



1 PARTICIPATING (via telephone):

2 Susan Fennell- NEFCOM  
3 Debbie Finley - NEFCOM  
4 Louvinia Holton - NEFCOM  
5 Wesley Norman - NEFCOM  
6 Robin Enkey - Budget PrePay, Inc.  
7 Lakisha Taylor - Budget PrePay, Inc.  
8 J.D. Johnson - DCF  
9 Vijay Muniswami - DCF  
10 Jay Bradbury - Cox Communications  
11 Leslie McLaughlin - Cox Communications  
12 Jerry Levis - Cox Communications  
13 Faye Sprull - Cox Communications  
14 Alexandria Davis - Cox Communications  
15 Rhonda Thomas - T-Mobile  
16 Ryan Taylor - FairPoint  
17 Ann Morrison - FairPoint  
18 Tim Loken - Windstream  
19 Kristen Boon - ITS Telecommunications, Inc.  
20 Stephen Athanson - TracFone/SafeLink  
21 Jorge Chamizo - TracFone/SafeLink  
22 Jennifer Lautenschleger - TDS  
23 Melissa Marks - Wide Open West (Formerly Knology)  
24 Jody Williams - Windstream Communications

14 PARTICIPATING (in person):

15 De O'Roark - Verizon  
16 Becki Edmonston - Verizon  
17 Susan Berlin - Sprint/Assurance Wireless  
18 Marsha Rule - Virgin Mobile/Assurance Wireless  
19 Greg Follensbee - AT&T  
20 Tracy Hatch - AT&T  
21 Tom McCabe - TDS  
22 David Konuch - FCTA  
23 Adam Teitzman - PSC  
24 Susan Berlin - Assurance Wireless  
25 Harvey Spears - CenturyLink  
Susan Masterton - CenturyLink  
Christie Pontis - CenturyLink  
Lisa Steffens - OPC  
Catherine Beard - PSC  
Curtis Williams - PSC  
Beth Salak - PSC  
Adam Teitzman - PSC  
Bob Casey - PSC  
Benjamin Legaspi - PSC

## P R O C E E D I N G S

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**MR. CASEY:** Well, good morning, everybody.  
I'd like to welcome you to the meeting of the Lifeline  
Work Group. We'll go ahead and take appearances in just  
a minute. Well, we can start. We can go around the  
table here, and please state your name and the company  
you'll be representing so the court reporter can get it  
down. And then after we do the ones here, we'll do the  
ones on the phone.

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

**MR. SPEARS:** Harvey Spears with CenturyLink.

**MS. PONTIS:** Christie Pontis, CenturyLink.

**MS. MASTERTON:** Susan Masterton, CenturyLink.

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

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

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

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

**MR. KONUCH:** Dave Konuch, FCTA.

**MS. BEARD:** Catherine Beard, PSC.

**MS. SALAK:** Beth Salak, PSC staff.

**MR. TEITZMAN:** Adam Teitzman with staff.

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

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

1 staff.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1           **MS. BOON:** Kristen Boon with ITS  
2 Telecommunications.

3           **MS. FENNEL:** Susan Fennell with NEFCOM.

4           **MS. THOMAS:** Rhonda Thomas with T-Mobile.

5           **MS. MORRISON:** Ann Morrison with FairPoint.

6           **MR. TAYLOR:** Ryan Taylor with FairPoint.

7           **MR. CASEY:** Anyone else on the line?

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

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

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

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

21           **SPEAKER:** Thank you.

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

24           We have four items we'd like to discuss today.  
25 The first item consists of the Florida Department of

1 Children and Families interface.

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

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

24 Eleven days after that filing, the FCC called  
25 us asking us for a conference call. And, of course, we

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

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

20 Who wants to start?

21 **MR. HATCH:** Why is everybody looking at me?

22 **MS. SALAK:** You're on a corner.

23 **MR. CASEY:** And please, please state your  
24 name.

25 **MR. HATCH:** This is Tracy Hatch with AT&T.

1           The rule says what it says, but I would direct  
2 you to the beginning of the rule. There's a statement  
3 in the very beginning of (c) where it says, "Initial  
4 program-based eligibility determination," which is under  
5 410 -- or it's 410(c). It says, "Except in states where  
6 a state Lifeline administrator or other state agency is  
7 responsible for the initial determination."

