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April 16, 2021

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)***  
**MPUC Docket No. P-999/CI-17-509**

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these reply comments to respond to two items raised by T-Mobile Central, LLC (“T-Mobile”) and Assurance Wireless USA, L.P. (“Assurance”) in their comments. As explained in greater detail below, the OAG supports any change to the Minnesota Public Utilities Commission’s (“Commission”) November 20, 2020 federal Universal Service Lifeline Program (“Lifeline Program” or “Lifeline”) order that reflects the meaning and spirit of the agreement reached by the parties during the February 5, 2021 Commission Lifeline workshop. The OAG does *not* suggest a rolling annual notice based on a subscriber’s enrollment date or propose that the annual Lifeline Program customer notice be coordinated to overlap with the recertification process. The OAG does, however, continue to recommend including subscriber anniversary information in the annual recertification timing section of the Lifeline Program new customer enrollment notice.

## **BACKGROUND**

On November 20, 2020, the Commission issued an order requiring mobile wireless Lifeline-only ETCs to distribute a notice to new Lifeline subscribers (“New Subscriber Notice”) within seven days of enrollment in the Lifeline Program.<sup>1</sup> On February 5, 2021, Commission staff held a workshop (“Lifeline Workshop”) to discuss the content and distribution of the New Subscriber Notice.<sup>2</sup> On March 26, 2021, the OAG filed letter comments stating that it does not oppose changing the timeframe for distribution of the New Subscriber Notice from “within seven

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<sup>1</sup> See *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)*, Docket No. P-999/CI-17-509, ORDER ESTABLISHING CUSTOMER NOTICE REQUIREMENT at 7-8 (Nov. 20, 2020) (setting a “within seven days” notice period and delineating the required content for the New Subscriber Notice).

<sup>2</sup> Docket No. P-999/CI-17-509, Notice of Comment Period at 1 (Mar. 3, 2021) (mentioning the Lifeline Workshop).

days” to “within one month.”<sup>3</sup> Shortly thereafter, T-Mobile and Assurance filed comments stating that the OAG’s “within one month” of enrollment proposal is “slightly different, and less workable, than the rolling monthly process” that they support.<sup>4</sup> They also discussed the annual Lifeline Program subscriber notice (“Annual Subscriber Notice”), arguing against a rolling annual notice and stating that discussion around the timing of the Annual Subscriber Notice at the Lifeline Workshop was confusing.<sup>5</sup>

## ANALYSIS

### I. CLARIFICATION REGARDING THE “WITHIN ONE MONTH” LANGUAGE USED IN THE OAG’S LETTER COMMENTS.

The OAG used the “within one month” language in its letter comments because the question raised in the Commission’s Notice of Comment Period (“Notice”) is worded as “within a month” of a new customer enrollment:

Should the Commission amend Ordering Paragraph 1 of its November 20, 2020 Order to allow Mobile Wireless Lifeline-Only ETCs subject to the Order to distribute the required notice *within a month* of a new customer enrolling, rather than within seven (7) days?<sup>6</sup>

The OAG sees no meaningful distinction between its “within one month” language and the “within a month” language used in the Commission Notice. And, since T-Mobile and Assurance propose no alternative language, the OAG is not sure precisely what wording change they seek. It is possible that T-Mobile and Assurance would prefer language to the effect of “distribute the required notice once a month after new customer enrollment.”<sup>7</sup> However, if such an approach will result in a customer receiving the notice *more than one month* after enrollment, that does not reflect the agreement reached at the Lifeline Workshop and the parties would need to discuss the change.

The OAG agrees that there should be flexibility for the timing of the New Subscriber Notice.<sup>8</sup> With the caveat that all subscribers receive the notice *no later than one month after* enrollment in the Lifeline Program, the OAG also agrees that the monthly batching of the New Subscriber Notices will be effective and timely for new subscribers.<sup>9</sup> That is why the OAG did not oppose the batched New Subscriber Notice approach at the Lifeline Workshop.

Neither the Commission’s “within a month” or the OAG’s minimally different “within one month” language restricts flexibility. Either phrase accommodates a monthly batching approach

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<sup>3</sup> See generally Docket No. P-999/CI-17-509, Letter Comments of the Office of the Attorney General (Mar. 26, 2021).

<sup>4</sup> Docket No. P-999/CI-17-509, Comments of T-Mobile and Assurance Wireless on Timing of Notice to New Customers at n.1 (Apr. 2, 2021) (“T-Mobile and Assurance Comments”).

<sup>5</sup> *Id.* at 4-5.

<sup>6</sup> Notice at 1 (emphasis added).

<sup>7</sup> T-Mobile and Assurance Comments at 4 (“Sending out the customer notices in a batch *once a month* would still be effective and timely for the new subscribers.”) (emphasis added).

<sup>8</sup> *Id.* at 3 (advocating that any change to the language of the Commission’s order adopt a flexible approach).

