60 days from the receipt of the e-mail
notification. Upon completion of initial enrollment, the eligible telecommunications carrier
shall credit the subscriber's bill for Lifeline service as of the date the eligible
telecommunications carrier received the e-mail notification from the Commission.

(c) The eligible telecommunications carrier shall maintain a current e-mail address with the
Commission, which the Commission will use to inform the eligible telecommunications
carrier of the Commission's Lifeline secure website address and that new Lifeline service
applications are available for retrieval for processing.

(d) The eligible telecommunications carrier shall maintain with the Commission the names, e-
mail addresses, and telephone numbers of one primary and one secondary company
representative who will manage the user accounts on the Commission's Lifeline secure
website.

(e) Within 20 calendar days of receiving the Commission's e-mail notification that the Lifeline
service application is available for retrieval, the eligible telecommunications carrier shall
provide a facsimile response to the Commission via the Commission's dedicated Lifeline
CODING: Words underlined are additions; words in struck-through type are deletions from
existing law.

- 7 -
service facsimile telephone line at (850) 413-7142, or an electronic response via the
Commission's Lifeline secure website, identifying the customer name, address, telephone
number, and date of the application for:
1. Misdirected Lifeline service applications;
2. Applications for customers currently receiving Lifeline service; and
3. Rejected applicants, which shall include the reason(s) why the applicants were rejected.
In lieu of a facsimile or electronic submission, the eligible telecommunications carrier may
file the information with the Office of Commission Clerk.
(f) Pursuant to Section 364.107(1), F.S., information filed by the eligible telecommunications
carrier in accordance with paragraph (9)(e) of this rule is confidential and exempt from
Section 119.07(1), F.S. However, the eligible telecommunications carrier may disclose such
information consistent with the criteria in Section 364.107(3)(a), F.S. For purposes of this
rule, the information filed by the eligible telecommunications carrier will be presumed
necessary for disclosure to the Commission pursuant to the criteria in Section 364.107(3)(a),
F.S.
(11) When an eligible telecommunications carrier provides a subscriber with notice of
impending termination of Lifeline assistance pursuant to Section 364.10(1)(e), F.S., the notice
shall contain the telephone number the subscriber may call to obtain more information about
the subscriber's Lifeline assistance from the eligible telecommunications carrier. Notices of
impending termination of Lifeline assistance provided by local exchange companies shall also
inform the subscriber of the availability of discounted residential basic local
telecommunications service, as set forth in Section 364.105, F.S. An eligible
telecommunications carrier shall not impose additional verification requirements on
subscribers beyond those which are required by this rule.
(12) If a subscriber's Lifeline assistance is terminated and the subscriber subsequently
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presents proof of Lifeline eligibility the subscriber shall be treated as making a new application for a Lifeline credit, the eligible telecommunications carrier shall reinstate the subscriber's Lifeline assistance as soon as practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of the date on which the eligible telecommunications carrier reinstates the subscriber's Lifeline assistance, the subscriber's bill shall be credited for Lifeline assistance as of the date the eligible telecommunications carrier received the proof of continued Lifeline eligibility. If the Office of Public Counsel certifies a subscriber eligible to receive Lifeline service under the income test set forth in Section 364.103(a), F.S., an eligible telecommunications carrier shall not impose any additional verification requirements on the subscriber.

(13) Eligible telecommunications carriers must advertise the availability of Lifeline assistance using media of general distribution, as required by Title 47, U.S. Code, Part I, Section 214(e)(1). Provision of universal service, Eligible telecommunications carriers, subparagraph (B), 2011 edition of the Telecommunications Act of 1996, which is incorporated into this rule by reference and which is available at: (hyperlink). An eligible telecommunications carrier must provide written notice to a customer within 30 days of receipt of the application providing the reason for a rejected Lifeline application, and providing contact information for the customer to get information regarding the application denial.

