

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

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Bridging the Digital Divide for Low-Income Consumers)	WC Docket No. 17-287
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Affordable Connectivity Program)	WC Docket No. 21-450
)	
Emergency Broadband Benefit Program)	WC Docket No. 20-445

Comments of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband (“WTA”) submits these comments on several of the issues raised in this Notice of Proposed Rulemaking concerning suggested reforms to the Commission’s Lifeline program.¹ WTA is a national trade association representing approximately 400 small, rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other communications-related services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States, and have been at the forefront of providing advanced services to these very difficult to serve territories. Many of WTA’s members offer services under the Commission’s Lifeline

¹ *Lifeline and Link Up Reform and Modernization*, FCC 26-8, released February 23, 2026, published in the Federal Register, 91 FR 16871, April 3, 2026 (hereafter cited as “NPRM”).

program, and some of them compete against wireless service providers that offer Lifeline-supported services. Thus, WTA's members have an interest in this proceeding.

WTA appreciates the Commission's desires to enhance the efficiency of the Lifeline program, and to minimize waste, fraud and abuse. Given those goals, the Commission must ensure that meaningful benefits are distributed by legitimate providers to eligible customers with minimum friction. In addition, the Commission must be mindful of ensuring that the burdens placed on Lifeline services providers are not unnecessarily onerous. With these guideposts in minds, WTA addresses several of the proposals in the *NPRM*.

First, in order to enhance verification, the *NPRM* suggests requiring Lifeline providers to obtain from Lifeline applicants their full nine-digit Social Security number, instead of just the last four digits.² However, as the Commission recognizes, such a requirement could impose significant additional costs on service providers in order to maintain the security of this highly confidential information while being transmitted to the verifier or if the Lifeline providers were required to retain that information.³ And the ability to maintain the confidentiality of this information will become increasingly difficult as sophisticated hackers (including state-sponsored hackers) expand their use of quantum computing.⁴ Nor is it clear the extent to which the additional potential accuracy of nine-digit verification exceeds the additional costs of securing that information. WTA thus urges the Commission not to adopt its proposal to require Lifeline providers to collect all nine digits of an applicant's Social Security number.

² *NPRM* at ¶'s 25-27.

³ *Ibid.*

⁴ *E.g.*, <https://www.rand.org/pubs/commentary/2023/09/when-a-quantum-computer-is-able-to-break-our-encryption.html>.

Second, the *NPRM* also suggests elimination of the provision that allows Lifeline providers who assess and collect monthly fees to avoid monitoring their customers' usage to ensure that any customers that do not use their service each month are de-enrolled (after a 15-day cure period).⁵ WTA acknowledges that some unscrupulous Lifeline providers may have abused this "monthly payment" exemption by charging an up-front annual fee but only crediting the account on a monthly basis to make it appear as if the customer is regularly receiving and paying the bills so as to create the appearance of a regular ongoing business relationship and consciously indicating by paying their bill that they continued to desire the service.⁶ However, it is not clear how prevalent a problem such evasive conduct is. But WTA assumes that it would almost exclusively be an issue with regard to Lifeline providers that are resellers, rather than facilities-based Lifeline service providers. WTA thus suggests that in order to protect against abuses without unnecessarily burdening legitimate Lifeline providers with the costs (and intrusiveness) of monitoring their customers' traffic,⁷ the Commission should revoke the "monthly billing exemption" only for resale Lifeline service providers, while keeping it in place for facilities-based Lifeline service providers.

⁵ *NPRM* at ¶ 89.

⁶ *NPRM* at ¶ 92.

⁷ *See, NPRM* at ¶ 71 ("We seek comment on ways to improve program efficiency while also reducing regulatory reporting burdens on ETCs participating in Lifeline, particularly small businesses, while ensuring that the integrity of the program is protected"), and *NPRM* Appendix B at ¶ 12 ("Further, the *NPRM* seeks comment on ways to reduce regulatory reporting burdens on ETCs participating in Lifeline, particularly small businesses."). Tracking usage also could be problematic for Lifeline voice customers, since many billing systems only track billable usage, and thus those systems would have to be re-configured to track all usage. Likewise, while service providers developed processes for ACP data tracking, those systems no longer exist, were manual and expensive to operate.

