

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

In the Matter of	)	
Bridging the Digital Divide for Low-	)	WC Docket No. 17-287
Income Consumers, Lifeline and Link Up	)	
Reform and Modernization	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Telecommunications Carriers	)	WC Docket No. 09-197
Eligible for Universal Service	)	
Support	)	
	)	

**NATIONAL LIFELINE ASSOCIATION COMMENTS ON THE EMERGENCY PETITION  
OF TRACFONE WIRELESS, INC. FOR AN ORDER DIRECTING USAC TO ALTER THE  
IMPLEMENTATION OF THE NATIONAL VERIFIER TO OPTIMIZE THE  
AUTOMATED AND MANUAL ELIGIBILITY VERIFICATION PROCESSES**

The National Lifeline Association<sup>1</sup> (NaLA) respectfully submits these comments in response to the Emergency Petition of TracFone Wireless, Inc. for an Order Directing USAC to Alter the Implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes filed on August 9, 2018.<sup>2</sup> NaLA supports the TracFone Petition because it correctly points out that the initial launch of the National Verifier by the Universal Service Administrative Company (USAC) before obtaining access to key databases to automatically verify

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<sup>1</sup> NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace. It supports eligible telecommunications carriers (ETCs), distributors, Lifeline supporters and participants and partners with regulators to improve the program through education, cooperation and advocacy. See <https://www.nalalifeline.org/>.

<sup>2</sup> See Emergency Petition of TracFone Wireless, Inc. for an Order Directing USAC to Alter the Implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes, WC Docket Nos. 17-287, 11-42, 09-197 (filed Aug. 9, 2018) (TracFone Petition); *Wireline Competition Bureau Seeks Comment on Emergency Petition of TracFone Wireless, Inc. for an Order Directing USAC to Alter the Implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes*, WC Docket Nos. 17-287, 11-42, 09-197, Public Notice, DA 18-846 (rel. Aug. 13, 2018) (Public Notice).

subscriber eligibility based on participation in qualifying federal programs (particularly Medicaid), while simultaneously refusing to accept eligibility documentation from third-party sources such as Managed Care Organizations (MCOs), has “undermine[d] the policy goals the Commission sought to achieve by establishing the [National] Verifier, to the detriment of USAC as well as vulnerable consumers who would benefit greatly from the services.”<sup>3</sup>

With respect to the management of the Lifeline program as currently constituted, nearly all stakeholders, including NaLA and its members, agree that the successful and efficient implementation of the National Verifier is necessary to the administration of the Lifeline program. In addition to supporting broadband services, the National Verifier was the primary reform to the Lifeline program adopted in the 2016 Lifeline Modernization Order and supported by all five commissioners. Unfortunately, by launching the National Verifier without first obtaining access to enrollment databases that would allow for automatic verification of a Lifeline applicant’s eligibility and then refusing to accept proof of eligibility generated by MCOs for the manual eligibility verification process, USAC will harm service providers’ efforts to enroll subscribers and low-income Americans’ ability to enroll in the program.<sup>4</sup> Further, this approach imposes unnecessary costs and burdens on consumers and the National Verifier administration. For example, as TracFone observes, Medicaid participants account for 29 percent of Lifeline enrollments, and USAC’s launch strategy has resulted in “some of the subscribers who need Lifeline the most—

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<sup>3</sup> TracFone Petition at 8.

<sup>4</sup> An analysis of available data from USAC by CGM, LLC for certain ETCs operating in the initial launch states demonstrates that access to relevant databases is a critical component of the process. For example, in Colorado, USAC has access to the SNAP, Medicaid, and Federal Public Housing Assistance (FPHA) databases. Of the ETCs whose data was reviewed by CGM, 80 percent of subscribers in Colorado who were required to reverify by August 30, 2018 were successfully reverified by the eligibility databases. By contrast, Wyoming, where USAC only has access to the FPHA database, had a mere two percent success rate in reverifications through an eligibility database for the same period.

especially those enrolled in Medicaid who depend on Lifeline services not just to connect to society but also to manage their care and communicate with their MCOs ... [being] left to languish, deprived of reasonable and timely access to the program.”<sup>5</sup> Continued rollout of the National Verifier by USAC in this manner “will be far less efficient and more wasteful than the carrier- and state-administered verification processes that the [National] Verifier is replacing”<sup>6</sup> and will have a severely negative impact on the Lifeline program and eligible low-income Americans nationwide.

Fortunately, it is not too late for the Commission to correct course and facilitate an efficient National Verifier launch and enrollment process. Indeed, instructing USAC to launch the National Verifier only in states where it has access to the necessary eligibility databases would promote the Commission’s stated objective that the National Verifier “determine eligibility for potential Lifeline subscribers in a manner that is cost-effective and administratively efficient” and provide an enrollment process that “better serve[s] eligible beneficiaries.”<sup>7</sup> Alternatively, directing USAC to accept proof of eligibility from MCOs, and granting Q Link’s petition seeking a service provider application programming interface (API),<sup>8</sup> will make the National Verifier more efficient and effective for USAC, consumers and service providers.

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<sup>5</sup> TracFone Petition at 2-3.

<sup>6</sup> *Id.* at 8.

<sup>7</sup> *See Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶¶ 128, 133 (2016).

<sup>8</sup> *See* Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018). Whether the Commission takes action on TracFone’s petition, agrees to expedite access to Medicaid enrollment databases, or accepts proof of eligibility from MCOs, the agency should grant the Q Link petition requesting a service provider API, which will improve enrollment processes and outcomes for consumers, USAC and service providers. *See* National Lifeline Association Comments on Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed Aug. 10, 2018).

For these reasons, the Commission should, as TracFone suggests, “postpone including a state in a hard launch of the National Verifier until access to ... key [eligibility] databases has been secured” or alternatively, “direct USAC to accept documentation produced through third parties’ automated access to state databases as part of the Verifier’s manual process, including MCO letterhead proof of Medicaid eligibility.”<sup>9</sup>

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By:  \_\_\_\_\_

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<sup>9</sup> TracFone Petition at iii.