

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

All Minnesota Eligible Telecommunications
Carriers

SERVICE DATE: August 5, 2014

DOCKET NO. P-999/M-14-20

In the Matter of Minnesota ETCs' 2013 Lifeline Recertification Results

The above entitled matter has been considered by the Commission and the following disposition made:

Accepted the analysis of the Minnesota Department of Commerce regarding the 2013 Lifeline recertification surveys of Minnesota's eligible telecommunications carriers (ETCs).

Found that all ETCs have complied with the requirement to submit their recertification results to the Commission, and the recertification results comply with required recertification procedures.

Use of the database compiled by the Minnesota Department of Human Services was encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact and minimize de-enrollments.

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the order. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Burl W. Haar
Executive Secretary



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May 16, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket Nos. P999/M-14-20

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

2013 Lifeline Re-certification Results

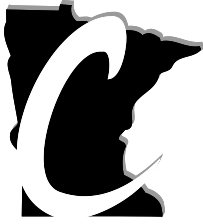
The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2013 Lifeline re-certification filings. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHIED
Financial Analyst

/s/ KATHERINE DOHERTY
Rates Analyst

BLL/KD/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/M-14-20

I. BACKGROUND

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 Order).

The federal Lifeline program subsidizes local telecommunications services provided to qualified low-income consumers by local service providers designated as “eligible telecommunications carriers” or ETCs. Lifeline provides a monthly discount of \$9.25 offered by ETCs.

Minnesota’s Telephone Assistance Plan (TAP) provides an additional discount to qualified low-income consumers in the form of monthly credits on consumers’ telephone bills. TAP provides a monthly discount of \$3.50 offered by all incumbent and competitive local exchange (ILEC and CLEC) service providers.

Link-Up provides a 100 percent reduction, up to \$100 off installation charges to qualifying residents of Tribal lands.

The following subscriber eligibility criteria apply to both the TAP and Lifeline programs:

- 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
- Low-Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Temporary Assistance to Needy Families (TANF)

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 TANF
- Head Start only for those meeting income-qualifying standards

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 Order.

ETCs filed FCC Form 555 with the Commission in compliance with Paragraph 148 of the Lifeline Order and Section 47 C.F.R. 54.416 (b) of the FCC's Rules requiring the reporting of the results of their aggregated re-certification data to the Commission. The Department reviewed this information and on April 22 and May 21, 2013 filed comments in Docket No. P999/M-12-1315 (12-1315) recommending that the Commission find that all the carriers, with one exception that subsequently filed, had complied with the FCC's recertification requirements.

II. STATEMENT OF ISSUES

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2013?

III. APPLICABLE LAW

47 C.F.R §54.410 (*"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.
- (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); or who relies on a temporary address and fails to respond to the carrier's address re-certification attempts pursuant to §54.410(g).

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 30 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.

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. A COMPARISON OF THE 2012 AND 2013 RE-CERTIFICATION DATA

The 2012 and 2013 re-certification results were submitted by ETCs to comply with Paragraph 148 of FCC’s Lifeline Order and Section 47 C.F.R. 54.416(b) of the FCC’s Rules and the Commission’s Order on July 22, 2013 in Docket No. P999/M-12-1315. A comparison of the results of the 2012 and 2013 Lifeline re-certification results is summarized below. The supporting data is provided in Attachment 1.

Year	Total # of Subscribers Subject to Verification	Total # of Subscribers De-enrolled	% De-enrolled	# of Subscribers Subject to verification excluding those subject to USAC’s process ¹	# of Subscribers De-enrolled for Non-response	# of Subscribers Who Responded but were Found Ineligible	% De-enrolled for Non-response	% De-enrolled due to a Finding of Ineligibility
2012	86,891	30,602	35.2%	86,891	30,140	462	34.7%	0.5%
2013	68,081	10,435	15.3%	64,352	7,983	656	12.4%	1.0%

Number of subscribers subject to re-certification: All Lifeline subscribers must re-certify in subsequent years in accordance with Paragraph 130 of the Lifeline Order and Section 47 C.F.R. 54.410(f) subp. 1 of the FCC’s Rules. In 2012, 86,891 were contacted directly or verified by means of the DHS database for re-certification. In 2013, 68,081 Lifeline subscribers were contacted directly, verified by means of the DHS database, or by the Universal Service Administrative Company (USAC) for re-certification (see Attachment 1).²

Number of Subscribers De-enrolled: The percentages for subscribers de-enrolled reflect the combination of Lifeline customers either who did not respond to the re-certification efforts of ETCs, or who responded, but were ineligible to continue receiving the Lifeline discount. The de-enrollment rate declined significantly from 35.2% in 2012 to 15.3% in 2013 (see Attachment 1).