Third, as part of the discussion of workable minimum service standards, the *NPRM* raises questions concerning the need to modify or retain the mobile broadband minimum monthly usage allowances.⁸ WTA believes that the proposal to eliminate minimum monthly data allowances does not fully take account of the Commission’s purposes for including those allowances when the values (and formula for adjusting those values) was adopted by the Commission a decade ago. As the Commission indicated in its 2016 Lifeline order:

In the 2015 Lifeline FNPRM, we proposed establishing minimum service standards for all Lifeline service offerings “to ensure the availability of robust services for low-income consumers.” ... In order for Lifeline customers to obtain the type of robust service which is essential to participate in today’s society, we conclude that forward-looking minimum service standards are required, and that those standards must be updated on a regular basis. (citations omitted)⁹

The Commission further explained in that decision:

The minimum standards that we establish strike a balance between the demands of affordability and reasonable comparability by providing consumers with services that allow them to experience many of the Internet’s offerings, but not mandating the purchase of prohibitively expensive offerings.¹⁰

Numerous commenters support establishing minimum service standards for broadband; they emphasize that Lifeline customers should not need to accept “second-tier” service, and that functional Internet access is essential to allow consumers to fully participate in society. Broadband access can help households meet their “basic needs for education, health care, disabilities access, and public safety.” (citations omitted)¹¹

Because technology develops at a rapid pace, any minimum standards we set would quickly become outdated without a timely updating mechanism. Commenters also agree that any minimum service level must be updated regularly. Accordingly, we conclude that minimum standards must be updated on a regular basis to ensure that

⁸ *NPRM* at ¶¶ 45-50.

⁹ *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, 31 FCC Rcd 3962 (hereafter cited as “2016 Lifeline Order”) at ¶ 69.

¹⁰ *2016 Lifeline Order* at ¶ 71.

¹¹ *2016 Lifeline Order* at ¶ 75.

consumers are able to continue to receive sufficiently robust service similar to what a substantial majority of American consumers subscribe to. (citations omitted)¹²

The Commission thus adopted a formula for adjusting the minimum monthly mobile broadband data allowance on a regular basis:

Data Usage Allowance. We conclude that after the phase-in of mobile data usage allowance standards, in order to update mobile broadband standards for data usage allowance in line with the principle of supporting services that a “substantial majority” of American consumers subscribe to, and given the types of data that are publically [sic] and regularly available, the minimum service standard for mobile broadband data usage allowance will be 70 percent of the calculated average mobile data usage per household. These values will be calculated as follows:

- First, the average number of mobile subscriptions per household will be determined by dividing the total number of mobile-cellular subscriptions in the United States, as reported in the *Mobile Competition Report* or by CTIA, by the total number of American households, as determined by the U.S. Census Bureau. This number will be rounded to the hundredths place.
- Second, the number of mobile subscriptions per American household will be multiplied by the percentage of mobile subscribers who own a smart phone, as reported by the Commission in its annual *Mobile Competition Report*, or other publicly available data sources, if necessary, in order to determine the number of mobile smartphone subscriptions per American household. Because this value should not include mobile subscriptions that are not data-capable, phones that are not data-capable will not be used when calculating the mobile broadband minimum service standards. Additionally, phones that are not data-capable have no impact on the average household’s mobile data capacity. This product will be rounded to the hundredths place.
- Third, the calculated average number of mobile smartphone subscriptions per household will be multiplied by the average data used per mobile smartphone subscriber, as reported by the Commission in its annual *Mobile Competition Report*, to determine the average mobile broadband data usage per household. This number will be rounded to the hundredths place and then multiplied by 0.7 to adjust for the fact that in these circumstances a “substantial majority” of subscribers will use less than the average.
- Fourth, to provide more simplicity for providers, the per-household capacity will be rounded down to the nearest 250 MB. (citations omitted)¹³

Following that 2016 decision, the Commission did phase in the mobile broadband data usage

¹² 2016 Lifeline Order at ¶ 77.

