



Annual Verification of Continued Lifeline Subscriber Eligibility

Missouri

This report provides findings regarding the Lifeline Program's annual requirement to verify the continued eligibility of existing Lifeline subscribers.

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The Lifeline program is a discounted phone service available to qualifying low-income consumers.¹ This report narrowly focuses on the requirement to annually verify the continued eligibility of existing Lifeline program participants. Listed below are two of the more major observations gleaned from reviewing reports associated with this requirement:

- *Missouri's Lifeline subscribers declined 44% from May 2012 to February 2013.*
- *The 2013 annual verification process de-enrolled 38,029 Missouri Lifeline subscribers mainly because subscribers ignored requests to verify eligibility.*

These observations and other findings will be discussed in the remainder of this report; however, a brief history of this requirement will be initially discussed.

The Requirement to Annually Verify the Continued Eligibility of Lifeline Subscribers

This section attempts to describe how the requirement has changed over time from the establishment of the Lifeline program in 1985 to current. Essentially three distinct time periods can be identified for the verification requirement:

- 1985 to 2004
- 2004 to 2012
- 2012 to current

1985 to 2004

In the beginning a federal requirement to annually verify the continued eligibility of Lifeline subscribers did not exist. Instead a Lifeline subscriber was required to notify his/her carrier when he/she no longer met the eligibility standards.² Any attempts to verify the continued eligibility of a Lifeline subscriber depended on the state. Missouri did not have such a requirement; however, a few states did attempt to verify a subscriber's continued eligibility primarily through on-line verification systems.³

¹ For a more detailed explanation about the Lifeline program and how it works in Missouri see *The Lifeline Program* a report compiled by the Missouri Commission Staff and filed in Case No. TW-2014-0012; July 10, 2013.

² Recommended Decision; *In the Matter of Federal-State Joint Board on Universal Service*; CC Docket No. 96-45; FCC 03J-2; released April 2, 2003; ¶ 31. (*Joint Board Recommended Decision*).

³ Illinois, Minnesota and Tennessee had procedures whereby the state could verify continued eligibility by accessing a database of state low-income assistance program participants. See Appendix E in *Joint Board Recommended Decision*.

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2004 to 2012

In 2004 the FCC adopted a federal requirement to verify the continued eligibility of at least a random sample of Lifeline subscribers.⁴ The FCC's requirement technically applied in default states (*states without their own Lifeline program*) while non-default states (*states with their own Lifeline program*) could establish their own state verification procedures. Missouri is a non-default state but Missouri's rules simply required compliance with federal verification requirements.⁵ The federal verification requirement required a company to verify the continued eligibility of a randomly selected sample of existing Lifeline subscribers. Sample size was determined by a formula requiring larger sample sizes if a company's verification results for the prior year revealed a significant number of ineligible subscribers.⁶ Subscribers selected for verification were required to submit proof of eligibility.⁷ A company's sampling verification results were submitted directly to the federal USF Administrator, and companies had to certify compliance with this requirement to the Missouri Commission as part of the annual USF certification process. During this time period many Missouri companies actually applied stricter verification procedures than required under federal requirements by verifying the eligibility of all Lifeline subscribers.⁸

2012 to current

The FCC changed the federal verification requirement in February 2012.⁹ The FCC now requires verification of all Lifeline subscribers and not simply a random sample of subscribers.

⁴ Report and Order and Further Notice of Proposed Rulemaking; *In the Matter of Lifeline and Link-Up*; WC Docket No. 03-109; FCC 04-87; released April 29, 2004. (*FCC's 2004 Lifeline Order*)

⁵ Missouri Commission rule 4 CSR 240-31.050(3)(E).

⁶ As an example see the sample size table in the FCC's Public Notice; *Deadline for Annual Lifeline Verification Surveys and Certifications*; WC Docket No. 03-109; DA 11-749; released April 28, 2011.

⁷ *FCC's 2004 Lifeline Order*; ¶ 35.

⁸ This statement is based on company responses to information gathered in Missouri Commission Staff data requests. These data requests pertained to a variety of compliance issues associated with the Lifeline program. The data requests and responses were filed in the summer of 2011 maintained in Tracking No. BISR-2011-1622 within the Missouri Commission's EFIS system.

⁹ *Report and Order and Further Notice of Proposed Rulemaking*; WC Docket No. 11-42 *In the Matter of Lifeline and Link Up Reform and Modernization*; FCC 12-11; released February 6, 2012 (*FCC Lifeline Reform Order*). Title 47 Part 54 Subpart E identifies the FCC's current rules and regulations regarding the Lifeline program.