(14) Eligible telecommunications carriers shall publicize the availability of Lifeline assistance in a manner reasonably designed to reach those likely to qualify for the assistance, as required by Title 47, Code of Federal Regulations, Part 54, Subpart E, Section 54.405 Carrier obligation to offer Lifeline, paragraph (b), as amended March 2, 2012, which is incorporated into this rule by reference and which is available at: (hyperlink). An eligible telecommunications carrier must provide 60 days written notice prior to the termination of Lifeline service. The notice of pending termination shall contain the telephone number at CODING: Words underlined are additions; words in struck-through type are deletions from existing law.
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which the subscriber can obtain information about the subscriber's Lifeline service from the
eligible telecommunications carrier. The notice shall also inform the subscriber of the
availability, pursuant to Section 364.105, F.S., of discounted residential basic local
telecommunications service.
(15) If the eligible telecommunications carrier generates customer bills, the eligible
telecommunications carrier must also place an insert in the subscriber's bill or a message on
the subscriber's bill at least once each calendar year advising subscribers of the availability of
Lifeline to those who qualify for the assistance. If a subscriber's Lifeline service is terminated
and the subscriber subsequently presents proof of Lifeline eligibility, the eligible
telecommunications carrier shall reinstate the subscriber's Lifeline service as soon as
practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of
the date on which the eligible telecommunications carrier reinstates the subscriber's Lifeline
service, the subscriber's bill shall be credited for Lifeline service as of the date the eligible
telecommunications carrier received the proof of continued Lifeline eligibility.
(16) Each eligible telecommunications carrier shall maintain accurate records in accordance
with the recordkeeping requirements identified in 47 C.F.R. § 54.417, detailing how the
consumer demonstrated his or her eligibility for at least 3 years, and for as long as the
subscriber receives Lifeline assistance from that eligible telecommunications carrier. All
eligible telecommunications carriers shall provide current Lifeline service company
information to the Universal Service Administrative Company at www.lifesupport.org so
that the information can be posted on the Universal Service Administrative Company's
consumer website.
(17) Eligible telecommunications carriers must advertise the availability of Lifeline service to
those who may be eligible for the service. At a minimum, if the eligible telecommunications
carrier publishes a directory, the eligible telecommunications carrier must include in the index
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of the directory a notice of the availability of Lifeline service. If the eligible

telecommunications carrier generates customer bills, the eligible telecommunications carrier

must also place an insert in the subscriber's bill or a message on the subscriber's bill at least

once each calendar year advising subscribers of the availability of Lifeline service.

(18) Eligible telecommunications carriers may not charge a service deposit in order to initiate

Lifeline service if the subscriber voluntarily elects toll-blocking or toll control. If the

subscriber elects not to place toll-blocking or toll-control on the line, an eligible

telecommunications carrier may charge a service deposit.

(19) Eligible telecommunications carriers may not charge Lifeline subscribers a monthly

number-portability charge.

(20) Eligible telecommunications carriers offering Link-Up and Lifeline service must submit

quarterly reports to the Commission no later than 30 days following the ending of each quarter

as follows: First Quarter (January 1 through March 31); Second Quarter (April 1 through June

30); Third Quarter (July 1 through September 30); Fourth Quarter (October 1 through

December 31). The quarterly reports shall include the following data:

(a) The number of Lifeline subscribers excluding resold Lifeline subscribers for each month

during the quarter;

(b) The number of subscribers who received Link-Up for each month during the quarter;

(c) The number of new Lifeline subscribers added each month during the quarter;

(d) The number of transitional Lifeline subscribers who received discounted service for each

month during the quarter; and

(e) The number of residential access lines with Lifeline service that were resold to other

carriers each month during the quarter.

Rulemaking Authority 120.80(13)(d), 350.12(2), 364.4252; 364.10(2)(b)(7). FS. Law

Implemented 364.9252; 364.10, 364.105, 364.183(1). FS. History—New 1-2-07. Amended 12-6-

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existing law.
25-4.113 Refusal or Discontinuance of Service by Company.

(1) As applicable, the company may refuse or discontinue telephone service under the following conditions provided that, unless otherwise stated, the customer shall be given notice and allowed a reasonable time to comply with any rule or remedy any deficiency:

(a) For non-compliance with or violation of any state or municipal law, ordinance, or regulation pertaining to telephone service.

(b) For the use of telephone service for any other property or purpose than that described in the application.

(c) For failure or refusal to provide the company with a deposit to insure payment of bills in accordance with the company's regulations.

(d) For neglect or refusal to provide reasonable access to the company for the purpose of inspection and maintenance of equipment owned by the company.

(e) For noncompliance with or violation of the Commission's regulations or the company's rules and regulations on file with the Commission, provided 5 working days' written notice is given before termination.

(f) For nonpayment of bills for telephone service, including the telecommunications access system surcharge referred to in subsection 25-4.160(3), F.A.C., provided that suspension or termination of service shall not be made without 5 working days' written notice to the customer, except in extreme cases. The written notice shall be separate and apart from the regular monthly bill for service. A company shall not, however, refuse or discontinue service for nonpayment of a dishonored check service charge imposed by the company, nor discontinue a customer's Lifeline local service if the charges, taxes, and fees applicable to dial tone, local usage, dual-tone multifrequency dialing, emergency services such as "911," and relay service are paid. No company shall discontinue service to any customer for the initial nonpayment of the current bill on a day the company's business office is closed or on a day.

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preceeding a day the business office is closed.

g) For purposes of paragraphs (e) and (f), "working day" means any day on which the
company's business office is open and the U.S. Mail is delivered.

