

May 31, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/M-18-20

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

2017 Lifeline Recertification Results

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2017 Lifeline re-certification filings. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHIED
Financial Analyst

BLL/lt
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. P999/M-18-20

I. BACKGROUND

A. *LIFELINE REFORM ORDER*

On February 6, 2012, the Federal Communications Commission (FCC) released its Lifeline and Linkup Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 11-42, 03-109, 12-23 and CC Docket No. 96-45 (Lifeline Reform Order). The federal Lifeline program subsidizes local telecommunications and broadband (internet) services provided to qualified low-income consumers by service providers designated as “eligible telecommunications carriers” (ETCs).¹ Lifeline provides a monthly discount of \$9.25,² and an additional \$25.00 for providing Lifeline service to an eligible resident of Tribal lands.³ In addition, incumbent local exchange carriers do not apply the access recovery charge (ARC) to Lifeline customers.⁴ Link-Up provides a 100 percent reduction, up to \$100, off installation charges to qualifying residents of Tribal lands.⁵

Minnesota’s Telephone Assistance Plan (TAP) provides an additional discount of \$3.50 to qualified low-income consumers in the form of monthly credits on consumers’ telephone bills. TAP is a required offering by local service providers that provide local exchange service in Minnesota.⁶ Local service providers are defined as a telephone company or a telecommunications carrier providing local service in Minnesota and include both [incumbent] local exchange carriers (ILECS) and competitive local exchange carriers (CLECs).⁷ Local exchange carriers are defined as a telephone company or telecommunications carrier providing local exchange service.⁸ A telephone company does not include a radio common carrier or an entity providing any mobile telecommunications service by means of radio signals and

¹ Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated “eligible telecommunications carriers,” or ETCs to qualify for subsidies from the federal Universal Service Fund (47 U.S.C. §254 (e)).

² 47 U.S.C. §54.403 (a) (1).

³ 47 U.S.C. §54.403 (a) (3).

⁴ For example, the ARC fee for CenturyLink customers is \$2.50, at this time.

⁵ 47 U.S.C. §54.413 (a) (1).

⁶ Minn. Stat. §237.70, subd. 2.

⁷ Minn. R. 7812.0100, subp. 34.

⁸ Minn. Stat. §237.01, subd. 8.

connection to a telephone network.⁹ Wireless or radio carriers do not offer TAP. Also, unlike the Lifeline program, customers of standalone broadband service are not eligible for the TAP credit.¹⁰

B. LIFELINE MODERNIZATION ORDER

The Lifeline Modernization Order focuses the Lifeline program on broadband by encouraging broadband providers to offer supported broadband services that meet minimum standards, including upload and download speeds, set to ensure Lifeline subscribers can participate fully in today's society.¹¹ The Lifeline Modernization Order also made changes to combat waste, fraud, and abuse, including the establishment of a National Lifeline Eligibility Verifier (NV) that will remove the responsibility of determining Lifeline subscriber eligibility from providers.¹²

The Lifeline Modernization Order also revised the Lifeline eligibility criteria. The following subscriber eligibility criteria now apply to the Lifeline program:¹³

- 1) Total household income does not exceed 135 percent of the Federal Poverty Guidelines;
or
- 2) Participation in one (or more) of the following programs:
 - Medicaid (medical Assistance)
 - Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps)
 - Supplemental Security Income (SSI)
 - Federal Public Housing Assistance
 - Veterans Pension benefit

Low-income consumers living on Tribal lands may also qualify by participation in one of several additional assistance programs:

- Bureau of Indian Affairs general assistance
- Tribally administered Temporary Assistance to Needy Families (TANF)
- Head Start only for those meeting income-qualifying standards
- Food Distribution Program on Indian Reservations

Income-based eligibility and the Tribal eligibility criteria were not modified.¹⁴

⁹ Minn. Stat. §237.01 subds. 4 & 7.

¹⁰ Minnesota Public Utilities Commission Order Clarifying Relationship Between Lifeline and TAP, and Maintaining Current TAP Credit and Surcharge Levels, issued October 11, 2016 in Docket No. P-999/CI-16-302.

¹¹ Third Report and Order, Further Report and Order, and Order on Reconsideration (The Lifeline Modernization Order), (FCC 16-38) rel. April 27, 2016, p. 3.

¹² *Id.*

¹³ 47 U.S.C. §54.409(a) and (b).

¹⁴ *Op. Cit.* Fn. 10, Para. 167 and Para. 204.

Whereas, annual recertifications were previously required to be filed by January 31 for the preceding year, beginning July 1, 2017, all subscribers enrolled prior to January 1, 2017 are to be recertified on a rolling basis based on the subscribers' service initiation date.¹⁵ Recertification was not required in 2017 for customers with anniversary dates during the transition period of January through June, 2017.¹⁶ The reformatted FCC Form 555 Recertification Form continues to be the means by which ETCs annually summarize their rolling recertification efforts, and the results of the prior year's recertification efforts continue to be due to USAC, state commissions, and the FCC by January 31 of the following year.¹⁷ Until the NV is operational in a state, service providers can choose to perform the annual recertification of Lifeline subscribers themselves or to have USAC perform the recertification.

