

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the Department on its Own)	
Motion into the Lifeline and Link-Up)	
Programs for Massachusetts Telephone)	D.T.C. 10-3
Customers.)	

COMMENTS OF TRACFONE WIRELESS, INC.

TracFone Wireless, Inc. ("TracFone") provides comments in response to the Request for Comment & Notice of Public Hearing ("Request for Comment") issued by the Department on September 17, 2010. In the Request for Comment, the Department asked for "comment on possible changes to the existing [Lifeline and Link-Up] programs to make them more effective and efficient and thereby increase subscribership while ensuring the integrity of the programs."¹ The Department specifically asked for comment on: (1) certification and verification procedures to ensure subscriber eligibility; (2) subscriber eligibility criteria; (3) services to which Lifeline subscribers may subscribe; and (4) outreach requirements.

TracFone, a leading provider of prepaid wireless service, has substantial experience meeting the needs of low-income individuals through its low-cost wireless plans and its provision of Lifeline service in numerous states. To date, TracFone has been designated as an Eligible Telecommunications Carrier ("ETC") in 33 states for the

¹ Request for Comment, at 1.

purpose of providing Lifeline service to qualified low-income households.² TracFone's SafeLink Wireless® Lifeline service is now available in 31 of those jurisdictions, including Massachusetts. TracFone has offered its SafeLink Wireless® Lifeline service to low-income customers in Massachusetts since December 2008. As a result, TracFone has significant experience providing Lifeline service and complying with federal and state laws governing Lifeline enrollment eligibility certification and verification. Indeed, the Department recently conducted an audit of TracFone's Lifeline eligibility verification procedures and found that "TracFone complied with the eligibility verification requirements currently in place, by surveying a random, statistically-valid sample of its customers, consistent with the FCC's annual audit requirement."³

TracFone understands and appreciates the challenges facing states and ETCs as they try to ensure that low-income consumers are aware of and have access to discounted telecommunications services while ensuring that only qualified low-income households are allowed to receive Lifeline benefits. TracFone believes that any modifications to the Department's current Lifeline requirements should minimize compliance burdens and costs while facilitating increased participation in the Lifeline program and preserving the integrity of the Lifeline program. Furthermore, rules governing certification and verification of Lifeline enrollment eligibility should be applied in a competitively neutral manner. The rules should not differ among ETCs based on technology (e.g., wireline vs.

² As a Lifeline provider, TracFone's comments are limited to the Lifeline portion of the universal service low-income programs because TracFone is not permitted to obtain Link-Up support. See Petition of TracFone Wireless, Inc. for Forbearance from 47 USC § 214(e)(1)(A) and 47 CFR § 54.201(i), 20 FCC Rcd 15095 (2005) (scope of the Federal Communications Commission's exercise of forbearance regarding the facilities requirement for ETCs with respect to TracFone is limited to Lifeline).

³ TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers, D.T.C. 09-9, Order at 13 (June 30, 2010).

wireless) or based on service offerings (e.g., discounted rates on billed wireline services vs. bundles of free wireless Lifeline services).

TracFone also notes that the Federal Communications Commission (“FCC”) has asked the Federal-State Joint Board on Universal Service (“Joint Board”) to recommend changes to the FCC’s rules governing Lifeline and Link Up eligibility, certification, verification, and outreach.⁴ The Joint Board has asked for comment on the questions presented in the Referral Order and interested parties have filed comments and reply comments. In accordance with the Referral Order, the Joint Board is expected to submit a recommended decision on changes to the FCC’s rules by November 4, 2010.

The issues presented in the Referral Order are virtually identical to the issues presented in the Department’s Request for Comment. Both the FCC and the Department have sought comment on the effective and efficient administration of the low-income programs, consumer eligibility requirements, certification of initial eligibility and verification of continued eligibility, and outreach requirements. Both the FCC and the Department have asked for views on the use of electronic databases to confirm Lifeline eligibility and the use of automatic Lifeline enrollment of individuals who qualify for certain public assistance programs.