Number of Non-Responders: Non-response is the largest single cause of de-enrollments in both years. The non-response rate declined significantly from 34.7% in 2012 to 12.4% in 2013 (see footnote 1 and Attachment 1).

¹ For the purpose of comparing de-enrollments due to non-response and de-enrollment due to a finding of ineligibility, the Department excluded the results of ETCs who elected to use the USAC verification process in 2013. Form 255 does not distinguish between non-response and a finding of ineligibility for the subscribers subject to USAC’s process, so the relevant data is not available. USAC’s process was not available for use in 2012.

² Wireline Competition Bureau Provides Guidance Regarding the 2013 Lifeline Recertification Process, WC Docket No. 11-42, Public Notice, Rel. May 22, 2013, Section III, pp. 4-6.

Number of Ineligible Responders: The percentage of ineligible responders represents customers who responded to the re-certification efforts of ETCs or USAC, but did not meet the criteria for continuing to receive the Lifeline discount on their local phone bills. Responders were ineligible either (i) because they no longer meet the income requirement, or (ii) because they no longer participate in one of qualified low income programs described previously. In 2013, 656 Lifeline recipients were de-enrolled by ETCs due to a finding of ineligibility (see Section IV.C.3.c and Attachments 1 and 3).

B. WHAT OBSERVATIONS EMERGE FROM THE RESULTS OF THE 2013 RE-CERTIFICATION EFFORTS?

1. The percentage of Lifeline subscribers that were de-enrolled declined from 35.2% in 2012 to 15.3% in 2013. All Lifeline subscribers were required for the first time to re-certify annually in 2012, and the impact on non-response rates (the largest factor in de-enrollments) was significant in 2012, the first year of the new rules. The non-response rate and resulting de-enrollment rates declined significantly in 2013. The 2013 non-response rate was 12.4%, down from 34.7% in 2012 (see Attachment 1).
2. ETCs that chose to use USAC to recertify their Lifeline subscribers experienced a significantly higher de-enrollment rate of Lifeline subscribers than ETCs that chose to directly contact their Lifeline subscribers, with or without the use of the DHS database. The de-enrollment rate for ETCs that relied on USAC to recertify their Lifeline subscribers was 48.2% (see Attachment 2).
3. The de-enrollment rate for ETCs that chose to contact directly their Lifeline subscribers after first submitting them to the DHS database for verification was 14.0% (see Attachment 3).
4. The de-enrollment rate for ETCs that directly contacted their Lifeline subscribers, excluding Telrite Corporation d/b/a Life Wireless (Telrite) and Virgin Mobile USA, L.P. d/b/a Assurance Wireless (Virgin Mobile) (collectively the Prepaid Wireless ETCs, but did not use the DHS database, was 23.2%) (see Attachment 4).
5. The Department considered the de-enrollment results of the Prepaid Wireless ETCs separately from other carriers who used the direct contact method. The process used by Prepaid Wireless ETCs for directly contacting their subscribers typically incorporates multiple methods of reaching out to, and re-certifying Lifeline subscribers (including text messaging, inbound and outbound telephone calling, website messages, as well as written communication) and differs from the direct contact processes used by other ETCs. In addition, the prepaid wireless carriers' business operations and turnover rates differ significantly from other ETCs, as reflected in the relatively high number of customers who were initially enrolled in the 2013 calendar year, and the number of customers who

were de-enrolled prior to recertification attempts.³ While Virgin Mobile's presence in February 2013 was relatively small,⁴ Telrite's significant presence in the Minnesota Lifeline market,⁵ and the relatively low de-enrollment rate for the prepaid wireless carriers (see Attachment 5) would skew the results for all ETCs using the direct contact only method (see Attachment 4), if considered together.

