



06-C-0890
2007 OT
OGC
Corresp.

Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

August 21, 2007

RE: Verification of Consumers' Continued Eligibility for Lifeline Support

RECEIVED
PUBLIC SERVICE
COMMISSION
OSCC FILES-ALBANY
22 PM 1:22

Dear Sir/Madam:

Attached, please find the State Telephone Company Verification of its Lifeline customers continued eligibility in this program.

The State Telephone Company has and continues to adhere to the Rules and Regulations of the New York State Department of Public Service concerning its Lifeline qualification criteria and verification procedures.

On July 27, 2006, the NYS Department of Public Service issued a guidance notice for ETCs in New York concerning the August 31, 2006 required filing. In its Notice, the Department of Public Service wrote: "For ETCs in New York, satisfaction of FCC standards for verification is sufficient. ETCs should send the verification results to the Universal Service Administration Company (USAC) as set out in the FCC's Notice by the stated deadline: August 31, 2006." The State Telephone Company has, with the issuance of the above notice, instituted procedures consistent with the above notice.

Sincerely,

Mark R. Evans

Assistant Vice-President



As of the date of this filing, the State Telephone Company has procedures in place to verify the continued eligibility of a statistically valid random sample of its Lifeline customers. The results for the State Telephone Company Lifeline Subscribers are provided in the chart below.


Additionally, procedures are currently in place requiring corroborating income documentation from subscribers that qualify based upon the income guidelines set out by the State of New York.

I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed below.

Company name	Company SAC	State	Number of Lifeline customers surveyed	Number of Lifeline customers found to be ineligible	Number of Lifeline customers who did not respond to survey*
State Telephone Company	150125	NY	78	0	12

*Note: Per the FCC's direction in Public Notice DA 05-1406 (rel. May 18, 2005), companies should update their filing upon completing the survey on October 31, 2006.

Signed,


Signature of Officer


Mark R. Evans


Assistant Vice-President


Company Address


Company Telephone Number

LIFELINE PROCEDURES

The following procedures are adhered to by the State Telephone Company.

1. **Eligibility:** Customers eligible for Lifeline discounts include Program-based customers enrolled in one of NY State's programs for low-income residents, including Medicaid (MA), Food Stamps (FS), Safety Net Assistance, Family Assistance Supplemental Security Income (SSI), Veteran's Disability Pension (DP) (non-service related), Veteran's Surviving Spouse Pension (SSP) (non-service related), or the Home Energy Assistance Program (HEAP). In addition, customer's who would be eligible to receive these programs based upon their income are also eligible to receive Lifeline benefits.
2. **Verification of Continued Eligibility:** The State Telephone Company will verify the continued eligibility of a statistically valid sample of its Lifeline subscribers and report the results to USAC annually and file a copy of those results with the NY Department of Public Service Secretary's Office on the same date.
 - a. Verification of Program –based Lifeline eligibility can be accomplished by verifying with the county officials, or by requiring the Lifeline subscriber to produce their benefits card or Heap approval notice.
 - b. Verification of Income eligible Lifeline subscribers require the Lifeline subscriber to produce documentation of their household income. Valid forms of proof include: the previous year's state, federal, or tribal tax return, current income statement from an employer or 3 consecutive months of pay stubs, a Social Security statement of benefits, a retirement/pension statement of benefits, a Veterans Administration statement of benefits, an Unemployment/Workman's Compensation statement of benefits, federal or tribal notice letter of participation in Bureau of Indian Affairs General Assistance, A divorce decree, or child support document.
3. **Annual Notice of Lifeline Program availability:** The State Telephone Company, pursuant to § 54.405(b) of the FCC Rules will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.
4. **Termination of Lifeline service-Notice:** If the State Telephone Company has a reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria, as described in §54.409. Notification of impending termination shall be in the form of a letter separate from the subscriber's monthly bill.
5. **Termination of Lifeline Service – Time:** The State Telephone Company will Allow subscribers 60 days to provide proof of eligibility following the date of the impending termination letter. Subscribers making such a demonstration must present proof of continued eligibility to the company consistent with applicable verification requirements, as described in §54.410(c). The State Telephone

Company will terminate subscribers who fail to demonstrate continued eligibility within the 60-day time period.

6. **Record Retention:** The State Telephone Company will maintain records to document compliance with all Commission and state requirements governing the Lifeline/Link Up programs for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request.
 - a. The State Telephone Company will maintain the documentation regarding a consumer's eligibility for Lifeline support for as long as the consumer receives Lifeline service from that ETC or until audited by the Administrator. If the State Telephone Company provides Lifeline discounted wholesale services to a reseller, it will obtain a certification from that reseller that it is complying with all Commission requirements governing the Lifeline/Link Up programs.
 - b. Non-eligible-telecommunications-carrier resellers that purchase Lifeline discounted wholesale services to offer discounted services to low-income consumers must maintain records to document compliance with all Commission requirements governing the Lifeline/Link Up programs for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request. To the extent such a reseller provides discounted services to low-income consumers, it constitutes the eligible telecommunications carrier referenced in §§54.405(c), 54.405(d), 54.409(d), 54.410, and 54.416.