

Report of the FCC/NARUC/NASUCA Working Group on Lifeline and Link-Up: “Lifeline Across America”

Executive Summary

Introduction

On July 26, 2005, during the NARUC Summer Meetings, the Federal Communications Commission (FCC or Commission) and the National Association of Regulatory Utility Commissioners (NARUC) launched “Lifeline Across America,” a nationwide initiative to provide state, local, and tribal entities with additional outreach resources on Lifeline and Link-Up, enhance consumer awareness, and ultimately draw more income-eligible consumers into federal and state Lifeline and Link-Up programs. On September 28, 2005, the FCC issued a Public Notice naming the 15 Working Group members and advising the public of the opportunity to provide input to the Working Group, now joined by the National Association of State Utility Consumer Advocates (NASUCA).

Lifeline and Link-Up are low-income support mechanisms, which ensure that quality telecommunications services are available to low-income consumers at just, reasonable, and affordable rates. These programs provide for discounts to low-income households for both the initial installation of phone service (Link-Up) and monthly phone bills (Lifeline). Since their inception, Lifeline and Link-Up have provided support for telephone service to millions of low-income customers. National statistics, however, reveal that a significant number of consumers who qualify for Lifeline and Link-Up may not be aware of the benefits of the programs.

“Lifeline Across America” Work to Date

The Working Group began work in the fall of 2005 and decided to actively solicit public input on Lifeline and Link-Up outreach to obtain information on current outreach experiences before developing new strategies. The Working Group established a dedicated FCC e-mail box lifeline@fcc.gov to receive input, and, in an FCC Public Notice dated January 10, 2006, the Working Group asked for input on topics such as the success of previous outreach on Lifeline and Link-Up, how to measure the success of outreach, what outreach efforts are currently underway, the existence of joint outreach (*e.g.*, between business and government), the effect of the 2005 hurricanes, challenges and obstacles to outreach, and overall recommendations. The Working Group also conducted telephone interviews with several relevant organizations, including the National Association of Social Workers, National Congress of American Indians, Home Health Nurses Association, and wireline and wireless carriers. The Working Group used all of the input it received to support the “next step” strategies discussed below.

To help raise awareness about the “Lifeline Across America” initiative and to assist in the collection of input and distribution of new outreach materials, on February 7, 2006, the Working Group launched a dedicated Lifeline and Link-Up Web site, www.lifeline.gov, hosted on the FCC’s Web site and linked to the Web sites of NARUC and NASUCA. The Lifeline and Link-Up Web site provides information and resources to consumers, consumer advocacy groups, industry, and government stakeholders in a user-friendly format and encourages visitors to give input on the Working Group’s outreach questions.

In November, 2006, NARUC and NASUCA passed resolutions calling for, among other things, more collaboration between public and private entities at both the state and federal levels to ensure that eligible consumers receive accurate and timely information about available Lifeline and Link-Up discounts.

The Working Group has also initiated communications with professional associations, ethnic and faith-based organizations, as well as regional economic developmental organizations. Currently, the Working Group is developing sample outreach materials for specific consumer groups.

Highlights of the Comments and Interviews

The Working Group has identified some consistent themes in its review of the information and comments filed in response to its request for input.

The message has not reached some constituencies. Although this theme became more evident through interviews with organizations with constituents that have direct contact with consumers, *e.g.*, social service agencies, the Working Group was able to identify some important constituencies that are generally not aware of the Lifeline and Link-Up programs. For example, the Working Group found that the National Association for Home Care and Hospice and the National Association of Social Workers were not informed about Lifeline and Link-Up. Both were eager to educate their members on the programs.

One-on-One outreach is critical. A wide cross-section of stakeholders, including social workers, carriers, state public utility commissions, share the view that the most effective way to educate and enroll eligible consumers is through direct, personal contact with consumers from a trusted source. In some communities, the trusted source may be a social worker; in others it may be a community newspaper, a community-based organization (such as a senior center) or even another individual consumer in the community.

Automatic Enrollment can be highly effective in reaching eligible consumers. Commenters reported that automatic enrollment programs increase participation rates for Lifeline and Link-Up and described automatic enrollment programs that have successfully been implemented across the country.

Standardizing the enrollment process and application form would reduce confusion. The Universal Service Administrative Company, which answers a significant volume of calls from individual consumers, indicated that consumers find the enrollment process confusing. Although a nationwide application may not be practical, uniform statewide applications have been developed with success, such as in Arizona.

Partnerships between government, carriers, and community organizations have been very effective in all parts of the country. The most meaningful success in outreach on Lifeline and Link-Up seems to emanate from partnerships between stakeholders to reach, inform, and enroll eligible consumers. Coordination has included cooperative outreach efforts with state commissions, carriers, social service agencies, community centers, public schools, and private organizations that may serve low-income individuals, such as American Association of Retired Persons (AARP) and the United Way. The Working Group heard that partnering among these stakeholders helps ensure that accurate information is provided directly to consumers, from a trusted source, with the opportunity for necessary interaction to answer questions and provide explanations. These partnerships seem to allow each participant to concentrate on the role each is best suited to play.

One size does not fit all. The long-term success of Lifeline and Link-Up depends on effective communications with and outreach to potential eligible consumers. There is no one best way to communicate the message. For example, reaching non-English-speaking populations may require different tactics than reaching the homebound elderly or residents located in remote locations on tribal lands.

Outreach on tribal lands has particular challenges because of the vast amount of area to be covered and the commensurate difficulty of reaching people in remote areas. Based on input we received from tribal organizations, the focus for outreach on tribal lands should be on working with tribal governments and infrastructures to achieve the most effective dissemination of information, as opposed to developing new materials targeted to residents of tribal lands.

Print materials can be effective outreach tools, but they should be provided in plain and simple language. Inserts into other utility bills were cited as an effective means of reaching the broadest possible range of consumers. Printed materials should use plain and simple language.

Broadcast media campaigns can be effective, particularly in combination with other mechanisms. The Working Group heard about several broadcast media campaigns on Lifeline and Link-Up. The most successful campaigns used broadcast media in combination with other mechanisms, such as concurrent brochures and other printed materials that supported the broadcast announcements. The significant cost of broadcast media advertising is the greatest barrier.

Web resources may be most useful to educate those who do the outreach. Despite the apparent narrowing of the digital divide between high- and low-income households, it appears that the Internet may be more useful for educating those who come in contact with eligible consumers, as opposed to a tool for directly reaching eligible consumers. The Working Group notes that searches for “Lifeline” on the most popular Internet search engines usually do not direct users to information on the Lifeline and Link-Up telephone programs.¹

During and after emergencies, government agencies and carriers must be flexible and coordinate with each other. After the 2005 hurricanes, flexibility on the part of federal and state agencies and carriers facilitated consumer access to phone service. Greater coordination among government agencies and with carriers, however, would improve outreach efforts and consumer access to phone service after future incidents.

Possible Next Steps to Improve Outreach on Lifeline and Link-Up

Many of the suggestions we heard for improving outreach on Lifeline and Link-Up -- for example, the need for increased coordination and education -- were exactly what we expected to hear. What we did not expect was how little certain relevant organizations and constituencies had come to know about the Lifeline and Link-Up programs. We believe that more widespread distribution of Lifeline and Link-Up materials already available would benefit a great number of consumers without upsetting existing efforts and budgets.

