

[Service Date February 7, 2012]

February 7, 2012

**NOTICE OF WORKSHOP
and
NOTICE OF RECESSED OPEN MEETING
(Set for Wednesday, February 22, 2012, at 9:30 a.m.)**

RE: Investigation of Recent Developments in Federal Low Income Support Policy,
Docket UT-120052

TO ALL INTERESTED PERSONS:

On February 22, 2012, the Washington Utilities and Transportation Commission (Commission) will conduct a recessed open meeting in the form of a workshop on recent developments in federal Low Income Support policy (Docket UT-120052). Specifically, on February 6, 2012, the Federal Communications Commission released its Report and Order and Further Notice of Proposed Rulemaking (FCC 12-11, Lifeline and Link Up Order) in WC Docket No.11-42, *et al.*, reforming the federal Low Income Support programs. The purpose of the workshop is to examine the Order's requirements and assess the impacts on carriers, consumers, and the Commission in Washington. We will also have an open discussion on the pending policy issues related to the Low Income Support in Washington.

The workshop will begin at **9:30 a.m., Wednesday, February 22, 2012, at the Commission's headquarters, Room 206, Richard Hemstad Building, 1300 S. Evergreen Park Drive S.W., Olympia, Washington.** The workshop will be informal and is scheduled for the entire day. Interested persons will have the opportunity to make presentations or comments on the FCC Lifeline and Link Up Order as well as the pending issues in Washington, between and after which the Commission will conduct a general discussion.

We invite all interested persons to provide written comments on the following questions before the workshop with particular emphasis on:

1. Should all wireless ETCs be required to use Department of Social Health Service (DSHS)'s Beneficiary Verification System (BVS)?
2. Is it feasible for the DSHS to provide access to BVS to all ETCs?

3. Should there be a mechanism to ensure that all ETCs check their customers' eligibility either by using BVS or by checking proof documentation from customers before enrollment? For example, should all wireless ETCs be required to certify annually that they verify all their Lifeline customers' eligibility before enrolling customers?
4. Should UTC, DSHS and all ETCs come up with an interim solution for duplicate Lifeline claims before the national database is fully implemented?
5. If so, what's the best mechanism?
 - a. Should duplicate check be conducted before or after a customer's enrollment?
 - b. Should the ETCs collectively select a third-party administrator to conduct the duplicate check?
 - c. How can we ensure a third-party administrator's independence and accountability?
 - d. Will the DSHS be better suited to conduct the duplicate check?
 - e. What should be done once duplication is detected?
 - f. Who should pay to support the implementation of the interim solution?

In addition, the Commission invites interested persons to provide written comments on the following:

6. Currently, Eligible Telecommunications Carriers (ETCs) in Washington follow three different sets of customer qualification criteria based on whether they offer landline, prepaid wireless or postpaid wireless Lifeline service plans. Should the Commission unify customer qualification criteria for all customers? What are the pros and cons for a uniform set of customer qualification criteria?
7. By Commission's ETC designation orders, all prepaid wireless ETCs are required to maintain direct contact with their Lifeline customers. What constitutes "direct contact" with consumers? What's the role of commission-based agents who market Lifeline products for ETCs? Should those agents' role be limited to advertising, distributing and collecting Lifeline application forms (not dispatching cell phones)?
8. Should there be sanctions on inappropriate marketing behaviors? To what extent should the ETCs be held responsible for their agents or contractors' inappropriate marketing behaviors?
9. Should the Commission set parameters for ETCs' Lifeline outreach and marketing behaviors? For example, is it appropriate to distribute cell phones at a carrier-sponsored event? Is it appropriate to solicit customers inside or in close proximity of social service agencies?
10. Many recent ETC petitioners are small companies focused solely on provision of Lifeline services. Should companies' financial strength be a concern in staff's evaluation of ETC applications? If so, what standards should apply?

Written comments should be submitted to the UTC under Commission Docket UT-120052 by the end of business day **February 21, 2012**. Interested Persons that want to present at the workshop should contact the Assistant Director for Telecommunications Section, William Weinman, as soon as possible. Mr. Weinman can be reached at (360) 664-1109, or WWeinman@utc.wa.gov.

The Commission has a conference bridge number, (360) 664-3846, for interested persons that cannot attend the workshop in person.

Sincerely,

DAVID W. DANNER
Executive Director and Secretary