BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

VERIZON COMMUNICATIONS INC., and MCI, INC.

For a Declaratory Order Disclaiming Jurisdiction Over or, in the Alternative, a Joint Application for Approval of Agreement and Plan of Merger

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DOCKET NO. UT-050814

VERIZON COMMUNICATIONS INC.'S SEPARATE STATEMENT REGARDING IMPLEMENTATION OF THE FUND

I. INTRODUCTION

Verizon Communications Inc. ("Verizon") submits the following separate statement regarding the handling of the fund established under Paragraph 221 of the Commission's Order No. 7, Order Accepting Settlement, On Condition; Approving Merger, On Condition.

Verizon's separate statement addresses three issues: (1) the choice of grant administrator; (2) the appropriate funding criteria for grant applicants; and (3) whether the Commission should change its existing direction regarding who should hold the assets comprising the fund pending disbursement.

In brief, the Commission should (1) select the United Way of Snohomish County ("UWSC") as the grant administrator in light of the depth and quality of its staff and its long experience in grant management and charitable work; (2) adopt the funding criteria proposed by Verizon and Staff, and reject the "advocacy" criteria proposed by Public Counsel; and (3) maintain its existing direction that Verizon retain the funds in question until such time as directed to disburse the funds by the Commission.

II. THE COMMISSION SHOULD SELECT UWSC AS GRANT ADMINISTRATOR

The two prospective grant administrators identified by the parties are the UWSC and the Greater Everett Community Foundation ("GECF"). Although both UWSC and GECF have certain strengths for administering the grant process in this case, UWSC has a number of specific

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strengths that would be particularly useful here, and weigh in favor of choosing UWSC as the grant administrator. (All citations in this section are to the grant administration materials attached to Staff's recitation of areas of agreement.)

Verizon notes at the outset its appreciation for the work of both UWSC and GECF in responding to inquiries regarding this fund. Both organizations clearly have done and are doing good work in the community and are supported by volunteers who have given of their time, energy, and money to improve their communities.

Verizon submits that UWSC is the right choice to administer this fund for four principal reasons: (1) UWSC's long history and general experience in grant administration; (2) the strength and depth of its staff; (3) its experience in telecommunications issues; and, (4) its relatively larger geographic reach. Cost is not an issue that should sway the balance in favor of either organization.

History and General Experience. UWSC has a long history of charitable work and grant administration. It has been in existence for over 65 years, and has grown into an organization that directs millions of dollars in grants and other programs each year. In 2004, for example, UWSC returned over \$8 million to the community in the form of grants, impact support, and other programs. The largest share of that money was in the form of grants. As described in the materials, UWSC has managed many different types of grants, including Multi-year Program Grants, Outreach Grants, Opportunity Grants and Strategic Alliance Grants. In one particular, on-going area, UWSC has allocated and is monitoring grants to 114 programs from 49 human service organizations. Similarly, UWSC is the grant administrator for Snohomish County's Emergency Food and Shelter Program, a Federal grant fund. See Feb. 22, 2006 Letter from Carl Zapora, Staff Attachment 2b. There should be little question that UWSC has a well-established presence in the community and the experience necessary to administer this fund.

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GECF does not have a comparable history. GECF has been in existence since 1993, and has only acted as a general-purpose community organization since 2001. (Prior to 2001, GECF was the Everett Parks Foundation.)

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Strength and Depth of Staff. UWSC is a substantial organization, with several personnel capable of handling this project. UWSC has identified Ms. Barbara Davis, Vice President, Impact and Community Development, as the primary staff person who would work on the project. As described in Staff Attachment 1c, however, UWSC also has numerous other qualified professional staff, including finance staff, marketing staff, resource development staff, and others. Their President, Carl Zapora, has 25 years of experience working with the United Way, and their Executive Vice President, Dennis Smith, has more than 25 years of nonprofit experience. Clearly, there are adequate personnel already in place at UWSC to handle this matter. Moreover, if something happened to Ms. Davis, or to any other member of UWSC's staff, there would be adequate replacement personnel to provide continuity of management on the project.

