

December 30, 2016

Michelle Garber
Vice President of Lifeline
Universal Services Administrative Company
700 12th Street, NW, Suite 900
Washington, DC 20005

Re: Comments on the Draft Lifeline National Verifier Plan

Dear Ms. Garber,

Thank you for the opportunity to comment on the November 30, 2016 Draft Lifeline National Verifier Plan (“Draft Plan”). The undersigned groups are longtime, strong supporters of the Lifeline program and the recent modernization order that requires the creation of the Lifeline National Verifier. The successful implementation of the Lifeline National Verifier has the potential to increase consumer control over their Lifeline options, and automate application and recertification processes, while protecting sensitive personal information and protecting the integrity of the Lifeline program.

We appreciate the planned, thoughtful, roll-out in the states of the National Verifier and the consideration of regular input by the Lifeline stakeholders to ensure the National Verifier is performing efficiently and appropriately (Draft Plan, pp. 26-27). This iterative design is also reflected in the updating of the National Verifier plan every 6 months. We expect, in particular, that as the first half dozen states switch over to the National Verifier we will learn from implementation “hiccups” and that there will be tweaks to the design and operation of the National Verifier so that it performs even better as the next batch of states are transitioned over. We appreciate the commitment to create flexible processes to accommodate the different ways states and agencies administer the programs that qualify a household for Lifeline (p. 25) and the strong commitment and consideration to data security and privacy in the design of the National Verifier (pp. 59-61).

Consumer advocates have identified one particular feature of the Draft Plan that is timely and a priority -- the zip code tool to identify ETCs in a given geography (see, “Display of public consumer education” on p. 41). Lifeline consumer advocates and community broadband adoption organizations need this zip code tool to help educate households about what services are available in a particular area. Consumers need access to the most up-to-date information about participating carriers and services (voice, broadband and/or bundles) to make informed choices about which Lifeline product best meets their needs. The stakes are high because of the one-year freeze on porting Lifeline broadband service. We strongly recommend this part of the Draft Plan receive high priority. The zip code tool facilitates a competitive marketplace for Lifeline and will encourage better product offers, which will benefit consumers and further leverage the Lifeline benefit.

These remaining brief comments on the Draft Plan primarily focus on two very important consumer interests regarding the National Verifier: (1) that the interfaces are user-friendly, and (2) that the design of the National Verifier maximizes access for all consumers.

Accessibility/Language/Technology

Accessibility for consumers with disabilities; use of simple graphics and plain, simple language to help those with limited-English-proficiency, and translated materials for non-English speakers are all critical for the consumer-facing parts of the National Verifier to be considered user-friendly (e.g., verification of eligibility on p. 32; eligibility verification/application status check on p. 35; Tribal support on p. 36; recertification on p. 38; benefit transfer on p. 39; display of public and private consumer information on pp. 42-43, and dispute resolution on pp. 50-51). We note that several business architecture diagrams state that communications to applicants will be through “preferred means of communication” (e.g., step 4 on p. 34 and step 8 on p. 39). We recommend that the “preferred means of communication” capture more than just text, voice or email to include language and accessibility preferences as well.

Facilitating Access Through Process Design

The design of certain processes, such as recertification (p. 14) demonstrate a commitment to maximizing access by automating the annual eligibility recertification to the extent possible and building in time and Lifeline consumer “touches” to increase opportunities for continuous connectivity while maintaining program integrity (i.e., avoiding administrative cost, disruptive service interruptions and churn due to a cumbersome recertification process).

We appreciate that this Draft Plan builds in different pathways for the consumer to apply for Lifeline service (e.g., the consumer can go through the service provider, an agency, an aggregator or apply directly to the National Verifier). This consumer choice is an important consumer protection as it avoids bottle-necks in trying to access Lifeline and facilitates consumers’ ability to shop for the best Lifeline service that meets his/her household’s needs. To the extent the high level design for direct consumer interaction with the National Verifier envisions use of an “application number” (see steps 6 and 7 on p. 32), we caution that it is foreseeable that consumers will misplace or forget their “application number.” Easy and quick work-arounds must be available to ensure that the “application number” does not act as a barrier to access. This scenario is different than in the aggregation situation, where shepherding applications (including use of application numbers) is part of the aggregator’s job (p. 34).

Currently a substantial majority of Lifeline consumers are applying their Lifeline benefit to wireless service. It is foreseeable that there will be a substantial percent of Lifeline consumers applying their benefit to wireless Lifeline broadband over smartphones. The design of consumer-facing operations such as application to Lifeline, application status check, dispute resolution, etc., should also include smartphone functionality (e.g., verification of eligibility on p. 32; status check on p. 35; Tribal support eligibility on p. 36; recertification on p. 38; zip code tool for finding ETCs on p. 41; access to consumer’s Lifeline information on pp. 42-43, and dispute resolution on pp. 50-51).

Where consumers are required to submit additional documentation for manual review of eligibility, consider options using technologies available on popular Lifeline products (e.g., taking a picture of relevant documents and texting or emailing to the Lifeline Eligibility Database (“LED”) (e.g., see step 2, dispute resolution on p. 50)).

Specific Recommendations on Business Architecture

Third-parties/aggregators: On slides that focus on third-party National Verifier accounts (e.g., 3rd party batch applications on p. 34, and approval and management of 3rd party NV accounts on p. 40), there are four types of 3rd parties envisioned: Service providers, social service programs, state/federal agencies and “other approved 3rd parties” that are designated by USAC. Lifeline aggregators would fall in that last category. The service providers, the social service programs and the state/federal agencies are entities that have a more formal and defined relationship with the Lifeline consumer. The “other approved 3rd party” will likely become more defined with time and experience, particularly with Lifeline aggregation. In light of that, it may make sense for USAC to build in a check-in for the “other approved” to make sure that they are still serving in the aggregation capacity and that their contact information is up to date.

In step 4 on p. 34, where the LED sends results of the Lifeline application to the applicant it would be helpful to also include the name of the 3rd party that submitted the Lifeline application.

Individual Recertification: In step 3 on p. 38, the LED should also provide the consumer with information on how to stop their Lifeline support and an easy to use process (e.g., one click) if they no longer want to participate in Lifeline.

Key Performance Indicator: In column 3 on p. 83, Consumer Experience, another key performance indicator is the average time spent in the various dispute resolution processes.

We appreciate the opportunity to provide these comments on the Draft Plan and look forward to future opportunities to provide stakeholder input.

Sincerely,



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