

Lifeline Program

Lifeline Program Update

Wednesday, July 27, 2016

Housekeeping

- Audio is available through your computer's speakers
- The audience will remain on mute
- Enter questions at any time using the "Questions" box
 - There is a large audience signed in today. We will accept as many questions as possible!
- If your audio or slides freeze, refresh the webinar

About the Lifeline Program Webinar

- Discusses general issues with the Lifeline Program, including:
 - Impacts and implementation considerations of the Modernization Order
 - National Lifeline Accountability Database (NLAD)
- To register for each session, please visit www.usac.org/li and click on “Trainings & Outreach” then “Lifeline Program Update Webinars”
- Submit suggested agenda items by noon EDT a week before the webinar to LifelineProgram@usac.org

Today's Agenda:

- NLAD Subscriber Snapshot Report
- Port Freeze Exceptions
- Lessons Learned From Common Audit Findings

Lifeline Program Update

NLAD Subscriber Snapshot Report

Reminder!

The **Snapshot Date** requirement takes effect on **September 1, 2016** with the **August 2016** data month!

Summary and Detail Subscriber Snapshot Report

- Generated at 6:00 AM ET on the 1st day of the month
- Available to download after 7:00 AM ET on the same day
- Summary Subscriber Snapshot report
 - Total count of active Tribal and Non-Tribal subscribers per selected SAC(s)
- Detail Subscriber Snapshot report
 - Listing of all active subscribers' records per selected SAC(s)
- Will be accessible in NLAD for a period up to 24 months



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SUBSCRIBER MANAGEMENT

- Enroll Subscriber
- Update Subscriber
- Transfer Lifeline Benefit
- De-Enroll Subscriber
- Submit Resolution Request
- Upload Subscriber File
- Lookup Subscriber

ACCOUNT MANAGEMENT

- ETC Administrator Home Page
- Manage NLAD Subaccounts
- Create NLAD Subaccount
- Create ETC API Account
- Manage Email Recipients
- Change Password

REPORTS AND TOOLS

- Reports
- User Guide
- API Specification
- Field Descriptions
- NLAD Access Agreement
- Training Videos

SUMMARY AND DETAIL SUBSCRIBER SNAPSHOT REPORT

[Instructions](#)

Select Filters

Select SAC(s)

Select SAC(s) ▼

Select FCC Form 497 Data Month / Year

Select Month and Year ▼

Note: Snapshot of the subscribers is taken on the 1st day of each month at 6 am ET. The snapshot data will be available for download after 7 am ET on same day. The snapshot data will be available for download up to 24 months. Example, selected data month of August (08/2016) reflects subscriber(s) as of September 01.

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REPORTS AND TOOLS

- Reports
- User Guide
- API Specification
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- NLAD Access Agreement
- Training Videos

Submit

Download Subscriber Snapshot Report(s)

FCC 497 Form Data Month/Year

06/2016

[Download Summary Report](#)

Summary Subscriber Snapshot Report				
SAC	No. of Non Tribal Subscribers	No. of Tribal Subscribers	Total No. of Subscribers	Download Detail Subscriber Snapshot Report
██████	196	0	196	Download Detail Report
██████	10	1	11	Download Detail Report
██████	0	0	0	Download Detail Report

Detail Subscriber Snapshot Report

- Snapshot Period
- Enrollment Date
- Enrollment Code
- ETC General
- Use Study Area Code (SAC)
- Last Name
- First Name
- Middle Name
- Telephone Number
- Street Address
- City
- State
- ZIP
- Independent Economic Household Flag
- Service Initiation Date
- Service Reverification Date
- Eligibility Program
- Link Up Date of Service
- Permanent Address Flag
- Non-Deliverable Rural Address Flag
- Tribal Address Flag
- Lifeline Tribal Benefit Flag
- BQP Last Name
- BQP First Name
- BQP Middle Name
- Mailing Street Address, City, State, ZIP

Lifeline Program Update

Port Freeze Exceptions

Voice

60 day port freeze for voice

Data

12 month port freeze for broadband

Bundle

Port freeze will be based off of the supported service type (voice or broadband)

Effective the later of December 1, 2016 or 60 days after PRA approval

Exceptions to Port Freeze Rules:

1

Subscriber moves their residential address

2

The provider ceases operations or otherwise fails to provide service

3

Provider has imposed late fees for non-payment greater than or equal to the monthly end-user charge for the supported service

4

Provider is found to be in violation of the Commission's rules during the 12 month period and the subscriber is impacted by such violation

Exception Processes Under Consideration

1. Use current exception management ticketing process in NLAD to transfer or enroll a subscriber within their benefit port freeze window.
 - Example:
 - **“R code” - Residential Address Change Code**, exception request to NLAD after review of document(s) to confirm the subscriber has moved their residential address.