(h) Without notice in the event of customer use of equipment in such manner as to adversely
affect the company's equipment or the company's service to others;

(i) Without notice in the event of hazardous conditions or tampering with the equipment
furnished and owned by the company;

(j) Without notice in the event of unauthorized or fraudulent use of service. Whenever service
is discontinued for fraudulent use of service, the company may, before restoring service,
require the customer to make, at his own expense, all changes in facilities or equipment
necessary to eliminate illegal use and to pay an amount reasonably estimated as the loss in
revenues resulting from such fraudulent use.

(2) In case of refusal to establish service, or whenever service is discontinued, the company
shall notify the applicant or customer in writing of the reason for such refusal or
discontinuance.

(3) Service shall be initiated or restored when the cause for refusal or discontinuance has been
satisfactorily adjusted.

(4) The following shall not constitute sufficient cause for refusal or discontinuance of service
to an applicant or customer:

(a) Delinquency in payment for service by a previous occupant of the premises, unless the
current applicant or customer occupied the premises at the time the delinquency occurred and
the previous customer continues to occupy the premises and such previous customer shall
benefit from such new service.

(b) Delinquency in payment for service by a present occupant who was delinquent at another
address and subsequently joined the household of the customer in good standing.

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(c) Delinquency in payment for separate telephone service of another customer in the same
residence:
(d) Failure to pay for business service at a different location and a different telephone number
shall not constitute sufficient cause for refusal of residence service or vice versa:
(e) Failure to pay for a service rendered by the company which is not regulated by the
Commission:
(f) Failure to pay the bill of another customer as guarantor thereof:
(g) Failure to pay a dishonored check service charge imposed by the company:
(h) When service has been discontinued for proper cause, the company may charge a
reasonable fee to defray the cost of restoring service, provided such charge is set out in its
approved tariff on file with the Commission:

Rulemaking Authority 350.127, 427.704(8) FS. Law Implemented 364.03, 364.19, 364.604.
427.704 FS. History—Revised 12-1-68, Amended 3-31-76, 10-25-84, 10-30-86, 1-1-91, 9-16-
92, 1-7-93, 1-25-95, 7-5-00. Repealed ____________

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existing law.
Application for Lifeline Assistance

Billing name ____________________________
Service Address _________________________
City State Zip Code ______________________

Last Four Digits of Social Security Number __________ Date of Birth ______________
Billing Address (if different from Service Address) _____________________________
City State Zip Code ______________________

Telephone Number (____) ____________ (NOTE: If you do not currently have local phone service, please contact a local phone provider in your area to establish service.)

Applicants who presently participate in the Medicaid, Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA) programs can complete an on-line electronic Lifeline application (available on the PSC Web site).

Is the residential address listed on this application permanent or temporary? (Check one.)

LifeLine is a federal benefit. Willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

Only one Lifeline benefit is available per household. A household is defined, for purposes of Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.

A household is not permitted to receive Lifeline benefits from multiple providers.

Violation of the one-per-household limitation constitutes a violation of the Lifeline rules and will result in the subscriber's de-enrollment from the program.

Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

I hereby certify that I participate in the following assistance program(s): (Check all that apply)

Temporary Cash Assistance
Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
Medicaid
Low-Income Home Energy Assistance Program (LIHEAP)
Supplemental Social Security (SSI)
Federal Public Housing Assistance (Section 8)
National School Lunch Program (NSLP) – Free lunch
Bureau of Indian Affairs Program (Tribal Temporary Assistance for Needy Families, Head Start Subsidy, NSLP) – Tribal Land Residents Only

(OVER)
I certify and agree to the following:

I will notify my Lifeline provider within 30 days if I no longer participate in a qualifying DCF assistance program, if I receive more than one Lifeline benefit, or if another member of my household is receiving a Lifeline benefit;

If I move to a new address, I will provide that new address to my Lifeline provider within 30 days;

If I provided a temporary residential address in this application, I will be required to verify my temporary residential address every 90 days with my Lifeline provider;

My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not already receiving a Lifeline benefit;

The information contained in this application is true and correct to the best of my knowledge;

I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and, I acknowledge that I may be required by my Lifeline provider to recertify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility will result in deenrollment and the termination of my Lifeline benefits.

I understand that my name, address, date of birth, last four digits of my Social Security Number or Tribal Identification Number, telephone number, and any other information may be provided to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for purposes of verifying that my household does not receive more than one Lifeline benefit.

I agree to allow exchange of any necessary information between the local telephone company, the appropriate federal or state agency, or fund administrator, to verify my eligibility to participate in the Lifeline discount program. I give this permission on the condition that the information in this form and any information about my participation in the above public assistance program provided by officials be maintained as confidential customer account information.