The revised recertification rule (47 CFR § 54.410(f)) clarifies that for ETC service providers that do not use USAC to recertify Lifeline subscribers, the service provider is to query any available state or federal database to determine on-going eligibility prior to using other means to recertify subscribers. The two state programs that are accepted to determine Lifeline eligibility are Medicaid and SNAP, which are both administered by the Minnesota Department of Human Services (DHS). If the subscriber's eligibility for Lifeline cannot be determined by the DHS database, a signed certification form that meets the certification requirements must be obtained from the subscriber.¹⁸

With the introduction of the rolling recertification process, ETCs that chose to use USAC for recertification are not able to use the DHS database to minimize the number of customers being contacted to recertify their eligibility. ETCs choosing to use USAC to perform the 2017 recertification process on their behalf were required to notify USAC by December 15, 2016.¹⁹ ETCs' election of USAC to check Lifeline subscriber eligibility for 2017 is automatically renewed for 2018, and USAC accepted elections for 2018 calendar year recertification until June 30, 2017.²⁰ USAC uses the National Lifeline Accountability Database (NLAD) to retrieve subscriber information, including anniversary dates, for use during the recertification process. USAC recertifies every subscriber listed in NLAD for the participating Service Area Code (SAC); no partial lists are permitted.²¹

¹⁵ *Op. Cit.* Fn. 10, Para. 418.

¹⁶ *Id.* Fn. 1041

¹⁷ Changes to FCC Form 555, Lifeline Program Update, July 12, 2017, p. 12.

¹⁸ 47CFR § 54.410(f)(2)(III) and (3)(III)

¹⁹ Public Notice, DA 16-1227, October 27, 2016, WIRELINE COMPETITION BUREAU PROVIDES GUIDANCE ON ROLLING RECERTIFICATION PURSUANT TO THE LIFELINE MODERNIZATION ORDER, WC Docket Nos. 11-42, 10-90, 09-197, p. 4.

²⁰ <http://usac.org/li/program-requirements/recertify-subscribers/usac-elected.aspx>.

²¹ *Id.*

When the NV becomes operational in a state, customer eligibility is to be performed via electronic access to the programs used to determine eligibility, when possible.²² The NV is designed to address several program integrity risks in the current Lifeline program.²³ Lifeline will move from service providers conducting eligibility verification to the NV conducting eligibility verification, for both the initial application process as well as the recertification process.²⁴ Service providers will be able to confirm the eligibility of new subscribers to Lifeline by accessing the NV. The initial launch of the NV will be in the states of Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming. Service providers in these states will be able, but not required, to use the NV system in the soft launch. The soft launch was scheduled for December 5, 2017, but on December 1, 2017, the FCC announced the initial launch of the NV would be delayed.²⁵

C. COMMISSION ACTION

On June 14, 2012, the Commission issued its order in Docket No. P-999/M-12-194 in which it directed ETCs to implement the FCC's Lifeline certification and annual re-certification requirements described in the Lifeline Reform Order. Subsequent orders were issued in 2013, 2014, 2015, 2016 and 2017 in Docket Nos. 12-1315, 14-20, 15-20, 16-20 and 17-20 to reflect the requirements of the Lifeline Reform and Modernization Orders, and required ETCs to submit the results of their annual Lifeline re-certification efforts. ETCs submit the results of their re-certification efforts on FCC Form 555, and the Department reports the results of each year's survey.

II. STATEMENT OF ISSUES

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2017?

III. APPLICABLE LAW

47 C.F.R § 54.410(f) (*"Annual eligibility re-certification process"*)

(f) Subpart (1) requires that all ETCs must annually re-certify all Lifeline subscribers.

(f) Subpart (2) describes the methods by which an ETC must confirm a subscriber's eligibility to receive Lifeline benefits.

²² All states are to be operational under the NV by the end of 2019. Lifeline NV Plan, January 2018, Universal Service Administrative Co., p. 15.

²³ *Id.* Fn. 21, pp. 8-12.

²⁴ The role of the NV is being filled by USAC.

²⁵ Lifeline NV Plan, January 2018, Universal Service Administrative Co., p. 3.

(f) Subpart (5) provides that “if an eligible telecommunications carrier is unable to re-certify a subscriber . . . , the eligible telecommunications carrier must comply with the de-enrollment requirements provided for in § 54.405(e) (4).”

47 C.F.R. §54.405 (e) (4) (“*De-enrollment for failure to re-certify*”) provides that:

[A]n eligible telecommunications carrier must de-enroll a Lifeline subscriber who does not respond to the carrier's attempts to obtain re-certification of the subscriber's continued eligibility as required by § 54.410(f); who fails to provide the annual one-per-household re-certifications as required by § 54.410(f).

And requires that:

Prior to de-enrolling a subscriber under this paragraph, the eligible telecommunications carrier must notify the subscriber in writing separate from the subscriber's monthly bill, if one is provided using clear, easily understood language, that failure to respond to the re-certification request within 60 days of the date of the request will trigger de-enrollment. If a subscriber does not respond to the carrier's notice of impending de-enrollment, the carrier must de-enroll the subscriber from Lifeline within five business days after the expiration of the subscriber's time to respond to the re-certification efforts. Service providers must de-enroll a subscriber who has requested de-enrollment within two business days.

47 C.F.R. §54.416(b) (“*Annual certifications by eligible telecommunications carriers*”) requires that:

All eligible telecommunications carriers must annually provide the results of their re-certification efforts, performed pursuant to § 54.410(f), to the [Federal Communications] Commission and the Administrator. Eligible telecommunications carriers designated as such by one or more states pursuant to § 54.201 must also provide, on an annual basis, the results of their re-certification efforts to state commissions for subscribers residing in those states where the state designated the eligible telecommunications carrier. Eligible telecommunications carriers must also provide their annual re-certification results for subscribers residing on Tribal lands to the relevant Tribal governments.