Lifeline is a national program designed to assist all low-income individuals in gaining affordable access to telecommunications services. Indeed, a national low-income support program is at the heart of the universal service goals codified in the Communications Act of 1934, as amended (“Communications Act”). Specifically, Section 254(b)(3) of the Communications Act (47 U.S.C. § 253(b)(3)) includes among

⁴ See Federal-State Joint Board on Universal Service, Lifeline and Link Up, 25 FCC Rcd 5079 (2010) (“Referral Order”).

the universal service principles that consumers throughout the Nation, “including low-income consumers,” have access to affordable telecommunications services. Given the fact that the FCC has commenced a proceeding on the issues in the Request for Comment and that the Lifeline program is a national program funded by the federal Universal Service Fund, TracFone urges the Department to delay any modifications to its rules governing Lifeline until the FCC has determined whether the Lifeline rules should be revised.

I. Access to an Electronic Database to Confirm Lifeline Eligibility on a Real Time Basis Will Substantially Increase the Effective and Efficient Administration of the Lifeline Program.

The Department has asked for comment on which certification and verification procedures will result in the most effective and efficient administration of the Lifeline program. In addition, the Department has requested views on which procedures will permit timely enrollment by subscribers who are eligible for Lifeline benefits.

TracFone believes that the maintenance of a database by the appropriate state social services agencies that can indicate whether an applicant for enrollment in a Lifeline program is Lifeline-eligible, and whether or not the applicant already receives Lifeline-supported service from another ETC would simplify the enrollment process for those households applying for Lifeline benefits, would expedite the ability of ETCs to enroll qualified households in their Lifeline programs, and would enable ETCs to promptly commence delivery of Lifeline-supported services to those qualified households.⁵ Such a system would properly place responsibility for the compilation and

⁵ The Department has asked for comment on whether there is a correlation between the enrollment method (e.g., via Internet, telephone, facsimile, or mail) and the rate of fraudulent enrollments. TracFone has not observed such a correlation.

maintenance of accurate and current eligibility information with the state agencies that are best positioned to make those determinations. However, for such a system to be effective, ETCs must be able to quickly determine whether Lifeline applicants are eligible, preferably on a real time basis.

TracFone understands that certain Massachusetts state agencies, including the Department of Transitional Assistance (“DTA”) and the Department of Housing & Community Development, maintain data that can be used to determine whether an applicant is eligible for Lifeline based on participation in a qualified program. Based on discussions with DTA staff when TracFone was preparing to commence Lifeline service in Massachusetts, TracFone learned that DTA usually needs several weeks to verify that an applicant is enrolled in a qualifying program. While TracFone is not aware of why DTA needs that amount of time to check its records, TracFone believes that the development of a database that can be accessed by ETCs and provide a prompt response on whether an applicant is eligible, without disclosing any other information about the applicant, would be the most effective way to increase Lifeline participation while ensuring that applicants are eligible. While a centralized database containing information from all social services agencies would be most efficient, TracFone also supports the maintenance of separate databases by the relevant social services agencies as long as each such database enables ETCs to quickly and accurately check applicants’ eligibility.

A uniformly accessible database would immediately inform ETCs whether Lifeline service applicants qualify for Lifeline support. Moreover, privacy concerns could be allayed by limiting database access to indicating to ETCs whether applicants are Lifeline-eligible with a yes or no response, and requiring ETCs to maintain the

confidentiality of that response.⁶ If the system also allowed the ETCs to record provision of Lifeline service to an individual in real-time, this would radically reduce the risk of duplicate claims for Lifeline support. Furthermore, automatic notifications could be sent by the database system both to Lifeline customers and to the ETCs if that Lifeline customer were to become ineligible for continued Lifeline services. This would enable ETCs to immediately remove customers who are no longer qualified from their Lifeline programs and would make it possible to terminate Lifeline support for those customers. Access to electronic databases would provide an efficient and uniform certification, enrollment and verification system available to all ETCs, regardless of the technology or business model attached to their Lifeline offerings.