After reviewing the input we received, we have combined our thoughts into a list of possible next steps for outreach on Lifeline and Link-Up. We have begun to address a number of these strategies through the resolutions discussed above as well as through coordinated work among the Working Group members.

¹We note that Verizon’s specific Lifeline offering did appear in the search results at least once.

Broader Strategies:

- ***Initiate communication with professional associations whose members have direct contact with eligible consumers.*** In some cases, it may be appropriate to participate in a national meeting or convention. In other cases, the distribution of educational materials may suffice. These organizations include, for example, National Association of Elder Law Attorneys.
- ***Initiate communication with regional economic development organizations.*** At a minimum, these associations should be encouraged to provide links on their Web sites to relevant information on Lifeline and Link-Up. Participating in joint outreach publications or events may also be appropriate to increase awareness. Examples of such organizations include the Appalachian Regional Commission, Delta Regional Authority, and the Alaska Rural Development Council.
- ***Initiate communication with ethnic, faith-based and other relevant associations.*** At a minimum, these associations should be encouraged to provide links on their Web sites to relevant information on Lifeline and Link-Up. Participating in joint outreach publications or events may also be appropriate to increase awareness.
- ***Encourage public/private partnerships within each state.*** These partnerships could be comprised of several entities, for example the public utilities commission, the Low Income Home Energy Assistance Program (or other energy assistance) agency, social services/human services agency, telephone providers, and community-based and faith-based organizations. Encourage similar partnerships involving tribes. This was a recommendation of the Federal-State Joint Board on Universal Service, and the input we received indicates that states that have used this approach have found it successful and effective.
- ***Develop outreach materials for specific consumer groups,*** for example, disabled consumers.
- ***Explore the feasibility of greater, perhaps nationwide, broadcast and/or print media presence on Lifeline and Link-Up.*** A feasible first step might be to develop press releases for smaller and rural market daily newspapers, community newspapers, and radio stations, as well as college, non-commercial, and Native American radio stations.
- ***Explore the possibility of creating a National Lifeline Awareness Week.*** This would involve, for example, coordinated releases from the FCC, state Governors/state public utility commissions (PUCs)/consumer advocates, carriers, and other appropriate federal agencies such as Department of Homeland Security and/or Health and Human Services, supported with an article in *PARADE* Magazine.
- ***Develop plans for providing Lifeline and Link-Up assistance in an emergency,*** including establishing procedures to waive eligibility requirements, down payments, etc., and for ***communicating the availability of Lifeline and Link-Up assistance in an emergency,*** which should include information about assistance at the federal, state and local levels.
- ***Initiate regular communication among federal government agencies that oversee low-income assistance programs.*** Such agencies include, for example, the Department of Veterans' Affairs, which administers low-income benefits to veterans.

More Specific Strategies:

- Communicate more systematically with home healthcare providers, starting with providing education and outreach materials to the *National Association for Home Care and Hospice* at their national convention.
- Communicate more systematically with state social service agency staff, starting with providing education and outreach materials to the *National Association of Social Workers* at their national convention later this year. Encourage agencies to make Lifeline and Link-Up *applications routinely available at state social service agencies and to discuss Lifeline and Link-Up along with other programs.*
- *Assist states exploring automatic enrollment* with “how to” information on the Working Group Web site, the NARUC Web site and at future NARUC meetings.
- *Urge states to consider uniform, statewide applications for Lifeline and Link-Up for use by all Eligible Telecommunications Carriers (ETCs) in a state.* Where possible, encourage joint energy and telephone discount applications.
- *Create model bill inserts* to be included in the bills of other utilities.
- Update and *expand the information available to consumers when they call the FCC.* This would be accomplished by revising the script provided to the call center staff.
- Improve the ability to find Lifeline and Link-Up information as the result of a *Google or other Internet search.* Related to this, encourage states with a state program to use the word Lifeline in the name of the program to help create a more nationwide identity.

More Specific Strategies Involving Action by ETCs:

- Encourage ETCs to *continually review and assess the effectiveness of their outreach materials and methods.*
- Encourage ETCs to *work with public utility commissions and state public counsels (or public advocates)* to develop effective outreach methods.
- Encourage ETCs to *include information about Lifeline and Link-Up on all disconnection notices and payment plan confirmation letters.*
- Encourage ETCs to *develop outreach methods targeted to reach households that do not currently have telephone service.*
- Encourage ETCs to *develop outreach materials for specific consumer groups*, i.e., non-English speaking populations.
- Encourage ETCs to identify *tribal liaisons* and to designate specific company employees to establish and maintain regular contact with tribal liaisons.
- Encourage *ETCs continually and routinely to update information* on their websites and on USAC’s www.lifelinesupport.org Web site. To support this, we encourage more regular communication between USAC, the FCC, and the NARUC Telecommunications and

Consumers Affairs Committees with respect to the accuracy and completeness of the information on the Web site.

I. INTRODUCTION

The Lifeline Across America initiative was created in July 2005 as a nationwide effort to draw more low-income consumers into federal and state Lifeline and Link-Up programs. As part of the initiative, a joint Working Group comprised of staff from the Federal Communications Commission and the National Association of Regulatory Utility Commissioners was established to determine effective ways of enhancing consumer awareness of Lifeline and Link-Up telephone services.

In this report, we present the observations and conclusions of the Working Group concerning best practices for outreach on the Lifeline and Link-Up programs. This report is divided into four sections. Section II provides: (1) an explanation of the mission and composition of the Working Group, (2) an explanation of Lifeline and Link-Up assistance, (3) a description of current outreach guidelines and enforcement, and (4) a description of current outreach activities. Section III provides a detailed report of the Working Group's activities and Section IV provides observations and recommendations.

Despite significant success of the programs in some states, Lifeline and Link-Up support helps only a portion of low-income households in this country.² States that engage in proactive, targeted efforts, such as aggressive outreach and intrastate multi-agency cooperation, appear to have the highest Lifeline and Link-Up take rates.³ This report evaluates current outreach methods and highlights the most effective ways of increasing consumer awareness of the Lifeline and Link-Up programs.

II. BACKGROUND

A. Mission and Composition of Working Group

On July 26, 2005, the FCC and NARUC launched "Lifeline Across America," a nationwide initiative to provide state, local, and tribal entities with additional outreach resources on Lifeline and Link-Up. The mission of the Working Group is to provide state, local, and tribal entities with additional outreach resources on Lifeline and Link-Up, enhance consumer awareness, and ultimately draw more income-eligible consumers into federal and state Lifeline and Link-Up programs.

On September 28, 2005, the FCC issued a Public Notice identifying the "Lifeline Across America" Working Group members and advising the public of the opportunity to provide input concerning the Lifeline and Link-Up programs. The current members of the Working Group, which now includes representatives from NASUCA, are as follows:

- Amy Bender, FCC Wireline Competition Bureau
- Lisa Colosimo, Public Utilities Commission of Ohio
- Beverlee DeMello, Florida Public Service Commission

² *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 8302 at Appendix K, Table I.B (2004) (*Lifeline Order*).