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Options also exist for providers in conducting the annual verification.¹⁰ For example, a Lifeline provider can conduct verification by contacting a Lifeline subscriber in a variety of different ways such as in person, in writing, by phone, by text message, or by email. The FCC allows consumers to respond to verification requests by self-certification without submitting proof of eligibility.¹¹ In 2013, Lifeline providers had the option to have the administrator of the federal universal service fund conduct the annual verification process on the company's behalf. Although a qualifying database is unavailable in Missouri, Lifeline providers in other states may verify subscriber eligibility by accessing a qualifying database rather than attempting to contact the subscriber.¹²

States continue to have some discretion to establish different verification requirements. The FCC states, "...States may supplement the federal re-certification methodology with their own procedures specifically tailored to state-specific program requirements...."¹³ The FCC further explains this statement by saying in a footnote, "For example, some states have verification procedures in place where the subscriber must provide proof of continued eligibility." The Commission recently supplemented the federal procedures in new Commission rules. The Commission's new rules relevant to the annual Lifeline subscriber verification process will be contained in 4 CSR 240-31.120(2)(C), effective April 30, 2014:

(C) An ETC shall annually recertify a subscriber's continued eligibility for participation in the Lifeline program. A subscriber shall submit proof of eligibility at least once every two (2) years unless an ETC has an automated means of verifying subscriber eligibility or alternatively a carrier's annual recertification process is administered by the FUSFA.

The Missouri Commission approved this rule despite opposition expressed by various parties in the rulemaking process. This opposition expressed concerns this rule goes too far and there is no reason to impose additional, state-specific regulations. In response to these concerns the Commission states, "The commission believes that the submission of "proof eligibility" at

¹⁰ For additional details see Public Notice; *Wireline Competition Bureau Provides Guidance Regarding the 2013 Lifeline Recertification Process*; WC Docket No. 11-42; DA 13-1188; released May 22, 2013. (*FCC Guidance on 2013 Recertification Process*)

¹¹ *FCC Lifeline Reform Order* ¶132.

¹² To clarify the use of a database for the annual verification process, database verification must be annually used if a state determines initial Lifeline eligibility through a state database. In other words a company may not attempt to use subscriber self-certification for the annual verification process if initial eligibility is determined by a database.

¹³ *FCC Lifeline Reform Order* ¶140.

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least once every two years is a reasonable and necessary requirement to protect the integrity of the MoUSF Lifeline program...”¹⁴

The Missouri Commission’s new rules will go into effect April 30, 2014. The timing of these new rules comes after companies may have already started the verification process for 2014. In this regard, Missouri Commission Staff anticipates companies must meet the new requirements of 4 CSR 240-31.120(2)(C) by the 2015 verification period with results submitted by January 31, 2016. At this time Missouri does not have an automated means to verify subscriber eligibility. Consequently companies will either need to see proof of eligibility or have the recertification process administered by the federal USF administrator (USAC). A company operating in multiple states and electing to have USAC administer the recertification process needs to be aware, “...This election must be made on an operating company basis and applies to all states and study area codes covered by the operating company.”¹⁵

Form 555 reports

The FCC’s reforms include a requirement for Lifeline providers to use the same form for reporting verification results to the FCC, USAC and applicable state commissions. The verification report form is labeled “Form 555”.¹⁶ Form 555 reports have been used for the last two years. The initial Form 555 reports were submitted for verifications conducted in 2012 for Lifeline subscribers enrolled in the program as of May 2012. The second round of Form 555 reports were recently submitted for verifications conducted in 2013 for Lifeline subscribers enrolled as of February 2013. Future verifications will continue to be conducted for all Lifeline subscribers enrolled as of February with Form 555 reports due January 31st of the subsequent calendar year.¹⁷

The Missouri Commission and the FCC differ in the confidentiality of Form 555 reports. For example, Form 555 reports are filed with the FCC in WC Docket No. 11-42 and are available for public inspection.¹⁸ The FCC has denied requests for confidential treatment of

¹⁴ Case No. TX-2013-0324; Missouri Commission’s Final Order of Rulemaking for 4 CSR 240-31.120.

¹⁵ *FCC Guidance on 2013 Recertification Process*; ¶11.

¹⁶ Form 555 instructions and the form can be found on the web sites of both USAC [at www.usac.org](http://www.usac.org) and the FCC [at www.fcc.gov](http://www.fcc.gov).

¹⁷ For example, the 2014 verification will be for all Lifeline subscribers enrolled as of February 2014 and the Form 555 report for 2014 will be due January 31, 2015.

¹⁸ Go to http://apps.fcc.gov/ecfs/comment_search/input?z=1707c. Insert “11-42” for the proceeding number and also insert “Report” for type of filing. (In order to see filings beyond the last 12 months activate “click here to remove the date restriction”.)