¹³ 2016 Lifeline Order at ¶ 94.

minimums, and increase them somewhat over time. However, the Commission subsequently waived the application of the formula, with the current monthly minimum usage “frozen” at 4.5 GB (as opposed to the current value of the formula reflecting a value of 29 GB).¹⁴

WTA believes that the Commission’s formula likely understates the needs of Lifeline households, who will be relying just on a mobile broadband connection, because most non-Lifeline households will also have a fixed broadband connection at home, and thus their phones (and other devices) will be utilizing that fixed broadband connection (through Wi-Fi) for their connectivity. As a result, the average mobile broadband usage that is utilized in the formula, which includes both Lifeline and non-Lifeline customers, does not fully reflect the total household usage because it does not reflect this in-home Wi-Fi traffic in non-Lifeline households. Moreover, data needs have increased significantly since 2016, with high-speed broadband now necessary for applications like videoconferencing/work from home, remote education, telehealth and higher-definition streaming. As a result, the current minimum allowance of 4.5 GB per month would appear to relegate mobile broadband Lifeline customers to “second-class” status.

Indeed, attached as an Appendix to these comments is the Grok/xAI response to a query on the typical activities that could be accomplished with a data allowance of 1 GB per week (roughly the equivalent of the current allowance of 4.5 GB per month), as well as a similar query concerning the typical activities a household could accomplish with a minimum data allowance of 1 GB per day (roughly the equivalent of the most recent formula minimum 29 GB per month). In sum, the current minimum mobile broadband data allowance for Lifeline customers would not allow the household to participate meaningfully in the digital age. And

¹⁴ *NPRM* at ¶¶ 45-46.

even if the Commission were to phase in the formula's minimum allowance of 29 GB per month, it would still only allow those mobile broadband Lifeline households fairly modest usage, and thus would not allow households to participate fully in the highly digital world. WTA therefore encourages the Commission to bolster rather than eliminate the minimum monthly usage allowances for mobile broadband Lifeline plans. Otherwise, Lifeline customers may be stuck with cheap but inadequate data plans, which is not a very efficient use of the Commission's Universal Service funds. At the same time, the Commission should ensure that Lifeline access to voice services continue to be supported, because many households still rely on voice services for critical communications.¹⁵

Fourth, WTA believes that some of the *NPRM* proposals introduce significant new friction that could prevent, impede or delay customers from activating Lifeline service, with little recognition of these new costs. For example, the proposed activation requirements (*e.g.*, outbound call, text, or data usage prior to reimbursement) create similar challenges as usage tracking with regard to the need to create and implement new systems, and may delay adding Lifeline benefits for a subscriber or impact reimbursement. The *NPRM* seeks comment on also requiring secondary verifications, and asks if the ETC should do that secondary verification.¹⁶ Because Lifeline applicants receive approval via the National Verifier, a secondary confirmation required via the Lifeline provider by text or email would be difficult to implement. The ETCs would have to build processes and systems to send, receive, track and retain confirmation related communications. It is also possible that a confirmation could fail because the contact information in the ETC's system may not be identical to the contact

¹⁵ *Cf.*, *NPRM* at ¶ 57.

¹⁶ *NPRM* at ¶ 35.

information provided to the National Verifier. In addition, for providers of fixed service, the ETC would need to obtain prior consent from the user before they could text the customer, or otherwise potentially incur significant risk under the Telephone Consumer Protection Act. That process to obtain prior consent creates yet another friction point. Moreover, a customer's failure to respond to a confirmation request could delay or block enrollment and potentially require re-application if responses fall outside the Universal Service Administrative Company ("USAC") 90-day approval window.

WTA is also concerned because the *NPRM* includes language that could be confusing, and differs from prior Commission policy. For example, the *NPRM* references providers furnishing or retaining eligibility certification forms, but eligibility determinations are handled by the National Verifier. In addition, the Commission explicitly removed requirements for service providers to receive and retain eligibility documentation in its *2017 Report and Order*, citing privacy, security, and burden reduction goals.¹⁷ The lack of clarity with regard to these requirements risks confusion during audits and the potential for unjustified negative compliance findings.