The maintenance of databases by social services agencies would also improve the current annual verification process. In Massachusetts, ETCs historically have verified subscriber eligibility on an annual basis by contacting the state agencies that administer programs that qualify individuals for Lifeline.⁷ TracFone, with the approval of the Department, complies with the FCC's rules concerning annual verification of Lifeline customers' eligibility.⁸ In accordance with FCC Rule 54.410(c)(2) (47 C.F.R. § 54.410(c)(2)), TracFone conducts an annual audit of a random, statistically-valid sample of its Massachusetts Lifeline customers to verify subscriber eligibility. In its 2009 annual

⁶ In certain jurisdictions, including Maryland, ETCs are required to execute confidentiality agreements as a condition of accessing state data bases to confirm Lifeline enrollment eligibility. TracFone believes that is an appropriate limitation and would be willing to execute such an agreement with the appropriate Massachusetts departments.

⁷ See Request for Comment, at 3.

⁸ See Letter from Geoffrey G. Why to Mitchell F. Brecher, TracFone's counsel, dated January 16, 2009; letter from Geoffrey G. Why to Mitchell F. Brecher, dated April 24, 2009.

verification audit based upon a statistically-valid sample of its customers pursuant to the FCC's rules, TracFone only received such verifications from 51 percent of the customers contacted. As noted by the Department in its Order related to its audit of TracFone's annual verification procedures, many of the subscribers were deemed ineligible for Lifeline due to a lack of response.⁹ Although such subscribers were deemed ineligible, due to a lack of response, TracFone did not know definitely whether those subscribers were, in fact, ineligible, or rather had merely failed to respond. In TracFone's experience, not receiving responses from individuals who receive a direct mailing requesting a response is an ongoing problem. The availability of an accessible database to confirm the continued eligibility of Lifeline customers would minimize fraud and eliminate the problems associated with trying to receive responses from those customers surveyed who are asked to provide proof of continued eligibility. Based on TracFone's experience in several states, including Massachusetts, TracFone believes electronic verification will minimize the administrative burdens on ETCs and applicants. Moreover, centralizing the verification process will minimize fraud and best ensure that only qualified consumers continue to enjoy Lifeline benefits, while facilitating the ability for qualified Lifeline customers to remain in the program.

The Department, in the Request for Comment, has asked about eligibility certification and verification practices in other states. TracFone has successfully worked with the Florida Public Service Commission and the Maryland Public Service Commission to obtain access to relevant databases without compromising the privacy of individuals, to determine whether Lifeline applicants are receiving low-income benefits

⁹ TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers, D.T.C. 09-9, Order at 13-14 (June 30, 2010).

that qualify them to receive Lifeline. The Florida and Maryland systems allow TracFone to certify an applicant's eligibility for Lifeline on a real time basis, thereby allowing TracFone to commence providing Lifeline benefits to eligible consumers in an expeditious manner. In Maine, the Department of Health and Human Services ("DHHS") requires ETCs to provide on an annual basis a computer disk listing all Lifeline customers. After receiving the disk, DHHS will send the ETCs a disk indicating which customers are no longer eligible for Lifeline. Other states, including Texas, have similar systems in place that notify ETCs of the names and addresses of individuals who qualify for Lifeline and verify on a periodic basis the continued eligibility of an ETC's Lifeline customers. TracFone is also aware that Missouri requires full certification (i.e., applicants must provide documentation proving participation in a qualified public assistance program) as opposed to self-certification (i.e., applicants, consistent with the FCC's certification rule, must self-certify under penalty of perjury that they participate in a qualified public assistance program). In TracFone's experience, full certification is extremely burdensome to applicants who often have difficulty locating and sending the required documentation to the ETC if they do not have access to a facsimile machine, scanner or copier. Full certification is also burdensome to the ETCs that are required to collect and review the documentation. Allowing ETCs to have access to an electronic database is far less burdensome than full certification and ensures that only qualified applicants are enrolled in Lifeline.

