


## Staff Briefing Papers

Meeting Date	June 17, 2021	Agenda Item **5
Company	All Minnesota High Cost ETCs	
Docket No.	<b>P999/CI-20-747</b>	
	<b>In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs</b>	
Issue	1) Should the Commission recommend appropriate advertising and outreach of Lifeline by High Cost ETCs?	
Staff	Sally Anne McShane <a href="mailto:sally.anne.mcshane@state.mn.us">sally.anne.mcshane@state.mn.us</a>	651-201-2224

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 <b>Relevant Documents</b>	<b>Date</b>
PUC Notice of Comment Period	October 7, 2020
Minnesota Telecom Alliance Comments	November 9, 2020
Office of the Attorney General Reply Comments	January 11, 2021
Department of Commerce Corrected Comments, Attachment A, and Attachment B	January 14, 2021
PUC Notes from 4-26-21 Lifeline Advertising Workshop	May 7, 2021
<b>Initial Telecom Comments Re: Lifeline Offerings, Outreach, and Advertising Efforts</b>	
Paul Bunyan Rural Telephone Cooperative	October 26, 2020
Upsala Cooperative Telephone Association DBA Sytek	October 26, 2020

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.



**Relevant Documents**

**Date**

West Central Telephone Association	October 27, 2020
Kasson Mantorville Telephone DBA KM Telecom	October 27, 2020
Sacred Heart Telephone Company	October 28, 2020
Clara City Telephone Company	October 28, 2020
Halstad Telephone Company	October 28, 2020
Northern Telephone Company	October 29, 2020
Interstate Telecommunications Cooperative	October 29, 2020
Western Telephone Company	October 29, 2020
Sleepy Eye Telephone Company	October 29, 2020
Scott-Rice Telephone Company	October 29, 2020
Hutchinson Telephone Company	October 29, 2020
Gardonville Cooperative Telephone Company	October 29, 2020
Manchester-Hartland Telephone Company	October 29, 2020
Zumbrota Telephone Company	October 29, 2020
Nuvera Communications	October 29, 2020
Starbuck Telephone Company	October 29, 2020
Dunnell Telephone Company, Inc.	October 30, 2020
Gardonville Cooperative Telephone Association Revised Comments	October 30, 2020
Frontier Communications	October 30, 2020
Ace Telephone Association	October 30, 2020
Valley Telephone Company	October 30, 2020
Rothsay Telephone Company	October 30, 2020
Park Region Mutual Telephone Company	October 30, 2020
Winnebago Cooperative Telephone Association	November 2, 2020
Federated Telephone Cooperative	November 3, 2020
Wikstrom Telephone Co.	November 3, 2020
Farmers Mutual Telephone Company	November 3, 2020
Christensen Communications Company	November 3, 2020
City of Barnesville Municipal Telephone	November 3, 2020
Albany Mutual Telephone Association	November 4, 2020
Lismore Cooperative Telephone Company	November 4, 2020
Wilderness Valley Telephone Company	November 4, 2020
Johnson Telephone Company	November 4, 2020
Mabel Cooperative Telephone Company	November 4, 2020
Harmony Telephone Company	November 4, 2020
Consolidated Telephone Company DBA CTC	November 4, 2020
Spring Grove Communications	November 4, 2020
Winthrop Telephone Company	November 4, 2020
Minnesota Valley Telephone Company	November 4, 2020
Garden Valley Telephone Company	November 5, 2020
Midcontinent Communications	November 5, 2020
Crosslake Communications	November 6, 2020



**Relevant Documents**

**Date**

Runestone Telephone Association	November 6, 2020
Woodstock Telephone Company	November 6, 2020
Roseau Electric Cooperative, Inc.	November 9, 2020
T-Mobile	November 9, 2020
Pine Island Telephone Company	November 9, 2020
Lonsdale Telephone Company	November 9, 2020
Granada Telephone Company	November 9, 2020
Eckles Telephone Company	November 9, 2020
Easton Telephone Company	November 9, 2020
Cannon Valley Telecom Inc.	November 9, 2020
Blue Earth Valley Telephone Company	November 9, 2020
CenturyLink	November 9, 2020
TDS Telecom	November 9, 2020
Arvig	November 9, 2020
Emily Cooperative Telephone Company	November 9, 2020
Southwest Minnesota Broadband Services	November 10, 2020
Roseau Electric Cooperative, Inc.	November 10, 2020
Alliance Communications Cooperative	November 10, 2020
Red River Rural Telephone Association DBA Red River Communications	December 30, 2020
Jaguar Communications, Inc. DBA MetroNet	April 16, 2021

## I. Statement of the Issue

- 1) Should the Commission recommend appropriate advertising and outreach of Lifeline by High Cost ETCs?