<sup>9</sup> *Id.* at 4.

and allows mobile wireless Lifeline-only ETCs to send out the New Subscriber Notice on a rolling basis immediately after enrollment, if they so choose. Nonetheless, the OAG, like T-Mobile and Assurance, is open to any change to the New Subscriber Notice language in the Commission's order, as long as it accurately reflects the parties' agreement from the Lifeline Workshop.

## **II. CLARIFICATION REGARDING THE ANNUAL SUBSCRIBER NOTICE DISCUSSION AT THE LIFELINE WORKSHOP.**

### **A. The OAG did not Suggest a Rolling Annual Subscriber Notice that is Based on a Subscriber's Enrollment Date or that Overlaps with the Annual Recertification Process.**

Each year, the eligibility of Lifeline subscribers must be recertified.<sup>10</sup> Minnesota uses the National Lifeline Eligibility Verifier ("National Verifier") for its recertification process.<sup>11</sup> This means that a Minnesota Lifeline Program subscriber's recertification is automated, unless the subscriber does not pass the National Verifier's automated checks and the Universal Service Administrative Company ("USAC") requires the subscriber to provide additional information to demonstrate its continued Lifeline Program eligibility.<sup>12</sup> Until recently, the annual recertification date for a subscriber in a state that uses the National Verifier was one year after the date that the subscriber was successfully reverified,<sup>13</sup> or one year after Lifeline Program enrollment, if the subscriber enrolled after the hard launch of the National Verifier.<sup>14</sup>

The OAG that a consensus developed at the Lifeline Workshop that a mobile wireless Lifeline-only ETC should send an Annual Subscriber Notice to its Minnesota subscribers at the end of the year.<sup>15</sup> The OAG did not suggest a rolling annual notice based on a customer's enrollment date or propose that the Annual Subscriber Notice be coordinated to overlap with the recertification process.<sup>16</sup>

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<sup>10</sup> 47 C.F.R. § 54.410(f). The FCC recently issued an order temporarily pausing the Lifeline Program recertification requirements through June 30, 2021. *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Order, DA 21-229 at 1 (rel. Feb. 24, 2021) ("*February 2021 Lifeline Waiver Order*").

<sup>11</sup> See USAC Website, National Verifier December 16, 2019 Launch, <https://www.usac.org/lifeline/eligibility/national-verifier/launches/national-verifier-december-2019-launch/> (last visited Apr. 16, 2021) (listing a December 16, 2019 National Verifier hard launch date for Minnesota).

<sup>12</sup> See USAC Website, Recertify Subscribers, <https://www.usac.org/lifeline/eligibility/recertify-subscribers/> (last visited Apr. 16, 2021) ("Every subscriber in National Verifier recertification will go through an initial automated data source check that will check for the subscriber's eligibility. . . . Subscribers whose eligibility cannot be verified via the initial automated check will be required to complete the Recertification Form and may be required to provide proof of eligibility. USAC will conduct outreach to these subscribers to inform them of the recertification requirement.") ("USAC Recertification Webpage").

<sup>13</sup> See USAC Website, Reverification, <https://www.usac.org/lifeline/eligibility/national-verifier/reverification/> (last visited Apr. 16, 2021) ("Reverification will reset a subscriber's anniversary date. Subscribers will be recertified one year after the date that they are successfully reverified. The National Verifier will perform all future recertification for subscribers in National Verifier states.")

<sup>14</sup> USAC Recertification Webpage ("Subscribers will only be due for recertification after they have successfully completed reverification or if they enrolled through the National Verifier.")

<sup>15</sup> T-Mobile and Assurance Comments at 4.

<sup>16</sup> *Id.* at 5.

On January 19, 2021, Commission staff circulated proposed language for the New Subscriber Notice.<sup>17</sup> Although the New Subscriber Notice is for newly-enrolled Lifeline Program subscribers, it discusses annual recertification. The proposed recertification language in the January 19, 2021 New Subscriber Notice explained that annual certification occurs on a subscriber's Lifeline Program enrollment anniversary.<sup>18</sup>

Shortly before the Lifeline Workshop, Commission staff circulated a revised New Subscriber Notice for consideration at the workshop.<sup>19</sup> Unlike the previous draft, the revised New Subscriber Notice did not explain that annual recertification occurs on a subscriber's Lifeline Program enrollment anniversary.<sup>20</sup>

Because the revised New Subscriber Notice did not explain that annual recertification occurs on a subscriber's Lifeline Program enrollment anniversary, the OAG was concerned about subscriber confusion. For example, a subscriber that enrolls in the Lifeline Program in April 2021 and receives its New Subscriber Notice in May 2021 could receive the Annual Subscriber Notice and think its recertification date is at the end of the calendar year instead of one-year from its recertification or enrollment date. Thus, during the Lifeline Workshop, the OAG recommended that *the language of the New Subscriber Notice* be changed to once again clarify that a Lifeline Program subscriber's recertification date is one year after the subscriber's recertification date or one year after the subscriber's Lifeline Program enrollment, if the subscriber enrolls after the hard launch of the National Verifier. *The OAG did not then, nor does it now, propose a rolling Annual Subscriber Notice based on a subscriber's Lifeline Program enrollment date or propose that the Annual Subscriber Notice overlap with the annual recertification process.*