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GECF does not have equivalent strength and experience of staff. It presently has two staff members, Ms. Metzger-Utt, Executive Director, and Ms. Anderson, Finance Director, with apparently a Program Director coming on board in the near future. In addition, GECF intends to provide specific expertise on this project by hiring Ms. Claire Bishop as a consultant. See generally Feb. 22, 2006 Letter from Maddy Metzger-Utt and exhibits, Staff Attachment 1b.

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Even with Ms. Bishop's addition, this is a relatively small staff for a project of this size and scope. This project will involve a substantial amount of money that will need to be administered over a number of years. It will require ongoing attention and management continuity. With GECF's relatively small staff, it would not take much of a personnel issue (such as a personal or family illness or other problem) to create concerns with the management of the fund because one or two key personnel were lost.

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GRAHAM & DUNN PC Pier 70, 2801 Alaskan Way ~ Suite 300 Seattle, Washington 98121-1128 (206) 624-8300/Fax: (206) 340-9599 The project is also quite large in comparison to GECF's historical levels. GECF's submission indicates that it has disbursed \$1.5 million in grants since 2001. That would mean that this grant would be almost equal to GECF's entire grant making over the last five years, which constitutes a fairly large jump in size and scope.

<u>Particular Relevant Experience</u>. GECF's proposal is to use Ms. Bishop as a consultant to provide GECF with telecommunications experience particularly relevant to this process.

As described in UWSC's materials, it also has experience with public telecommunications projects. UWSC was one of the leading organizations in helping to develop and implement the 2-1-1 system in Washington, which was launched on February 22, 2006. UWSC's Executive Vice President, Dennis Smith, is the Board Chair for WIN 2-1-1. See Staff Attachment 1c.

<u>Larger Geographic Reach</u>. UWSC is a county-wide organization. As indicated by its experience with 2-1-1, it has also been involved in statewide issues. Although GECF is apparently developing a greater geographic focus, it is a young organization that appears to be just starting to branch out beyond Everett.

Cost Issues. There is no particular reason to favor or disfavor either organization based on costs. Both UWSC and GECF have provided variable cost estimates, based in part on the still-undetermined scope of the grant administration work. UWSC has estimated a 2-5% cost for this project, or \$25,000 to \$62,500, with more specific numbers available when the project becomes more concrete. See Feb. 22, 2006 Letter from Carl Zapora, Staff Attachment 2b. GECF estimates a cost of \$36,000, but part of that estimate is an estimate of 180 hours of consultant time at \$125/hour. See Grant Management for the Verizon-MCI Public Purpose Fund, Staff Attachment 1b. GECF indicates that the billable time in question could increase depending on the scope of the project. *Id.* Thus, both organizations are in the same ballpark as to estimated costs, with similar types of variability built into their estimates based on how the

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project is finally established. Cost does not provide a consideration that should tip the balance toward either organization.

III. THE COMMISSION SHOULD ADOPT THE STAFF-VERIZON PROPOSED FUNDING CRITERIA AND REJECT PUBLIC COUNSEL'S PROPOSAL

A. The Staff-Verizon Proposed Funding Criteria

The parties have not been able to reach full agreement on the funding criteria to be used by the grant administrator. Staff and Verizon have been able to work out an agreed-upon set of funding criteria, which provides:

Projects selected for funding must be targeted in Verizon's Washington service territory for local exchange service and must address at least one of the following areas:

- a) Provide consumer education and outreach on telecommunications services such as raising consumer awareness by providing information on competitive telecommunications services, prices and availability.
- b) Improve access to telecommunications services, such as efforts to provide or improve telecommunications services to a community or specific population (e.g. elderly, low income, Native American, homeless).
- c) Make services more readily available to the public, such as conducting training or other educational efforts targeted to a community or specific population.
- d) Other purposes which benefit a broad range of telecommunications consumers.