## II. Background

Only 17% of eligible Minnesotans participate in the Lifeline program.<sup>1</sup> In the November 25, 2020 Order in Docket No. P-999/PR-20-8, the annual Eligible Telecommunications Carrier (ETC) certification docket, the Commission initiated an investigation into High Cost ETC offerings of Lifeline services.<sup>2</sup> The Order found that Lifeline offering, advertising, and outreach would be more appropriately addressed in a separate docket, and therefore, opened Docket No. P-999/CI-20-747.

To be deemed High Cost, ETCs must serve affordable voice and/or broadband in hard-to-serve rural areas and are then provided funding by the FCC to do so. Another Universal Service program is the Lifeline program. Lifeline offers monthly discounts up to \$9.25 for telephone or internet services to eligible low-income customers. ETCs are required by the FCC to provide outreach and advertising about the Lifeline program.

## III. Workshop

The October 7, 2020 Notice of Comment Period launching the investigation noted that staff anticipated holding a workshop in 2021 to discuss the information filed in the initial and reply comments; to discuss best practices in offering, advertising, and outreach of Lifeline; and to propose next steps in the proceeding.

Commission staff hosted a virtual workshop on April 16, 2021 with High Cost ETCs and stakeholders in attendance.<sup>3</sup> There were approximately 60 participants.

Staff opened the workshop by summarizing the Commission's November 20, 2020 Order and explaining the purpose of the docket. Two ETCs presented to attendees about specific outreach and advertising practices being used. Mark Klinkhammer of Garden Valley Telephone Company explained the many ways that this company informs their customers of the Lifeline program. Then Brent Christensen of Christensen Communications Company spoke about the evolution of the Lifeline program. His concern is that enrollment is shrinking despite company efforts to recertify their Lifeline customers.

The rest of the time was used for a question and answer session. Some notable points include:

- Tracking the most effective Lifeline outreach, advertising, and sign-up methods by ETCs has proved difficult.

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<sup>1</sup> USAC Program Data – Lifeline Participation. <https://www.usac.org/lifeline/resources/program-data/>.

<sup>2</sup> Docket No. P-999/PR-20-8 Order Certifying Eligible Telecommunications Carriers' Use of Federal High-Cost Subsidy, November 25, 2020, p. 4.

<sup>3</sup> Notes from the April 16, 2021 workshop were filed in the docket on May 7, 2021.

- Some social services providers will actively point eligible customers toward the Lifeline discount, but none are able to sign up customers themselves virtually.
- The National Verifier<sup>4</sup> has proved to be a barrier to companies that are trying to enroll new customers or recertify existing customers, and it can be difficult to reach the right person at the Universal Service Administrative Company (USAC)<sup>5</sup> for help.

#### IV. Parties' Comments

The PUC issued a Notice of Comment Period asking for initial comments to be filed by High Cost ETCs by November 9, 2020 and for reply comments to be filed by interested stakeholders by November 30, 2020.<sup>6</sup> The initial comments asked High Cost ETCs:

- How many Lifeline customers they are currently serving and to identify any patterns or trends seen in Lifeline enrollment in their service area;
- How High Cost ETCs are advertising Lifeline services with a special explanation about advertising and outreach to diverse populations;
- To submit a sample of their Lifeline advertising materials and an explanation of the types of outreach and advertising ETCs use to reach eligible populations most effectively; and
- Any other observations or experiences around Lifeline that's relevant to the Commission's inquiry.

Approximately half of Minnesota's ETCs filed initial comments in the docket. 64 ETCs filed initial comments. There are 121 Commission-designated ETCs in Minnesota.

The reply comments asked stakeholders about:

- Best practices in terms of advertising and outreach on the Lifeline program;
- Whether High Cost ETCs are properly offering the Lifeline program; and
- Whether there are any other issues or concerns.

##### A. MTA Comments

The Minnesota Telecom Alliance (MTA) filed initial comments on November 9, 2021, saying that to educate consumers about the Lifeline benefits, their member companies use a wide array of methods available to them at the company's own expense.