³ See, e.g., Carol Weinhus, Tom Wilson, Gordon Calaway, *et al.*, Telecommunications Industries Analysis Project, *Calculations and Sources for Closing the Gap: Universal Service for Low-Income Households*, August 1, 2000 (finding that the Lifeline/Link-Up take rate almost tripled from 13.1% to 39.6% when states implemented outreach initiatives designed to increase telephone penetration and participation).

- Greg Fogleman, Florida Public Service Commission
- Larry Greer, Mississippi Public Utilities Staff
- Vicki Helfrich, Mississippi Public Utilities Staff
- Karol Krohn, Indiana Office of the Utility Consumer Counselor
- Sharon Lee, FCC Enforcement Bureau
- Patrice O'Connor, New York Department of Public Service
- Lauren Patrich, FCC Consumer and Governmental Affairs Bureau
- Dee Porter, Oklahoma Corporation Commission
- John Ridgway, Iowa Utilities Board
- Jennifer Salhus, FCC Wireless Telecommunications Bureau
- Cindi Schieber, FCC Wireless Telecommunications Bureau
- Sandra Sloane, New York Public Service Commission
- Robert Somers, FCC Consumer and Governmental Affairs Bureau
- Dana Walton-Bradford, FCC Wireline Competition Bureau

The Working Group also acknowledges the contributions of Deena Frankel of the Vermont Public Service Board and Angela Gilliland of the Indiana Office of the Utility Consumer Counselor.

B. Explanation of Lifeline and Link-Up

Lifeline and Link-Up are support mechanisms that ensure that quality telecommunications services are available to low-income consumers at just, reasonable, and affordable rates. Since their inception, the Lifeline and Link-Up programs have been designed to ensure that telephone service is affordable for low-income consumers by providing universal service funds to reduce the price they pay for basic telephone service (Lifeline) and initial telephone installation (Link-Up).⁴

Under the Commission's rules, states may adopt their own Lifeline and Link-Up programs to provide additional support to low-income consumers. These states may establish their own state-specific eligibility criteria or use the federal eligibility criteria as their default standard. States that have elected to use the federal default criteria, and states that have not adopted their own Lifeline and Link-Up programs, are called "federal default states." Consumers residing in federal default states must satisfy the eligibility criteria set forth in the Commission's rules to receive Lifeline and Link-Up assistance.⁵ Consumers residing in states with their own Lifeline and Link-Up programs must meet the eligibility criteria established by the state.

The Commission's rules provide four tiers of federal Lifeline support. All eligible telephone subscribers may receive Tier 1 support, which provides a discount of up to \$6.50 off of

⁴ 47 C.F.R. § 54.401 (defining Lifeline as a retail service offering available only to qualifying low-income consumers that permits these consumers to pay reduced monthly charges based on the Lifeline support amount); 47 C.F.R. § 54.411 (defining Link-Up as a reduction in the carrier's customary charge for commencing telecommunications service for a single telecommunications connection at a consumer's principal place of residence).

⁵ See 47 C.F.R. § 54.409. Specifically, the consumer must certify, under penalty of perjury, that he or she participates on one of the following federal programs: Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance (Section 8), Low Income Home Energy Assistance Program, National School Lunch Program's free lunch program, or Temporary Assistance for Needy Families. A consumer may also receive Lifeline and Link-Up benefits if he or she can show that his or her income is at or below 135% of the federal poverty guidelines. *Id.*

the monthly cost of telephone service for a single telephone line in the subscriber's principal residence.⁶ Tier 2 support provides an additional \$1.75 per month in federal support as long as all relevant state regulatory authorities approve such an additional reduction.⁷ Tier 3 support provides support in an amount equal to one-half of the subscriber's state or carrier-provided Lifeline support, up to a maximum of \$1.75.⁸ Finally, Tier 4 support provides enhanced Lifeline support to eligible residents of tribal lands, as defined in section 54.400(e) of the Commission's rules.⁹ Under Tier 4, eligible residents of tribal lands receive up to \$25.00 in additional discounts off the monthly cost of telephone service, provided that this amount does not bring the basic local residential rate below \$1 per month per qualifying low-income subscriber.¹⁰

The Link-Up program assists qualifying low-income consumers in initiating telephone service by paying a portion of the service connection charge.¹¹ Specifically, the Link-Up program provides eligible telephone subscribers a discount of half off the installation charge or \$30.00, whichever is less.¹² Eligible residents of tribal lands may receive up to \$70.00 more off the initial costs of installing telephone service.¹³

All Eligible Telecommunications Carriers (ETCs) are required to publicize the availability of Lifeline and Link-Up support in a manner reasonably designed to reach those likely to qualify for the service.¹⁴

C. Outreach Practices and Assessing ETC Outreach Efforts

1. Outreach Practices

On December 21, 2000, the Commission requested that the Federal-State Joint Board on Universal Service (Joint Board) review the Lifeline and Link-Up program for all low-income consumers, including a review of outreach practices.¹⁵ In its *Recommended Decision*, released on

⁶ See 47 C.F.R. §§ 54.401(a)(2).

⁷ 47 C.F.R. § 54.403(a)(2). All of the states have approved. See *Lifeline Order*, 19 FCC Rcd at 8306, n.12 (2004).

⁸ 47 C.F.R. § 54.403(a)(3).

⁹ 47 C.F.R. § 54.403(a)(4).

¹⁰ *Id.*

¹¹ See 47 C.F.R. § 54.411.

¹² 47 C.F.R. § 54.411(a)(1).

¹³ 47 C.F.R. § 54.411(a)(3).

¹⁴ See 47 C.F.R. §§ 54.405(b), 54.411(d). See also *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12250, at para. 78 (2000) (amending sections 54.405 and 54.411 of the Commission's rules). See also *Lifeline Order*, 19 FCC Rcd at 8332, para. 58 (seeking comment on whether the adoption of specific rules governing the advertisement of the Lifeline/Link-Up program would strengthen the operation of these programs.)

¹⁵ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, 15 FCC Rcd 25257 (2000) (*Referral Order*).

April 2, 2003, the Joint Board recommended that the Commission provide, among other things, outreach guidelines to states and carriers to improve Lifeline and Link-Up subscribership.¹⁶ Specifically, the Joint Board stated that the Commission should advise states and carriers to: (1) use outreach materials and methods designed to reach households that do not currently have telephone service, (2) develop outreach advertising that can be read or accessed by any sizeable non-English speaking populations within a carrier's service areas, and (3) coordinate their outreach efforts with governmental agencies or tribes that administer any of the relevant government assistance programs.