C. DEPARTMENT FINDINGS

1. All ETCs have complied with the requirement to submit their re-certification results to the Commission. The re-certifications comply with required re-certification procedures of the Lifeline Order and the Commissions 13-137 Order after discussions to clarify misunderstandings in the data filed, as reflected on Attachment 1, were conducted by the Department (see section IV.C.3 of these comments).
2. ETCs that used USAC to recertify their Lifeline subscribers were barred from directly contacting Lifeline subscribers or another database, and were required to accept the recertification results obtained from USAC. Lifeline subscribers either who did not respond to USAC's inquiry, or who responded that they were ineligible, represented the highest percentage of de-enrollments compared to recertification efforts by either direct contact only or use of the DHS database and subsequent contact of Lifeline subscribers who did not appear on the DHS database. The 2013 de-enrollment rates for the various recertification procedures were:
 - a. USAC - 48.2% (see Attachment 2)
 - b. DHS and direct contact - 14.0% (see Attachment 3)
 - c. Direct contact only - 23.2% (excluding Telrite and Virgin Mobile) (see Attachment 4)
 - d. Telrite and Virgin Mobile - 8.2% (see Attachment 5)

³ 18,415 or 46% of Telrite's February 2013 customers were de-enrolled prior to its re-certification efforts. Virgin Mobile reported 328 subscribers in 2013, of whom 256 (78%) were initially enrolled in 2013 and hence did not need to be contacted. USAC's re-certification procedures exclude Lifeline subscribers that were initially enrolled in the current calendar year, as well as subscribers that were de-enrolled prior to the re-certification attempt.

⁴ Virgin Mobile was designated as an ETC by the Commission on December 7, 2012.

⁵ Telrite reported 39,891 Lifeline subscribers subject to verification or 59% of total Minnesota Lifeline subscribers.

3. Completing FCC Form 555 to report Lifeline recertification efforts can be confusing, and the Department encountered the following issues when ETCs filed their recertification results:
 - a. ETCs that used the DHS database must follow-up by direct contact with Lifeline subscribers whose names were not registered in qualifying programs. Some ETCs that used the DHS database indicated that Lifeline subscribers who did not appear on the DHS data base check were classified as ineligible. While Lifeline subscribers may not appear in the DHS data base check for enrollment in an approved low-income program, Lifeline subscribers may qualify for Lifeline benefits if their income level is below 135 percent of the Federal Poverty Guidelines. Thus, subscribers not in the DHS database need to be contacted to verify eligibility.
 - b. Emily Cooperative Telephone Company (Emily) clarified that seven of the Lifeline subscribers submitted to the DHS database were not listed as recipients of qualifying programs. Emily contacted Lifeline subscribers not verified by the DHS and verified that they qualified for Lifeline benefits based on income eligibility. Thus, the verification process was performed correctly.
 - c. Farmers Mutual Telephone Company, Federated Telephone Cooperative, Gardonville Cooperative Telephone Association reported on their Form 555 that Lifeline recipients were de-enrolled as a result of submitting names to the DHS. All three ETCs confirmed that they verified ineligible income levels after the DHS data base checks.
 - d. Lonsdale Telephone Company (Lonsdale) reported that the names of 25 Lifeline subscribers were submitted to an eligibility database, but subsequent interaction with the Department revealed that the 25 Lifeline subscribers were contacted directly by an agent of Lonsdale (Solix). Five Lifeline recipients did not initially respond to the direct contact, but four Lifeline subscribers subsequently responded to Lonsdale's direct contact, leaving one Lifeline subscriber to be de-enrolled for non-response.
 - e. Consolidated Telephone Company and C-I Communications initially de-enrolled subscribers that did not appear in the DHS data base, but then re-enrolled Lifeline subscribers and provided credits back to the date of de-enrollment after a direct contact to determine if they qualified for Lifeline benefits based upon their income levels.
 - f. Wikstrom Telephone Company, Inc. (Wikstrom) reported 132 Lifeline subscribers were checked for eligibility by the DHS, and Wikstrom subsequently contacted 108 Lifeline subscribers. Twenty-seven Lifeline subscribers did not respond to Wikstrom's effort to verify their eligibility, and nine Lifeline subscribers were ineligible for Lifeline benefits. Wikstrom indicated that Lifeline subscribers confirmed by the DHS database check were not subsequently de-enrolled through direct contact.

