

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Advancing Broadband Availability Through Digital Literacy Training	)	WC Docket No. 12-23
	)	
Lifeline and Link Up	)	WC Docket No. 03-109

**COMMENTS OF THE PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA**

Pursuant to the Further Notice of Proposed Rulemaking released in the above-cited dockets on February 6, 2012 (FNPRM)<sup>1</sup> the Public Service Commission of the District of Columbia (DC PSC) respectfully files limited comments on four issues presented in the FNPRM. The DC PSC supports the creation of a national eligibility database, the use of Lifeline funds for digital literacy training, and a requirement that Lifeline service providers permit the application of Lifeline funding to bundled services containing a voice element. The DC PSC opposes AT&T's proposal to permit incumbent wireline Lifeline providers to discontinue providing Lifeline service, since granting the proposal could end wireline Lifeline service in the District of Columbia.

**THE FCC SHOULD ENCOURAGE THE DEVELOPMENT OF A NATIONAL ELIGIBILITY DATABASE**

In the FNPRM, the FCC seeks input on several issues relating to the development of national and state eligibility databases that would contain information relating to subscribers eligible for Lifeline service.<sup>2</sup> The DC PSC encourages the development of a national eligibility database, which would be a

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<sup>1</sup> Public Notice, *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, rel. March 6, 2012.

<sup>2</sup> FNPRM at ¶ 406-416.

more efficient way to collect, store, and verify customer eligibility information. With a national database, eligible telecommunications carriers (ETCs) would have one database to query, instead of a wide variety of state databases. The existence of a national eligibility database designed specifically for verification of Lifeline eligibility would eliminate the need for ETCs to query state databases that would not have been designed for such purposes, reducing the potential for confusion due to different methods of collecting and storing data. In jurisdictions that do not regulate certain types of ETCs,<sup>3</sup> a national eligibility database would avoid the problem of requiring agencies to provide access to their databases to ETCs that are unregulated in their jurisdiction. Additionally, state databases may not contain complete information, especially in states that lack jurisdiction over certain types of ETCs, since some eligible customers may verify eligibility with ETCs directly.

The DC PSC recognizes that any national eligibility database would probably need to interface with state databases that contain information about eligible customers. However, states should not have to pay for these interfaces, since such interfaces would assist in the administration of the federal Lifeline program. Additionally, states do not currently have the resources to pay for such interfaces.

Conditioning the receipt of Lifeline funds on the creation and availability of state eligibility databases would not be an effective way to promote creation of or gain access to these databases. Many of the state agencies that control these databases are outside the jurisdiction of state commissions, so state commissions could not compel compliance with any direction from the FCC. If the state agency chose not to share its eligibility information, there would be no way to avoid losing Lifeline funding for the state's Lifeline customers.

The information contained in a national eligibility database needs to be made available to state commissions and other state agencies. In jurisdictions in which the state commission does not have authority over all types of Lifeline providers, access to the national eligibility database will provide information that cannot be obtained in state databases, which would be useful in the administration of

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<sup>3</sup> In the District of Columbia, the DC PSC is precluded from regulating all issues relating to wireless carriers and most issues relating to Voice over Internet Protocol (VoIP) service providers. D.C. Code § 34-2066(b) and (c) (2010 Repl.),

state Lifeline programs. The FCC should ensure that state commissions and state agencies verifying customer eligibility have access to a national eligibility database.

**LIFELINE FUNDS SHOULD BE USED TO SUPPORT DIGITAL LITERACY TRAINING AND ACCESS TO BROADBAND EQUIPMENT.**

In the FNPRM, the FCC poses several questions about using Lifeline funding for digital literacy.<sup>4</sup> Now that the FCC has determined that Lifeline funding should be used to support broadband services, the DC PSC supports the use of Lifeline funding to educate low income consumers about how to use the broadband network. Due to the wide array of services and functions available on broadband, mere access to the broadband network will not enable consumers to take advantage of these functions. Digital literacy classes are necessary to provide education about how to be comfortable with and use the broadband network.

The DC PSC believes that existing neighborhood institutions can assist in providing digital literacy. Schools, libraries, senior centers, and other similar institutions already provide education on a variety of other subjects, and serve as access points for broadband devices. The DC PSC encourages partnerships with these institutions.