Finally, WTA supports the *NPRM's* proposal to remove obsolete rules. Some provisions in Sections 54.404, 54.410, 54.416, and 54.417 of the Commission's Rules should be revised or deleted so that the rules align with current National Verifier processes.¹⁸ As a result of these outdated provisions, some of the WTA members' auditors have requested documentation that the service provider does not receive (*e.g.*, National Verifier certification

¹⁷ *Bridging the Digital Divide for Low-Income Consumers*, 32 FCC Rcd 10475 (2017) at ¶ 43.

¹⁸ The Appendix to these Comments includes specific proposed revisions.

and recertification forms). Eliminating outdated rule provisions would reduce confusion among providers, USAC, auditors, and the Commission, while improving compliance clarity.

WTA recognizes that some unscrupulous service providers have abused the Lifeline programs, and WTA appreciates the need to improve the processes to minimize any such occurrences in the future. WTA is also hopeful that the Commission’s well-publicized enforcement efforts will also discourage future misconduct.¹⁹ But the Commission should not “throw the baby out with the bath water.” Given the critical importance of connectivity today – both for participating in the digital economy or calling 911 when necessary -- the Commission should strive to ensure that households that need Lifeline support to obtain or maintain connectivity receive it.

Respectfully submitted,

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¹⁹ *E.g., American Broadband & Telecommunications Company, Jeffrey S. Ansted, 37 FCC Rcd 6332 (2022); Total Call Mobile, Inc., 31 FCC Rcd 13204 (EB 2016); TracFone Wireless, Inc., 38 FCC Rcd 10895 (2023).*

Appendix

AI Summary of typical activities that could be accomplished with a data allowance of 1 GB per week:

A **1 GB per week** data allowance (roughly 4 GB per month) is a **very limited** plan in 2026. It suits extremely light users who rely heavily on Wi-Fi, use their phone mainly for essentials, and stay highly disciplined with data-saving habits. Most average smartphone users consume far more—often 15–25 GB per month—so this allowance demands strict management or you'll run out quickly, potentially by mid-week. Data usage varies by app settings, quality (e.g., low vs. HD), background activity, and whether autoplay or high-res content is involved. Here's a realistic breakdown using current average estimates:

Very Light Usage (Stretches Farthest)

These activities consume minimal data, allowing 1 GB to last the full week or more:

- **Text messaging** (WhatsApp, iMessage, SMS): Thousands of messages (often just KB each). You could handle daily conversations with plenty left over.
- **Email** (basic, no large attachments): Several thousand emails. Checking inbox multiple times daily uses almost nothing.
- **Web browsing** (text-heavy pages, minimal images): Roughly 10–17 hours total across the week (about 50–100 MB per hour). This might mean 15–30 minutes per day on average.
- **Navigation** (Google Maps, Apple Maps, Waze—turn-by-turn): 100+ hours total (5–10 MB per hour or ~2 MB per minute). You could use maps daily for directions without much worry.

Moderate/Limited Usage

With careful use, you can fit in some of these, but they'll eat into your allowance fast:

- **Social media scrolling** (Facebook, Instagram, X—with images, limited video/autoplay off): Around 5–10 hours total (100–200 MB per hour). This translates to perhaps 10–20 minutes per day max, or less if videos sneak in. Heavy feeds with Reels or autoplay can double consumption.
- **Music or podcasts** (Spotify, Apple Music at low/normal quality): 7–20+ hours total (40–150 MB per hour). You might manage 15–45 minutes per day at lower bitrates, but higher quality shortens this significantly.
- **Voice calls over data** (WhatsApp voice): Several hours possible, as they use far less than video.