4. ETCs that used the DHS database to validate their Lifeline subscribers for eligibility had a lower de-enrollment rate by reducing the number of Lifeline subscribers needing a direct contact (see Sections IV.B.3 and 4 of these comments).

V. COMMISSION ALTERNATIVES

1. Accept the Department's analysis regarding the ETC's 2013 Lifeline recertification surveys:
 - a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
 - b. To minimize de-enrollments, use of the DHS database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact.
2. Accept the Department's analysis regarding the ETC's 2013 Lifeline recertification surveys with modifications.
3. Reject the Department's analysis regarding the ETC's 2013 Lifeline recertification surveys.

VI. RECOMMENDATION

The Department recommends Alternative 1.

Accept the Department's analysis regarding the ETC's 2013 Lifeline recertification surveys:

- a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
- b. To minimize de-enrollments, use of the DHS database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact.

2013 ETC Lifeline Re-Certification Results																	Attachment 1	
Filed Data																		
ETC	FCC Form 497	Lines provided to wireless resellers	# initially enrolled in current calendar year	Number of Subscribers ETC contacted directly to recertify	# of customers responding	# of non-responders	# Ineligible responders	# of de-enrolled	# de-enrolled prior to recertification attempt	# reviewed by state or access to eligibility data	# de-enrolled as result of ineligibility	# de-enrolled prior to recertification attempt	# de-enrolled for non-response or ineligibility	# de-enrolled because ineligible	Total # de-enrolled	Percent of Subscribers de-enrolled		
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q		
						(E-F)		(G+H)					(I)	(L)	(N+O)	(P/B)		
Interstate Telecommunications	50	0	50	50	38	12	0	12	0	0	0	0	12	0	12	24%		
Johnson Tel	132	0	0	132	109	23	1	24	16	0	0	0	24	0	24	18%		
Kasson & Mantorville Tel Co	55	0	0	55	55	0	4	4	0	0	0	0	4	0	4	7%		
Lismore Coop Tel Co	5	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0%		
Lonsdale Tel	25	0	0	5	4	1	0	1	0	25	0	0	1	0	1	4%		
Mabel Coop Tel Co	33	0	3	30	29	1	0	1	0	0	0	0	1	0	1	3%		
Manchester-hartland Telephone Co.	8	0	0	9	7	2	0	2	0	0	0	0	2	0	2	25%		
Mankato Citizens Telephone Co	865	0	26	508	358	150	3	153	43	314	0	0	153	0	153	18%		
Mid-Communications, Inc.	271	0	10	137	68	69	0	69	11	123	0	0	69	0	69	25%		
Midcontinent Communications	165	0	12	5	5	0	0	0	0	153	64	10	0	64	64	39%		
Minnesota Valley Tel	13	0	0	13	12	1	0	1	0	0	0	0	1	0	1	8%		
New Ulm Telecom	225	0	0	98	72	26	2	28	0	127	0	0	28	0	28	12%		
Nexus Communications, Inc. dba Reachout Wireless	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-		
Northern Tel Co	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0%		
Park Region Tel Co	27	0	0	32	26	6	2	8	0	0	0	0	8	0	8	30%		
Paul Bunyan Rural Tel Co	422	0	35	387	319	68	8	76	0	0	0	0	76	0	76	18%		
Pine Island Tel	38	0	0	35	34	1	0	1	3	0	0	0	1	0	1	3%		
Polar Communications Mutual Aid Corp.	269	0	8	244	177	67	5	72	25	0	0	0	72	0	72	27%		
Q Link Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-		
Red River Rural Telephone Assoc.	17	0	0	17	12	5	0	5	0	0	0	0	5	0	5	29%		
Rothsay Telephone	11	0	0	11	11	0	0	0	0	0	0	0	0	0	0	0%		
Runestone Telecom Assn- 361423	19	0	1	0	0	0	0	0	0	19	11	11	0	11	11	58%		
Runestone Telecom Assn- 361475	169	0	11	0	0	0	0	0	0	169	97	97	0	97	97	57%		
Sacred Heart Telephone Co	14	0	0	14	13	1	0	1	0	0	0	0	1	0	1	7%		
Scott Rice Tel Co dba Integra Telecom	97	0	1	96	77	19	1	20	12	0	0	0	20	0	20	21%		
Sleepy Eye Telephone Co	69	0	0	30	20	10	1	11	0	39	0	0	11	0	11	16%		
Spring Grove Comm	57	0	0	15	14	1	1	2	1	42	0	0	2	0	2	4%		
Starbuck Telephone Co	72	0	0	72	62	10	0	10	0	0	0	0	10	0	10	14%		
T-Mobile Central LLC	65	0	30	25	20	5	0	5	10	0	0	0	5	0	5	8%		
TDS- Arvig Tel, Bridge Water, Mid-State, Winsted (4)	600	0	8	548	458	90	4	94	2	0	0	0	94	0	94	16%		
Telrite Corporation d/b/a Life Wireless	39891	0	1279	20197	17280	2917	366	3283	18415	0	0	0	3283	0	3283	8%		
TerraCom, Inc.	778	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%		
Upsala Coop Tel Assn	41	0	0	43	40	3	0	3	0	0	0	0	3	0	3	7%		
Valley Tel Co	12	0	0	14	10	4	0	4	0	0	0	0	4	0	4	33%		
Virgin Mobile USA, LP	328	0	256	72	71	1	3	4	27	0	0	0	4	0	4	1%		
West Central Tel Assn.	92	0	3	81	67	14	2	16	0	0	0	0	16	0	16	17%		
Western Telepone Company	58	0	0	34	29	5	1	6	0	24	0	0	6	0	6	10%		
Wikstrom Tel	250	0	8	108	81	27	9	36	2	132	0	0	36	0	36	14%		
Wilderness Valley Tel Co	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0%		
Windstream- Lakedale and Sherburne (2)	332	0	9	334	295	39	0	39	1	0	0	0	39	0	39	12%		