In the *Lifeline Order*, the Commission agreed that more vigorous outreach efforts could improve Lifeline and Link-Up subscribership and, therefore, adopted the outreach guidelines set forth above.¹⁷ The Commission declined to prescribe specific outreach procedures or requirements, thereby enabling states and carriers to have maximum flexibility to determine the most appropriate outreach mechanisms for their respective consumers.¹⁸

Along with its Order, the Commission adopted a Further Notice of Proposed Rulemaking exploring whether adoption of rules governing the advertisement of the Lifeline and Link-Up programs would strengthen their operation. The Commission sought comment on whether it should require ETCs to print and distribute posters, flyers, or other print media advertising Lifeline/Link-Up to state, federal, or tribal public assistance agencies in their service areas. The Commission also sought comment about whether ETCs should be required to provide outreach materials in languages other than English if a percentage of the population served by the ETC speaks a language other than English.¹⁹

2. Assessing ETC Outreach Efforts

As noted above, the Commission's rules require ETCs to publicize the availability of the Lifeline and Link-Up programs in a manner reasonably designed to reach those likely to qualify for the service.²⁰ The Commission has not mandated specific outreach requirements. Rather, ETCs are encouraged to tailor their outreach efforts to the communities they serve. Outreach efforts must be ongoing and frequent to ensure that new and existing eligible consumers are aware of the benefits of the Lifeline and Link-Up Programs.²¹

When the Commission receives information indicating that an ETC is not fulfilling its obligation to advertise the availability of the Lifeline and Link-Up programs, the FCC's Enforcement Bureau initiates a fact-finding effort to determine whether an investigation is

¹⁶ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 18 FCC Rcd 6589, 6612, para. 50 (2003) (*Recommended Decision*).

¹⁷ See *Lifeline and Link-Up*, WC Docket No. 03-109, Notice of Proposed Rulemaking, 18 FCC Rcd 11628 (2003), modified by *Federal-State Board on Universal Service Lifeline and Link-Up*, WC Docket No. 03-109, Erratum, 18 FCC Rcd 16694 (2003) (collectively *NPRM*); *Lifeline Order*, 19 FCC Rcd 8302, at para. 44.

¹⁸ *Lifeline Order*, 19 FCC Rcd 8302 at para. 44.

¹⁹ *Id.* 19 FCC Rcd at 8333, para. 58.

²⁰ 47 C.F.R. §§ 54.405(b), 54.411(d).

²¹ 19 FCC Rcd 8302, 8327-8328.

warranted.²² To date the Enforcement Bureau has investigated numerous ETCs. Since 2004, the Bureau's efforts have resulted in a Forfeiture Order being issued against an ETC and negotiated Consent Decrees with several ETCs. Each of these Orders involved service on tribal lands. These actions resulted in voluntary contributions to the U.S. Treasury totaling \$345,000 and the development and implementation of specialized outreach programs targeted at low-income residents in each of the tribal land areas in which the ETCs serve.

D. Current Outreach Activities

1. Federal Communications Commission

Through its Consumer Affairs and Outreach Division within the Consumer and Governmental Affairs Bureau (CGB), the FCC works to educate and assist consumers on a range of issues. With respect to Lifeline and Link-Up, the FCC has a number of ongoing activities:

Publication and Distribution of Fact Sheets. The FCC publishes general fact sheets about Lifeline and Link-Up, which are available online at the FCC Web site.²³ There is a special fact sheet discussing the distinctive features of the programs available for those living on tribal lands. After the hurricanes of 2005, the FCC also published special fact sheets discussing Lifeline/Link-Up programs for hurricane victims. The Lifeline/Link-Up fact sheets are often made available at an FCC exhibit booth set up at outreach events, including but not limited to, the annual conventions of AARP, the National Association for the Advancement of Colored People (NAACP), the American Library Association, the National Association of Consumer Agency Administrators, the National Council of La Raza, the League of United Latin American Citizens, the Delta Regional Authority, the Rural Telecommunications Congress, and at the Public Service Recognition Week on the National Mall in Washington.

Community Outreach Events. FCC outreach staff often mentions the Lifeline/Link-Up programs at community outreach events and distributes the FCC fact sheets discussed above. These events provide general information to community groups about a variety of telecommunications related issues and do not specifically focus on the Lifeline/Link-Up programs.

FCC Consumer Call Center. The FCC's consumer call center staff discusses the Lifeline/Link-Up programs with members of the public who call the FCC's toll-free information line for information about a variety of topics.

Consumer Information Registry. Recently, CGB launched an e-mail notification initiative called the Consumer Information Registry. Under this initiative, consumers can sign up for electronic notification of regulatory developments in areas of particular interest to them, including the Lifeline/Link-Up programs.

Other Initiatives. CGB has a number of other on-going initiatives whose mission extends beyond Universal Service and merit a brief discussion. The Indian Telecommunications Initiative is a comprehensive FCC program that seeks to promote understanding, cooperation, and trust among Native Americans, tribal organizations and government agencies, and the

²² Such information is referred to the Commission from a variety of sources including consumers, state agencies, and USAC.

²³ Appendix 2 provides web resources available on Lifeline and Link-Up.

telecommunications industry. Goals include informing consumers in Indian country about financial support available through federal government programs, including Universal Service discounts. The FCC also has on-going rural and broadband initiatives that address provision of communications services to unserved areas.

2. States

There are a number of ongoing outreach initiatives in states throughout the country:

Linking Outreach to Enrollment in Qualifying Assistance Programs. The Colorado Department of Human Services mails a letter regarding the Lifeline program to each eligible subscriber when the subscriber enrolls in a qualifying assistance program. The Nebraska Public Service Commission participates in a cooperative effort with the Nebraska Health and Human Services System to send pre-approved applications to individuals or households that are enrolled in another qualifying assistance program but are not participating in Lifeline or Link-Up.

Outreach Task Force. The North Carolina Utilities Commission participates in an outreach task force comprised of representatives from the major telecommunications companies, state agencies administering qualifying programs, the Attorney General's Office, the North Carolina Utilities Commission, and other organizations assisting low income citizens in North Carolina. The task force creates and distributes brochures to promote the Lifeline and Link-Up programs. The task force's efforts have helped increase enrollment in the state.

Mandating Carrier Actions. In Vermont, utilities are required to provide two notices advertising the Lifeline and Link-Up programs per year as bill inserts. In Indiana, in 2001, as part of an alternative regulatory plan, the state and its largest local exchange carriers began a series of public service announcements to reach consumers eligible for Lifeline and Link-Up programs.

Automatic Enrollment. Automatic enrollment is an electronic interface between a state agency and the carrier that allows low-income individuals to automatically enroll in Lifeline/Link-Up following enrollment in a qualifying public assistance program. In Massachusetts, for example, households that qualify for the Low Income Heating and Energy Assistance Program (LIHEAP) can give their permission, at the time of application, for the LIHEAP administering agency to disclose information to Verizon that allows the household to enroll in Lifeline.

In New York and New Jersey, Verizon implemented an automatic enrollment program in April 2003. The New York State Office of Temporary and Disability Assistance sends Verizon a tape each month and the company matches the data on the tape with existing data and sends a letter to anyone new on the list and then asks anyone no longer on the list to re-certify. New York employed a confidentiality agreement between the state agency and the carrier to facilitate the release of qualifying information and safeguard consumer privacy rights. Since 2003, Verizon is no longer in a rate structure plan, but continues to use automatic enrollment. New York Lifeline customers can purchase custom calling features earning Verizon about \$40 million per year.

Further detail regarding state activity is available in Section IV of this report.

3. USAC

The Universal Service Administrative Company (USAC) is an independent, not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC.

USAC administers the Universal Service Fund for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries. The Universal Service Fund helps provide communities across the country with affordable telecommunications services.