The methods MTA members often use to *target their customers* include:

- Welcome packets sent to new subscribers;
- Monthly bill inserts;
- Company newsletters;

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<sup>4</sup> The National Verifier is an online portal from USAC where customers can sign up to find out whether they are eligible for Lifeline and to recertify their Lifeline service.

<sup>5</sup> USAC (Universal Service Administrative Company) is the organization designated by the FCC to administer the Lifeline program. The FCC's *2016 Lifeline Modernization Order* charged USAC with creating and maintaining the National Verifier.

<sup>6</sup> Notice of Comment Period, October 7, 2020, p. 1.

- Letters and brochures sent via US Mail;
- Advertisements in phone books distributed to all households in the service area;
- Brochures offered to office visitors; and
- Company websites.

The methods MTA members often use to *promote Lifeline to the broader public* include:

- Advertisements in local newspapers;
- Advertisements on social media, i.e. Facebook and Instagram; and
- Letters with brochures explaining the Lifeline program addressed to area social service offices with encouragement for staff to distribute the information to eligible individuals.

MTA states that their member companies already do significant advertising of the Lifeline program at their own expense. They encourage the Commission to explore other options to increase participation in the Lifeline program rather than mandating additional advertising.

## **B. Department Comments**

### **1. Introduction to Department Comments**

The Department of Commerce (Department)'s two main recommendations from their January 14, 2021 reply comments were that the Commission can: 1) decide upon best practices for Lifeline advertising and require High Cost ETCs to follow those best practices or refer the issue of best practices to a workgroup; and 2) determine if webpages advertising Lifeline on High Cost ETCs' websites are necessary.

The Department reviewed all filings in the docket from High Cost ETCs. They say that most of the carriers that did respond reported their Lifeline customer numbers and provided examples of their Lifeline advertising, but only a few specifically mentioned outreach to diverse populations or discussed the most effective outreach practices. It was noted that some carriers do not have an explanation of Lifeline on their websites. If they do, the Lifeline webpage is difficult to find, i.e. it is only available through a search box that is not very intuitive, or the page is difficult to discern as being about Lifeline.

The Department cites 45 U.S.C. 214 (e), which allows states the authority to designate ETCs, and that once the designation is received, a carrier must advertise Lifeline. Further, the Department discusses 47 C.F.R. 54.405, which requires ETCs to specifically offer appropriate advertising. This includes: publicizing the availability of Lifeline service in a manner able to reasonably reach low-income customers; the name of the ETC must be on all advertising materials; and indicate on all advertising materials in plain language that this is a Lifeline service, that Lifeline is a government program, that the service is non-transferable to another individual, that only eligible customers may enroll in Lifeline, and that the program is limited to one discount per household. The Department asserts that "both the FCC and Congress have clearly indicated that State Commissions have authority to oversee the types of advertising for Lifeline service and has authority to ensure Lifeline service is properly advertised."<sup>7</sup>

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<sup>7</sup> Department comments, January 14, 2021, p. 3.

## 2. Analysis of High Cost ETCs' Filings

The Department's reply comments largely analyzed the High Cost ETCs' responses.<sup>8</sup> While many companies provide the number of Lifeline customers they serve, few were able to identify patterns or trends. However, a few companies did offer observations about the Lifeline program.<sup>9</sup> Additionally, few companies distinguished between customers that use the Lifeline service on voice-only or broadband or between Tribal and non-Tribal customers. The Department identified that MTA filed comments, asking the Commission not to mandate advertising that would force their members to take on extra expenses.

In their comments, the Department identified different types of outreach and advertising the companies are currently employing:

- **Websites.** Most companies have a website, but the Department says that many of the websites are hard to reach and were outdated or incorrect.
- **Direct Outreach by the Company.** These items include bill inserts, posters in their offices, newsletters, annual notices, postcards sent to subscribers, user guides, brochures, and welcome packets.
- **Outreach by Third Parties.** This includes outreach to social service agencies; posters in senior housing, grocery stores, and gas stations; and placing advertising on available cable networks.
- **Social Media.** A few companies said that they are using Facebook, Instagram, or blogs to advertise Lifeline.

## 3. Best Practices

The Department defines the term 'best practices' from the Commission Order as High Cost ETCs using "multiple avenues for reaching those who are potential Lifeline customers in order to educate and assist them in obtaining Lifeline service."<sup>10</sup> They use an FCC set of guidelines published in 2004 that recommend a multi-pronged outreach approach that includes regular mailings; posters in places where low-income individuals may see them; outreach materials that can be understood by non-English speakers; and coordination with government agencies, including USAC as an outreach resource.