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

17           Now, granted, the way this rule is structured  
18 doesn't cover all possible scenarios, and so you end up  
19 in this hybrid gray area where what applies and what  
20 doesn't. But that "except" language, if you accept the  
21 fact that you're the administrator doing the initial  
22 determination, basically takes us out of having to use  
23 the portal. It doesn't say we can't obviously for  
24 whatever reason, but it doesn't indicate that we have to  
25 use the portal. And I'm not sure in the context of the



1 conversation with the FCC why they're thinking we should  
2 have to do the portal other than perhaps they're not  
3 looking at all possible combinations of what behaviors  
4 the ETCs are doing.

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

8 **MR. HATCH:** Yeah.

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

12 **MR. HATCH:** Right.

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

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

19 **MR. CASEY:** Okay. That's just an  
20 interpretation.

21 **MR. HATCH:** No, I understand.

22 **MR. CASEY:** Right.

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

25 **MR. HATCH:** I don't know. Well, the problem

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

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

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

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

1 using the portal or using the DCF portal, which was  
2 correct.

3 **MR. ANTHANSON:** Okay.

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

7 **MR. ANTHANSON:** That's correct.

8 **MR. CASEY:** What company wants to go next?

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

11 **MR. CASEY:** Your name and company?

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

14 **MR. SPEARS:** What company are you with?

15 **MR. McCABE:** With TDS Telecom.

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

19 **MR. McCABE:** Unaware.

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

22 **MR. McCABE:** (Nods negatively.)

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

1 with the FCC?

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

6 **MS. SALAK:** Okay.

7 **MS. MASTERTON:** This is Susan Masterton with  
8 CenturyLink.

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

12 **MS. SALAK:** Okay.

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

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

24 **MR. CASEY:** TracFone did that based on the  
25 information they had at the time. And as they said,

1 they corrected two of the states. I believe it's two of  
2 the states.

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

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

16 I can tell you that in at least one other  
17 state, as I understand it, the way this works is once  
18 you get whatever log-in information you need, you can go  
19 to the DCF website and at least check on a onesie/  
20 twosie (phonetic) basis, does this person qualify or  
21 not? I now understand that there may be more involved  
22 with the Florida DCF website. So we are still looking  
23 into that. Once we talk to them and get a better sense  
24 of what may be involved in making it a  
25 machine-to-machine connection, which I understand may be

1 required, we can get back to you on, you know, whether  
2 we can do it, will do it, can do it. But right now  
3 we're still investigating.

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

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

7 **MS. JOHNSON:** Good morning.

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

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

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

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

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

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

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

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

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

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

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

20 **MR. CASEY:** Okay.

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

23 **MS. JOHNSON:** Yes.

24 **MR. MUNISWAMI:** I am not aware of that  
25 restriction was there in place because it's a web

1 service. And as long as we give you a credential and  
2 you come with the credentials to access that web  
3 service, we don't really see where you are coming from  
4 as long as you come with the credentials. So I don't  
5 know that restriction was ever in place.

6 **MS. JOHNSON:** Okay. I do see back in April  
7 2012 they were talking to T-Mobile about an agreement.  
8 I don't remember ever seeing one signed. So if I can  
9 get her information, we can talk with her on the phone,  
10 me and Vijay and my IT staff, and we can see what we can  
11 do.

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

15 **MS. JOHNSON:** That sounds great.

16 **MR. CASEY:** And get you two together.

17 **MS. JOHNSON:** Okay. Thanks.

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

20 **MR. CASEY:** Hey, Jay.

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

25 **MR. CASEY:** Could someone from DCF answer



1 that?

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

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

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

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

1 simpler for us.

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

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

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

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

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

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

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

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

25 Okay. What other companies can give us some

1 information, some input?

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

9 **MR. CASEY:** Okay. What I'll do is send out  
10 the contact information to each of the 24 ETCs. We now  
11 have 24 ETCs in Florida. And we also have 35 waiting at  
12 the FCC. I don't know if you knew that or not. There's  
13 35 wireless ETC petitions waiting at the FCC for  
14 approval for Florida.