USAC answers calls from consumers regarding the Lifeline and Link-Up programs and provides information to consumers through its Web site. USAC also provides information about the Lifeline and Link-Up programs to telecommunications companies, social service agencies, tribal organizations, and states. Outreach resources on the Web site include: 1) a newsletter, *USAC CONNECTION*, which reports news on the High Cost and Low Income programs on a monthly basis; 2) brochures produced by USAC to educate stakeholders, and 3) success stories. In addition, USAC's Web site also provides *Tips and Best Practices* for ETCs as well as training sessions that include a discussion of: 1) USAC's role in administering Lifeline and Link Up; 2) the process for applying for Lifeline and Link Up support; and 3) guidelines and best practices for advertising.

In 2005, USAC sent a voluntary survey form to states seeking information on state Lifeline and Link-Up programs. USAC received responses from 31 states or territories. As part of its survey, USAC requested information regarding each state's outreach efforts. Information regarding state responses to the survey can be found on USAC's website at <http://www.universalservice.org/li/tools/state-surveys.aspx>.

In a phone interview on June 2, 2006, USAC representatives suggested that telecommunications companies and state public utility commissions use USAC as a resource.

III. Working Group Activities

A. Planning Stage

As noted above, the Working Group is composed of members from NARUC, the FCC, and NASUCA. The Working Group met via conference calls throughout the Fall of 2005 to discuss various ways of soliciting input from the public. On January 10, 2006, the Working Group issued an FCC Public Notice in which it solicited input on methods to increase participation in the Lifeline and Link-Up programs.²⁴ The Working Group also established a dedicated FCC email box (lifeline@fcc.gov) to receive input.

The Public Notice consisted of the following questions:

- 1. Success of outreach:** What are successful examples of Lifeline/Link-Up outreach within the last two years? Why was this outreach successful? What form or type of media did this outreach activity take (*e.g.*, advertisements, brochures)? How was the outreach developed? How were the costs covered? To the extent that past outreach on Lifeline/Link-Up has been less than successful, please explain why you think this was so.
- 2. Measuring the success of outreach:** How should the success of outreach efforts on Lifeline/Link-Up be measured?
- 3. Currently available information:** If someone contacts your organization asking for information regarding the type of assistance available through Lifeline or Link-Up, what do they receive? What resources do you currently have available to promote the availability of Lifeline and Link-Up to your constituency? What resources would you

²⁴ See, Appendix 3.

- like to have available? Is there anything on your Web site about assistance for low-income consumers? Is it specific to Lifeline and Link-Up? Do you produce a hard copy publication to promote Lifeline and Link-Up?
4. **Joint outreach:** Are you aware of any joint partnerships or outreach activities that have taken place or are planned in your region? If so, what has been your experience?
 5. **Effects of 2005 Hurricanes:** Have you seen or do you anticipate an increase in the number of consumers that apply for Lifeline and/or Link-Up as a result of the hurricanes? Has your region made changes recently in Lifeline/Link-Up eligibility as a result of the hurricanes? What additional outreach measures would you propose for Lifeline/Link-Up as a result of the hurricanes? Other emergency situations?
 6. **Challenges and obstacles:** What are some of the challenges/obstacles to implementing a successful outreach program on Lifeline and Link-Up?
 7. **Overall recommendations:** What recommendations would you make in terms of outreach on Lifeline and Link-Up? Does an increase in the number of consumers eligible for or applying to the programs impact how outreach should be done?

The Working Group received input from various state PUCs, state government agencies, consumer advocacy groups, telecommunications carriers, research centers, and individual consumers as well as organizations representing a variety of interests.²⁵

The Working Group also conducted a limited number of telephone interviews with: the AARP, the National Association of Social Workers, the National Congress of American Indians, the National Association for Home Care and Hospice, and several wireline and wireless carriers. Members of the Working Group also conducted follow-up telephone interviews with several commenters to obtain additional information regarding best outreach practices.

B. Web site Preparation and Launch

Another major component of the “Lifeline Across America” initiative has been Web site enhancements. In December 2005, the Working Group began discussing ways to redesign and enhance the information that was available online about the Lifeline and Link-Up programs. The group’s goal was to redesign the information available online to better highlight the Lifeline and Link-Up programs and to provide information about the programs in a more customer-friendly and useful manner. The group decided that the new Web site would feature a homepage with links to information specifically tailored to different groups, including consumers, consumer advocates and social service agencies, hurricane victims, industry, government, and media. The group established a new address for the Web site: www.lifeline.gov. After determining the structure and new address for the Web site, the group split into federal/state teams to develop information for each section.

The Working Group launched the new Web site on February 7, 2006. The new Web site is user-friendly, easy to navigate, and contains information for anyone who wants in-depth knowledge of the Lifeline and Link-Up programs as well as someone who is learning about them for the first time. The Working Group continues to monitor and update the Web site. As the Working Group completes its analysis of the input it has received on Lifeline and Link-Up outreach, it plans to make available new and targeted outreach materials through the Web site.

²⁵ A complete list of commenters is attached as Appendix 1.

C. Resolutions

Most recently, NARUC and NASUCA passed resolutions calling for, among other things, more collaboration between public and private entities at both the state and federal levels to ensure that eligible consumers receive accurate and timely information about available Lifeline and Link-Up discounts. In addition, the resolutions encouraged participating phone companies to work with state PUCs, consumer advocate groups, social service agencies, companies providing other utility services, and other community-based organizations to improve educational outreach regarding the Lifeline and Link-Up telephone assistance programs, facilitate the distribution of accurate information, and help eligible consumers enroll in these universal service support programs. Appendix 3 provides a listing of Working Group public releases.

IV. Observations and Recommendations

A. Key Themes of Comments

In response to the Public Notice, the Working Group received input from over 50 public and private organizations and a number of individual consumers. A list of commenters is attached as Appendix 1. Several themes emerged from these comments.

The message has not reached some very important constituencies. We spoke with representatives of the National Association for Home Care and Hospice and the National Association of Social Workers and found that these constituencies were not informed about Lifeline and Link-Up. Both were eager to be able to educate their members on the programs and welcomed the opportunity to educate their members at their national conventions.

One-on-one outreach is critical. Public and private commenters said that one-on-one outreach is critical to create real awareness among consumers and translate that awareness into enrollment. These commenters said that one-on-one outreach should come from a trusted source, such as a social service agency, or in the case of native people living on reservations, the tribal government. Outreach that does not come from a trusted source, according to commenters, is less likely to be effective. For example, USAC told of a major wireline carrier that had undertaken a door-to-door campaign to promote Lifeline and Link-Up, but found many consumers reluctant to open their door to speak with a company representative whom they did not know personally. The Indiana Office of the Utility Consumer Counselor, on the other hand, has used door-to-door canvassing with success. The Legal Services of Texas stated that the most effective way to educate and enroll eligible consumers is through agencies with direct contact with consumers and programs, such as Head Start and Meals on Wheels.