2013 ETC Lifeline Re-Certification Results Filed Data											Attachment 1						
ETC	FCC Form 497	Lines provided to wireless resellers	# initially enrolled in current calendar year	Number of Subscribers ETC contacted directly to recertify	# of customers responding	# of non-responders	# Ineligible responders	# of de-enrolled	# de-enrolled prior to recertification attempt	# reviewed by state or access to eligibility data	# de-enrolled as result of ineligibility	# de-enrolled prior to recertification attempt	# de-enrolled for non-response or ineligibility	# de-enrolled because ineligible	Total # de-enrolled	Percent of Subscribers de-enrolled	
A	B	C	D	E	F	G (E-F)	H	I (G+H)	J	K	L	M	N (I)	O (L)	P (N+O)	Q (P/B)	
Winnebago Coop Telecom Association	13	0	0	0	0	0	0	0	0	13	5	0	0	5	5	38%	
Winthrop Tel	12	0	0	12	11	1	0	1	0				1	0	1	8%	
Wolverton Telephone Co.	2	0	0	2	1	1	0	1	0				1	0	1	50%	
Woodstock Tel Co	29	0	1	29	28	1	1	2	0			2	2	0	2	7%	
Zumbrota Telepoone Co	39	0	0	39	28	11	0	11	0			0	11	0	11	28%	
Totals	68081	241	4538	39002	31018	7983	641	8624	20822	4803	1811	672	8624	1811	10435	15%	
Excluding 3,729 USAC ETCs (see Attach 2)	64352						12.4%	1.0%					12.7%	2.7%	15.3%	0.0%	
2012 Results	86891			70550			30140	462					30140	462	30602		
							34.7%	0.5%					34.7%	0.5%	35.2%		