IV. ANALYSIS

A. YEARLY COMPARISON OF RE-CERTIFICATION DATA

The 2017 re-certification results were submitted by ETCs to comply with Paragraph 148 of FCC’s Lifeline Reform Order and Section 47 C.F.R. 54.416(b) of the FCC’s Rules. The FCC Form 555 used to report re-certification results changed its format for 2017. On July 1, 2017, ETC service providers must recertify all subscribers on a rolling basis according to their anniversary dates, or every 12 months from the customers’ service initiation dates. The results of the July – December 2017 recertification effort are taken from FCC Form 555 as summarized on Attachment 1, page 6 reflect a slightly different format than reported in prior years:

Subscribers to be Recertified (a) Col. C	State Database Recertified (b) Col. D	Direct Contact By ETC (c) Col. F	Direct Contact De-enrolled (d) Col. G	Third Party/USAC Contacted (e) Col. I	Third Party/USAC De-enrolled (f) Col. K	Total Subscribers De-enrolled (g) Col. M	Percent of Subscribers De-enrolled (h) Col. O
2017							
28,989	1,813	22,080	5,690 25.77% (% = d/c)	5,096	2,130 41.80% (% = f/e)	7,820	26.98% (% = g/a)

The 2012 – 2016 results are presented in the previous format of FCC Form 555 format submitted by ETCs and summarized below. The supporting data is provided in Attachment 1, page 6.

Subscribers to be Re-certified (a)	Subscribers Contacted Directly (b)	Responding Subscribers (c)	Non-responding Subscribers (d) (d = b-c)	Ineligible Subscribers Contacted Directly (e) (% = e/b)	Subscribers De-enrolled Contacted Directly (f) (f = d+e) (% = (f/b))	Subscribers reviewed by DHS/USAC (g)	Subscribers De-enrolled by DHS/USAC (h) (% = h/g)	Total Subscribers De-enrolled (i) (i = f+h) (% = (i/a))
2016								
60174 ²⁶	43629	35216	8412 19.3%	191 .44%	8603 19.7%	16983	1110 6.5%	9713 16.02%
2015								
56354	47709	37469	10219 21.4%	231 .5%	10450 21.9%	9033	1061 11.7%	11511 20.29%
2014								
64509	58458	37818	20640 35.3%	646 1.1%	21286	7720	2413 31.3%	23699 35.81%
2013								
63302	39002	31018	7983 20.5%	641 1.6%	8624 22.1%	4803	1811 37.7%	10435 16.48%
2012								
72327	70615	30440	30140 42.7%		30599 43.3%	1712	253 14.8%	30852 42.66%

B. WHAT OBSERVATIONS EMERGE FROM THE RESULTS OF THE 2017 RE-CERTIFICATION EFFORTS?

- The number of Lifeline subscribers surveyed in 2017 declined from the previous year, since recertification was not required in 2017 for customers with anniversary dates of January through June, 2017, with rolling recertification used after July 1, 2017 (see Column (a) for 2017). The 60,174 Lifeline subscribers required to be surveyed in 2016 increased from the 56,354 subscribers surveyed in 2015 (see Column (a) for 2012-2016).
- The overall de-enrollment rate increased in 2017. The 2016 overall de-enrollment rate of 16.02% declined from 20.29% in 2015 (see Column (i) for 2012-2016), but increased to 26.98% for the last half of 2017 (see Column (h) for 2017). The increased de-enrollment percentage in 2017 reflects increased percentages of de-enrollments in both direct contact (25.77%) and USAC (41.80%) recertification surveys. (See Columns (d) and (f) for 2017 versus Columns (f) and (h) for 2012-2016).
- Historically, non-response has been a significant factor in wireline ETC Lifeline de-enrollments.²⁷ The reformatted FCC Form 555 did not request information regarding

²⁶ The number claimed on Form 497 and the resulting subsidy is 438 less than the total directly contacted and database reviewed subscribers. Virgin Mobile explained that beginning with the September 2014 data month, it instituted a voluntary reduction of two percent of its subscriber count in its Form 497 filings. This voluntary reduction, implemented after discussion with the FCC and USAC, is intended to protect the integrity of the Universal Service Fund and ensure that Virgin Mobile does not over collect as the result of any unintentional administrative oversight including during the implementation of NLAD.

²⁷ Lifeline subscribers surveyed directly by an ETC without the use of a federal or state database, 8,412 or 19.28% of subscribers did not respond to the survey in 2016. This compares to 10,219 or 21.42% of Lifeline subscribers not

the results of non-responses from Lifeline subscribers in 2017.

4. ETCs that used USAC to certify Lifeline subscribers are instructed not to use other methods of certification.²⁸ Two (2) ETCs reported using direct contact and USAC to certify Lifeline subscribers (see Attachment 2, Column (F)).^{29, 30} The explanations for using USAC in addition to direct contact to recertify Lifeline subscribers appears reasonable, and reflect the ETCs' extra efforts to keep eligible Lifeline subscribers enrolled. The de-enrollment rate for ETCs that chose to use USAC to recertify their Lifeline subscribers remains high and increased in 2017. The USAC de-enrollment rate was 41.80% in 2017 compare to 31.76% in 2016, and 32.68% in 2015 (see Column (f) for 2017, and Column (h) for 2015 and 2016).
5. ETCs that do not use USAC to recertify Lifeline subscribers are instructed to first query the appropriate state or federal database to determine on-going eligibility prior to using other means to recertify subscribers.³¹ In 2017, only five (5) ETCs first queried the DHS database and subsequently contacted those Lifeline subscribers that were not in either Medicaid or SNAP (see Attachment 3, Column O for 2017). For these five companies, the de-enrollment rate increased to 9.34% in 2017, compared to 5.27% in 2016, and 8.80% in 2015 (see Attachment 3, Column (O) for 2016 and 2015).
6. Not all companies that choose direct contact for recertification first queried the state database, as directed. The thirty-two (32) companies that directly contacted Lifeline subscribers without the use of a database review had a 14.06% de-enrollment rate in 2017 (see Attachment 4, Column (O) for 2017). Some explanations for not first querying the DHS database were: (1) the NV was not operational, (2) they were not aware of the DHS database, or (3) they preferred to retain personal contact with vulnerable

responding to the survey being directly sent by ETCs in 2015. Only 191 or .44% of Lifeline of subscribers contacted directly by an ETC in 2016 and .5% in 2015 were de-enrolled because they were ineligible or did not meet the qualifying requirements for Lifeline benefits (see Columns ((d), (e) and (f) for years 2016 and 2015).