The Department recommends the following options for outreach:

- 1) **Website.** An accurate description of Lifeline should be available on a company's website within three clicks or by using a search bar. The Department recommends that companies may wish to consult with the Consumer Affairs Office (CAO) on the best search terms.

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<sup>8</sup> The Department's reply comments contain two attachments. Attachment A identified the following: companies that did not respond to the Commission's initial comment period; companies that the Department believes are offering Lifeline properly; and issues that the Department has found to merit attention by the ETCs to properly administer Lifeline. Attachment B contains analysis of each ETC. Both attachments contain the Department's observations of each company's website.

<sup>9</sup> Department comments, January 14, 2021, p. 5.

<sup>10</sup> Department comments, January 14, 2021, p. 6.

- 2) **Social Media.** Social media channels should have prominent information on Lifeline.
- 3) **Social Service Agency Outreach.** ETCs should keep in regular contact with social service agencies that will offer information about Lifeline to their clients.
- 4) **Lifeline Champion and Community Outreach.** All smaller companies should have one employee designated as the “Lifeline champion,” who is well-versed in the Lifeline program, speaks with community groups, posts flyers, and is knowledgeable on the diverse populations in their service area. Larger companies should have an internal education program for customer service representatives, so they can assist consumers with enrolling in Lifeline easily.
- 5) **Outreach through Various Formats.** Outreach efforts led by state and federal government agencies, like Lifeline Awareness Week, are good opportunities for enrollment increase.

The Department singled out Garden Valley Telephone as the company using the most Lifeline advertising formats, and therefore, meeting the Department’s definition of ‘best practices.’<sup>11</sup> They also listed other companies with notable Lifeline outreach efforts:

- **TDS Telecom.** The Lifeline information on their website can be found within one click, and they offer five types of outreach.
- **Midcontinent Communications (Midco).** They air Lifeline advertisements on their cable service.
- **CenturyLink.** They placed at least 190 ads in Minnesota newspapers in 2020.

#### 4. High Cost ETCs’ Websites

The Department believes that many of the companies that filed in docket by the initial comment deadline are not properly offering Lifeline. They say this because many companies have Lifeline webpages that were:

- 1) **Difficult to reach.** Department staff had difficulty finding the Lifeline information due to a dead link or poor searchable keywords.
- 2) **Does not contain Lifeline information at all.** The Department specifically addressed two 2017 FCC CAF II (Auction 903) winners that do not have any Lifeline information on their websites: Jaguar Communications and LTD Broadband.<sup>12</sup> Also two DBAs of the same small Minnesota company have websites without any information on them: Northern Telephone Company and Wilderness Valley Telephone Company.
- 3) **Contents outdated on Lifeline credit or eligibility criteria for enrollment.** Several of the companies have not updated the voice-only Lifeline credit from \$7.25 to \$5.25.<sup>13</sup> While

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<sup>11</sup> Staff discusses Garden Valley Telephone’s complete list of Lifeline advertising strategies on p. 12 of the briefing papers.

<sup>12</sup> Jaguar Communications made a filing in this docket on April 16, 2021. They have been purchased by MetroNet, which has a Lifeline page on their website. LTD Broadband’s ETC designation was approved in Docket Nos. P-999/CI-21-86 and P-6995/M-21-133 at the May 13, 2021 agenda meeting. The decision requires LTD to file their Lifeline advertising plan within 10 days of the Commission Order.

<sup>13</sup> This change was made on December 1, 2020. Voice-only Lifeline support will be eliminated for some census blocks on December 1, 2021. On June 2, 2021, the FCC’s Wireline Competition Bureau



federal poverty guideline is updated annually, some companies have not updated the income limits on their websites and other materials.

The Department stresses that “websites are a necessary and significant means to communicate about Lifeline service.”<sup>14</sup> However, they do recognize that continually updating websites is a challenge.

### C. Office of the Attorney General Comments

The Office of the Attorney General’s (OAG) main recommendation from their January 11, 2021 reply comments is to develop and implement a clear set of Lifeline program advertising and outreach best practices.