2013 ETC Lifeline Re-Certification Results																
Carriers that only contacted subscribers directly excluding Telrite and Virgin Wireless																
ETC	FCC Form 497	Lines provided to wireless resellers	# initially enrolled in current calendar year	Number of Subscribers ETC contacted directly to recertify	# of customers responding	# of non-responders	# Ineligible responders	# of de-enrolled	# de-enrolled prior to recertification attempt	# reviewed by state or access to eligibility data	# de-enrolled as result of ineligibility	# de-enrolled prior to recertification attempt	# de-enrolled for non-response or ineligibility	# de-enrolled because ineligible	Total # de-enrolled	Percent of Subscribers de-enrolled
A	B	C	D	E	F	G (E-F)	H	I (G+H)	J	K	L	M	N (I)	O (L)	P (N+O)	Q (P/B)
Ace Telephone Association	236	0		212	185	27	10	37	24				37	0	37	16%
City of Barnesville	35			35	33	2	2	4	0				4	0	4	11%
Benton Coop Tel Co	83	0		82	64	18	0	18	0	0	0	0	18	0	18	22%
Blue Earth Valley Tel, Cannon Valley Tel, Easton Tel, Eckles Tel, Granada, Pine Island (6)	227	0	227	189	166	23	0	23	36	0	0	0	23	0	23	10%
Blue Jay Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Boomerang Wireless, LLC d/b/a enTouch Wireless	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Budget PrePay Inc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Cannon Valley Telecom, Inc.	46	0	2	44	38	6	0	6	2	0	0	0	6	0	6	13%
CenturyLink	14767	240	1761	12404	8668	3736	0	3736	2094	0	0	0	3736	0	3736	25%
Christensen Communications Company	32	0	1	31	22	9	0	9	1				9	0	9	28%
Citizens Tel Co of MN LLC & Frontier Telecom of MN, Inc.	2515	0	573	1953	1465	488	206	694	53	0	0	0	694	0	694	28%
Clara City Telephone Co	44		0	44	32	12	0	12	0				12	0	12	27%
Crosslake Tel & Cablevision	21	0	0	23	20	3	1	4	0				4	0	4	19%
Dunnell Tel Co, Inc.	1	1		1	1	0	0	0	0	0	0	0	0	0	0	0%
Easton Telephone Company	27	0	0	24	22	2	0	2	3	0	0	0	2	0	2	7%
Eckles Telephone Co	53	0	53	48	41	7	0	7	5	0	0	0	7	0	7	13%
Global Connection Inc of America	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Granada Tel	7	0	7	5	5	0	0	0	2	0	0	0	0	0	0	0%
I-Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Interstate Telecommunications	50	0	50	50	38	12	0	12	0	0	0	0	12	0	12	24%
Johnson Tel	132	0	0	132	109	23	1	24	16				24	0	24	18%
Kasson & Mantorville Tel Co	55	0	0	55	55	0	4	4	0	0	0	0	4	0	4	7%
Lismore Coop Tel Co	5	0	0	5	5	0	0	0	0				0	0	0	0%
Mabel Coop Tel Co	33	0	3	30	29	1	0	1	0				1	0	1	3%
Manchester-hartland Telephone Co.	8	0	0	9	7	2	0	2	0				2	0	2	25%
Minnesota Valley Tel	13	0	0	13	12	1	0	1	0				1	0	1	8%
Nexus Communications, Inc. dba Reachout Wireless	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Northern Tel Co	1	0	0	1	0	0	0	0	0				0	0	0	0%
Park Region Tel Co	27			32	26	6	2	8					8	0	8	30%
Paul Bunyan Rural Tel Co	422	0	35	387	319	68	8	76	0	0	0	0	76	0	76	18%
Pine Island Tel	38	0	0	35	34	1	0	1	3	0	0	0	1	0	1	3%
Polar Communications Mutual Aid Corp.	269	0	8	244	177	67	5	72	25				72	0	72	27%
Q Link Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Red River Rural Telephone Assoc.	17	0	0	17	12	5	0	5	0				5	0	5	29%
Rothsay Telephone	11	0	0	11	11	0	0	0	0	0	0	0	0	0	0	0%
Sacred Heart Telephone Co	14		0	14	13	1	0	1	0				1	0	1	7%
Scott Rice Tel Co dba Integra Telecom	97	0	1	96	77	19	1	20	12	0	0	0	20	0	20	21%
Starbuck Telephone Co	72		0	72	62	10	0	10	0				10	0	10	14%
T-Mobile Central LLC	65	0	30	25	20	5	0	5	10	0	0	0	5	0	5	8%