Preference will be given to projects that provide a broad telecommunications related consumer benefit and advance a broad public interest.

Ineligible activities include: lobbying, advocacy on behalf of candidates for public office and/or advocacy for state or congressional legislation, initiatives or referenda and/or advocacy in administrative or judicial proceedings; projects that would supplant Verizon's own investments or expenses to replace or maintain a modern and efficient network; projects that would supplant Verizon's own charitable activities. Projects submitted by otherwise eligible applicants will not be ineligible under these criteria merely because the applicant has previously been or is engaged in lobbying or advocacy activities, so long as the project for which it seeks funding is not a lobbying or advocacy activity.

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("Staff-Verizon Proposed Funding Criteria"). This is not the ideal set of criteria that Verizon would have proposed if the matter were entirely up to it, but, in the spirit of compromise, Verizon has worked with Staff to come up with a set of criteria that addresses many (though not all) of Verizon's concerns and that is acceptable to Verizon. Verizon urges the Commission to adopt the Staff-Verizon Proposed Funding Criteria.

Public Counsel has not agreed to this proposal. The principal point of disagreement is that Public Counsel would like to leave open the possibility that grants would be made to organizations for use in supporting "advocacy" projects, rather than excluding such projects as provided for in the Staff-Verizon proposal.

The Commission should reject Public Counsel's proposal. There are both practical and legal problems with using this fund for "advocacy" projects. The practical problem is distinguishing between advocacy that advances the public interest, and advocacy that diminishes it. Since public policy is often in the eye of the beholder, Verizon believes that it is impractical and inappropriate for the grant administrator to decide what types of "advocacy" projects are worthy of funding and which are not. The legal problem is that use of the funds for advocacy raises issues under the Fair Campaign Practices Act regarding the use of public funds by state agencies. Given all of the positive, worthwhile projects that can be funded with this money, the Commission should avoid the practical and legal problems raised by Public Counsel's proposal and expressly exclude "advocacy" from the funding criteria, as reflected in the language agreed to by Verizon and Staff.

B. The U S WEST Experience

By way of background, it may be helpful to the Commission for Verizon to review some of the facts arising out of the use of the "consumer education" settlement fund in the U S WEST rate case refund matter. These facts have colored Verizon's review of the various proposed sets of funding criteria that the parties have discussed in this case, and Verizon believes they are

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important to the Commission's consideration of Public Counsel's proposal to include "advocacy" in the scope of permissible uses of this fund.

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As the Commission is aware, the judicial settlement of the U S WEST rate case led to, among other things, the creation of a \$2 million settlement fund to be used for consumer education. To implement the fund, the Commission and the parties to that case selected the Seattle Foundation to act as a grant administrator. The funding criteria fund directed that the funds be used for "consumer education and/or outreach" on telecommunications services and issues, including policy issues. *See* The Seattle Foundation Telecommunications Consumer Education Fund FACT SHEET, attached as Attachment A.

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After proposals were made, the Seattle Foundation selected, among other organizations, the Spokane Neighborhood Action Programs ("SNAP") and the Affiliated Tribes of Northwest Indians Economic Development Corporation ("ATNIEDC") to receive substantial funds to use for consumer education. *See* The Seattle Foundation Telecommunications Consumer Education Fund Grant Recipients, attached hereto as Attachment B. The grants were for the periods August 2001 to July 2003, for SNAP, and June 2001 to May 2003, for ATNIEDC.

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From the existing record, it appears that both SNAP and ATNIEDC used the U S WEST funds, in part, to undertake regulatory advocacy work before the Commission. SNAP, for example, became the lead agency in the Low Income Telecommunications Project, or "LITE," which then undertook to submit comments to the Commission on various rulemaking proceedings. *See, e.g.*, Comments of the Low Income Telecom Project (August 22, 2001), Docket No. UT-003074; Comments of the Spokane Neighborhood Action Programs' Low Income Telecom Project (December 18, 2001), Docket No. UT-991301. LITE's comments submitted in Docket No. UT-003074 in August 2001 specifically noted that the organization was being lead by SNAP, that the organization was "recently created," and that it was being "funded by the Seattle Foundation." Given the timing, it seems likely, if not certain, that the funding in question from the Seattle Foundation was in fact the U S WEST settlement.