The OAG discusses how the FCC requires ETCs to advertise their Lifeline services. Further, High Cost ETCs that receive Lifeline support must annually file FCC Form 481, which must include details of the company’s Lifeline plan. The OAG says that an FCC Form 481 will be rejected if:

- It contains an inactive Lifeline webpage link, or the link cannot be found;
- The Lifeline webpage is not specific to program guidelines;
- Printed materials don’t include information on minutes or usage parameters;
- Websites outline eligibility and enrollment, but do not include terms and conditions; or
- Websites and other materials don’t include information about toll calls and additional services.

USAC has provided their own guidance on Lifeline advertising, including:

- Posting notices at public transportation stops, agencies, shelters, and soup kitchens;
- Running public service announcements; and
- Providing information booths at central locations.

The OAG pointed out that not all of Minnesota’s High Cost ETCs are offering Lifeline properly. While no ETCs are violating Lifeline program rules to the point of warranting a denial of ETC status, many companies did not have a working Lifeline webpage, and many who did have a working Lifeline webpage did not include up-to-date information.

The OAG says that “a state may adopt those ETC regulations and requirements it sees fit to preserve and advance the Universal Service programs so long as those regulations and requirements are not inconsistent with the FCC’s rules.”<sup>15</sup> Further, they quote the FCC’s 2004 Lifeline Order that allows states and ETCs the flexibility to determine appropriate outreach mechanisms.

The OAG proposes the following best practices:

- 1) **Mandatory Lifeline program disclosures.** High Cost ETCs should periodically review their Lifeline advertising and outreach materials to ensure the materials are up to date.

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announced that some census blocks will have continued voice-only support at \$5.25 per month until November 30, 2022.

<sup>14</sup> Department comments, January 14, 2021, p. 10.

<sup>15</sup> OAG comments, January 11, 2021, p. 9.

- 2) **Internet-only advertising prohibited.** High Cost ETCs should supplement any internet advertising with print media, direct mail, etc. that can reasonably reach potential Lifeline customers in their service area.
- 3) **Advertising reasonably designed to reach eligible households.** High Cost ETCs should submit samples of Lifeline materials to the Commission on a triennial basis for the Commission and other stakeholders to review advertisement avenues currently in use. ETCs may reference their FCC Form 481 filing to satisfy this requirement.
- 4) **Webpages containing Lifeline information encouraged.** High Cost ETCs should develop and maintain webpages that contain Lifeline program-specific information to publicize the availability of the Lifeline program to potentially eligible customers.
- 5) **Functioning websites and Lifeline information webpages.** High Cost ETCs should conduct periodic checks to ensure a functioning company website and a functioning Lifeline program webpage.
- 6) **Lifeline-specific webpages.** High Cost ETCs should maintain a Lifeline-specific webpage if they are using a website to advertise the Lifeline program.
- 7) **Three clicks or less.** High Cost ETCs' Lifeline-specific webpages should be available from the homepage in three clicks or less.
- 8) **Website or printed materials include plan information.** High Cost ETCs should include all Lifeline plan information, i.e. minutes, usage parameters, eligibility, sign-up, terms and conditions, toll calls, additional service charges, etc.
- 9) **Website or printed materials need continual updates.** High Cost ETCs should continually update their webpages or printed materials to reflect changes to the Lifeline program, i.e. eligibility, application, and recertification requirements; applicable discounts; broadband minimum service charges; etc.
- 10) **Tribal governments made aware of enhanced Lifeline benefits.** High Cost ETCs should cooperate with Commission and Department staff to develop and implement meaningful Lifeline program tribal engagement.

The OAG recommends that the Commission direct any interested parties to a designated task force to review the Lifeline advertisement and outreach efforts of Minnesota ETCs with higher Lifeline participation to identify and implement best practices.

The OAG writes about a 2005 federal-state working group, Lifeline Across America Working Group (LAAWG), that examined Lifeline outreach efforts and provided suggestions. The LAAWG's suggestions are the following:

- Establish a Lifeline outreach taskforce;
- Establish a process to identify and raise awareness of the Lifeline program with state associations and/or organizations that serve Minnesota's low-income populations;
- Establish a process to identify additional opportunities for one-on-one Lifeline program outreach; and
- High Cost ETCs should be: 1) required to continually review and assess their outreach materials and methods' effectiveness; 2) encouraged to include Lifeline program information on all disconnection notices and payment plan confirmation letters; and 3)

required to develop outreach methods targeted at households that do not currently have service.