Finally, TracFone stresses that any rules governing Lifeline enrollment eligibility certification and verification should apply to all ETCs whether they are wireline or wireless carriers and whether they are incumbent or competitive ETCs. The technology

used by the ETC or the length of time the ETC has provided Lifeline service should not impact how an applicant's eligibility is initially certified or annually verified. All Lifeline recipients receive a benefit and should be subject to the same standards and requirements for establishing their eligibility, irrespective of whose Lifeline program they choose to enroll.

II. Automatic or Automated Enrollment Procedures Should Not Favor Any Type of Provider or Technology.

TracFone supports the concept of automatic enrollment in Lifeline as a way to increase Lifeline participation among qualified low-income households and to simplify and expedite the enrollment process, both for ETCs and for consumers. However, it is imperative that any automatic enrollment system be implemented in a manner which is competitively neutral such that it does not favor any ETCs or category of ETCs, including, for example, incumbent LECs. An automatic enrollment process that does not inform consumers of all their Lifeline options and afford consumers the opportunity to select from among those options or, worse, that automatically enrolls qualified customers in their existing wireline local exchange carrier's Lifeline program, based on their existing wireline telephone number, without affording such customers an opportunity to select from among the available Lifeline programs which best meet their needs, is both discriminatory and not in the interests of those households which qualify for Lifeline assistance.

One way to avoid such favoritism of the incumbent provider and resulting reduction of consumer choice of ETCs is to utilize verification data which do not include assigned telephone numbers. In several states, entities responsible for verification of Lifeline eligibility utilize such data points as name, residential address, date of birth, and

last four digits of Social Security number. By matching one or more of those data points against lists of persons enrolled in qualifying programs (e.g., Medicaid, Supplemental Nutritional Assistance Program, Transitional Assistance for Needy Families, etc.), a Lifeline applicant's eligibility for enrollment can be determined.

TracFone believes that an automated, rather than automatic, enrollment system, if implemented properly, would increase Lifeline enrollment without improperly favoring or disfavoring any ETC. In an automated system, individuals are given the opportunity to enroll in a Lifeline program as soon as they become eligible, for example, at the time they sign up for a qualifying benefit program such as Medicaid, the Low Income Home Energy Assistance Program or the School Lunch Program. However, they must affirmatively elect to do so.

The agent interacting with the consumer, the notice of benefit enrollment, or the website through which the customer enrolled, should make clear that the consumer is not required to select his or her current wireline telephone service provider as the Lifeline provider. Information about all the Lifeline providers servicing the area, the benefit packages they offer, and provider contact information should be provided. It should be clear that consumers need not select a Lifeline provider at that time, and that they may wait until a future time to select a Lifeline program in which to enroll.

III. The Department Should Expand Lifeline Eligibility Standards to Ensure that Low-Income Households Can Take Advantage of Lifeline.

The Department has also asked for comment on whether additional social services programs should be designated as programs that qualify individuals for Lifeline and whether the Department should adopt income-based eligibility. TracFone believes that the Department has an interest in determining which residents of Massachusetts should

benefit from Lifeline service and in ensuring that those residents are able to easily apply for and obtain Lifeline service. Therefore, if the Department determines that participation in additional social services programs should qualify individuals for Lifeline, TracFone would support that decision.

TracFone urges the Department to consider expanding Lifeline eligible groups to include otherwise-qualified low-income persons with no permanent residences, including persons residing at homeless shelters. TracFone has experienced an increase in requests from homeless shelters and other group living facilities for Lifeline service for the residents of those facilities. TracFone believes that the FCC's one-per-household rule, implemented years ago, to prevent multiple persons living in the same family residences from obtaining Lifeline benefits at such addresses should not preclude multiple unrelated residents of the same homeless shelter or other group living facilities from obtaining Lifeline support. Recognizing this long-unfulfilled need, and recognizing the unique ability of wireless telecommunications to bring Lifeline assistance to persons with no permanent residential addresses, TracFone has already brought the issue to the attention of the FCC. Indeed, TracFone has been working with the FCC to establish an interim process that will enable residents of a shelter to get Lifeline service. Furthermore, the FCC has recognized the importance of this issue by asking for comment on whether Lifeline service should be available to residents of group living facilities in its Referral Order.