**B. The OAG Continues to Recommend that Commission Staff Include Information About a Subscriber's Lifeline Anniversary Date in the Annual Certification Section of the New Subscriber Notice.**

After the Lifeline Workshop, the FCC released an order that explains that the Lifeline recertification rule has been amended so that Lifeline annual recertifications may be completed by the end of each calendar year, instead of by each subscriber's anniversary date:

. . . .We . . . note that, on October 13, 2020, an amendment to the Lifeline recertification rule took effect, requiring that Lifeline subscribers' annual recertifications be completed by the end of each calendar year instead of by each subscriber's anniversary date. To provide USAC . . . with enough time to reasonably stagger the beginning of recertifications again after the expiration of the waiver granted in this Order, and consistent with the amended rule['s] requirement that Lifeline subscribers undergo one recertification per calendar year, we clarify that subscribers' eligibility need only be recertified once in calendar year 2021. Any subscribers with

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<sup>17</sup> Email from S. McShane, Commission Rates Analyst, to J. Gullikson et al. (Jan. 19, 2021).

<sup>18</sup> *Id.*, Draft Notice from Acme Telephone Company.

<sup>19</sup> Email from S. McShane, Commission Rates Analyst, to J. Gullikson et al. (Jan. 29, 2021).

<sup>20</sup> *Id.*, Draft Notice from Acme Telephone Company (informing a new subscriber that, to keep its Lifeline benefit, it needs to "recertify every year").

anniversary dates falling on or between January 1, 2021 and September 28, 2021 may have their recertification process delayed under this Order but must have their eligibility recertified after the waiver has expired.<sup>21</sup>

A prior order, released in 2019, clarifies that USAC and the National Verifier may continue to recertify Lifeline subscribers on a rolling basis or may recertify them by the end of the applicable calendar year:

. . . . As of the effective date of this Order, ETCs will not be required to complete recertification of a Lifeline customer's eligibility by the anniversary of that customer's service initiation date. Instead, the recertification process must merely be completed on an annual basis pursuant to the revised section 54.410(f)(1) of the [FCC]'s rules. *We note that . . . USAC, and the National Verifier may continue to use a rolling recertification approach, as that would meet the requirement for annual recertification.* Recertifications for all eligible Lifeline subscribers must be completed by the end of each calendar year, unless the requirement otherwise is waived by the [Wireline Competition] Bureau or [FCC].<sup>22</sup>

A review of USAC's website indicates that it plans to continue recertifying Lifeline subscribers on a rolling basis.<sup>23</sup> Therefore, the OAG continues to recommend that Commission staff include information about a subscriber's Lifeline anniversary date in the annual certification section of the New Subscriber Notice.

## CONCLUSION

The OAG supports any change to the Commission's November 20, 2020 federal Universal Service Lifeline Program order that reflects the meaning and spirit of the agreement reached by the parties during the Lifeline Workshop. The OAG continues to recommend that Commission

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<sup>21</sup> *February 2021 Lifeline Waiver Order*, para. 5 (citing 47 C.F.R. § 54.410(f), the *2019 Lifeline Order*, and the applicable Federal Register notice).

<sup>22</sup> *In the Matter of Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17-287 et al., Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111, para. 114 (2019).

<sup>23</sup> See USAC Recertification Webpage (explaining that the National Verifier recertification process will begin 90 days before a subscriber's National Lifeline Accountability Database anniversary date).

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staff include information about a subscriber's Lifeline anniversary date in the annual certification section of the New Subscriber Notice.

Sincerely,

/s/ **Kristin Berkland**

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## CERTIFICATE OF SERVICE

**Re:   *In the Matter of a Commission Investigation into the Appropriate Notice and Outreach Requirements for Eligible Telecommunications Carriers under 47 USC § 214(e)***  
**MPUC Docket No.   P-999/CI-17-509**

I, JUDY SIGAL, hereby certify that on the 16th day of April, 2021, I e-filed with eDockets *a Reply Letter of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
JUDY SIGAL

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-509_Official
Regulatory	Contact	N/A	Assurance Wireless	PO Box 5040 Charleston, IL 61920-9907	Paper Service	No	OFF_SL_17-509_Official
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Vanessa	Favier	VFAVIER@tracfone.com	Tracfone Wireless, Inc. dba SafeLink Wireless	9700 NW 112th Ave. Miami, FL 33178	Electronic Service	No	OFF_SL_17-509_Official

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