²⁸ <http://usac.org/li/program-requirements/recertify-subscribers/usac-elected.aspx>

²⁹ April 13, 2018 electronic reply from MidContinent Communications in response to the Department's April 12, 2018 electronic information request asking why two subscribers were directly contacted when 266 subscribers were contacted by USAC. A small group of lifeline customers that are contacted by USAC contact Midcontinent with their follow-up questions instead of USAC. Midcontinent follows through with customers to save them from being frustrated with, and de-enrolled by, USAC.

³⁰ April 13 and 17, 2018 electronic replies from Qwest Corporation d/b/a CenturyLink QC in response to the Department's April 12 and 17, 2018 electronic information requests asking why 32 subscribers were directly contacted when 2,904 subscribers were contacted by USAC. Thirty-two customers were not on USAC's mailing list, and QC's policy is to follow-up on customers not on USAC's mailing list to assure they have an opportunity to recertify.

³¹ CFR § 54.410 (f).

subscribers to avoid confusion and incorrect disconnection.³² There would clearly be less confusion if customers could be recertified via the DHS database, with no direct consumer contact needed.

7. The de-enrollment results of the prepaid wireless ETCs were reviewed separately from other carriers because of their significant presence and the nature of their participation in the Lifeline program. Like the wireline Lifeline ETCs described in the previous paragraphs (IV,B,5 and 6) of these comments, wireless ETCs that do not use USAC to recertify Lifeline subscribers are instructed to first query the appropriate state or federal database to determine on-going eligibility prior to using other means to recertify subscribers. Of the twelve (12) wireless ETCs, only Telrite first queried a database before directly contacting Lifeline subscribers, and its de-enrollment rate was 17.86%. Telrite's results were favorable compared to the average de-enrollment rate of 23.58% for prepaid wireless ETCs that did not first query the DHS database (see Attachment 5).

Lifeline subscribers of prepaid wireless ETCs represented 22,322 of 29,989 (74.43%) of all Lifeline subscribers requiring recertification in 2017 (see Attachment 5, Column (C) / Attachment 1, Column (C)) compared to the 72.89% in 2016 and 67.42% of all Lifeline subscribers requiring recertification in 2015 (see Attachment 5, Column (E) for 2016 and 2015 / Attachment 1, Column (E) for 2016 and 2015).

Lifeline subscribers of prepaid wireless ETCs continue to have significantly higher de-enrollments prior to recertification than wireline ETCs. The de-enrollment rate for wireless providers prior to recertification was 29.61% in 2017 (see Attachment 5, Column (B) / Column (A)), compared to 24.51% in 2016 and 35.69% in 2015 (see Attachment 5, Column (D) / Column (A) for 2016 and 2015). This compares to the de-enrollment rate for wireline carriers prior to recertification of 2.76% in 2017, 2.89% in 2016 and 5.02% in 2015 (see (Attachment 1, Column (D)-Attachment 5, Column (B)) / (Attachment 1, Column (A)-Attachment 5, Column (A)) for 2017; and (Attachment 1, Column (D)-Attachment 5, Column (D)) / (Attachment 1, Column (A)-Attachment 5, Column (A)) for 2016 and 2015).

High de-enrollment rates prior to recertification may suggest that there were many subscribers receiving Lifeline benefits that were not eligible for the program. As all customers are to be certified through the NV by the end of 2019, there should be a significant reduction of ineligible customers enrolled in the program, and then later de-enrolled.

³² April 13 and 17, 2018 electronic replies from Windstream Communications and New Ulm Telecom, Inc. in response to the Department's April 12 and 17, 2018 electronic information requests asking why a database was not first consulted before directly contacting Lifeline subscribers for recertification.

C. *DEPARTMENT FINDINGS*

1. All ETCs have complied with the requirement to submit their recertification results to the Commission. The combination of using the DHS database, and then contacting only those customer's whose eligibility could not be verified by the database, produces the lowest de-enrollment rate. Once the NV becomes operational, the responsibility to verify the eligibility of Lifeline subscribers transfers from ETC service providers to USAC. At that time, there will be no option for service providers on how recertification is to occur.
2. The sharp decline to only 28,989 Lifeline subscribers surveyed in 2017 reflects the fact that recertification was not required in 2017 for customers with anniversary dates during the transition period of January through June, 2017, before rolling recertification began on July 1, 2017. The increased de-enrollment rate in 2017 reverses a declining trend in de-enrollment rates since 2014.