While financial support for broadband telecommunications services and digital literacy training are essential components of access to broadband functionality, there is another component that is necessary for broadband adoption. Without broadband equipment to access broadband telecommunications services, affordable broadband service and digital literacy education will not be as effective. The DC PSC supports the use of Lifeline funding to support all three components of broadband access: access to broadband services; access to broadband equipment; and access to broadband education.

**ELIGIBLE TELECOMMUNICATIONS CARRIERS SHOULD BE REQUIRED TO PERMIT CUSTOMERS TO APPLY THE LIFELINE DISCOUNT TO ANY BUNDLE WITH A VOICE**

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<sup>4</sup> FNPRM at ¶ 424-447.

**COMPONENT.**

The DC PSC supports a requirement that ETCs permit Lifeline customers to apply the discount to a bundled service that includes voice service.<sup>5</sup> In the District of Columbia, there is one wireline ETC, Verizon Washington, DC Inc. (Verizon DC), which offers one tariffed Lifeline service. This service includes basic local service, operator services, access to E911 and other N11 codes, calls to toll free numbers, access to local directory assistance, and toll limitation service.<sup>6</sup> Verizon DC does not offer bundled Lifeline services, and opposed offering them in the DC PSC's recent rulemaking proceeding revising the District of Columbia's universal service rules.<sup>7</sup> In that proceeding, the DC PSC adopted rules permitting but not requiring ETCs to offer bundled Lifeline services. In the order adopting the rules, the DC PSC noted its support for bundled Lifeline services, since they provide flexible service options.<sup>8</sup> The DC PSC would encourage a requirement that ETCs permit customers to apply their Lifeline discount to any bundled service offering that contain a voice component.

**INCUMBENT WIRELINE ETCS SHOULD NOT BE PERMITTED TO OPT OUT OF PROVIDING LIFELINE SERVICE.**

In its January 24, 2012 *ex parte* letter, AT&T proposes that the FCC end the requirement that incumbent wireline providers offer Lifeline service.<sup>9</sup> The DC PSC strongly opposes the adoption of such a proposal. In the District of Columbia, the DC PSC has no jurisdiction over wireless ETCs. Additionally, there is only one wireline ETC, Verizon DC. If AT&T's proposal were adopted, then Verizon DC could cease providing wireline Lifeline services, leaving District of Columbia low income

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<sup>5</sup> FNPRM at ¶ 488-493.

<sup>6</sup> Verizon Washington, DC Inc. Local Exchange Service tariff, P.S.C.-D.C. No. 202(C)(2)(5).

<sup>7</sup> *Formal Case No. 988, In the Matter of the Development of Universal Service Standards and the Universal Service Trust Fund for the District of Columbia* Comments of Verizon Washington, DC Inc. on Notice of Proposed Rulemaking Issued November 26, 2010 ("Verizon DC Comments") at 3-4, filed December 27, 2010.

<sup>8</sup> *Formal Case No. 988*, Order No. 16558 at 7, ¶ 21, rel. September 29, 2011.

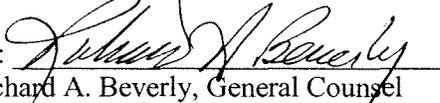
<sup>9</sup> *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up*, WC Docket Nos. 11-42, 03-109, AT&T *ex parte*, filed January 24, 2012,

consumers without wireline Lifeline service. What Lifeline service would exist would not be funded by the District of Columbia Universal Service Trust Fund and not subject to the DC PSC's oversight, leaving Lifeline consumers with no ability to redress any problems with Lifeline service with the DC PSC. While the popularity of wireless service has increased, there are still some consumers, particularly the elderly, who want and need wireline Lifeline service for health and security purposes. The FCC should not eliminate the option to receive wireline service from Lifeline customers, which would be the result of adopting AT&T's proposal. Throughout this proceeding, the FCC is attempting to broaden Lifeline service options for eligible consumers, not eliminate them. The DC PSC strongly encourages the FCC to reject AT&T's proposal, since it could result in the end of wireline Lifeline service in many jurisdictions, including the District of Columbia.

The DCPSC appreciates the opportunity to comment in this proceeding.

Respectfully submitted,

**PUBLIC SERVICE COMMISSION  
of the DISTRICT OF COLUMBIA**

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