Carriers also reported the importance of one-on-one outreach. Verizon discussed its efforts to organize information meetings at community centers, public housing communities, assisted living facilities, and church groups. Fones4All Corporation, a carrier that specializes in serving low-income consumers, reported that one-on-one outreach is its main outreach vehicle, and that it communicates information on Lifeline and Link-Up through door-to-door efforts of its field agents, many of whom are themselves consumers enrolled in the programs.

Automatic Enrollment can be highly effective in reaching eligible consumers. The need for one-on-one outreach from a trusted source is one of the reasons behind the movement in many states to introduce automatic enrollment. A number of commenters endorsed automatic enrollment as an efficient and effective means of increasing participation in Lifeline and Link-Up.

Commenters reported on automatic enrollment programs that have been implemented successfully across the country.

Qwest, for instance, cited programs in New Mexico, Iowa, North Dakota, and Washington where consumers are presented with an opportunity to enroll in Lifeline and Link-Up when they enroll in another qualifying program, such as LIHEAP. AT&T also recommended automatic enrollment and pointed to the Texas program as a model. AT&T indicated that the Texas program utilizes partnerships involving a third-party administrator, carriers, and social service agencies. The social service agencies send data to the administrator, who matches the data to that of the carriers. The administrator contacts the carriers with a list of eligible consumers, and the consumers receive a letter stating they will be automatically enrolled unless they prefer to opt out.

The Iowa Utilities Board reported on its automatic enrollment program that offers Lifeline and Link-Up to consumers when they sign up for LIHEAP. In its program, when consumers sign up for LIHEAP assistance, they are asked if they would like their names to be forwarded to the telephone company to apply for Lifeline assistance at the same time. The Iowa Utilities Board indicated that its automatic enrollment program has been successful in raising enrollment in Lifeline and Link-Up dramatically and that training for customer assistance workers taking LIHEAP applications has involved minimal expense. The New York Public Service Commission noted that automatic enrollment has been used in New York for the past ten years. It recommended automatic enrollment as the best method for enrolling the greatest number of eligible consumers in Lifeline and Link-Up. The Indiana Office of Utility Consumer Counselor also endorsed automatic enrollment, noting that it appears to be an effective way to increase participation in Lifeline and Link-Up.

At least one state has decided against instituting automatic enrollment for the moment, however, because of the cost. The Wyoming Office of Consumer Advocate reported on discussion in that state several years ago regarding the possibility of initiating automatic enrollment. The Department of Family Services came out against automatic enrollment because of the cost to modify their operations and computer systems. Bell South notes that the administrative costs of automatic enrollment as well as privacy issues and competitive neutrality must be considered prior to implementation.

Standardizing the enrollment process and application form would reduce confusion. Several parties recommended standardizing the application process to increase enrollment in Lifeline and Link-Up. Qwest reported on the effort of the Arizona Corporation Commission and state's ETCs to develop a generic application form that would be accepted by all carriers. In both Texas and the District of Columbia, customers can already use one enrollment form to apply for specific energy discount programs as well as Lifeline and Link-Up. A more uniform application process was also a key recommendation of USAC.

Partnerships between government, carriers, and community organizations have been very effective in all parts of the country. Many commenters discussed the importance of partnerships between government agencies, carriers, and community organizations. A particularly good example of these partnerships seems to be the Lifeline Consumer Advisory Boards in Ohio. Ohio's Elective Alternative Regulation companies with more than 50,000 access lines are required by the Public Utilities Commission of Ohio to create a Lifeline Consumer Advisory Board comprised of staff from the Ohio Commission, the Office of the Ohio Consumers' Counsel, representatives from consumer groups representing low-income consumers, and the company. The Lifeline Consumer Advisory Boards provide feedback to carriers on

marketing tools, evaluate the geographic locations in which to distribute marketing pieces, review enrollment reports to determine the overall success of the program, and decide where budget allocations would be most effectively spent, and where more outreach is needed to promote greater enrollment. The Ohio Commission reported that the outreach ideas and materials generated by the boards have been extremely successful because they have been developed with the help of board members that work with low-income consumers and have knowledge about how to best reach those consumers.

Another example of effective partnerships came from the Florida Public Service Commission. The Florida Commission's Connect Florida program focuses on establishing sustained partnerships with local non-profit community-based organizations. The partnerships hold community events to present information on Lifeline and Link-Up and to encourage non-profit organizations to participate on a year-round basis. Key groups, such as senior centers, public housing groups, churches, and urban leagues, are notified well in advance, and advertisements are placed in local newspapers and provided to local radio stations. Awareness is raised through the participation of community leaders, social service agency representatives, as well as consumers and the media. The Florida Commission has found that marketing and promotion in the partnership setting has meant that consumers are receiving information from trusted sources, making enrollment more likely. The Florida Commission's Back-to-School Project is another partnership effort that partners carriers with school districts. A bilingual Lifeline brochure and application is included in the information packets provided to every child – 2.6 million students - in a Florida public school through local school distribution. Future efforts through the Back-to-School Project will likely target specific geographic areas of the state, rather than the entire state.

The California Public Utilities Commission also described a successful partnership approach. A Commission contractor established an Outreach Advisory Committee comprised of organizations representing target populations. The Committee offered input on branding and logo development for California's Lifeline program as well as creative concepts for radio, television, and print ads. The District of Columbia Public Service Commission has used a "multi-utility working group" for years to promote discount programs. The working group sponsors a Joint Utility Discount Day annually at the Washington Convention Center that typically draws 5,000 – 7,000 consumers. The D.C. Commission believes that the working group setting motivates companies to strive higher in outreach efforts.

AARP also reported having positive experience with a community-based approach featuring partnerships among relevant organizations that have the ability to reach consumers directly. Working through local religious congregations or other faith-based community groups has proven an excellent way to reach underserved population groups. AARP has been involved in "Benefit Outreach Sundays" where volunteers distribute materials, answer questions about Lifeline and Link-Up, and assist in enrollment.

We did not hear from anyone or any organization that partnerships are not an effective tool for outreach.

One size does not fit all. Several commenters stressed the importance of a tailored approach for outreach. BellSouth reported that it believes the overall success of the programs is linked to recognizing that circumstances differ from state to state, therefore the outreach should differ. Frontier Corporation reported that it has put effort into understanding its customer base and which approach might appeal to different types of customers. As a result, it has been able to properly integrate targeted materials with the most appropriate approach for its customers. Some

respondents indicated that states and/or communities within states may have different “trusted sources.” For example, consumers in one community may be comfortable discussing Lifeline and Link-Up assistance with a representative from a telecommunications carrier, whereas consumers in another community may not. Other respondents noted that differences in the circumstances from state to state also impact how the success of a program should be measured.

Outreach on tribal lands has particular challenges because of the vast amount of area to be covered and the commensurate difficulty of reaching people in remote areas. Outreach on tribal lands offers some unique challenges. Respondents, including the National Congress of American Indians, indicated that outreach on tribal lands seems most effective when done by the tribes themselves. There are many factors that may drive this result, including the fact that each tribe is unique and knows best how to reach its members--often by tapping into the tribe’s existing internal network and structure, especially the tribal communications’ offices.

