

California LifeLine Working Group Conference Call Notes

July 25, 2012



REMINDER: When passively participating on the conference call, kindly **do** press the “MUTE” option. Please **do not** simply press the “HOLD” button. Thank you for your cooperation.

Agenda Item	Discussion	Action Items/Pending Issues
Team Member Name Change	Anna has changed her last name from Lee to Jew.	Anna Jew is one of the team members working on service provider claims. Her e-mail address remains as aml@cpuc.ca.gov .
Order Instituting Rulemakings	R.11-03-013: No update R.09-06-019: The Proposed Decision on Basic Service Elements is on the Commission’s agenda for August 2, 2012. However, it will most likely be held given the publication of the Alternate Decision.	Alternate Decision on Basic Service Elements: http://docs.cpuc.ca.gov/EFILE/ALT/170937.PDF

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Xerox Transition Project	<p>At yesterday's carrier call, Xerox updated the number of global issues.</p> <p>Xerox is still working on the ability of Web-based carriers to see the decisions, and hopes to push the change tonight.</p> <p>Xerox did push the changes last night to resolve the problem of a Web-based carrier not seeing the correct information on a consumer after clicking on the consumer.</p>	<p>Each service provider should take a look at the updated global issues and tell Bill Allen of Xerox if they missed anything.</p> <p>This coming weekend, Xerox will target fixing the global issues related to 1) status code 20 reconnects 2) zip+4 issue and 3) 40030 error for blank rate group on disconnects and removals.</p> <p>If a service provider deems there is a problem with not making the rate group field required for disconnects and removals, please inform Bill Allen of Xerox by July 27, 2012.</p> <p>Xerox will provide the third version of the Weighted Average Count Report on July 27, 2012.</p> <p>Xerox will inform service providers if the fix to the Web-based carriers' ability to see the decisions did not get resolved.</p> <p>On February 22, 2012, Edy Tardeo of AT&T requested for Communications Division to issue an administrative letter.</p>

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FCC 12-11	<p>Communications Division staff verbally asked FCC staff four questions during a states' workshop call. The first question dealt with when a new application form needed to be sent. We gave three specific scenarios: 1) when a current participant switch service providers, 2) when a current participant's phone service gets disconnected then subsequently reconnects, and 3) when a current participant on the regular discount chooses to apply for Enhanced Lifeline. FCC staff indicated that as a precaution, a new application form should be sent. However, if a state had a database of the required information, then the state may opt to not send a new application form and just continue the participant's eligibility subject to de-enrollment rules.</p> <p>The second question ascertained whether the FCC would be amenable for states to make available electronic copies of the forms versus paper copies to the service providers. In response, the FCC staff positively affirmed the possibility of electronic copies instead of paper copies.</p> <p>The third question was regarding how to evaluate an application if an applicant failed to certify her/his eligibility for the Enhanced Lifeline and Link-Up Program, i.e. can the applicant be approved for the smaller Lifeline discount if the applicant filled out the rest of the application correctly.</p>	<p>With regards to each of the responses the FCC staff provided during the states' workshop call, Communications Division staff intends to consult with our Legal Division staff, and to seek written confirmation from and/or reach an understanding with the FCC.</p> <p>On July 11, 2012, Communications Division stated we will make available a draft template of the California LifeLine annual notice by July 31, 2012.</p> <p>On March 21, 2012, Communications Division staff indicated they will draft a template for scripts to share.</p> <p>On March 21, 2012, Communications Division staff stated they will inform the Working Group as to any further guidance it may have.</p>