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Form 555.¹⁹ In contrast, Form 555 reports filed with the Missouri Commission are maintained within the Commission's Electronic Filing and Information System and are automatically classified as confidential.²⁰

Form 555 Results

Attachment A identifies Form 555 results for 2013 and also contains aggregate results from 2012. Although company-specific information in Attachment A has been classified as confidential, the following observations can be made from Form 555 results:

- Missouri's Lifeline subscriber quantities declined 44% from May 2012 to February 2013.
- Missouri Lifeline subscribers are doing a better job in 2013 of responding to verification requests than 2012.
- The 2013 annual verification process directly caused 38,029 Missouri Lifeline subscribers to be de-enrolled; however, nearly all of these de-enrollments were due to the subscriber ignoring eligibility verification requests.
- A total of 91,847 Missouri subscribers to free Lifeline service were de-enrolled in 2013 due to non-usage.²¹
- Five companies elected to have USAC conduct the company's 2013 annual verification process.

These observations as well as other findings will be described in the remainder of this report.

Lifeline subscriber quantities have declined

Lifeline subscriber quantities were 346,643 in May 2012 versus 195,178 in February 2013 representing a decline of 44%. These quantities specifically reflect the number of Lifeline subscribers claimed on Form 497 for May 2012 and February 2013.²² Most companies experienced a decline in the number of Lifeline subscribers. For example, in comparing Lifeline subscribers in May 2012 to February 2013, 37 companies reported serving fewer Lifeline subscribers, 12 companies reported serving more Lifeline subscribers and 1 company reported

¹⁹ Order; In the Matter of Request for Confidential Treatment of Nexus Communications, Inc. Filing of FCC form 555; WC Docket No. 11-42; DA 13-871; released April 29, 2013.

²⁰ The Missouri Commission maintains these reports in EFIS as a non-case related submission under type of submission labeled "Annual USF Certification".

²¹ FCC rule 47 CFR 54.405(e)(3) requires a Lifeline provider offering Lifeline service without a monthly fee to de-enroll the subscriber if the service is not used during a 60-day time period.

²² Form 497 is the form submitted by Lifeline providers to USAC in order to receive federal Lifeline funding.

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serving the same number of Lifeline subscribers.²³ Four wireless companies reported significant declines totaling 143,237 subscribers or 95% of the 151,465 decline in Missouri's Lifeline subscribership between May 2012 and February 2013. Only three companies with more than 1,000 Missouri Lifeline subscribers experienced a growth in Lifeline subscribers between May 2012 and February 2013. Most companies serve less than 1,000 Missouri Lifeline subscribers in February 2013 which is evidenced by the following table:

Number of Companies Serving Missouri Lifeline Subscribers	
Subscriber Quantities	Companies
50,000 or more	1
20,001 to 30,000	2
10,001 to 20,000	4
1,001 to 10,000	4
1 to 1,000	42
0	8

Lifeline subscriber response rates have increased.

A greater proportion of Lifeline subscribers are responding to verification requests. In 2012 approximately 55% of Lifeline subscribers contacted responded to verification requests while this percentage increased to 70% in 2013. During the 2013 verification period, 86,592 subscribers responded to verification requests out of the contacted 123,532 subscribers. The improvement in response rates may be due to Lifeline subscribers gaining a better understanding of the importance of responding to a verification request since a subscriber is automatically de-enrolled for failing to respond. Response rates may have also gone up due to improved efforts by companies in contacting customers.

De-enrollments caused by the annual verification process

The FCC's review of Form 555 reports appears to be primarily focused on a de-enroll percentage. In fact the FCC modified the 2013 Form 555 report to more clearly identify this percentage.²⁴ Essentially this percentage is based on de-enrollments caused by a non-response or a finding of ineligibility and comparing it to the number of Lifeline subscribers claimed. The FCC's only reported results from the 2012 verification process is this percentage whereby the FCC states, "Based on results from the FCC Forms 555 submitted by ETCs, and analysis from

²³ These company numbers are approximate for the FCC allows affiliated companies to consolidate information and file one Form 555 report. These numbers assume affiliated companies have the same trend as reported in the companies' combined report.

²⁴ Public Notice; *Wireline Competition Bureau Seeks Comment on Proposed Changes to Lifeline FCC Form 555 and Accompanying Instructions*; WC Docket No. 11-42; DA 13-1865; released September 6, 2013.

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USAC, the Bureau reports that 29 percent of all subscribers that were enrolled in the program in June 2012 have been de-enrolled from the program.” The FCC goes on to say, “...The recertification requirement reform alone is projected to save \$400 million in 2013.”²⁵ The FCC has yet to release additional results for 2012 or any annual verification results for 2013. The FCC’s \$400 million savings projection is unclear whether it is separate from other savings projected from Lifeline reforms.²⁶

On a comparative basis, Missouri’s de-enroll percentages were 26% in 2012 and 19% in 2013. Missouri’s 2013 de-enroll percentage almost exclusively reflects de-enrollments caused by failing to respond to a verification request. For example, the 2013 verification process de-enrolled a total of 38,029 subscribers for the following reasons:

- 97% (36,940 subscribers) were de-enrolled because of ignoring the verification request.
- 2% (671 subscribers) were de-enrolled because of responding “no longer eligible”.
- 1% (418 subscribers) was de-enrolled because USAC or a database verification system declared the subscriber to be ineligible.