Year	Subscribers to Recertify	De-enrollment Rate/ subscribers
2017	28,989	26.98% or 7,820
2016	60,174	16.02% or 9,713
2015	56,354	20.29% or 11,511
2014	64,509	35.81% or 23, 699
2013	63,302	16.48% or 10,435
2012	72,327	42.66% or 30,852

3. The 2017 de-enrollment rates for the various recertification procedures were:
 - a. USAC- 41.80% (Attachment 2, Column (O) for 2017)
 - b. DHS database verification then direct contact- 9.34% (Attachment 3, Column (O) for 2017).
 - c. Direct contact only 14.06% (excluding the Prepaid Wireless ETCs) (Attachment 4, Column (O) for 2017)
 - d. Prepaid Wireless ETCs 23.58% (Attachment 5, Column (O) for 2017).
4. Non-response by wireline Lifeline subscribers was reported to be the largest cause of de-enrollments in the years prior to 2017. With the 2017 Form 555 reporting, the FCC did not ask for de-enrollments due to non-response.
5. Wireline ETCs using USAC have the highest de-enrollment rates again this year (41.80%) as they have had for the previous three years, 31.76% in 2016, 32.68% in 2015, and

- 56.71% in 2014 (see Attachment 2, Column (O)). The NV is to perform all recertification, once it is operational.
6. Wireline ETCs that used the DHS database and then direct contact with remaining subscribers to recertify their Lifeline subscribers continue to have the lowest de-enrollment rate of 9.34% compared to 5.27% in 2016 and 8.80% in 2015 (see Attachment 3, Column (O)). The number of ETCs verifying Lifeline subscribers with this method declined sharply for 2017. In 2016, 11,356 Lifeline subscribers were reviewed (see Attachment 3, Column (E) by 26 ETCs with this method, and in 2017, the number of subscribers reviewed by this method was 664 by five ETCs (see Attachment 3, Column (C)). The impending transition to the NV is the likely reason for the decline in the service provider use of the DHS database and direct contact with the remaining customers.
 7. Prepaid wireless ETCs continue to have the majority of Lifeline subscribers subject to recertification 74.43% in 2017 (see Attachment 5, Column (c) / Attachment 1, Page 6, Column (C)) compared to 72.89% in 2016 and 67.42% in 2015 (see Attachment 5, Column (E) / Attachment 1, Page 6, Column (E)). Prepaid wireless ETCs have used the direct contact method of Lifeline subscribers to verify their eligibility. Like wireline ETCs, once the NV is operational it will perform the initial eligibility determination and recertification for prepaid wireless Lifeline customers.
 8. De-enrollment rates may increase as more companies choose to use USAC for Lifeline recertification, prior to the NV being operational. Once the NV is operational in Minnesota, the de-enrollment rates may decline if the NV is able to verify eligibility through the eligible program databases, eliminating the need to directly contact those customers. However, USAC has indicated that it may not seek access to the DHS databases that serve the two eligibility programs that are administered at the state level, Medicaid and SNAP. To the extent that these two programs serve a high percentage of those consumers receiving Lifeline, there may continue to be a large number of customers that will be recertified manually by the NV. If this occurs, there may continue to be a large de-enrollment of customers, similar to what is experienced by the customers of those ETCs that currently choose to use USAC for the recertification.

V. COMMISSION ALTERNATIVES

1. Accept the Department's analysis regarding the ETC's 2017 Lifeline recertification surveys. All ETCs must file their 2018 FCC Form 555 Lifeline survey results by January 31, 2019.
2. Accept the Departments analysis regarding the ETC's 2017 Lifeline recertification surveys with modifications.
3. Reject the Departments analysis regarding the ETC's 2017 Lifeline recertification surveys.

VI. RECOMMENDATION

The Department recommends Alternative 1.

2017 ETC Lifeline Re-Certification Results																Attachment 1
Annual Certification			Recertification Methods													
			State/Fed	Data Base	ETC Direct Contact			Third Party								
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)	
Hutchinson Telephone Company- see NU Telecom, Inc.																
I-Wireless LLC	1516	173	1343	0		1343	667	676	0	self survey	0	0	667	1343	49.66%	
Interstate Telecommunications	10	0	10	0		0	0	0	10	USAC	8	2	8	10	80.00%	
Johnson Telephone Company	62	12	50	0		50	12	38	0	self survey	0	0	12	50	24.00%	
KMP d/b/a Mid-State Tel Co.- see TDS																
Kasson & Mantorville Tel Co	18	0	18	0		18	1	17	0	self survey	0	0	1	18	5.56%	
Larson Utilities, Inc.																
(1) Minnesota Valley Telephone Company	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%	
(2) Winthrop Telephone Company	1	0	1	0		1	0	0	0	self survey	0	0	0	1	0.00%	
Lismore Coop Tel Co	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%	
Lonsdale Tel	11	0	11	0		11	3	8	0	self survey	0	0	3	11	27.27%	
Loretel Systems, Ins.- see Arvig Enterprises, Inc.																
Mabel Coop Tel Co	15	0	15	0		15	4	11	0	self survey	0	0	4	15	26.67%	
Manchester-Hartland Telephone Co.	8	0	8	0		8	1	7	0	self survey	0	0	1	8	12.50%	
Mankato Citizens Telephone Co- see Consolidated Communications, Inc.																
Melrose Telephone Co.-see Arvig Enterprises, Inc.																
Mid-Communications, Inc.- see Consolidated Communications, Inc.																
Mid-State Telephone Co. see TDS																
Midcontinent Communications	277	9	268	0		2	0	2	266	USAC	104	171	104	268	38.81%	
Midwest Telephone Company- see Arvig Enterprises, Inc.																
Minnesota Valley Tel- see Larson Utilities, Inc.																
N-U Telecom, Inc.																
(1) Hutchinson Telephone Company	34	2	32	0		32	8	24	0	self survey	0	0	8	32	25.00%	
(2) New Ulm Telecom, Inc.	103	3	100	0		100	18	82	0	self survey	0	0	18	100	18.00%	
(3) Sleepy Eye Telephone Company	17	0	17	0		17	1	16	0	self survey	0	0	1	17	5.88%	
(4) Western Telephone Company	8	0	8	0		8	4	4	0	self survey	0	0	4	8	50.00%	
Northern Tel Co (affiliate of Wilderness Valley)	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%	
Osakis Telephone Company- see Arvig Enterprises, Inc.																
Park Region Tel Co (affiliate of Valley Tel Co)	9	1	8	0		0	0	0	8	Solix	1	7	1	8	12.50%	