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ATNIEDC's grant description provided that, with the U S WEST settlement money, ATNIEDC would establish a "telecommunications consumer education resource center." See Attachment B. According to ATNIEDC's website, ATNIEDC did create such a center and named it the "Washington Tribal Telephone Outreach Program." See Attachment C. The principal purpose of the Program was to promote utilization of low-income programs, but the other goal of the Program was "to affect regulations regarding telecommunications. Our Coordinators will comment and encourage tribes to comment on both state and federal regulations that apply to telecommunications." See id. Thus, ATNIEDC, like SNAP, used the U S WEST settlement funds to create organizations whose activities and/or express goals were to engage in regulatory policy advocacy.

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And these are only the activities of which Verizon is aware. Given this history, it is not unreasonable to assume that there may have been other efforts undertaken by SNAP and/or ATNIEDC along similar lines.

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At least in Verizon's review of the material, this advocacy work was not contemplated by the Seattle Foundation grants. While U S WEST funding criteria did not expressly *prohibit* regulatory advocacy, the permitted uses of the fund were specified to be "consumer education" and "outreach," not regulatory advocacy. The funding criteria did allow for teaching consumers "how to get involved" in policymaking proceedings, but it did not provide for the grant recipients to be engaged in those activities themselves. Doubtless both SNAP and ATNIEDC felt that they were acting in the public interest by undertaking regulatory advocacy, and felt that they had important points to make to the Commission that were in the public interest, but the point here is simply what they did and whether those activities squared with the U S WEST settlement, not whether SNAP and ATNIEDC were acting with good motives or not.

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This is part of the context in which Verizon considered Public Counsel's proposal that the funding criteria in this case permit some degree of "advocacy." In light of the U S WEST experience (and other concerns described below), Verizon proposed that advocacy *not* be part of

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Pier 70, 2801 Alaskan Way ~ Suite 300 Seattle, Washington 98121-1128 (206) 624-8300/Fax: (206) 340-9599 the permissible funding criteria in this case; indeed, Verizon proposed that the funding criteria expressly *exclude* advocacy. Verizon wanted to be very sure that the organizations that receive these funds be clearly instructed as to permissible and impermissible uses, and that a set of permissible uses in one area not become the springboard to a set of uses that Verizon believes to be inappropriate, such as advocacy or lobbying.

C. The Practical Problems With "Advocacy" Projects

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Allowing the fund in this case to be used for "advocacy" purposes would raise the very practical concern of what *type* of advocacy should be supported and encouraged. Permitting organizations to use the funds for advocacy would necessarily involve the grant administrator, the parties, and perhaps the Commission in answering the contentious and difficult question of what qualifies as "good" telecommunications advocacy. The controversial nature of this problem is amply illustrated by the very fact that the parties are so vigorously arguing about whether to include "advocacy" in the process at all; it is simply impossible to address the question of using the funds for advocacy without getting into disputes over who will receive the money and what positions they might advocate for or against in using it.

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As just one example of the problems that can arise: The proper regulation, or lack of regulation, of the telecommunications industry is unquestionably a highly contested and controversial issue. There are nonprofit organizations that believe strongly that the public interest would be served by increasing the degree of regulation of telecommunications providers; there are other nonprofit organizations, such as the Cato Institute, that believe just as strongly that the public interest would be better served by *decreasing* regulation of the industry. And there are any number of organizations and academics at various points on the spectrum in between. If this fund is going to be open to use for "advocacy" purposes, then organizations from across the spectrum of telecommunications policy should be able to apply and receive grants. Other than preexisting views about what constitutes "good" telecommunications policy, there is no inherent reason for the Commission to favor one policy viewpoint over another.