Heavy/Data-Intensive Activities (Very Restricted)

These can burn through your 1 GB in hours or less—avoid or minimize them, and always use Wi-Fi:

- **Video streaming** (YouTube, Netflix, TikTok):
 - Standard Definition (SD/480p): ~0.5–1 GB per hour → Maybe 1 hour total per week (a short video or two).
 - High Definition (HD/1080p): 1.5–3+ GB per hour → Often just 15–30 minutes total before it's gone.
 - 4K or short-form video (TikTok/Reels with autoplay): Even less feasible—hundreds of MB in minutes.
- **Video calls** (WhatsApp, FaceTime, Zoom): 200–300+ MB per hour (or more for group calls) → Perhaps 3–4 hours total per week for very short calls (e.g., a few 5–10 minute calls). Longer sessions aren't practical.
- **Online gaming or downloads**: 40–300 MB per hour (plus large updates) → Limited to very brief sessions or none at all.

Realistic Weekly Scenario

With strict habits (data saver modes on, autoplay disabled, background data restricted, low quality settings, and Wi-Fi for anything possible), a typical light user might manage something like:

- Daily: Messaging, emails, quick searches or maps (under 50–100 MB/day).
- A few times a week: 10–15 minutes of mindful social scrolling or music.
- Occasional: One short SD video clip or brief voice call.

This could keep you under 1 GB for the week, leaving a small buffer. However, one accidental HD video, extended scrolling session, or app update could push you over early. Heavy social media or entertainment users will likely exhaust it in 1–3 days.

Tips to Stretch 1 GB Per Week

- Connect to Wi-Fi for all streaming, downloads, updates, and heavy browsing.
- Enable low-data modes in apps and your phone's settings; set video quality to the lowest.
- Disable autoplay, background refresh, and auto-downloads.
- Download maps, music playlists, or offline content over Wi-Fi in advance.
- Monitor usage daily via your phone's built-in tools to catch surprises.

- Consider text-based alternatives (e.g., browser instead of apps for some social/news).

In summary, 1 GB per week works for minimalists, basic communicators, or travelers/supplemental users who are mostly on Wi-Fi and prioritize essentials like directions and messaging. It's not suitable for typical modern usage involving videos, photos, or extended app time—many people would need 3–5x more for comfort. Track your own habits for a week on a higher plan to see what fits best. If your needs grow, even small upgrades make a big difference.

***AI Summary of Typical Activities that could be Accomplished
with a Data Allowance of 1 GB per Day:***

A **1 GB per day** data allowance (about 30 GB per month) provides a moderate amount of mobile or internet data for typical smartphone activities. It's often sufficient for lighter to moderate users who prioritize essentials like messaging, browsing, navigation, and occasional media, but it requires mindful usage to avoid running out—especially with data-heavy tasks like video streaming or high-quality social media scrolling.

Data consumption varies based on factors like app settings, video/audio quality (e.g., SD vs. HD), whether autoplay is enabled, background app refreshes, and connection type. Here's a breakdown of what you can **typically do** with 1 GB, using average estimates from common activities:

Light Usage (Low Data Consumption)

These activities use very little data, so 1 GB can stretch far:

- **Text messaging (e.g., WhatsApp, iMessage, SMS):** Thousands of messages (often just a few KB per text). You could easily handle hundreds of daily conversations.
 - **Email:** 10,000+ emails without attachments (roughly 3–20 KB each). Checking and sending basic emails multiple times a day uses almost nothing.
 - **Web browsing** (text-heavy sites, no heavy images/videos): Around 10–17 hours total, or roughly 30–60 minutes per day on average (at ~60 MB/hour). [Gigsky](#)
 - **Navigation (Google Maps, Apple Maps, Waze):** 100–500 hours of turn-by-turn directions (5–10 MB/hour). You could navigate all day for weeks without issue.
- Confused

Moderate Usage

- **Social media scrolling** (e.g., Facebook, Instagram, X/Twitter, with images but limited video): 6–11 hours total (100–150 MB/hour for basic browsing/interacting). This might translate to 20–40 minutes of mindful daily use. Heavy feeds with autoplay videos or Reels can double or triple this consumption. [Mobile.asda](#)
- **Music streaming** (e.g., Spotify, Apple Music at standard/normal quality): 7–23 hours total (45–140 MB/hour depending on bitrate). You could listen for 15–45 minutes per day comfortably. Higher quality (320 kbps) uses more. [Confused](#)
- **Voice calls over data** (e.g., WhatsApp calls): Several hours, as they use far less than video.