Reminders for Exceptions Process:

§54.404 The National Lifeline Accountability Database:

(b)(11) All eligible telecommunications carriers must securely retain subscriber documentation that the ETC reviewed to verify subscriber eligibility, for the purposes of production during audits or investigations or to the extent required by NLAD processes, which require, *inter alia*, verification of eligibility, identity, **address**, and age.

Reminders for Exceptions Process:

- Maintaining proper documentation supports USAC audits and strengthens controls for the benefit port freeze exception process. It is USAC's intention to audit this process as to maintain the integrity and proper functioning of the benefit port freeze process.
- Recommended documents to support verification of residential address are provided on our website:
<http://www.usac.org/li/tools/nlad/dispute-resolution/address-resolution.aspx>

Lifeline Program Update

Lessons Learned From Common Audit Findings

Finding: Improper Recertification Process - Recertification Requests

- ❖ Many service providers do not specify on the recertification requests that the subscriber must respond within 30 days of the date of the request.

Helpful Hint(s):

- ❖ Services providers should notify subscribers in writing, using clear, easily understood language, that failure to respond to the recertification request within 30 days of the date of the request will trigger de-enrollment from the Lifeline Program. Rules governing this process can be found at 47 C.F.R. § 54.405(e)(4).

Modernization Order Changes:

- ❖ On December 1st, 2016 or 60 Days after PRA approval, whichever is later, service providers must provide subscribers 60 days to respond to the recertification efforts.

Finding: Inaccurate Form 555 Reporting

- ❖ Many service providers do not have an adequate system in place for collecting, reporting, and monitoring data to report the correct number of subscribers on the Form 555. Most errors occur when carriers report its subscribers de-enrolled for non-usage.

Helpful Hint(s):

- ❖ Service providers should implement sufficient processes to collect and retain adequate records to document the collection of all subscriber information, including de-enrollment dates.
- ❖ De-enrollments due to non-usage should be recorded on the FCC Form 555, even if the subscriber was re-enrolled in subsequent months.

Finding: Improper Certification Documentation Disclosures

- ❖ Many service providers omit required disclosures on the subscriber certification documentation. The most commonly omitted disclosure is the "**under penalty of perjury**" disclosure.

Helpful Hint(s):

- ❖ Service providers must list ALL of the required disclosures on the subscriber certification documentation. If one of the disclosures is omitted, the subscriber did not complete the required certifications. Rules governing this process can be found at 47 C.F.R. §§ 54.410(d) & 54.410(f)(2)(iii)

Modernization Order Changes:

- ❖ The Order allows USAC to work with the FCC to standardize certification and recertification forms that carriers must use to enroll its subscribers. This will eliminate similar findings from occurring in the future. In the interim, service providers must ensure their forms meet the requirements of the Rules.

Finding: **Inadequate Advertising Method**

- ❖ Many service providers' advertising efforts are not sufficient and do not publicize the availability of the Lifeline Program in a manner designed to reach those likely to qualify for the service within its entire designated service area.

Helpful Hint(s):

- ❖ If the service provider has concerns about the ability to map subscribers, they should contact their state public utility or service commission to discuss clarification of their ETC-designated service area. Rules governing this process can be found at 47 C.F.R. § 54.405(b)
- ❖ Also, see Section E of the [2004 Lifeline Order](#) for FCC outreach guidelines.

Questions?

Please enter your questions using the
“Questions” box

Thank You!

- Thank you for joining us at today's webinar
 - Submit agenda items for next month's webinar to LifelineProgram@usac.org
- Sign up for the Lifeline Program emails for updates and upcoming events
 - Go to www.usac.org and click “subscribe” in the upper-right corner
- For questions about NLAD, email NLADsupport@usac.org or call (877) 524-1325