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This would create real problems. The administrator would either have to stay completely neutral in awarding grants, or apply some standard of what qualifies as "good" telecommunications policy. In the former case, the fund could then be used for all manner of advocacy purposes, some of which might even run at cross purposes, which would not be a fruitful use of the funds. In the latter case, the grant administrator would simply be applying its own bias of what qualifies as "good" telecommunications policy.

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Moreover, once that decision is made (regardless of how it is made), there would very likely be disagreement from the parties as to whether the grant administrator had chosen the "right" type of advocacy organization, which could reasonably be expected to lead to further disputes and perhaps even recourse to the Commission for resolution of the disputes. Addressing such disputes would not be a productive use of the parties' time, the fund, or the Commission's time.

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Public Counsel may argue that such disputes are unlikely, but any number of examples would illustrate the problem. Would Public Counsel agree that this money could be used to fund a study and report by a conservative, nonprofit think tank such as the Cato Institute or the American Enterprise Institute recommending, for instance, a deregulatory result, such as the abolition of various Washington state administrative rules? Similarly, would Public Counsel agree that the money could be used to fund litigation by some conservative action group challenging regulatory policies in court on behalf of consumers? (Obviously, these are only illustrative examples, as Verizon has no idea whether the Cato Institute or the American Enterprise Institute would actually be interested in such projects.) If the fund were to be open to "advocacy" projects, it should be open to all types of such projects, not just those that Public Counsel would favor.

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The Commission's goals would be better served by focusing on the practical good that can be done with these funds, rather than arguing about what qualifies as "good" telecommunications-related advocacy.

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D. The Legal Problems With "Advocacy" Projects

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In addition to these practical problems, the use of this public fund for advocacy raises legal issues under the Fair Campaign Practices Act ("FCPA"), RCW 42.17. RCW 42.17.190 generally provides that public funds are not to be used, "directly or indirectly," for "lobbying." "Lobbying" is defined under the FCPA as attempting to influence, among other things, the passage or defeat of legislation or the adoption or rejection of "any rule, standard, rate or other legislative enactment." RCW 42.17.020(31).

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The use of these funds for "advocacy" type projects raise the question of whether these provisions of the FCPA might be triggered. The fund in this case appears to be "public funds," in that it is money whose expenditure will be directed by a state agency.¹ Use of the funds to finance advocacy projects to influence the State legislature or the Commission with respect to legislative enactments would appear to qualify as "lobbying" under the definitional provisions of the FCPA. This could lead to the result that the Commission would be perceived as "lobbying" as defined by the FCPA if some portion of the funds were used for regulatory or legislative advocacy.

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It is possible that there might be some technical legal means whereby some types of use of these funds for advocacy could avoid direct prohibition under the FCPA. The FCPA is complex, and there might be lobbying types of activities that would be permitted under narrow exceptions of one form or another. Regardless of whether liability under the statute would be clear, however, the question is whether the Commission should permit advocacy-oriented projects that even raise these issues or that come close to the lines established in the FCPA. The better course of action is to steer clear of these issues and use the funds in a positive, less problematic fashion.

¹ The breadth of the definition of "public funds" under the FCPA is indicated in RCW 49.17.128, which provides that: "Public funds, whether derived through taxes, fees, penalties, or any other sources, shall not be used to finance political campaigns for state or local office."

In addition, even if there were some way in which a limited type of advocacy project could comply with the FCPA, it would pose significant risks. For example, a grant recipient who received a narrowly tailored "advocacy" grant may decide that it needs to expand the scope of its advocacy to other arenas, as apparently happened in the U S WEST settlement. A narrowly tailored grant that avoided the "lobbying" problem as initially framed could, after the fact,

become a lobbying problem.