Heavier Usage (Data-Intensive)

These can eat through your allowance quickly—limit them or use lower quality/settings:

- **Video streaming** (YouTube, Netflix, TikTok, etc.):
 - Standard Definition (SD/480p): Roughly 0.7–1 GB per hour → About 1 hour total per day max.
 - High Definition (HD/1080p): 1.5–3 GB per hour → Often just 20–40 minutes before hitting limits.
 - 4K: 7+ GB per hour → Not practical at all (a few minutes max). [Pandasecurity](#)
- **Video calls** (WhatsApp, FaceTime, Zoom, Skype): About 3–4 hours total (200–300 MB/hour for standard quality). Short daily calls (10–20 minutes) are feasible, but longer group calls add up fast. [Gigsky](#)
- **Short-form video apps** (TikTok, Instagram Reels): Often 500 MB–1 GB per hour due to autoplay → 1 hour or less total.

Realistic Daily Combinations

With careful management (e.g., disabling autoplay, using data-saver modes, lowering quality, and turning off background data), a typical balanced day might look like:

- Morning navigation + emails/messaging: Minimal usage.
- Midday web browsing or social scrolling (20–30 minutes): ~50–150 MB.
- Afternoon music or a short video call: Another 100–300 MB.
- Evening light browsing or one short SD video: Top it off without exceeding 1 GB.

This leaves room for occasional extras like online shopping, banking, or quick searches. Heavy users who watch hours of HD video, play online games (40–300 MB/hour plus downloads), or scroll endlessly on video-heavy apps may run out by midday and need Wi-Fi backups or stricter limits.

Proposed Revisions to Part 54 Rules

§ 54.404 The National Lifeline Accountability Database.

(b) The National Lifeline Accountability Database.

Existing Rule	Proposed Rule	Reason
<p>(6) Eligible telecommunications carriers must transmit to the Database in a format prescribed by the Administrator each new and existing Lifeline subscriber's full name; full residential address; date of birth and the last four digits of the subscriber's Social Security number or Tribal Identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number; the telephone number associated with the Lifeline service; the date on which the Lifeline service was initiated; the date on which the Lifeline service was terminated, if it has been terminated; the amount of support being sought for that subscriber; and the means through which the subscriber qualified for Lifeline.</p>	<p>(6) Eligible telecommunications carriers must transmit to the Database in a format prescribed by the Administrator each new and existing Lifeline subscriber's full name; full residential address; date of birth and the subscriber's Social Security number or Tribal Identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number; the telephone number associated with the Lifeline service; the date on which the Lifeline service was initiated; the date on which the Lifeline service was terminated, if it has been terminated; the amount of support being sought for that subscriber; and the means through which the subscriber qualified for Lifeline.</p>	<p>The National Verifier determines eligibility.</p> <p>Because of this, carriers do not know how a subscriber qualified for Lifeline and that information is not currently transmitted.</p>
<p>(11) All eligible telecommunications carriers must securely retain subscriber documentation that the ETC reviewed to verify <u>the</u> subscriber eligibility, for the purposes of production during audits or investigations or to the extent required by NLAD processes, which require, <i>inter alia</i>, verification of eligibility, identity, address, and age.</p>	<p>(11) All eligible telecommunications carriers must securely retain subscriber documentation that the ETC reviewed to verify <u>the</u> subscriber eligibility, for the purposes of production during audits or investigations or to the extent required by NLAD processes, which require, <i>inter alia</i>, verification of eligibility, identity, address, and age.</p>	<p>Carriers could receive the one-per-household document however, overall eligibility is demonstrated and determined by USAC.</p>

§ 54.410 Subscriber eligibility determination and certification.