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

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

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

20 **MR. CASEY:** Yeah.

21 **MR. McCABE:** Tom McCabe with TDS. Just out of  
22 curiosity, I mean, is -- your conversations with the  
23 FCC, is it at any cost? I mean, you're saying that, you  
24 know, companies need to get onto this portal. You know,  
25 NEFCOM mentioned that the cost is prohibitive or it's

1 expensive to do. I mean, I know our level of Lifeline  
2 customers, I think, have, you know, really declined  
3 quite a bit since the ETC wireless guys have gotten  
4 into, into business. I mean, if we're only getting, you  
5 know, one or two of these a month, are we going to be  
6 required to go out there and spend, you know, five,  
7 ten grand for something like this? And is, and is there  
8 any alternatives out there in terms of, you know, what  
9 would we need to do to -- would we need to go to the FCC  
10 to seek a waiver of this requirement or is that --

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

14 **MR. McCABE:** Okay.

15 **MR. CASEY:** Especially for the smaller  
16 companies.

17 **MR. McCABE:** Okay. Okay.

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

20 **MR. CASEY:** Yeah. We've actually talked  
21 about, the Lifeline group here has actually talked  
22 about -- the Lifeline group at the Commission has talked  
23 about maybe creating a, some input where an ETC could  
24 log in, just like they're doing now to return  
25 applications, they could log in to our website and then

1 have access to DCF where you could put in the name,  
2 birth date, last four digits of the Social Security, and  
3 it will pop back yes or no whether they're qualified.  
4 So that's one thing that we're looking at. Of course,  
5 that's in the early stages. We'd have to get a bunch of  
6 approval here at the PSC too.

7 **MS. SALAK:** And DCF.

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

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

15 **MR. CASEY:** Right.

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

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

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

25 **MS. SALAK:** We were all, the three of us were

1 on the call. They were quite adamant. They were -- we  
2 gave cost as a reason, especially for the small  
3 companies. I mean, we gave cost as a reason. We  
4 gave -- we did just have the major discussion about,  
5 well, there are two different functions. There's the  
6 actual initial application and then there's the Web  
7 interface, and we did have that discussion.

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

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

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

15 **MR. CASEY:** We were kind of blindsided.

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

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

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

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

25 **MR. McCABE:** Your process is so far, so much

1 farther ahead than other states that I've dealt with  
2 that it's kind of surprising. I would have thought that  
3 they would have been wanting to talk to you as an  
4 example, not that you're not doing it right.

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

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

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

20 **MS. SALAK:** Because --

21 **MS. MASTERTON:** What role will you play? Do  
22 you -- I don't think you certify Lifeline; right? I  
23 mean, how do they -- what do they expect you to do to  
24 make us do it? Isn't that something that's kind of  
25 between us and the FCC? That's what I don't understand.

1           **MS. SALAK:** Well, every state program has to  
2 at a minimum follow everything that the FCC mandates.

3           **MS. MASTERTON:** Or?

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

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

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

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

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

20           **MS. MASTERTON:** Right.

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

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

25           **MS. SALAK:** And if it's a requirement in their



1 rule, then at a minimum we have to follow that rule.

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

4 **MS. MASTERTON:** Yeah. Exactly. That's what  
5 I'm saying.

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

9 Again, we are -- huh?

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

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

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

18 **MR. HATCH:** We'll have a meeting.

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

21 **MS. SALAK:** Exactly.

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

25 **MR. CASEY:** Right.

1           **MR. O'ROARK:** Do you guys have any sense of  
2 how long that would take, when that might happen?

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

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

10          **MR. LEGASPI:** A few days.

11          **MS. SALAK:** A few days.

12          **MR. CASEY:** A few days.

13          **MS. MASTERTON:** Oh, really?

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

16          **MR. CASEY:** We, we have --

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

20          **MR. CASEY:** Right. They have set it up for us  
21 where we could actually go in because sometimes we'll  
22 get complaints and things like that that say, "I'm on  
23 food stamps and they denied me." Well, I can right  
24 there put in their name, the last four digits, and it'll  
25 instantly pop back yes or no. So they have set it up

1 for us. And, of course, Benjie is here with our IT  
2 folks. He's the one that set it up.