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Finally, there is the issue of perception. Even if a project could be tailored so as to avoid "lobbying" as defined under the FCPA and sufficient controls could be put in place to prevent an inadvertent or *post hoc* legal problem, the Commission could still be in the position of being perceived as using public funds for a lobbying purpose (such as supporting or opposing particular pieces of legislation).

E. These Funds Should Be Used to Fund Good Projects that Touch Many People

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Fortunately, there are many positive, noncontroversial ways in which these funds can be used to address the issues identified by the Commission and to touch many Verizon customers in valuable and important ways. In light of these opportunities, it simply does not make sense to open the door to the practical and legal problems identified above and the disputes that will inevitably accompany the use of these funds for policy advocacy. The Commission should adopt the funding criteria agreed upon by Verizon and Staff, which focus on positive uses of the fund and avoid the problems discussed above.

IV. VERIZON SHOULD RETAIN POSSESSION OF THE FUND

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Paragraph 221 of the Commission's Order provides that Verizon shall retain possession of the fund pending its disbursement. That paragraph states, in relevant part:

Verizon shall retain custody of the funds but need not segregate them. It must make disbursements, up to the total amount, by direction of the Commission.

This language not only directs that Verizon will hold the funds pending choice of a grant administrator or other program for using the funds, but will hold them until disbursed at the

direction of the Commission on *as-needed basis* for the projects ultimately selected for funding. It indicates that disbursement will take place "up to the total amount," which indicates piecemeal disbursement until the entire amount of the fund is exhausted.

It has now been proposed that this direction be altered so that Verizon would deposit the entire amount of the fund with the grant administrator, once selected, rather than retaining the money until disbursement is directed.

The Commission's direction should not be altered, for three reasons. First, nothing has changed between the time of the Commission's order and now to justify changing the Commission's existing direction with respect to these funds. The Commission's order clearly contemplates that Verizon would retain use of the funds until they were actually needed. Not only was Verizon permitted to hold the money, it was not required to segregate the funds, meaning that the money would be retained in Verizon's general accounts and would be subject to use as ordinary Verizon assets (including the accrual of interest on those assets).

Second, retaining the funds will permit Verizon to better track and account for the use of the funds internally, which it is very interested in doing. If the grant administrator holds the funds and disburses them, Verizon will have to ask the grant administrator for accountings of the funds, which will generate an additional layer of accounting administration.

Third, holding the funds will provide Verizon with some assurance and protection that the funds are being used appropriately. As discussed above, it appears that some of the organizations that received U S WEST settlement grants used the funds for purposes that, at least in Verizon's view (and probably U S WEST's), were outside the originally contemplated scope of the grants for consumer education and outreach. In that circumstance, no remedy was available because the funds had already been disbursed in total to the grant administrator. If the funds here were disbursed by Verizon pursuant to the Commission's direction on an as-needed basis, however, that would provide Verizon with the opportunity to inform the Commission if it believed that funds were being used inappropriately and to seek relief accordingly.

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For this reason, if the Commission does decide to direct Verizon to deposit the entire amount with the grant administrator, the Commission should nevertheless build into its order

some avenue for relief in the event that Verizon, or any of the parties for that matter, believe that

the funds are being used inappropriately. This relief need be no more complicated than the

opportunity to bring the matter before the Administrative Law Judge for hearing and a factual

determination of whether the grant funds are being used as contemplated.

V. CONCLUSION

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For the foregoing reasons, Verizon urges the Commission to (1) select United Way of Snohomish County as the grant administrator; (2) to adopt the funding criteria agreed to by Staff and Verizon; and (3) continue the status quo with respect to the handling of the fund under Paragraph 221, with the funds held by Verizon until disbursed by order of the Commission on as-

needed basis.

Filed: February 28, 2006

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The Seattle Foundation Telecommunications Consumer Education Fund FACT SHEET

Background

The Seattle Foundation received a \$2 million grant from Qwest Corporation, formerly known as US West. The grant is a result of a settlement reached with the Washington Utilities and Transportation Commission, Washington State Attorney General, TRACER and the American Association of Retired Persons. The settlement, issued in August 2000, concluded a court action concerning the setting of rates for telecommunications services provided by Qwest.