Special materials targeted to Native Americans may not be critical to a successful tribal outreach effort, but proper dissemination of outreach materials is. Because of postal address issues on reservations for example, outreach by mail is less than effective. Outreach materials should also clearly explain not just the criteria for enrolling in the programs, but also information on factors that might change a consumer’s eligibility for participation in the program, *i.e.*, what happens if a consumer no longer qualifies for another type of assistance.

Qwest notes that the greatest success in increasing Lifeline and Link-Up enrollment on tribal lands has come when the outreach is conducted in conjunction with a state, local or tribal agency that enrolls consumers in several programs -- such as LIHEAP, Food Stamps, or Temporary Assistance for Needy Families.

Print materials can be effective outreach tools, but they should be provided in plain and simple language. Inserts into other utility bills were cited as an effective means of reaching the broadest possible range of consumers. For example, it is estimated that up to 98 percent of households receive a gas bill. Inserts into telephone bills are obviously not effective in reaching consumers without existing service. The North Carolina Public Utilities Commission reported that they send bill inserts annually to Medicaid recipients in the state.

The Office of the Regulatory Staff - South Carolina Public Service Commission has engaged in a particularly in-depth effort to distribute printed materials. They reported that they have been effective in educating and enrolling consumers through presentations to church groups, community agencies, and civic organizations; posters in the client waiting areas of social service agencies; door hangers in residential areas; and advertisements in local reference directories, such as Black Pages USA. The Florida Public Service Commission views the extensive, but targeted, distribution of educational materials with appropriate follow up as a major component of effective outreach.

AARP discussed a wide range of printed materials with the potential to reach eligible consumers, including: bus bench advertisements, door knob flyers for residential areas, paper tray inserts for fast food restaurants, mailing enclosures in a mailing for another government assistance program or for another utility, store displays, brochures to give to school children to take home, and enclosures in pay envelopes for companies that employ a large number of low-to-mid-level wage earners.

When printed materials are used, several commenters emphasized the importance of using plain and simple language. The Office of the Ohio Consumers’ Counsel, for example, noted that the posters, flyers, and pamphlets left behind with groups that assist low-income

consumers must be self-explanatory and provide enough instruction so consumers can enroll by themselves. The National Congress of American Indians also stressed the importance of using plain and simple language in outreach materials.

The North Carolina Department of Justice and the New York State Department of Public Service have both distributed printed materials in English and Spanish. This practice is also supported by the University of Florida, Public Utility Research Center.

Broadcast media campaigns can be effective, particularly in combination with other mechanisms. We received information about a number of successful media campaigns. The California Public Utilities Commission reported that mass market advertising, if directed appropriately, can be a very effective medium for reaching targeted customers. To provide information about the Lifeline program to consumers, the Commission used a combination of TV and radio spots, along with other printed materials. It noted that, as a result of its media campaign, the calls it received regarding enrollment in Lifeline increased significantly.

The Office of the Ohio Consumers' Counsel also reported on a successful "media blitz." It noted that every February, one local telephone company sends out bill inserts, promotes Lifeline through newspaper ads, utilizes the local cable community page and runs a paid advertisement on a local radio station. Nextel Partners also noted the effectiveness of media campaigns, indicating that it has repeatedly observed a direct correlation between a specific Lifeline newspaper ad and the number of inquiries received from the specific geographic area where the ad appeared. Cingular Wireless suggested that a nationwide public service announcement with a celebrity spokesperson funded, potentially, through the Universal Service fund, might be a successful method of reaching consumers.

AARP, however, noted that while broadcast campaigns have the potential to reach vast audiences at once, it is becoming increasingly difficult to place public service announcements during prime time television hours. According to AARP, to the extent that announcements are not in prime time, their effectiveness decreases. Qwest also expressed doubt regarding the effectiveness of media campaigns, reporting that its 2005 media campaign, which it teamed with interior bus advertisements, generated only 277 calls out of an estimated 200,000 eligible consumers in the area, at a cost of \$162 per call.

It is important to test different approaches, and in some areas of the country, a media campaign might be useful.

Web resources may be most useful to educate those who do the outreach. A number of public utility commissions reported that they post information about Lifeline and Link-Up on their website, and, in some cases, also post applications that consumers can use to apply for benefits.²⁶ T-Mobile USA (T-Mobile) commented on the information available on the FCC's website, noting that web resources available after Hurricane Katrina played a role in the program's effectiveness. USAC noted that its website provides information for consumers including a map that consumers can click on to receive information about the ETCs in a particular state and each carrier's application process.

Other parties, however, noted that reaching consumers through the web can be difficult. The District of Columbia Public Service Commission noted that web resources may not reach eligible consumers because these consumers are less likely to have ready access to the Internet.

²⁶ Appendix 2 lists the resources that are available on state public utility commission websites.

The National Congress of American Indians noted that web-based materials are not effective on tribal lands because Internet access is limited.

A number of commenters discussed how their web sites provide information to carriers and other organizations that do outreach. The California Public Utilities Commission noted that it uses web resources to inform and train community-based organizations, call center staff, and Lifeline Program Management staff. USAC indicated that its web site, www.lifelinesupport.org, provides information to ETCs on the rules associated with the Lifeline and Link-Up programs. It also noted that the Web site provides carriers with a letter that they can customize and use for outreach to their customers and also offers a monthly newsletter describing best practices and tips for outreach.

During and after emergencies, government agencies and carriers must be flexible and coordinate with each other. In response to the Public Notice, many parties described the impact of the 2005 hurricanes on service provision. After the 2005 hurricanes, flexibility on the part of federal and state agencies and carriers facilitated consumer access to phone service. The FCC, for example, adopted temporary modifications to the federal Lifeline and Link-Up programs to help qualified victims of Hurricane Katrina obtain wireless phone service and reconnect their phone service. States, such as South Carolina and Georgia, eased Lifeline and Link-Up qualification requirements for a six month period for certain evacuees. In addition, some carriers provided relief above and beyond the scope of federal and state programs. Cingular, for example, set up a free mobile calling station where many hurricane evacuees were housed and also allowed affected consumers to place free calls at Cingular retail stores. For a limited time, Cingular also provided special billing and collection relief for affected customers. T-Mobile indicates it provided free service to more than 25,000 households affected by Hurricane Katrina.

Greater coordination among government agencies and with carriers, however, would improve outreach efforts and consumer access to phone service after future incidents. T-Mobile reported that the FCC's outreach efforts, including creating a special Web site with information regarding hurricane relief efforts, played a significant role in educating the telecommunications industry and consumers regarding the Katrina Lifeline program. T-Mobile also suggested using temporary ETC status in the future as modeled after the Katrina Lifeline program. In addition, most carriers noted that they advertised Lifeline and Link-Up services through print media. Some provided Lifeline and Link-Up materials to local Federal Emergency Management Agency (FEMA) officials, made door-to-door visits in affected communities, and set up displays at temporary housing sites. All of the carriers, however, seemed to agree that more could be achieved through widespread coordinated press releases by federal, state, and local governments that inform consumers about all available programs. Such press releases would complement efforts by carriers to publicize telecommunications programs. In addition, if consumers must be approved by FEMA for individual disaster assistance in order to qualify for a telecommunications program, Qwest noted that outreach for such a program would be most effective if provided at the time that consumers are notified by FEMA that they are approved for assistance. The National Association for Home Care and Hospice indicates that its members were significantly affected by Hurricane Katrina and the Association would like to better understand how members should be prepared for future disasters.