2017 ETC Lifeline Re-Certification Results																Attachment 1
Annual Certification			Recertification Methods													
			State/Fed	Data Base	ETC Direct Contact			Third Party	Third Party							
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M=(G+K)	N=(D+F+I)	O=(M/N)*100	
(1) Arvig Telephone Company	69	4	65	0		0	0	0	65	USAC	25	40	25	65	38.46%	
(2) Bridge Water Telephone Co	21	0	21	0		0	0	0	21	USAC	10	11	10	21	47.62%	
(3) KMP d/b/a Mid-State Tel Co.	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%	
(4) Mid-State Telephone Company	31	1	30	0		0	0	0	30	USAC	7	23	7	30	23.33%	
(5) Winsted Telephone Company	9	1	8	0		0	0	0	8	USAC	5	3	5	8	62.50%	
Tekstar Communications Inc.- see Arvig Enterprises, Inc.																
Telrite Corporation d/b/a Life Wireless	4022	1088	2934	1284	DHS	1650	524	1126	0	self survey	0	0	524	2934	17.86%	
Tempo Telecom LLC	154	22	132	0		132	39	3	0	self survey	0	0	39	132	29.55%	
TerraCom, Inc.	25	4	21	0		21	8	13	0	self survey	0	0	8	21	38.10%	
Tri-Co Technologies	1	0	1	0		1	0	1	0	self survey	0	0	0	1	0.00%	
Twin Valley-Ulen Telephone Co. - see Arvig Enterprises, Inc.																
Upsala Coop Tel Assn	10	2	8	0		8	0	8	0	self survey	0	0	0	8	0.00%	
Valley Tel Co (Affiliate of Park Region Tel Co)	1	0	1	0		0	0	0	1	Solix	0	1	0	1	0.00%	
Virgin Mobile USA, LP dba Assurance Wireless *	9631	5196	4435	0		4435	893	3615	0	self survey	0	0	893	4435	20.14%	
West Central Tel Assn.	21	0	21	0		21	5	16	0	self survey	0	0	5	21	23.81%	
Western Telephone Company see NU-Telecom, Inc.																
Wikstrom Telephone Co., Inc.	156	6	150	0		150	3	143	0	self survey	4	0	7	150	4.67%	
Wilderness Valley Tel Co (affiliate of Northern Tel Co)	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%	
Windstream Communications																
(1) Windstream Communications LLC-361414	51	2	49	0		49	6	43	0	self survey	0	0	6	49	12.24%	
(2) Windstream Communications LLC-361482	24	2	22	0		22	5	17	0	self survey	0	0	5	22	22.73%	
Winnebago Coop Telecom Association 316337	2	0	2	0		0	0	0	2	USAC	1	1	1	2	50.00%	
Winsted Telephone Co. see TDS																
Winthrop Tel- see Larson Utilities, Inc.																
Wolverton Telephone Co. 361512-see PolarTel																
Woodstock Tel Co	4	0	4	0		4	0	4	0	self survey	0	0	0	4	0.00%	
Zumbrot Telephone Co- see Hanson Communications, Inc.																
2017	38569	9580	28989	1813		22080	5690	16443	5096		2130	2970	7820	28989	26.98%	
			95	6.25%		76.17%	19.63%	56.72%	17.58%		41.8%	10.2%		28989		

2017 ETC Lifeline Re-Certification Results																Attachment 2
Third Party/USAC Companies																
Annual Certification				Recertification Methods												
				State/Fed	Data Base	ETC Direct Contact			Third Party							
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M=(G+K)	N=(D+F+I)	O=((M/N)*100	
Albany Mutual Telephone Association	29	0	29	0		0	0	0	29	USAC	20	9	20	29	68.97%	
Arvig Enterprises, Inc.																
(1) Arrowhead Communications Corporation	9	0	9	0		0	0	0	9	USAC	6	3	6	9	66.67%	
(2) Callaway Telephone Company, Inc.	4	0	4	0		0	0	0	4	USAC	3	1	3	4	75.00%	
(3) Clements Telephone Co.	1	0	1	0		0	0	0	1	USAC	1	0	1	1	100.00%	
(4) Eagle Valley Telephone Company	7	0	7	0		0	0	0	7	USAC	2	5	2	7	28.57%	
(5) East Otter Tail Telephone Company	125	0	125	0		0	0	0	125	USAC	55	70	55	125	44.00%	
(6) Felton Telephone Company	1	0	1	0		0	0	0	1	USAC	1	0	1	1	100.00%	
(7) Home Telephone Company	15	0	15	0		0	0	0	15	USAC	6	9	6	15	40.00%	
(8) Loretel Systems Inc.	31	0	31	0		0	0	0	31	USAC	22	9	22	31	70.97%	
(9) Melrose Telephone Company	42	0	42	0		0	0	0	42	USAC	18	24	18	42	42.86%	
(10) Midwest Telephone Company	38	0	38	0		0	0	0	38	USAC	16	22	16	38	42.11%	
(11) Osakis Telephone Company	8	0	8	0		0	0	0	8	USAC	2	6	2	8	25.00%	
(12) The Peoples Telephone Co. of Bigfork	22	0	22	0		0	0	0	22	USAC	9	13	9	22	40.91%	
(13) Redwood County Telephone Company	12	0	12	0		0	0	0	12	USAC	5	7	5	12	41.67%	
(14) Tekstar Communications Inc.	112	0	112	0		0	0	0	112	USAC	48	64	48	112	42.86%	
(15) TwinValley-Ulen Telephone Company	35	0	35	0		0	0	0	35	USAC	8	27	8	35	22.86%	
City of Barnesville Municipal Telephone	4	0	4	0		0	0	0	4	USAC	0	4	0	4	0.00%	
Benton Coop Tel Co	17	0	17	0		0	0	0	17	USAC	7	10	7	17	41.18%	
CenturyLink																
(2) CenturyLink-Embarq	354	11	343	0		0	0	0	343	USAC	133	210	133	343	38.78%	
(3) CenturyLink-MN	132	3	129	0		0	0	0	129	USAC	52	77	52	129	40.31%	
(5) CenturyLink-QC	3048	112	2936	0		32	21	11	2904	USAC	1190	1714	1211	2936	41.25%	
Consolidated Tel Co																
(1) C-I Communications	29	0	29	0		0	0	0	29	USAC	19	10	19	29	65.52%	
Farmers-Federated																
(1) Farmers Mutual Tel (361389)	10	0	10	0		0	0	0	10	USAC	8	2	8	10	80.00%	
(3) FederatedTelephone Coop (369021)	16	0	16	0		0	0	0	16	USAC	9	7	9	16	56.25%	
(4) Federated Telephone Coop(361403)	6	0	6	0		0	0	0	6	USAC	4	1	4	6	66.67%	