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

5 **MS. SALAK:** J.D.?

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

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

10 **MS. SALAK:** Exactly.

11 **MR. CASEY:** Right. Right.

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

14 **MR. CASEY:** Okay.

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

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

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

25 **MR. CASEY:** Well, you know, like Tom said, if

1 you're only getting a couple a month, you know,  
2 something like that.

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

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

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

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

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

1           **MS. SALAK:** Uh-huh.

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

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

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

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

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

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

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

25                 And as you know, USTA has gotten a waiver for

1 the state of Florida and some other states since this  
2 rule went into effect -- I believe it was June 1st of  
3 last year. And there's -- the temporary waiver is in  
4 effect right now until February 1st. So we're good  
5 until February 1st.

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

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

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

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

25 **MS. MASTERTON:** Okay. I mean, I don't know.

1           **MS. SALAK:** Did they, did they put the -- the  
2 temporary ones they didn't put out for comment, did  
3 they?

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

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

20           **MS. SALAK:** Uh-huh.

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

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

25           **MR. CASEY:** Yeah. It was kind of fun because

1 they said, "Well, some of the companies have been  
2 complaining that they're not going -- they don't get the  
3 information necessary for the national duplications  
4 database." I says, "That's what you want to talk  
5 about?" And they said, "Yeah." I says, "Well, you need  
6 to reference our May 29th filing, our permanent waiver  
7 petition, because all the information that's necessary  
8 for the national duplications database is in those."  
9 "Oh," they said, "Oh, I guess we don't need to talk to  
10 you then." I said, "Yeah." I said, "Well, if you want  
11 to talk, just call us."

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

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

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

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

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

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



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

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

7           **MR. FOLLENSBEE:** Well, I just saw it late  
8 yesterday, so. I think we got it like at about midnight  
9 last night.

10          **MS. MASTERTON:** Yeah. Okay. Thanks.

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

13          **MR. FOLLENSBEE:** Well, I'm sorry.

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

16          **MR. FOLLENSBEE:** I wasn't either.

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

18          **MR. SPEARS:** This morning.

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

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

23                 Yes.

24          **MR. FOLLENSBEE:** I guess I've got a question.  
25 As a contingency, have you discussed with DCF that they

1 may need to put a budget request in that could be  
2 quickly thrown out for 2014/15 just in case the FCC does  
3 something squirrely?

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

6 **MR. FOLLENSBEE:** Okay.

7 **MS. SALAK:** We've been very optimistic.

8 **MR. FOLLENSBEE:** I know you have been.

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

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

14 **MR. FOLLENSBEE:** No. But who knows with the  
15 FCC.

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

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

22 **MR. HATCH:** Yeah.

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

25 **MR. FOLLENSBEE:** We don't know what taken care

1 of means. You just say they're going to address it in  
2 January.

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

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

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

10 **MR. HATCH:** Agency budgets have already gone  
11 in.

12 **MS. EDMONSTON:** I thought so.

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

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

18 **MR. HATCH:** I believe it.

19 **MR. FOLLENSBEE:** I believe it would be too.

20 **MR. CASEY:** Change the system, yeah.

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

23 **MR. HATCH:** As well you should not.

24 **MR. CASEY:** Because we've had conference calls  
25 all along with the FCC about our systems and everything,

1 and they just finally says, "Well, just file a permanent  
2 waiver. File for a permanent waiver." I said, "Okay."  
3 And that's what we did by November 1st.

4 Any other comments or questions on number two?

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

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

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

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

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

24 **MS. BERLIN:** Assurance Wireless is in the  
25 middle of it now, and it was done by a mailed form which

1 could be mailed back or faxed, by phone, and via the  
2 website. So basically anybody who needs to be  
3 recertified in this area has multiple ways to get  
4 recertified.

5 **MR. CASEY:** Has different options. Okay.

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

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

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

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

24 **MR. FOLLENSBEE:** They did have the ability  
25 because we used them for AT&T Mobility across all of our

1 entities in the states and Puerto Rico. So they were  
2 able to do it.