## V. Staff Analysis

### A. Lifeline Offerings

This docket was partially opened to examine High Cost ETCs' offering of the Lifeline program. Neither the Department nor the OAG think that all High Cost ETCs are properly offering Lifeline as well as possible, after a review of the ETCs' advertising and outreach practices. Both have concerns about ETCs not having adequate or enough information on their Lifeline webpages.

However, 47 C.F.R. 54.405 requires ETCs to perform advertising by publicizing the availability of Lifeline service in a manner that can reasonably reach low-income customers; the ETC's name must be on all advertising materials; and indicate in plain language that it is a Lifeline service, that Lifeline is a government program, that the service is non-transferable to another individual, that only eligible customers may enroll in Lifeline, and that the program is limited to one discount per household. The majority of ETCs seem to be meeting this bare minimum.

Since "offering" was not clearly defined by the Commission, staff wants to differentiate between properly applying the Lifeline discount to customer's bills and making advertising efforts. All High Cost ETCs are properly offering Lifeline as far as providing the discount to low-income customers, as requested.

### B. Lifeline Advertising and Outreach

All High Cost ETCs that submitted comments in this docket are doing some type of advertising. However, as the Department and the OAG point out, more work can be done to increase participation in the program.

The Department points out that "subscribers are paying a significant percentage of their telecommunications bill to allow companies to receive subsidies to serve high cost areas and customers who are low-income."<sup>16</sup> If all ETC subscribers are subsidizing the Lifeline program, then ETCs have an obligation to perform advertising and outreach in a bid to serve more Lifeline customers.

The FCC requires all ETCs to advertise the availability of the Lifeline program in a manner reasonably designed to reach eligible households. The FCC allows states to add additional requirements above those designated by the FCC so long as they do not burden the ETCs' federal support.

There is mutual agreement between the FCC and USAC regarding advertising requirements. There are three guidelines that must be followed in Lifeline advertising:

- 1) **Periodic reviews to ensure Lifeline program information is up to date.** For example, every year the Federal Poverty Guidelines are updated. This needs to be reflected in all

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<sup>16</sup> Department comments, January 14, 2021, p. 10.

of an ETC's advertising material. Currently, not all of Minnesota's ETCs are updating their materials frequently enough.

- 2) **Targeting households that don't already have service.** To increase Minnesota's Lifeline participation rate, Minnesota's High Cost ETCs must target households that don't already have phone, or now more importantly, broadband service. This requires greater outreach. Although it does require more of an effort on the part of ETCs, it is in their best interest to enroll more customers.
- 3) **Outreach through various formats.** Clearly, not all low-income customers are alike. An ETC needs to try as many different methods as possible to reach all potential customers. Most of Minnesota's ETCs are using various methods, but there is always room for improvement since the participation rates are still very low.

In USAC's May 2021 newsletter, they reminded Lifeline service providers that they are required to advertise the availability of Lifeline support in a manner reasonably designed to reach eligible consumers within their study areas under Section 54.405(b), including trying to reach consumers that do not have Lifeline-supported service. A new advertising idea they include in the newsletter is to provide outreach to disabled communities by using telecommunications relay services (TRS), text telephone (TTY), speech-to-speech services (STS), and providing outreach materials in Braille. They also recommend translating advertising into languages other than English for any sizeable populations that speak other languages in an ETC's service area and proactively reviewing advertising materials periodically to ensure outreach is accurate, up-to-date, and includes necessary information.

Commission staff, stakeholders, and the ETCs themselves recognize that phone service is dropping off while broadband service is growing. In fact, the FCC is ending Lifeline support for voice-only service in some census blocks on December 31, 2021. The COVID-19 pandemic has shown us the necessity of broadband service. Future broadband growth is a focus for ETCs, despite the MPUC not having the ability to regulate it.

The Department of Commerce is advocating for all High Cost ETCs to have working, informational websites. To my earlier point, internet service is becoming ubiquitous and is the first place that most Americans look for information.

The OAG suggests Commission staff look at other states' Lifeline outreach successes and connect ETCs with Tribal liaisons. TDS Telecom would like Commission staff to provide Lifeline information to social service agencies, so they can directly inform customers seeking low-income assistance.

The Commission, through CAO, has been conducting a TAP (Telephone Assistance Plan)-Lifeline workgroup, as well as having an outreach student worker on staff. The following is a list of some of the outreach efforts CAO makes: 1) sending brochures to agencies that ask for replenishment; 2) working with radio stations to promote telephone discounts; 3) presenting about the TAP and Lifeline programs to social service agencies and low-income housing; and 4) signage on Metro Transit buses and electronic messages on train platforms.

