

CHICAGO

2017

National Lifeline Association

LIFELINE
WORKSHOP



LifeLine: California Update

Joshua T. Guyan
Partner





Update on LifeLine in California



- CPUC Motion for Extension of Time Eligibility
- Port Freezes and Address Exception
- Activation/Connection Charge Reimbursements
- Annual Recertification
- Online Enrollment

CPUC Motion for Extension of Time on Eligibility



CPUC Motion

- Requests extension until December 31, 2018 to comply with FCC rules on Lifeline eligibility
- Unforseen circumstances and staffing constraints
- Hiring new Administrator; contract expires April 2018
- Complied with previous Waiver Order by incorporating the port freeze on time

California LifeLine Coalition Letter

• Supports extension, conditioned on implementing the 12-month broadband port freeze and exceptions process consistent with USAC guidance



Port Freezes and Address Exception



January Decision

- Implemented 60-day port freeze (but not 12-month)
- No evidence required to demonstrate consumers meet one of the exceptions to the port freeze
- Consumers do not have to affirmatively state or confirm changing residential address
- Administrator will confirm address provided is different than one on file

California LifeLine Coalition Petition for Modification (Mar. 7, 2017)

- CPUC decision is inconsistent with requirements of 2016 Lifeline Modernization Order and California opt-out of the NLAD
- USAC requires documentation of new address (R codes)



Activation/Connection Charge Reimbursements (\$39)



- 2 per year per subscriber
- Limited to two situations
 - (1) New to LifeLine program
 - (2) Benefit transfer from one provider, wireline or wireless, to a wireless LifeLine provider
- Not available for re-enrollments or benefit transfers after 30 days from de-enrollment
- California LifeLine Coalition raised issue of reimbursements for program re-enrollments with the same or different provider in comments and June 30, 2017 Petition for Modification



Annual Recertification



- Benefit transfers do not count as recertification
 - Administrator conducts expensive outreach to recertify 100% of all subscribers every year
 - Added online recertification and IVR option
 - 32% success rate
- Improve coordination efforts between Administrator and service providers for outreach
- Recommendations for improvement that would increase success rate from 32% to 86% at potential annual savings of \$2.69M



Online Enrollment





 Outside of California, ETCs can enroll with initials or check marks for certifications and signature pursuant to the Federal E-SIGN Act

- California E-SIGN
 - Public entities not required to accept
 - Have to get approval from CPUC and Administrator

Questions?





Joshua T. Guyan
PARTNER
Kelley Drye & Warren LLP

Communications

Phone: **(202) 342-8566**

E-mail: jguyan@kelleydrye.com