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

4 **MR. FOLLENSBEE:** Yes.

5 **MR. CASEY:** Okay.

6 **MR. BRADBURY:** This is Jay --

7 **MR. CASEY:** Go ahead, Jay.

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

11 **MR. CASEY:** That makes it easy.

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

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

16 **MR. BRADBURY:** It was, yes.

17 **MR. CASEY:** Okay. Tom?

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

22 **MR. CASEY:** Thank you.

23 How about Tom?

24 **MR. McCABE:** TDS Telecom completed theirs on  
25 November 1st. We did via letter.

1           **MR. CASEY:** Via letter?

2           **MR. McCABE:** Yes.

3           **MR. CASEY:** Okay.

4           **MS. SALAK:** Going to use USAC?

5           **MR. McCABE:** We're not sure. It may be an  
6 option in the future.

7           **MS. SALAK:** Would anyone like to share what  
8 their results were? Were they the same as last year?

9           **MR. FOLLENSBEE:** Do not know. Sorry.

10          **MR. HATCH:** Our expert had another engagement.

11          **MR. CASEY:** As you know, we lost a third of  
12 our Lifeline customers last year because of  
13 recertification; 348,000 for Florida.

14          **MR. FOLLENSBEE:** But if we filed our November  
15 report, it would have, all these figures would have been  
16 in that. Which we do every month, don't we?

17          **MS. SALAK:** You do it quarterly.

18          **MR. FOLLENSBEE:** Quarterly? Okay. Well, when  
19 you get the January report for the fourth quarter, that  
20 will tell you.

21          **MR. CASEY:** But we can go around that by  
22 seeing what you file at USAC and what's reimbursed.

23          **MR. FOLLENSBEE:** That is true.

24          **MR. CASEY:** And then just divide it by 9.5.  
25 That's what we usually do to get a rough idea of how

1 many customers you have.

2 What other companies can give us some  
3 information?

4 **MS. FENNELL:** This is Susan with NEFCOM. We  
5 did ours by mail and then we did a few follow-up phone  
6 calls. We have completed our recertification as of  
7 November. Last year we actually lost about  
8 200 customers when we did the recertification.

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

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

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

15 Any other companies?

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

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

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

25 **MS. WILLIAMS:** We started out with a little



1 over 5,000.

2 **MR. CASEY:** And what method did you use for  
3 recertification?

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

6 **MR. McCABE:** Bob?

7 **MR. CASEY:** Yeah.

8 **MR. McCABE:** Out of approximately 600 --

9 **MR. SPEARS:** What's your name?

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

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

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

15 **MR. CASEY:** Go ahead.

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

21 **MR. CASEY:** Very good.

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

1 about next year.

2 **MR. CASEY:** Okay. Any other companies?

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

5 **MR. CASEY:** Okay.

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

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

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

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

24 How about some other companies? Any other  
25 ETCs out there that can help us out?

1           Okay. Any other comments here? Questions?

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

7           **MR. SPEARS:** Transfer them directly to you.

8           **MR. CASEY:** Besides having us do it.

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

17           **MR. CASEY:** And this is --

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

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

23           **MR. FOLLENSBEE:** Well, yeah, that and the fact  
24 that you could streamline it by just having the money  
25 sent to us without having to send a form in to request

1 being reimbursed. So there's several things that AT&T  
2 has suggested that would streamline and modernize how  
3 the whole process should work. So I'll be glad to get a  
4 copy of those comments for you.

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

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

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

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

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

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

25 **MR. CASEY:** Thank you for the clarification.

1           **MR. BRADBURY:** You're welcome, sir.

2           **MR. HATCH:** Just like old times.

3           **MR. FOLLENSBEE:** Just like old times, Jay.

4           Thanks.

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

8           **MR. BRADBURY:** I think that's correct.

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

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

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

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

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

21          **MR. TEITZMAN:** Yeah. That's fine.

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

1 the comments?

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

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

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

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

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

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

13 **MR. CASEY:** Okay.

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

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

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

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

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

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

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

23 **MR. CASEY:** Yeah.

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

1           **MR. CASEY:** Uh-huh.

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

4           **MR. McCABE:** Yeah.