The Minnesota High Cost ETC that is making the greatest outreach effort is Garden Valley Telephone. They use the following methods to advertise Lifeline: brochures; phone directories; direct mail; letters to social service offices; company newsletters; bill tag messages and letters to customers; website; welcome guide; Lifeline Awareness Week; social media; streamlined customer contacts; and additional assistance plans. While Garden Valley Telephone is a larger company with a marketing department, even small companies can use some of these free ideas like a Facebook account.

A common complaint that arose in the workshop held on April 16<sup>th</sup> was the difficulty of navigating USAC's databases – NLAD (the National Lifeline Accountability Database) and the National Verifier. USAC encourages every ETC to enroll their representatives for a RAD (Representative Accountability Database) ID. This system validates the identities of the service provider's representatives and allows them to complete transactions in NLAD and the National Verifier, including enrollments, eligibility checks, and recertifications. Essentially, this system allows companies to sign up customers themselves as they have done before the addition of the National Verifier, but a RAD ID must now be utilized. More companies are able to renew their existing Lifeline customers' discounts and enroll more new customers if they have a RAD ID and are comfortable navigating the system.<sup>17</sup>

The PUC's Notice for Comment requested "an explanation of the types of outreach and advertising ETCs use to reach eligible populations most effectively."<sup>18</sup> Very few companies submitted their advertising outreach plan to diverse populations. This includes Minnesota's larger High Cost ETCs. Consolidated Telephone Company (DBA CTC), T-Mobile, and Arvig's websites have links to Lifeline information translated into Spanish. Specifically, CTC's links to USAC's Spanish language webpage. This is a good free option for translation of Lifeline materials. Also, USAC's Lifeline Support Center can assist consumers in 200 different languages, including American Sign Language. The Support Center can answer questions about application status, qualification documents, assistance reviewing the benefit, etc.<sup>19</sup> Lifeline ETCs can easily link to the Lifeline Support Center on their website. Linking to USAC's Lifeline Support Center and Spanish language webpage (or full website translation if the ETC has the resources) is a good first start for outreach to diverse populations. However, since multiple advertising formats are needed to reach the maximum number of customers, other options are needed like working with local non-profits that serve diverse populations.

Some companies' advertising materials included information about the enhanced Tribal benefits,<sup>20</sup> but most did not talk about direct outreach to the Tribal governments. T-Mobile is the only Minnesota ETC performing Tribal outreach. They conduct outreach to Minnesota's Tribal governments and worked with the Department's Tribal Liaison in May 2020.

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<sup>17</sup> Kristin Berkland, a representative of the OAG, has offered to request a training with a USAC representative on using the RAD ID.

<sup>18</sup> Notice of Comment Period, October 7, 2020, p. 1.

<sup>19</sup> USAC's Lifeline Support Center is open 7 days a week 8am-8pm CST. Consumers can call 1-800-234-9473 or visit <https://www.lifelinesupport.org/help/>.

<sup>20</sup> Low-income consumers on Tribal lands can receive a Lifeline discount of up to \$34.25 per month and an up to \$100 reduction in first-time connection charges.

Many High Cost ETCs use the same advertising methods: websites, customer bills, directories, etc. How people get information has changed over time, i.e. there are less newspaper readers than in the past and more web users. Staff recognizes that some advertising requires more resources. A lot of advertising efforts listed in these briefing papers require only some creativity and some time spent pondering how best to use a small company's limited resources. One of the main goals of these briefing papers is to compile creative ideas (not necessarily expensive ideas) that the small companies can use at their discretion to maintain and further increase the Lifeline participation in their service area.

Since the beginning of the COVID-19 pandemic, many Minnesotans have lost income and now qualify for low-income programs like Lifeline. These individuals may have never participated in low-income programs before and may be unsure how to start. This creates urgency for High Cost ETCs to make contact with new and existing customers for enrollment in the Lifeline program.

