

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 3, 2012

**NOTICE TO ALL SERVICE PROVIDERS OFFERING
CALIFORNIA LIFELINE PROGRAM DISCOUNTS**

RE: Adjustments to the California LifeLine Program's (California LifeLine) Application Process, Clarification on the Method for Using the Application Date, Guidance on the Temporary Extension of Duration of the California LifeLine Discounts, and Resumption of the Renewal Process

Application Process Adjustments¹

Effective June 1, 2012, the Communications Division adjusted California LifeLine's application process to allow the California LifeLine Administrator (Administrator) to distribute a second application form to applicants that did not submit their first application form. However, the overall timeframe for the application process remains the same compared to the timeframe pre-June 1, 2012. The adjusted application process is similar to when an applicant receives a correctable denial and also reflects how the renewal process is implemented.

With this adjustment, the Administrator will mail this second application form on the 53rd day after the carrier feed process date. The applicant will then have 22 days to submit the second application form. After which the Administrator will have until the 82nd day to inform the applicant and the service provider of its decision depending on when the applicant submits the second application form.

If the applicant submits the second application form with errors, then the applicant will be denied outright with the relevant denial reasons.

Method for Using the Application Date

According to General Order 153 (G.O. 153), Sections 2.4 and 5.8.1, the application date represents the date by which any back-credits of the California LifeLine discounts can begin after the Administrator approves the applicant's eligibility or the Consumer Affairs Branch overturns a denial.² For consumers trying to participate in the program, the application date is the date when the consumer contacts a service provider and asks for the California LifeLine discounts. G.O. 153, Section 2.48, defines the application date differently from the service start date, which is when a consumer starts to receive and is billed for phone service. According to the California LifeLine Program's pre-qualification rules, a consumer must always have a service start date on or before the application date.

¹ See the attached timelines.

² For renewing California LifeLine participants the application date would equal the anniversary date.

If a service start date occurred before the application date, then the California LifeLine discounts shall begin on the application date. However, if the service start date coincided with the application date, then the California LifeLine discounts shall commence on the application date, which happens to also be the same date as the service start date.

On the other hand, if the applicant restarts the application process, the application date must coincide with this subsequent attempt to participate in the program.

Temporary Extension of Duration of the California LifeLine Discounts

On April 26, 2012, the California Public Utilities Commission (CPUC) filed a Petition for Waiver³ with the Federal Communications Commission requesting a twelve-month extension of time to comply with 47 C.F.R. § 54.410(f) annual re-certification requirements amongst other rules from the *Lifeline Reform Order*⁴. On May 31, 2012, the FCC issued a Waiver Order⁵ ruling on the CPUC's Petition for Waiver in which it extended the deadline by which the CPUC would be required to comply with 47 C.F.R. § 54.410(f) to December 31, 2013. The CPUC's Final Resolution T-17366 issued on July 13, 2012 adopted the modification to the California LifeLine Program's rules to be consistent with our plan to suspend the renewal process. Therefore, the Communications Division suspended the annual renewal process beginning June 1, 2012, and resumed the process by October 31, 2012. California LifeLine participants' eligibility to receive their California LifeLine discounts on their phone service will not be affected as a result of this temporary suspension.

This temporary suspension of the renewal process allows the program to prolong the duration of the California LifeLine discounts. The Communications Division set forth the following conditions by which the California LifeLine discounts could last longer than one year:

1. if a California LifeLine participant either failed to submit the completed and signed renewal form showing her/his continued eligibility or submitted a renewal form with correctable errors before June 1, 2012, but is still entitled to receive another renewal form;
2. if a California LifeLine participant was scheduled to receive a renewal form between June 1 and October 31, 2012; and/or
3. if the Administrator did not notify the relevant service provider on time of the denial of a renewing participant.

For the first two conditions, the Administrator will send a postcard to the California LifeLine participant informing him/her of the suspended renewal process.⁶ Then for the third condition,

³ See CPUC's Petition for Waiver, filed April 26, 2012 with the FCC; WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45.

⁴ *Lifeline and Link Up Reform and Modernization et al.*, Report and Order and Further Notice of Proposed Rulemaking, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45, FCC 12-11 (rel. Feb. 6, 2012) (*Lifeline Reform Order*).

⁵ *Lifeline and Link Up Reform and Modernization et al.*, Waiver Order, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45, FCC 12-11 (rel. May 31, 2012).

⁶ The California LifeLine Program was in the process of modifying its renewal process, thus renewal forms were temporarily unavailable.

the Administrator will reflect the decision date as the day it actually notifies the service provider of the denial i.e., Field 41 will be equal to Field 44 in the return feed.⁷

Resumption of the Renewal Process

In compliance with Resolution T-17366, the California LifeLine renewal process resume by October 31, 2012. In coordination with the Administrator, we have divided the California LifeLine participants in need of undergoing the renewal process into two major groups. One group consists of those California LifeLine participants whose anniversary dates are 105 days from October 31, 2012 and thereafter. The second group, called "Catch-Up Renewals", includes those California LifeLine participants that were entitled to or scheduled to receive a renewal form between June 1 and October 31, 2012 as described in the section immediately above.

