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May 2 Deadline for ETCs to Elect to have USAC Perform Lifeline Recertification

As was true last year, ETCs are being offered the opportunity to have the Universal Service Administrative Company (USAC) perform Lifeline recertification for your Lifeline subscribers in 2016 https://apps.fcc.gov/edocs_public/attachmatch/DA-16-347A1.pdf. Once an ETC elects USAC to perform recertification, USAC will continue to perform recertification in subsequent years. USAC will assume that all study area codes (SACs) of the electing ETC are included in the request unless the ETC affirmatively indicates to USAC which SACs USAC should not recertify.

If you used USAC to perform recertification in 2015, USAC will perform the recertification this year unless you tell them otherwise. If you are in this situation and wish to continue to have USAC perform recertification of Lifeline subscribers, no action is required. ETCs that did not elect to use USAC last year and that do not make an election by May 3, 2016 will be responsible for conducting recertification of their subscribers.

Although it is anticipated that the newly adopted (but not yet released) Lifeline reform order will take the burden of initially establishing customer eligibility (certification) and determining continued customer eligibility (recertification) from subscribers, these processes will take some time for the FCC to set up. In the interim, ETCs have the opportunity to have USAC perform recertification by making this election.

How to Make the Election

If you wish to begin to have USAC perform Lifeline recertification, you must provide notice to USAC by May 2, 2016. ETCs make their election by sending an email to USAC at LIVerifications@usac.org. USAC will provide guidance to ETCs regarding the format of the information in the email. *ETCs that elect to have USAC recertify their Lifeline subscribers must provide USAC with their subscriber list by July 1, 2016.* The subscriber list must be based on the ETC's February 2016 FCC Form 497 and must be sent to USAC in a standardized format as instructed by USAC. USAC will provide ETCs with guidance regarding the necessary format. If any subscribers on an ETC's FCC Form 497 are no longer active by the time the ETC provides the subscriber list to USAC, the ETC should note such subscribers when transmitting in the list to USAC. The ETC should also note which, if any, of these subscribers were de-enrolled due to non-usage.

If a state agency performs recertification for some or all of your subscribers, you may not elect to use USAC for recertification of those subscribers. For example, if a state performs the

recertification only for subscribers qualifying under the SSI and SNAP programs, these subscribers could not be subject to the USAC recertification process, but subscribers qualifying under the other eligibility criteria (such as low income) could be subject to the USAC recertification process if you so elect. Also, ETCs may remove from the subscriber list provided to USAC those subscribers whose eligibility can be verified through access to a qualifying database.

ETCs electing USAC to perform recertification should make every reasonable effort to assist subscribers in recertifying through the recertification process established by USAC. This includes providing a toll-free number that USAC can provide to the ETC's consumers who have questions about their service.

USAC's Process

USAC will complete the recertification process over a series of months and will provide each ETC that selects USAC to do recertification with 45 days' notice before USAC begins the process for that ETC unless USAC begins that ETC's recertification process prior to August 15, 2016. *Once USAC provides the ETC with this notice, the ETC has 15 days to send USAC an updated version of the contact information for those consumers represented on its February 2016 FCC Form 497.*

USAC will provide each ETC with a record of the subscriber recertification and a list of subscribers that did not certify and therefore must be de-enrolled, and will provide ETCs with sufficient information to compile their FCC Form 555 at least 30 days before the annual January 31 due date. *ETCs must de-enroll subscribers within five days of receiving notice from USAC that the subscriber has failed to certify.* Within that same five-day period, USAC will notify those consumers that their ETC is in the process of de-enrolling them and providing steps that the consumer can take to re-enroll if they remain eligible. *All ETCs must de-enroll all subscribers who do not recertify their eligibility by December 31, 2016 and make any necessary updates to the NLAD within one business day thereafter .* For further information about the USAC process, please visit the [USAC Information page](#).

Please contact your GVNW Consultant, or Courtney Spears (830.895.7221, cspears@gvnw.com), with any questions or assistance you may have about the Lifeline Recertification.