



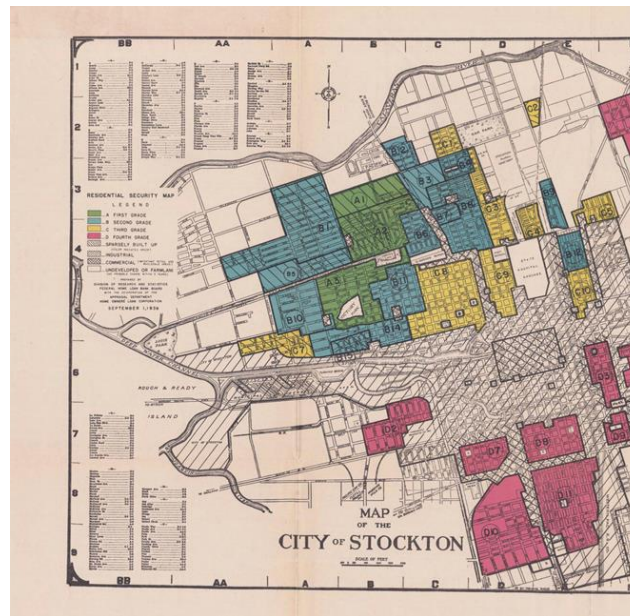
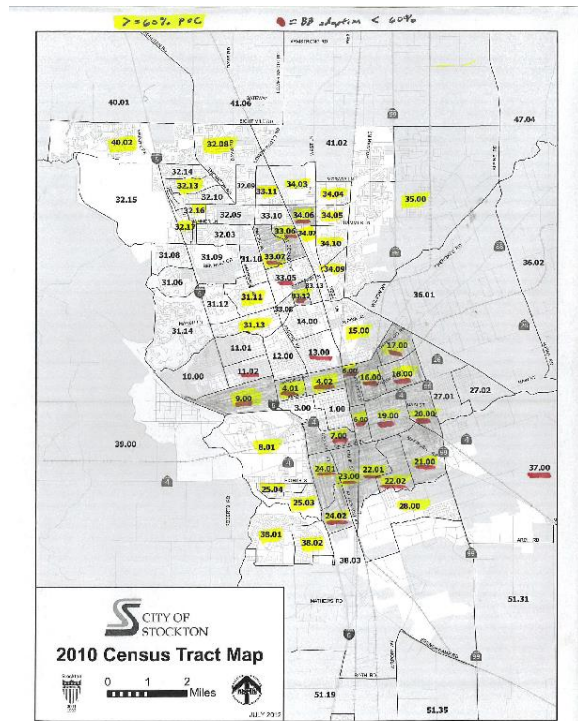
LifeLine Pilot Projects

August 6, 2018



- ➔ Carriers' criticisms of the program are largely about **self-inflicted** inefficiencies.
- ➔ Mass market providers have, for the most part, demonstrated that they have **no interest** in participating in the program.
- ➔ Communities of color have historically been, and continue to be, **redlined out of access to affordable communications services.**

Communications Redlining



- Allow LifeLine program to function regardless of changes to federal program
- Drive up LifeLine participation rate by creating incentives for enrolling new customers.
- Enabling LifeLine-only providers to become new entrants in the overall communications services market.



Target Markets for Pilot Programs

- Areas with:
 - Low/negligible home broadband adoption
 - Historically underserved communities
 - Where providers aren't marketing
 - Where facilities-based providers haven't maintained infrastructure.

- Specific Suggestions:
 - Re-entry population/families of persons in custody (DOC).
 - Pair with San Joaquin projects.

- Ideal size: legislative district*



Service Plans & Duration

- We should reward providers who demonstrate alignment with the **purposes of the program**, not **compliance with the rules**
 - Ex. Unlimited voice/text/broadband, battery backup, compliance with Commission service quality metrics.
 - Tiered subsidy is a proven method & is technology neutral.
- Duration: one year + one renewal period
- Low-income households should not have to exchange privacy for service.



Discount Level

- Tiered subsidies as incentives
 - Unlimited data
 - Net neutrality
 - Unserved/underserved communities
 - Regional enrollment rates
- Minimal compliance with program=minimal compensation for service.
- Use aggregated subsidies to purchase wholesale access to phone/text/data, thereby leveraging state's purchasing power.
- We need to rethink the purpose of the nonrecurring charge reimbursement.



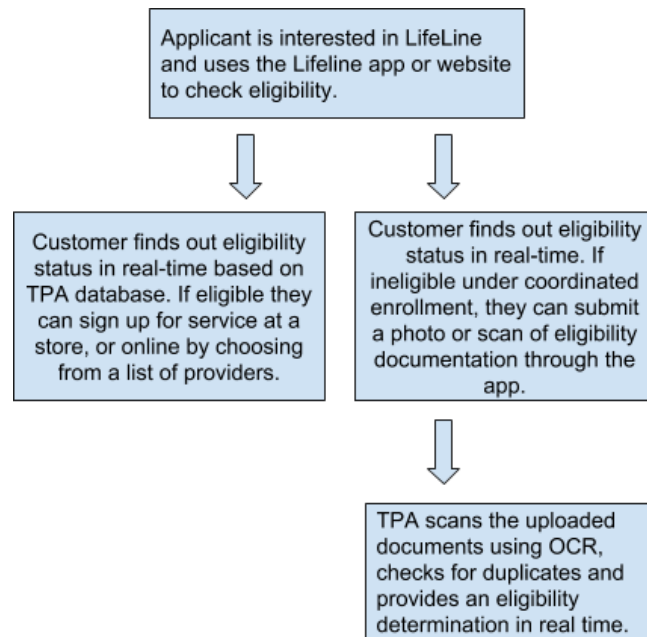
Enrollment Process

- One point of entry—LifeLine website
 - Providers can walk customers through the website at their point of sale using the provider's device.
 - LifeLine website should include functionality to switch LifeLine providers with one click.
 - Gives consumers a single point of contact for:
 - Problems with provider
 - Renewal



Eligibility Determinations

- We can vastly improve how the program conducts online verification.
 - Eliminate SSN requirement.
 - New technologies (ex. OCR & online check deposits) can make the verification process almost instantaneous.
 - If problems with signature, can let applicant know while they're still on the website.
 - Mobile app for enrollment & renewal (push notifications)





Marketing and Outreach

- Commission needs to be deliberate about reaching out to unserved/underserved households
- In-language marketing requirements
- Unique identifier for each individual involved in direct marketing & their supervisors
- Incentives for participants to recruit eligible households
- Increased Commission oversight



Reimbursements

- Maintain stability of overall federal & state reimbursements
- Clawbacks for:
 - Failure to meet service quality standards
 - Failure to meet marketing standards
- Unlimited data pilot—fund before or after?



Pilot Approval Process

- Require providers advocating for specific pilots to have some skin in the game
 - Filed tariff
 - Commitment to providing service during pilot period
- Community review/approval

- Enrollment and renewal
- Equity in enrollment and renewal numbers
- Number of participating providers
 - New entrants
 - Market equilibrium

- Report to legislature by legislative district



Thank you



Questions?