Existing Rule	Proposed Rule	Reason
(b) <i>Initial income-based eligibility determination.</i>		
(i) Must not seek reimbursement for providing Lifeline to a subscriber, unless the carrier has received a certification of eligibility from the prospective subscriber that complies with the requirements set forth in paragraph (d) of this section and has confirmed the subscriber's income-based eligibility using the following procedures:	(i) Must not seek reimbursement for providing Lifeline to a subscriber, unless the carrier has received a notification from the state Lifeline administrator, or other state agency that the prospective subscriber complies with the requirements set forth in paragraph (d) of this section and has confirmed the subscriber's income-based eligibility using the following procedures:	<p>The National Verifier does not currently provide the completed certification of eligibility form, nor is that desired.</p> <p>The certification is part of the National Verifier application and retained by USAC.</p> <p>The rules require enrollment of the subscriber into NLAD. A successful NLAD enrollment reflects the certification was submitted.</p>
(c) <i>Initial program-based eligibility determination.</i>		
(i) Must not seek reimbursement for providing Lifeline to a subscriber unless the carrier has received a certification of eligibility from the subscriber that complies with the requirements set forth in paragraph (d) of this section and has confirmed the subscriber's program-based eligibility using the following procedures:	(i) Must not seek reimbursement for providing Lifeline to a subscriber, unless the carrier has received a notification from the state Lifeline administrator, or other state agency that the prospective subscriber complies with the requirements set forth in paragraph (d) of this section and has confirmed the subscriber's income-based eligibility using the following procedures:	Same as above.
(d) <i>Eligibility certification form.</i>		
<i>Eligibility certification form.</i> Eligible telecommunications carriers and state Lifeline administrators or other state	(d) Eligibility certification form. Eligible telecommunications carriers, <u>the National Verifier</u> and state Lifeline administrators	The certification form is part of the USAC application.

agencies that are responsible for the initial determination of a subscriber's eligibility for Lifeline must provide prospective subscribers Lifeline certification forms that provide the information in <u>paragraphs (d)(1) through (3)</u> of this section in clear, easily understood language. If a Federal eligibility certification form is available, entities enrolling subscribers must use such form to enroll a qualifying low-income consumer into the Lifeline program.	or other state agencies must provide prospective subscribers the Federal eligibility certification form	Carriers can provide the certification form to its subscribers with no obligation to receive or retain the form, which is the current practice.
(1) The form provided by the entity enrolling subscribers must provide the information in <u>paragraphs (d)(1)(i) through (vi)</u> of this section:	(1) The form provided by the entity enrolling subscribers must provide the information in <u>paragraphs (d)(1)(i) through (vi)</u> of this section:	
(2) The form provided by the entity enrolling subscribers must require each prospective subscriber to provide the information in paragraphs (d)(2)(i) through (viii) of this section:	2) The form provided by the entity enrolling subscribers must require each prospective subscriber to provide the information in paragraphs (d)(2)(i) through (viii) of this section:	

§ 54.416 Annual certifications by eligible telecommunications carriers.

Existing Rule	Proposed Rule	Reason
(b) All eligible telecommunications carriers must annually provide the results of their re-certification efforts, performed pursuant to § 54.410(f), to the Commission and the Administrator. Eligible telecommunications carriers designated as such by one or more states pursuant to § 54.201 must also provide, on an annual basis, the results of their re-certification efforts to state commissions for subscribers residing in those	(b) All eligible telecommunications carriers must annually provide the results of their re-certification efforts, performed pursuant to § 54.410(f), to the Commission and the Administrator. Eligible telecommunications carriers designated as such by one or more states pursuant to § 54.201 must also provide, on an annual basis, the results of their re-	The National Verifier conducts recertification and therefore, have the results. Carriers currently report zero's on the FCC Form 555.

<p>states where the state designated the eligible telecommunications carrier. Eligible telecommunications carriers must also provide their annual re-certification results for subscribers residing on Tribal lands to the relevant Tribal governments:</p>	<p>certification efforts to state commissions for subscribers residing in those states where the state designated the eligible telecommunications carrier. Eligible telecommunications carriers must also provide their annual re-certification results for subscribers residing on Tribal lands to the relevant Tribal governments.</p>	
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