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

7           **MR. FOLLENSBEE:** January 15th would be great.

8           **MS. MASTERTON:** Exactly.

9           **MR. FOLLENSBEE:** Unless that's a weekend.

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

11          **MS. SALAK:** Is it a weekend?

12          **MR. CASEY:** January 15th is a Wednesday.

13          **MR. BRADBURY:** It's a Wednesday.

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

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

17          **MR. FOLLENSBEE:** January 15th.

18          **MR. CASEY:** January 15th.

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

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

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

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

1           **MR. BRADBURY:** Thank you.

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

5           Any other questions or comments on the Florida  
6 Lifeline program?

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

10          **MS. MASTERTON:** Thank you for having us.

11          **MR. CASEY:** Thank you.

12          (Proceeding concluded at 10:53 a.m.)

13

14

15

16

17

18

19

20

21

22

23

24

25



1 STATE OF FLORIDA )  
2 COUNTY OF LEON ) : CERTIFICATE OF REPORTER

3  
4 I, LINDA BOLES, CRR, RPR, Official Commission  
5 Reporter, do hereby certify that the foregoing  
6 proceeding was heard at the time and place herein  
7 stated.

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

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

18 DATED THIS 13<sup>th</sup> day of December  
19 2013.

20  
21 Linda Boles  
22 LINDA BOLES, CRR, RPR  
23 FPSC Official Commission Reporters  
24 (850) 413-6734  
25

**Florida Lifeline Work Group Meeting**  
**December 5, 2013**  
**Agenda**

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

1. The Florida Department of Children and Families Web Services Interface which verifies participation in the Medicaid, Temporary Assistance for Needy Families, and Supplemental Nutrition Assistance Programs. 47 C.F.R. §54.410(c)(1)(i)(A) states:
  - a. If the eligible telecommunications carrier can determine a prospective subscriber's program-based eligibility for Lifeline by accessing one or more databases containing information regarding enrollment in qualifying assistance programs ("eligibility databases"), the eligible telecommunications carrier must access such eligibility databases to determine whether the prospective subscriber qualifies for Lifeline based on participation in a qualifying assistance program;

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

2. The status of the FCC Temporary Waiver for Florida of FCC Rules 47 C.F.R. §54.407(d), 47 C.F.R. §54.410(b)(2)(ii), 47 C.F.R. §54.410(c)(2)(ii), and 47 C.F.R. §54.410(e) which require state agencies that make the initial determination of a subscriber's eligibility for Lifeline to provide each ETC with a hard-copy of each of the Lifeline certification forms.
3. How each Florida ETC will perform the required 2013 Lifeline customer recertifications. Will the recertifications be accomplished in person, in writing, by phone, by text message, by email, or otherwise through the Internet? Did your ETC elect to have USAC conduct the 2013 annual recertification of your Lifeline customers?
4. Any other ideas to streamline the Lifeline enrollment process for both the applicant and ETC?

**Parties/Staff** **Handout**  
**event date** 12/5/13  
**Docket No.** 130000-07

September 13, 2013

**VIA ELECTRONIC FILING**

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

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

Dear Ms. Dortch:

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

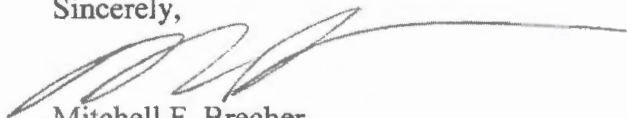
During the meeting, we discussed several matters regarding the federal Lifeline program supported by the Universal Service Fund ("USF"). Specifically, we briefed the attendees on the status of TracFone's efforts to obtain access to Lifeline program-based eligibility databases in various states. As part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

We also discussed certain aspects of the plans for implementing the National Lifeline Accountability Database (NLAD) by the Universal Service Administrative Company (USAC). One problem we discussed involves the requirement that ETCs provide a telephone number to the database at the time of enrollment. This requirement presents difficulties for TracFone and, presumably, other ETCs. As a mobile virtual network operator, TracFone does not have available an inventory of North American Numbering Plan telephone numbers to assign to customers. Rather, when it activates a customer, it requests that the underlying carrier on whose network the customer is to be served assign a telephone number. This method has worked well and has prevented fraudulent use of assigned numbers. Moreover, assigning a telephone number and loading the number into the NLAD database at the time of enrollment but prior to activation

will do nothing to prevent waste, fraud and abuse of USF resources. We informed the staff that TracFone is working with USAC to attempt to find a workable resolution to this problem such as use of a single "dummy" number at the time of enrollment but that further involvement by the Commission may become necessary to rectify this problem. That dummy number would be replaced with a permanent telephone number once it was assigned. That permanent number would then be loaded into the NLAD.