Distribution of Grant Funds

The Seattle Foundation will distribute the \$2 million grant (plus interest & minus expenses) through a "Request for Proposals" process. Grants will be awarded for the support of consumer education and outreach projects of general benefit to consumers in the state of Washington.

Eligibility to Apply for Funding:

• Application for funding is limited to organizations with tax-exempt status under section 501 (c) (3) of the IRS code, or that are governmental agencies.

 Grant-funded activities must take place in, benefit exclusively the residents of the state of Washington, and be provided by organizations with a presence in Washington State.

 Applicants are required to certify that they have no affiliation with, or do not receive any funds (with the exception of charitable contributions) from telecommunications service providers.

 Applicants must be able to demonstrate their ability to properly account for the use of funds and how the funds will be administered.

• Recipients will be required to present a final report detailing the use of grant funds and an evaluation of the results of grant-funded activities.

Funding Criteria:

 Projects selected for funding must provide consumer education and/or outreach on telecommunications services and/or policy issues affecting residential, business and/or lowincome consumers in Washington State.

 Services and/or policy issues include: rates, services, service quality, competitive choice, marketing and consumer protection, and participation in and understanding of state telecommunications policymaking proceedings.

 Ineligible activities include: advocacy on behalf of specific candidates for public office and/or advocacy for specific legislative or congressional legislation, initiatives, or referendum.

 Preference will be given to projects advancing broad public interest and providing community, statewide or intrastate-regional benefits.

Timing:

November 1, 2000

Requests for Proposals distributed statewide to non profit and governmental organizations identified as potential applicants, and also made available to any

requesting organization during the application period.

January 31, 2001

Grant proposals due in The Seattle Foundation's office.

June 30, 2001

Grants awarded.

For further information regarding the grantmaking process contact Claire Bishop at The Seattle Foundation, email - tccf@seafound.org, or by phone (206) 622 - 2294.

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The Seattle Foundation Telecommunications Consumer Education Fund Grant Recipients

Spokane Neighborhood Action Programs

\$ 688,141

Contact: Don Andre, andre@snapwa.org, (509) 744-3370 212 W. Second Avenue Spokane, WA 99201

SNAP will act as the lead agency in this statewide collaborative project to provide consumer education to low-income persons about telecommunications, public assistance programs to subsidize the cost of receiving telephone service, and how to become involved in public policy proceedings concerning telecommunications. Low-income people will be reached with information by trained staff at the 31 community action agencies operating throughout Washington State. Grant period: 8/01 to 7/03.

North Central Educational Service District

\$ 467,592

Contact: Dr. Gene Sharratt, genes@ncesd.org, (509) 665-2610 P.O. Box 1847 Wenatchee, WA 98807-1847

A statewide, multifaceted educational outreach effort will be organized to reach adults with information to help them become more effective consumers of telecommunications services. In addition to educating the general public, efforts by several organizations including the Washington State Governor's Commission on Hispanic Affairs and the Hispanic Chamber of Commerce, will be coordinated to reach Hispanic audiences with the same information, Grant period: 7/01 to 6/03.

Affiliated Tribes of Northwest Indians Economic Development Corporation \$ 460,228

Contact: Mark Ufkes, <u>markufkes@atniedc.com</u> (206) 542-5112 18130 Midvale Ave. N. Suite C Shoreline, WA 98133

Additional Representatives: Sharon Goudy (invited) Yakama Nation ATNI-EDC Board Member

Mike Marchand (invited)
Colville Confederated Tribes
ATNI-EDC Board Member

Roy Sahali, Manager University of Washington Tribal Connections Project Rs@u.washington.edu

A telecommunications consumer education resource center will be established and outreach conducted to members of Washington State's 28 federally recognized Tribes. Outreach will include the distribution of information about telecommunications and promotional material about the Washington Telephone Assistance Program, Lifeline and Link-Up, as well as assistance in signing people up for each of these programs. This project is a part of a larger effort to build the technological capacity of the Tribes. Collaborators include the Washington Governor's Office of Indian Affairs, University of Washington Tribal Connections Project, Northwest Indian College, The Evergreen State College Northwest Indian Applied Research Institute, Peninsula College Tribal Technology Center Program and NPower. Grant period: 6/01 to 5/03.