Customer's signature: [Signature]
Date: [Date]

Customers of AT&T Florida, CenturyLink, or Verizon who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, do qualify for Lifeline service. Those customers may demonstrate their eligibility for Lifeline service to the Florida Office of Public Counsel. Please contact the Florida Office of Public Counsel at 1-800-540-7039. Customers of other telephone companies who are at or below 150% of the federal poverty income guidelines, but are not currently receiving benefits from one of the listed programs, should contact their telephone company to see if their telephone company is voluntarily enrolling Lifeline applicants through the income eligibility test of 150% or less of the federal poverty income guidelines.
Applicants who presently participate in the Medicaid Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, or Temporary Cash Assistance (TCA) programs can complete an on-line electronic Lifeline application (available on the PSC Web-site).
Lifeline Florida On-line
Application for Recipients of
Medicaid, Supplemental
Nutrition Assistance Program
(SNAP)/Food Stamps, or
Temporary Cash Assistance
(TCA)

Section 364.107(1), Florida Statutes provides that personal identifying information concerning a
participant in a telecommunications carrier's Lifeline Assistance Plan held by the Public Service
Commission is confidential.

Lifeline is a federal benefit. Willfully making false statements to obtain the benefit can result in fines,
imprisonment, de-enrollment or being barred from the program.

Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline
program, as any individual or group of individuals who live together at the same address and share income
and expenses.

A household is not permitted to receive Lifeline benefits from multiple providers. Violation of the one-per-
household limitation constitutes a violation of the Lifeline rules and will result in the subscriber's de-
enrollment from the program. Lifeline is a non-transferable benefit and the subscriber may not transfer his or
her benefit to any other person.

Customers of AT&T Florida, CenturyLink, or Verizon who are at or below 150% of the federal poverty income
guidelines, but are not currently receiving benefits from one of the listed programs, do qualify for Lifeline
service. Those customers may demonstrate their eligibility for Lifeline service to the Florida Office of Public
Counsel. Please contact the Florida Office of Public Counsel at 1-800-540-7039. Customers of other telephone
companies who are at or below 150% of the federal poverty income guidelines, but are not currently
receiving benefits from one of the listed programs, should contact their telephone company to see if their
telephone company is voluntarily enrolling Lifeline applicants through the income eligibility test of 150% or
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Applicants wishing to qualify for Lifeline using Supplemental Security Income (SSI), Federal Public Housing Assistance (Section 8), Low-Income Home Energy Assistance Program (LIHEAP), National School Lunch Free Lunch Program, or Bureau of Indian Affairs Programs (Tribal Temporary Assistance for Needy Families, Head Start Subsidy, NSLP) can complete a hard-copy Lifeline application (available on the PSC Web site), and submit it to their telephone provider along with verification that they are currently participating in one of these programs.

**Contact Information**

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<th>*Last Name</th>
<th>*First Name</th>
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<th>*Address Line 2</th>
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<tr>
<th>*City</th>
<th>*State</th>
<th>*Zip Code</th>
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The residential address listed on this application is:  

- Permanent  
- Temporary  
- Check if different Billing address

<table>
<thead>
<tr>
<th>*Telephone (###-###-####)</th>
<th>Date (mm/dd/yyyy)</th>
<th>* Date of Birth (mm/dd/yyyy)</th>
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<td>08/21/2012</td>
<td>08/21/2012</td>
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<table>
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<th>*Last 4 digits of Social Security Number</th>
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The last four digits of your Social Security Number are required to complete this application. If you do not wish to provide this information here, please apply for Lifeline directly through your Service Provider.

**Service Provider**

Select Provider:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
- Temporary Cash Assistance (TCA)

**I certify, that:**

- I will notify my Lifeline provider within 30 days if I no longer participate in a qualifying DCF assistance program, if I receive more than one Lifeline benefit, or if another member of my household is receiving a Lifeline benefit.
- If I move to a new address, I will provide that new address to my Lifeline provider within 30 days.
If I provided a temporary residential address in this application, I will be required to verify my temporary residential address every 90 days with my Lifeline provider;

My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service;

The information contained in this application is true and correct to the best of my knowledge;

I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and,

I acknowledge that I may be required by my Lifeline provider to recertify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility will result in deenrollment and the termination of my Lifeline benefits.

I understand that my name, address, date of birth, last four digits of my Social Security Number or Tribal Identification Number, telephone number, and other information may be provided to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that my household does not receive more than one Lifeline benefit.

I agree to allow exchange of any necessary information between the local telephone company, the appropriate federal or state agency, or fund administrator, to verify my eligibility to participate in the Lifeline discount program. I give this permission on the condition that the information in this form and any information about my participation in the above public assistance programs provided by officials be maintained as confidential customer account information.

I agree to these terms and conditions:

- [ ] Yes
- [x] No

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Rule 25-4.0665, F.A.C.  
Form PSC/RAD 158 (REV 06/10)