B. Possible Next Steps to Improve Outreach on Lifeline and Link-Up

Many of the suggestions we heard for improving outreach on Lifeline and Link-Up were exactly what we expected to hear - increased coordination and education. What we did not expect was how little certain relevant organizations and constituencies understood about the

Lifeline and Link-Up programs, which highlights the importance of increasing the reach of educational efforts. This leads us to believe that there is a substantial amount of work to be done with materials already available. We believe that connecting a few more dots would go a long way to help a large number of consumers without breaking existing budgets.

While Lifeline and Link-Up are programs with proven track records, more consumer education is needed. Continued expansion of outreach efforts for the Lifeline program will require a sustained effort by the FCC, NARUC, NASUCA, states, and telecommunications carriers, including the development of new and innovative ways to improve awareness and streamline the enrollment process.

After reviewing all of the input we received as well as existing resources, each member of the Working Group shared a list of possible next steps for outreach on Lifeline and Link-Up. We have combined our collective thoughts into the strategies that follow. We have begun to address a number of these strategies through the resolutions discussed above as well as through coordinated work among the Working Group members.

Broader Strategies:

- ***Initiate communication with professional associations whose members have direct contact with eligible consumers.*** In some cases, it may be appropriate to participate in a national meeting or convention. In other cases, the distribution of educational materials may suffice. These organizations include:
 - American Public Human Services Association
 - National Association of Elder Law Attorneys
 - Legal Services Corporation (parent of Legal Aid Societies)
 - *Pro Bono* Committees of State and Local Bar Associations
 - American Library Association (to inform librarians that may assist consumers who use computers at the library)
 - Meals on Wheels programs

- ***Initiate communication with regional economic development organizations.*** At a minimum, these associations should be encouraged to provide links on their Web sites to relevant information on Lifeline and Link-Up. Participating in joint outreach publications or events may also be appropriate to increase awareness. Examples of such organizations include the Appalachian Regional Commission, Delta Regional Authority, and the Alaska Rural Development Council.

- ***Initiate communication with ethnic, faith-based and other relevant associations.*** At a minimum, these associations should be encouraged to provide links on their Web sites to relevant information on Lifeline and Link-Up. Participating in joint outreach publications or events may also be appropriate to increase awareness. Examples of such organizations include:
 - National Congress of American Indians
 - Affiliated Tribes of Northwest Indians
 - NAACP
 - National Urban league
 - La Raza
 - Hebrew Immigrant Aid Society
 - B'nai Brith

- Asian Advocacy and Assistance Groups
 - Catholic Relief Services
- **Encourage public/private partnerships within each state** comprised of several entities, for example the public utility commission, LIHEAP (or other energy assistance) agency, social services/human services agency, telephone providers, and community-based and faith-based organizations to ensure that accurate and current information is disseminated to those who interface with consumers. Encourage similar partnerships involving tribes. This was a recommendation of the Joint Board on Universal Service,²⁷ and the input we received indicates that states that have used this approach have found it successful and effective.
- **Develop outreach materials for specific consumer groups**, for example, disabled consumers.
- **Explore the feasibility of greater, perhaps nationwide, broadcast and/or print media presence** on Lifeline and Link-Up. A feasible first step might be to develop press releases for smaller and rural market daily newspapers, community newspapers, and radio stations, as well as college, non-commercial, and Native American radio stations.
- **Explore the possibility of creating a National Lifeline Awareness Week** with coordinated releases from the FCC, state Governors/PUCs/consumer advocates, carriers, and other appropriate federal agencies such as DHS and/or HHS, supported with an article in PARADE Magazine.
- **Develop plans for providing Lifeline and Link-Up assistance in an emergency**, including establishing procedures to waive eligibility requirements, down payments, etc., and for **communicating the availability of Lifeline and Link-Up assistance in an emergency**, which should include information about assistance at the federal, state and local levels.
- **Initiate regular communication among federal government agencies** that oversee low-income assistance programs. For example:
- **Department of Veterans Affairs**, which administers low-income benefits
 - **Department of Housing and Urban Development**, which administers low-income housing
 - **General Services Administration**/Federal Citizens Information Center and publishes the Consumer Action Handbook, a compilation of consumer resources
 - **Social Security Administration**/Social Security Retirement and Supplemental Security Income Programs
 - **Department of Health and Human Services** which includes both Health Care Financing Administration that runs Medicare and Medicaid and the Administration for Children and Families that oversees the Low-Income Heating and Energy Assistance Program, Temporary Assistance for Needy Families, and Head Start
 - **Department of Agriculture**/Food and Nutrition Service which oversees the Food Stamp and National School Lunch Programs
 - **Department of Interior**/Bureau of Indian Affairs

²⁷ See *Recommended Decision*, 18 FCC Rcd at 6612, para. 50 (2003).

More Specific Strategies:

- Communicate more systematically with home healthcare providers, starting with providing education and outreach materials to the *National Association for Home Care and Hospice* at their national convention.
- Communicate more systematically with state social service agency staff, starting with providing education and outreach materials to the *National Association of Social Workers* at their national convention later this year. Encourage agencies to make Lifeline and Link-Up *applications routinely available at state social service agencies and to discuss Lifeline and Link-Up along with other programs.*
- *Assist states exploring automatic enrollment* with “how to” information on the Working Group Web site, the NARUC Web site and at future NARUC meetings.
- *Urge states to consider uniform, statewide applications for Lifeline and Link-Up for use by all ETCs in a state.* Where possible, encourage joint energy and telephone discount applications.
- *Create model bill inserts* to be included in the bills of other utilities.
- Update and *expand the information available to consumers when they call the FCC.* This would be accomplished by revising the script provided to the call center staff.
- Improve the ability to find Lifeline and Link-Up information as the result of a *Google or other Internet search.* Related to this, encourage states with a state program to use the word Lifeline in the name of the program to help create a more nationwide identity.

More Specific Strategies Involving Action by ETCs:

- Encourage ETCs to *continually review and assess the effectiveness of their outreach materials and methods.*
- Encourage ETCs to *work with public utility commissions and state public counsels (or public advocates)* to develop effective outreach methods.
- Encourage ETCs to *include information about Lifeline and Link-Up on all disconnection notices and payment plan confirmation letters.*
- Encourage ETCs to *develop outreach methods targeted to reach households that do not currently have telephone service.*
- Encourage ETCs to *develop outreach materials for specific consumer groups*, i.e., non-English speaking populations.
- Encourage ETCs to identify *tribal liaisons* and to designate specific company employees to establish and maintain regular contact with tribal liaisons.
- Encourage *ETCs continually and routinely to update information* on their websites and on USAC’s www.lifelinesupport.org Web site. To support this, we encourage more regular communication between USAC, the FCC, and the NARUC Telecommunications and Consumers Affairs Committees with respect to the accuracy and completeness of the information on the Web site.

- [Appendix 1](#) - List of Commenters
- [Appendix 2](#) - Links To State Public Utility Commission or Other Web Pages On Lifeline & Link-Up Assistance
- [Appendix 3](#) - Working Group Public Releases