2017 ETC Lifeline Re-Certification Results																Attachment 3
Wireline Data base & Direct Contact Companies																
Annual Certification				Recertification Methods												
				State/Fed	Data Base	ETC Direct Contact			Third Party							
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)	
CenturyLink																
(4) CenturyLink-NW Wisc	69	2	67	60	Wisconsin Cares	7	5	2	0	self survey	0	0	5	67	7.46%	
Consolidated Communications Holding Company, Inc.																
(1) Consolidated Communications of Mid-Communications Company	129	2	127	96	Minnesota DHS	31	22	9	0	self survey	0	0	22	127	17.32%	
(2) Consolidated Communications of Minnesota Company	350	0	350	269	Minnesota DHS	81	31	50	0	self survey	0	0	31	350	8.86%	
Garden Valley Tel Co	86	0	86	74	Minnesota DHS	12	3	9	0	self survey	0	0	3	86	3.49%	
Gardonville Coop Tel Assn	34	0	34	30	State of Minnesota	4	1	3	0	self survey	0	0	1	34	2.94%	
2017	668	4	664	529		135	62	73	0		0	0	62	664	9.34%	
													664	664		
													5	5		
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)	
2016 Totals	12099	150	252	341	11356	2429	1878	551	15	566	8927	32	11356	598	5.27	
2015 Totals	2059	0	55	88	1916	576	511	82	7	89	1368	82	1944	171	8.80	
2014 Totals	3246	150	26	178	3042	1248	805	444	14	458	1794	25	3043	483	15.87	
2013 Results	2771		150		2621								2942	387	13.15	

2017 ETC Lifeline Re-Certification Results															
Direct Contact Companies															
Annual Certification			Recertification Methods			ETC Direct Contact			Third Party			Attachment 4			
			State/Fed	Data Base											
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)
Ace Telephone Association 361346	86	0	86	0		86	18	68	0	self survey	0	0	18	86	20.93%
Alliance ETC- (Hills)	7	0	7	0		7	1	6	0	self survey	0	0	1	7	14.29%
Christensen Communications Company	7	0	7	0		7	2	5	0	self survey	0	0	2	7	28.57%
Dunnell Tel Co, Inc.	2	0	2	0		2	0	2	0	self survey	0	0	0	2	0.00%
Emily Cooperative Tel	7	0	7	0		7	4	3	0	self survey	0	0	4	7	57.14%
Hanson Communications, Inc.															
(1) Clara City Telephone Co	13	0	13	0		13	1	12	0	self survey	0	0	1	13	7.69%
(2) Sacred Heart Telephone Co	4	0	4	0		4	0	4	0	self survey	0	0	0	4	0.00%
(3) Starbuck Telephone Co	16	0	16	0		16	1	15	0	self survey	0	0	1	16	6.25%
(4) Zumbrota Telepoone Co	7	0	7	0		7	0	7	0	self survey	0	0	0	7	0.00%
Harmony Telephone Company (MSG Tel, Inc.- holding company)	21	2	19	0		19	2	17	0	self survey	0	0	2	19	10.53%
Johnson Telephone Company	62	12	50	0		50	12	38	0	self survey	0	0	12	50	24.00%
Kasson & Mantorville Tel Co	18	0	18	0		18	1	17	0	self survey	0	0	1	18	5.56%
Larson Utilities, Inc.															
(2) Winthrop Telephone Company	1	0	1	0		1	0	0	0	self survey	0	0	0	1	0.00%
Lonsdale Tel	11	0	11	0		11	3	8	0	self survey	0	0	3	11	27.27%
Mabel Coop Tel Co	15	0	15	0		15	4	11	0	self survey	0	0	4	15	26.67%
Manchester-Hartland Telephone Co.	8	0	8	0		8	1	7	0	self survey	0	0	1	8	12.50%
N-U Telecom, Inc.															
(1) Hutchinson Telephone Company	34	2	32	0		32	8	24	0	self survey	0	0	8	32	25.00%
(2) New Ulm Telecom, Inc.	103	3	100	0		100	18	82	0	self survey	0	0	18	100	18.00%
(3) Sleepy Eye Telephone Company	17	0	17	0		17	1	16	0	self survey	0	0	1	17	5.88%
(4) Western Telephone Company	8	0	8	0		8	4	4	0	self survey	0	0	4	8	50.00%
Paul Bunyan Rural Tel Co	55	1	54	0		54	9	45	0	self survey	0	0	9	54	16.67%
PolarTel															
(1) Polar Communications Mutual Aid Corp. 381630	59	9	50	0		50	7	0	0	self survey	0	0	7	50	14.00%