TracFone supports allowing individuals to qualify for Lifeline based on income. Under the FCC's rules, individuals are eligible for Lifeline service if they can prove that their household income is at or below 135 percent of the Federal Poverty Guidelines

("FPG").¹⁰ TracFone also supports the authority of the Department to decide whether to offer Lifeline to more low-income households, such as those households with income at or below 150 percent of FPG. However, TracFone urges the Department to continue to allow program-based eligibility for Lifeline. The FCC's rules require individuals qualifying for Lifeline under an income-based criterion to present documentation of their household income prior to enrollment.¹¹ In TracFone's experience, a very small percentage of Lifeline applicants, when they have the choice of qualifying for Lifeline based on income level or program participation, will choose to rely on income level. Furthermore, requiring low-income individuals to provide documentation is especially burdensome for individuals who may not have easy access to a facsimile machine, copier, or a scanner to provide the documentation. Therefore, low-income individuals should have the option of qualifying for Lifeline based on their participation in a public assistance program, which can be easily verified through access to a database maintained by the appropriate social services agencies.

IV. Lifeline Subscribers Should Have the Ability to Apply the Lifeline Discount to the Lifeline Plans Offered by ETCs and to Purchase Additional Services or Features.

The Department has requested comment on the services for which Lifeline subscribers may use their discounts. In particular, the Department has asked whether Lifeline subscribers should be able to apply the Lifeline subsidy to the basic exchange component of telephone services packages or the telephone component of bundled service packages. ETCs are required to provide Lifeline subscribers with access to local and interexchange telecommunications services as well as access to the various functions

¹⁰ 47 C.F.R. § 54.409(b).

¹¹ 47 C.F.R. § 54.410(a).

listed in FCC rule 54.101(a).¹² ETCs have discretion to develop a Lifeline service plan or plans that provide the functions required by Section 54.101(a) so long as they pass through 100 percent of the Lifeline support to the Lifeline subscribers.¹³ Therefore, if an ETC decides to offer a Lifeline product that includes services that must be provided as part of Lifeline service and other services that are not required as part of Lifeline service, then a Lifeline qualified individual may apply the Lifeline discount to the portion of the ETC's services that are supported by the federal Universal Service Fund. However, if an ETC offers such a bundled service, it should also be required to provide an unbundled Lifeline service so that low-income consumers are not required to purchase services that they do not want or need.

The Department has also queried whether there are certain vertical features to which Lifeline subscribers should not be permitted to purchase. TracFone, like most wireless service providers, provides vertical features, including voice mail, call waiting, and caller ID, to its customers at no additional cost. TracFone's Lifeline plans, each of which provide Lifeline benefits to Lifeline customers without any charge, include the same vertical features that TracFone provides to its non-Lifeline customers. Therefore, this issue is more applicable to wireline carriers, which usually charge separately for vertical features. Nevertheless, in TracFone's view, the Department should not restrict Lifeline consumers from purchasing any vertical features offered by a Lifeline provider.

¹² 47 C.F.R. § 54.101(a).

¹³ See 47 C.F.R. § 54.403(a).

V. The Department Should Apply the Federal Requirements Governing Outreach.

The Department has asked for comment on establishing updated outreach requirements. In the Request for Comment, the Department refers to the federal outreach requirements that ETCs advertise the availability of Lifeline using media of general distribution and in a manner designed to reach those likely to qualify for service.¹⁴ In addition, the Department refers to outreach requirements that were set forth in a proceeding concerning New England Telephone, now Verizon. TracFone questions whether those requirements are applicable to it or to ETCs other than Verizon.