The Administrator will spread the Catch-Up Renewals into several weeks occurring between October 15, 2012 and December 28, 2012. Additionally, the Administrator will be performing quality control measures before fully ramping up its renewal efforts.

With regards to eligibility decisions the Administrator makes for the Catch-Up Renewals, if the Administrator approves the renewal of a California LifeLine participant, the Administrator will maintain the existing anniversary date. However, if the Administrator denies the renewal of a California LifeLine participant falling into the Catch-Up Renewals, the Administrator will reflect the decision date as the day it actually notifies the service provider of the denial i.e., Field 41 will be equal to Field 44 in the return feed, to eliminate the possibility of the back-billing issue.

Another processing change involves when a service provider will receive the notification of either an approval or denial as they relate to the Catch-Up Renewals. Given the service provider notification for the Catch-Up Renewals will not be dependent on the anniversary date since the anniversary date has already passed, the Administrator will send the decision as soon as it determines the final eligibility for those consumers falling in the Catch-Up Renewals process.

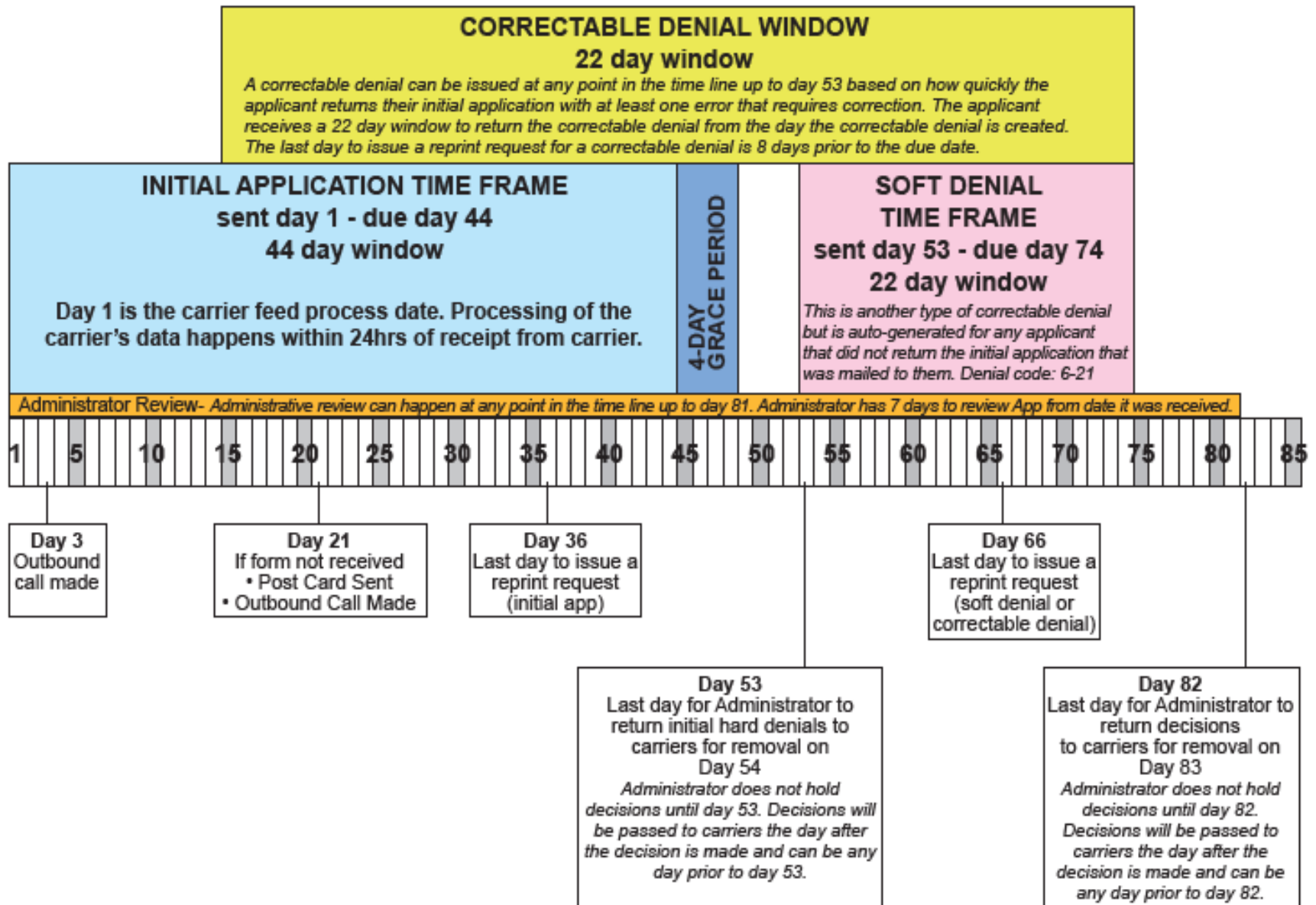
For questions, contact Michaela Pangilinan by phone at 415-703-1890 or by e-mail at wow@cpuc.ca.gov.

/s/ JONATHAN LAKRITZ

Jonathan Lakritz, Branch Manager
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⁷ If the Administrator transmitted the denial of the renewing participant to the service provider on time, then the decision date would have been the day before the participant's anniversary date.

California LifeLine Application Process



California LifeLine Renewal Process