2017 ETC Lifeline Re-Certification Results																Attachment 4
Direct Contact Companies																
Annual Certification			Recertification Methods			ETC Direct Contact			Third Party							
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)	
Red River Rural Telephone Assoc.	18	0	18	0		18	0	18	0	self survey	0	0	0	18	0.00%	
Scott Rice Tel Co dba Integra Telecom (Integra Telecom Holding Inc.)	31	0	31	0		31	2	0	0	self survey	0	0	2	31	6.45%	
Spring Grove Comm	37	0	37	0		37	0	37	0	self survey	0	0	0	37	0.00%	
Tri-Co Technologies	1	0	1	0		1	0	1	0	self survey	0	0	0	1	0.00%	
Upsala Coop Tel Assn	10	2	8	0		8	0	8	0	self survey	0	0	0	8	0.00%	
West Central Tel Assn.	21	0	21	0		21	5	16	0	self survey	0	0	5	21	23.81%	
Western Telepone Company see NU-Telecom, Inc.																
Wikstrom Telephone Co., Inc.	156	6	150	0		150	3	143	0	self survey	4	0	7	150	4.67%	
Windstream Communications																
(1) Windstream Communications LLC-361414	51	2	49	0		49	6	43	0	self survey	0	0	6	49	12.24%	
(2) Windstream Communications LLC-361482	24	2	22	0		22	5	17	0	self survey	0	0	5	22	22.73%	
Winnebago Coop Telecom Association 316337	2	0	2	0		0	0	0	2	USAC	1	1	1	2	50.00%	
Woodstock Tel Co	4	0	4	0		4	0	4	0	self survey	0	0	0	4	0.00%	
2017	916	41	875	0	0	873	118	678	2	0	5	1	123	875	14.06%	
				0.00%		99.77%	13.49%	77.49%	0.23%		0.6%	0.1%		875		
# of companies			33	0		32			1							
													24	33		

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
2016 Totals	0	0	79	177	1752	1752	1444	307	33	340	0	0	1752	340	19.41
								#REF!		#REF!		#REF!			
2015 Totals	15075	163	471	681	13760	13760	10155	3567	43	3610	0	0	13760	3610	26.24%
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
2014 Totals	18091	190	466	831	16604	16576	12064	4512	36	4548	32	21	16608	4569	27.51
2013 Results						17427				4965					28.49%
2012 Results						70615				30599					43.33%
								42.7%		43.3%		14.8%			

2017 ETC Lifeline Re-Certification Results																Attachment 5			
Wireless Companies																			
Annual Certification				Recertification Methods															
				State/Fed Data Base			ETC Direct Contact			Third Party									
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O				
			C-A-B										M=(G+K)	N=(D+F+I)	O=(M/N)*100				
American Broadband and Telecommunications	54	20	34	0		34	6	28	0	self survey	0	0	6	34	17.65%				
Blue Jay Wireless LLC																			
Boomerang Wireless, LLC d/b/a enTouch Wireless	1149	285	864	0		864	691	173	0	self survey	0	0	691	864	79.98%				
Global Connection Inc of America	117	5	112	0		112	43	69	0	self survey	0	0	43	112	38.39%				
I-Wireless LLC	1516	173	1343	0		1343	667	676	0	self survey	0	0	667	1343	49.66%				
Q Link Wireless LLC (Quadrant Holdings Group LLC)	15025	2598	12427	0		12427	2463	9964	0	self survey	0	0	2463	12427	19.82%				
Sage Telecom Communications LLC (TSC Acquisition Corporation)	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0					
T-Mobile Central LLC	20	0	20	0		20	3	17	0	self survey	0	0	3	20	15.00%				
TAG Mobile LLC	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0					
Telrite Corporation d/b/a Life Wireless	4022	1088	2934	1284	DHS	1650	524	1126	0	self survey	0	0	524	2934	17.86%				
Tempo Telecom LLC (subsidiary of Birch Equity Partners)	154	22	132	0		132	39	3	0	self survey	0	0	39	132	29.55%				
TerraCom, Inc.	25	4	21	0		21	8	13	0	self survey	0	0	8	21	38.10%				
Virgin Mobile USA, LP	9631	5196	4435	0		4435	820	3615	0	self survey	0	0	820	4435	18.49%				
2017	31713	9391	22322	1284	0	21038	5264	15684	0	0	0	0	5264	22322	23.58%				
				5.75%		94.25%	23.58%	70.26%	0.00%		0.0%	0.0%							
# of companies				1		10			0				10						
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O				
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M=(F+K)	N=(J+L)	O=(N/M)*100				
2016 Totals	69149	0	8341	16945	43863	39570	31948	7622	143	7765	4731	26	44301	7791	17.59				
2015 Totals	68648	0	6149	24503	37996	33360	26792	6568	181	6749	4988	109	38348	6858	17.88				
2014 Totals	75852	18762	8253	26580	41019	40803	25086	15717	601	16318	1731	4	42534	16322	38.37				
2013 Results	40219	0	1535	18442	20242	20269	17351	2918	369	3287	0	0	20269	3287	16.22				