Senior Services of Seattle-King County

\$ 396,779

Contact: Gwen Robbins, <u>gwenr@seniorservices.org</u>, (206) 727-6294 1601 – 2nd Ave. Suite 800 Seattle, WA 98101

Additional Representatives; Senior Services of Seattle-King County Eileen Murphy, Assistant Director Senior Information & Assistance Programs (206) 727-6235 eileenm@seniorservices.org

Jean Mathisen, Program Director Senior Rights Assistance (206) 727-6216 jeanma@seniorservices.org

Asian Counseling & Referral Services (ACRS)
Gary Tang, Program Director
Aging and Adult Services
(206) 695-7600
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Washington Protection and Advocacy System (WPAS)

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Senior Services will collaborate with Asian Counseling and Referral Services and the Washington Protection and Advocacy System, to deliver basic consumer information about telecommunications products and services, with an emphasis on accessibility services and products and consumer fraud, to the frail elderly, people with limited English skills and people with disabilities statewide. Using existing networks of information and referral programs, staff will be trained to relay information to their clients. Grant period: 8/01 to 6/03.

ATTACHMENT C

HOME	MEMBER SERVICES	PHILANTHROPY	MARKETPLACE	MEDIA		

TELECOMMUNICATIONS

Washington Tribal Telephone Outreach Program Overview

The Washington Tribal Telephone Outreach Program began as a result of a grant from the Seattle Foundation's Telecommunications Consumer Education Fund, which resulted from a Qwest settlement. As part of this grant, the telecommunications-related consumer education and outreach to the Tribes is designed to eliminate impediments to telephone services on reservations and to clarify the numerous services and competitive rate options available to them from various providers. It is our goal to give Washington State Tribes equal access to telecommunications and information technology services, while ensuring that Tribes make these decisions with full information about existing options.

The primary function of the Washington State Tribal Telephone Outreach program is to promote the increased utilization of the Lifeline and Linkup Programs, which offer low cost telephone services for low-income Native Americans living on reservations. Our two Tribal Telephone Outreach Coordinators will conduct extensive outreach to each tribe - these two staff positions have divided the Washington State Tribe's based on geographic location. To find out, which Coordinator works with your Tribe, click here.

The secondary goal of the Washington Tribal Telephone Outreach Program is to affect regulations regarding telecommunications. Our Coordinators will comment and encourage tribes to comment on both state and federal regulations that apply to telecommunications.

Finally, we will also be working with Washington State Tribes to help their members make better choices regarding their telecommunication needs. Phone bills are detailed and oftentimes difficult to understand. The Tribal Telephone Outreach Coordinators will help customers by providing information on how to read their phone bills and how to spot fraud. From more information on fraud, click here.

ATNI-EDC is also looking to lead an effort to provide Tribes with direct technical assistance and Internet training through technology professionals, once telecommunication infrastructures are in place. To find out more about our Tribal Technology Program, click here.

Tribal Telecommunication Mission

Our mission is to provide research, information, and technical assistance and training, while working with individual Tribes to link telecommunication needs with available resources for low-income Native Americans and Tribal governments in Washington State.

Ultimately, we hope that establishing our telecommunications outreach project will help tribal decision makers to prioritize communication and utility infrastructure improvements that will meet their economic development and community goals.

More Information

For more information please visit our Telecomm Virtual Outreach Library Sponsored by the Seattle Foundation

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