Irrespective of whether those Verizon requirements are applicable to other ETCs in the Commonwealth, it is essential that low-income individuals be aware of and participate in the universal service low-income programs. Indeed, based on the Universal Service Administrative Company's most recent data, in Massachusetts less than 50 percent of low-income households eligible are actually enrolled in Lifeline.¹⁵ While that is somewhat above the national average, the fact remains that in Massachusetts, more than one-half of the low-income households who are intended to benefit from the Lifeline program are not enrolled and are not benefitting. TracFone supports the Department's efforts to increase participation so that the low-income households that are intended to benefit from the program receive those benefits. However, TracFone suggests that the Department change the outreach requirements stated in the Request for Comment because they interfere with ETCs' abilities to develop their own business strategies for enrolling Lifeline customers.

¹⁴ See 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)(2).

¹⁵ See 2009 Participation Rates by State, available at <http://www.usac.org/li/about/participation-rate-information.aspx>.

The outreach requirements referenced in the Request for Comment focus on ETCs' conduct by requiring ETCs to train employees regarding Lifeline, instruct employees to inform customers about Lifeline, limit sales efforts related to optional services, and include sales incentives for signing up Lifeline customers. Moreover, not all ETCs can comply with some of the requirements. For example, TracFone is unable to use bill inserts to notify customers of Lifeline or to include Lifeline information in a directory because, as a prepaid wireless carrier, TracFone does not issue bills or provide directories.

TracFone recommends that the Department require ETCs to follow the federal standards for outreach. Section 214(e)(1)(B) of the Communications Act (47 U.S.C. §214(e)(1)(B)), requires ETCs to advertise the availability of Lifeline using media of general distribution. The FCC's current outreach guidelines emphasize the importance of states and carriers using outreach materials to reach households without telephone service and advertising that can be accessed by non-English speaking populations. The guidelines also provide that states and carriers should coordinate their outreach efforts with governmental agencies that administer any of the relevant government assistance programs.¹⁶

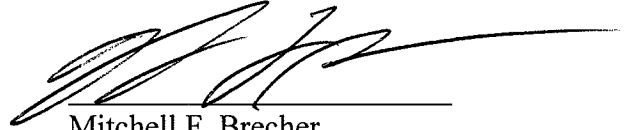
TracFone believes that the federal outreach requirements and guidelines are sufficient to promote consumer awareness of the universal service low-income programs. In the 31 jurisdictions in which TracFone is providing Lifeline service, it has observed state utility commissions and state agencies that administer public assistance programs engaging in outreach efforts and working together to administer the Lifeline program. In

¹⁶ See Lifeline and Link-Up, 19 FCC Rcd 8302, ¶¶ 44-49 (2004).

addition, TracFone has successfully advertised its Lifeline service in accordance with Section 214(e)(1)(B) of the Communications Act and the FCC's outreach guidelines. TracFone does not support mandatory outreach requirements that specify how ETCs must advertise because such requirements would interfere with an ETC's marketing strategy as it competes with other ETCs for Lifeline subscribers. To the extent that the Department determines that it needs to establish more specific outreach guidelines, TracFone urges the Department to require relevant social services agencies to treat all ETCs equally when engaging in outreach efforts. For example, if a state or agency lists carriers offering Lifeline in a particular state, all ETCs in that state must be listed.

Finally, TracFone notes that those ETCs who believe that Lifeline can be efficiently provided and who are motivated to actively promote their Lifeline services will do so without detailed regulations governing how they market their programs; those who would prefer not to effectively promote Lifeline are not likely to aggressively market a service which they do not want to offer. Increased outreach requirements risk discouraging provider participation in Lifeline. In contrast, allowing ETCs to craft their advertising and marketing efforts in response to the dictates of the marketplace and simplifying the administrative process by implementing an electronic certification and verification system, will provide incentives which should encourage more ETCs to enter the Lifeline services market and to actively and creatively promote the availability of their Lifeline programs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Brecher', is written over a horizontal line.

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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of TracFone Wireless, Inc. was served by electronic mail on this 14th day of October, 2010.

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