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

Sincerely,



Mitchell F. Brecher  
*Counsel for TracFone Wireless, Inc.*

Cc: Ms. Radhika Karmarker  
Mr. Jonathan Lechter  
Mr. Christopher Cook

Attachments



## State Database Fact Sheet

### Costs

#	State	<u>Actively working since</u> 8/2012	<u>Launch Date</u>	<u>Days since initial approach/launch</u>	<u>Development Cost</u>	<u>Login / User ID Cost</u>	<u>Maintenance Fee (Annual)</u>	<u>Programs Validated</u>
1	AR	8/8/2012	8/14/2013	371	\$3,400.00	\$95 per requested user ID	\$1,000.00	Medicaid, SNAP and TANF
2	FL		4/30/10		\$0	\$0	\$0	Medicaid, SNAP and TANF
3	IL	8/8/2012	5/15/2013	280	\$0	\$0	\$1,200	Medicaid, SNAP and TANF
4	MD		3/2/10		\$0	\$0	\$0	Medicaid, SNAP, TANF, Electrical Univ Svc, MD Energy Assis (EAP), Public Assis to Adults (PAA)
5	MI	7/1/2012	11/6/2012	128	\$20,000.00	\$0	1st yr \$4,000 + 5% annual increase	SNAP, TANF / Family Independence Program (FIP)
6	NY	8/8/2012	1/16/2013	161	\$0	\$0	\$0	Medicaid, SNAP, TANF, LIHEAP, SSI, Safety Net Assistance
7	OR	8/1/2012	1/21/2013	173	\$0	\$0	\$0	Medicaid, SNAP, TANF, SSI
8	SC	8/8/2012	11/6/2012	90	\$0	\$0	\$0	SNAP, TANF / Family Independence Program (FIP)
9	TX		8/14/2012		\$0	\$0	\$0	Medicaid, CHIP (Children's Medicaid), SNAP
10	WA		11/23/10		\$0	\$0	\$0	Medicaid, SNAP, TANF, SSI, State Fam Assis (SFA), Refugee Assistance, DSHS Chore Service, Disability Lifeline, Community Options Prog Entry System (COPES)
11	WI		3/17/2011		\$0	\$500 per requested user ID	\$0	Medicaid, SNAP, TANF, SSI, Badger Care, LIHEAP, WisconsinWorks (W2)
12	TN	8/8/2012	10/15/2013	433				Medicaid, SNAP, TANF, SSI, LIHEAP
13	NC	8/8/2012			Estimated Cost \$57,655			Medicaid, SNAP, TANF, LIHEAP and Crisis Intervention Prog (CIP)

**Notes:**

Working with add'l 18 states AL, AZ, CT, DC, DE, GA, KY, LA, MA, ME, MS, NH, NV, OH, PA, TN, UT, VA - Avg time 380 days

Active DB Count	State	Wireless	Home	Total ETC's	ETC's utilizing database	% of ETC's utilizing State databases to verify eligibility
1	Michigan	14	38	52	1	98%
2	Illinois	9	48	57	12	79%
3	New York	8	39	47	2	96%
4	South Carolina	13	33	46	1	98%
5	Oregon	7	32	39	7	82%
6	Florida	4	21	25	3	88%
7	Maryland*	20	4	24	1	96%
8	Wisconsin	22	74	96	35	64%
9	Washington	11	21	32	6	81%
10	Texas	21	68	89	11	88%
11	Arkansas	17	27	44	1	98%
		<b>146</b>	<b>405</b>	<b>551</b>	<b>80</b>	<b>-85%</b>

\*State has not responded

FI - (TracFone, Assurance and I-Wireless)