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FCC 12-11 (continued)	<p>The FCC staff indicated that it is possible to approve an applicant for the smaller Lifeline discount in the case he/she failed to certify to receive the Enhanced Lifeline and Link-Up discounts.</p> <p>The fourth question tried to find out whether the FCC had an expectation for states to fund any portion of the Enhanced Lifeline and Link-Up Program. The FCC staff confirmed there was no such expectation and the states can elect to subsidize the Enhanced Lifeline and Link-Up Program.</p> <p>At this point in time, we are not making any changes to the California LifeLine Program’s enrollment processes as a result of FCC staff’s responses. Communications Division staff will await further guidance from our Legal Division staff prior to revising the enrollment processes.</p> <p>However, based on the FCC staff’s response to Communications Division staff’s fourth question and the California LifeLine Program’s rules regarding claims, it is in the best interest for the program and California ratepayers to evaluate the extent to which service providers unduly claimed for funding from the state for the Enhanced Lifeline and Link-Up discounts and to seek refunds from the relevant service providers.</p>	<p>Service providers that offer Enhanced Lifeline and Link-Up discounts and have submitted claims within the past two years to the California LifeLine Program for these discounts will need to review their past claims and determine whether they failed to take the full subsidy amount from the federal government prior to claiming from the California LifeLine Fund. Service providers will need to demonstrate that they do not need to refund the state within 30 days. Additionally, as necessary, service providers will need to re-file their tariffs.</p> <p>Communications Division staff will research and share the applicable California rules and procedures.</p> <p>Patrick Rosvall requested for Communications Division staff to issue an administrative letter instructing service providers to review their past claims and to submit estimates of possible refunds to the California LifeLine Fund and any associated working papers. Communications Division staff will issue an administrative letter.</p>

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FCC 12-11 (continued)	<p>California requires service providers to claim the maximum allowable funding from the federal government prior to seeking funding from the state. Communications Division staff is concerned that perhaps service providers received funds from the state that should have come from the federal government instead.</p> <p>There is no timeline for revising the application form. However, renewal forms will need to be developed by the end of October 2012, which may be a logical window to make changes to the application form.</p> <p>Currently, applicants that do not provide either their Tribal ID or the last four digits of their SSN do not get denied.</p>	<p>Edy Tardeo of AT&T requested an extension of time to 60 days instead of 30 days for service providers to submit their estimates, if any, of possible refunds to the California LifeLine Fund resulting from a review of past claims involving Enhanced Lifeline and Link-Up discounts. Communications Division staff will consider this request of additional time.</p> <p>For those service providers interested in guidance about whether to submit their annual ETC certification, please contact Charles Christiansen directly.</p>
Brainstorming Session on Enhanced Lifeline form processing	<p>Enhanced Lifeline applicants that do not complete the Enhanced Lifeline certification step, but correctly fills out the rest of the application form will get denied for both California LifeLine and Enhanced Lifeline discounts. At the moment, the applicant's only recourse is to reapply.</p>	

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<p>Brainstorming Session on Enhanced Lifeline form processing (continued)</p>	<p>AT&T sought clarification about a note from Xerox regarding the correctable denial process in which an applicant that did not submit a form will get another chance to apply because Xerox will send a second form and give the applicant additional time. AT&T asked if this was part of a June 1, 2012 process change. AT&T stated that the old process did not provide a second form if an applicant did not previously submit a form.</p> <p>The expanded return feed contains approvals, denials, and status codes. However, the regular feed only contains approvals and denials.</p> <p>Communications Division staff encourages all service providers to choose to receive the expanded return feed option. Only the service providers that choose the expanded return feed option will get notified if a form was undeliverable. Then a service provider can send an updated address to Xerox after which a second form will be sent to the applicant.</p> <p>AT&T sought clarification because its customer service representatives are informing consumers that they will be denied, and not get a second chance to fill out a form. AT&T is concerned they are informing consumers incorrectly since they did not know of this process change. AT&T claimed there was a lack of proper notification of this process change.</p>	<p>Communications Division staff will research the process of providing a second form and additional time to applicants that did not submit their first form.</p>

Administrator Statistics – click on the link below:

http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/FormNotices_Public+Program.htm

Consumer Affairs Branch Statistics – click on the link below:

<http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/CAB+LifeLine+Statistics+Reports.htm>

Working Group Conference Call Notes – click on the link below:

<http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/LifeLine+Meeting+Minutes.htm>

Working Group Conference Call Agendas – click on the link below:

<http://www.cpuc.ca.gov/PUC/Telco/Information+for+providing+service/LifeLine+Meeting++Agendas.htm>

Upcoming Conference Call: August 1, 2012 10:00 – 11:00 a.m. PST