### C. List of Lifeline Advertising and Outreach Options

Staff have compiled all of the advertising and outreach ideas that have been identified in this docket. They are listed below:

- **Website.** High Cost ETCs must have a Lifeline webpage that meets the following criteria:
  - Retrievable information within three clicks; OR
  - By using a search bar keyword (CAO may consult with High Cost ETCs on the best search terms.);
  - Periodic checks to ensure functionality;
  - Displays all plan information, including minutes, usage parameters, eligibility, sign-up, terms and conditions, toll calls, additional service charges, etc.; and
  - Continual updates to reflect changes to the Lifeline program, including eligibility, application, and recertification requirements; applicable discounts; broadband minimum service charges, etc.
- **Social Media.** High Cost ETCs must utilize social media accounts, i.e. Facebook, Twitter, Instagram, YouTube, etc., to advertise the Lifeline program.
- **Social Service Agency Outreach.** High Cost ETCs must keep in regular contact with local social service agencies, i.e. LIHEAP providers, counties, etc., that will offer information about Lifeline to their clients, including providing brochures and/or other handouts.
- **Lifeline Champion.** Small High Cost ETCs must designate one employee as the "Lifeline Champion" that will be well-versed in the Lifeline program, i.e. attend monthly USAC webinars, and serve as the company's contact for new customers inquiring about the program or looking for ways to reduce their bill. The Champion should be equipped with a RAD ID. Large High Cost ETCs must educate all customer service employees about the Lifeline program.
- **Community Outreach.** High Cost ETCs must perform community outreach by communicating with community groups, non-profits, and/or churches; posting flyers in senior and/or low-income housing, shelters, grocery stores, gas stations, public transportation stops, social service agencies, food shelves, and soup kitchens; billboards

purchased on main roads in the service area; airing public service announcements; running information booths at central locations and community events; and placing advertisements in local newspapers.

- **Tribal Outreach.** High Cost ETCs must perform outreach to Tribal governments in their service area.
- **Diverse and Disabled Population Outreach.** High Cost ETCs must inform diverse and disabled populations in their service area, including but not limited to translating Lifeline advertising materials into other languages and using telecommunications relay services (TRS), text telephone (TTY), and speech-to-speech services (STS).
- **Disconnection Notices.** High Cost ETCs must include Lifeline program information on all past due bills, disconnection notices and disconnection door tags, and payment plan agreements.
- **Paper Materials.** High Cost ETCs must include Lifeline information on all paper materials sent to customers, including but not limited to a welcome packet sent to new customers, inserts or onserts included in the monthly bill, company newsletters, annual notices and brochures sent via US mail, phone books distributed to all households in the service area, and brochures offered to customers that are signing up in a company's office.
- **Lifeline Awareness Week.** High Cost ETCs must participate in the FCC-organized Lifeline Awareness Week, held annually the first week after Labor Day, by utilizing their advertising toolkit ideas. Toolkit ideas include contacting mayoral and other elected officials' offices to arrange proclamations; holding community events; producing extra advertising materials to hand out to prospective customers; arranging PSAs with local radio and television stations; and sending news releases to local media outlets.

Based on the record and stakeholder discussions, staff suggests the following priorities for High Cost ETCs' advertising and outreach of Lifeline:

- **Lifeline webpage.** A functioning website is a necessity in 2021 since most people look for information online first.
- **Outreach to low-income, diverse populations, and Tribal lands.** Outreach to these specific populations will reach those that can arguably benefit the most from the Lifeline program. Outside of some providing information to counties' social services offices in their service areas, this is an option overlooked by many ETCs.
- **Information about the Lifeline program placed on past due bills.** Customers with past due bills may be struggling to pay them and could most use the Lifeline discount. Some ETCs have stated that they use this strategy.
- **A Lifeline Champion at small companies.** Appointing one employee to be the expert on the Lifeline program, including training them on the RAD ID/National Verifier database, will increase the number of current Lifeline customers by either recertification or enrollment action.



## VI. Decision Options

- 1) The Commission recommends High Cost ETCs adopt and implement some or all of the best advertising and outreach practices identified in this docket. (See list above.) (*Department, OAG*)
- 2) High Cost ETCs must file an annual report on any advertising and outreach efforts they have made in the past year, or file FCC Form 481. (*OAG*)
- 3) The Commission requires High Cost ETCs to offer webpages that correctly show all income and other requirements and contains the correct rates. Information must be reachable within three clicks of the company's home page and be easily searchable. (*Department, OAG*)
- 4) The Commission refers the issues of best practices, requiring websites, and any other requirements for High Cost ETCs concerning websites to a working group for further consideration. (*Department, OAG*)
- 5) The Commission takes no action.