This information suggests the annual verification process is not weeding out customers because of a finding of ineligibility but rather the subscriber has simply failed to respond to the request for verification.

Lifeline subscribers de-enrolled for ignoring the verification request can immediately re-apply to the program. Form 555 results do not provide any insight into how many of these subscribers re-apply; however, it is happening. For example, nearly all the Lifeline subscribers for one Missouri company were de-enrolled for failing to respond to the company’s verification request. A follow-up discussion with an official associated with this company indicates nearly all of the de-enrolled subscribers reapplied to the Lifeline program immediately after receiving their next bill without the Lifeline discount. It is unclear if this company’s experience is unusual. Nevertheless such occurrences may have implications if the de-enroll percentage is used to project future savings to the Lifeline program.

De-enrollments due to non-usage of free Lifeline service are still high but have declined

The FCC’s reforms establish a requirement for Lifeline providers offering a Lifeline service with no monthly fee to de-enroll a Lifeline subscriber if the subscriber fails to use the service within a sixty day time period. This de-enrollment information is identified on a monthly

²⁵ Public Notice; *Wireline Competition Bureau Announces Results of the 2012 Annual Lifeline Recertification Process*; WC Docket No. 11-42; DA 13-872; released April 25, 2013.

²⁶ Public Notice; *Wireline Competition Bureau Issues Final Report on Lifeline Program Savings Target*; WC Docket No. 11-42; DA 13-130; released January 31, 2013. This notice identifies \$213 million savings experienced in 2012 due to Lifeline reforms.

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basis for the calendar year in a company's Form 555 report. Results for the past two years are reflected below:

De-enrollments Due to Non-Usage of a Free Lifeline Service in Missouri		
	2012	2013
Number of Providers Offering "Free" Lifeline Service	10	17
Lifeline Subscribers with Free Lifeline service	293,398	149,667
Total Number of Lifeline Subscribers De-enrolled for Non-Usage	151,640	91,847

This table shows from 2012 to 2013 the number of companies providing free Lifeline service to subscribers increased from 10 to 17 companies. A total of 151,640 subscribers were de-enrolled for non-usage in 2012 and 91,847 subscribers in 2013.²⁷

Five companies optioned to have USAC conduct the company's verification

The FCC's reforms allow a company to have USAC conduct a company's annual verification beginning in 2013.²⁸ In Missouri, five companies optioned to have USAC conduct verification.²⁹ Subscriber eligibility was confirmed for approximately 1,000 Lifeline subscribers; however, 418 subscribers were de-enrolled due to a determination of subscriber ineligibility by USAC.

USAC's verification process is described as follows:³⁰ If a company elects to have USAC conduct the company's annual verification then the company may not attempt to recertify subscribers on their own. USAC will mail a letter to a company's Lifeline subscriber. The letter explains the subscriber must verify eligibility within 30 days using any one of three methods: (1) call a toll-free number to an interactive voice response system; (2) verify eligibility through a website maintained by USAC; or (3) mail a signed form provided by USAC. Subscribers will also receive a call or text message from USAC sometime during the 30-day period to help prompt a response. USAC tabulates and provides the results to the company. The company then uses such information to compile and submit the Form 555 report.

²⁷ De-enrollments for non-usage began May 1, 2012.

²⁸ *FCC Lifeline Reform Order* ¶133.

²⁹ Two wireless companies and three ILECs.

³⁰ *FCC Guidance on 2013 Recertification Process*.

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A company electing to use USAC for the annual verification process is not permitted to recertify subscribers on its own, which is a restriction that has received little discussion.³¹ One Missouri company's Form 555 report indicates verification was conducted by both USAC and the company. USAC attempted to verify the eligibility of the company's 22 Lifeline subscribers but 4 of the 22 customers ended up contacting the company after receiving USAC's correspondence. According to a company official, 3 customers indicated they were no longer eligible and were immediately de-enrolled, and 1 customer walked into the company's local office and verified eligibility. Specific instruction from the FCC or USAC on how such situations should be handled may be helpful since the USAC option is relatively new and it seems reasonable to expect some customers may contact the company after receiving correspondence from an unknown source such as USAC.³²

Unique Form 555 Findings

One company excluded verifications conducted if the customer initiated the contact

The Missouri Commission Staff contacted this company because the company's Form 555 results suggested the company contacted 652 fewer customers than anticipated.³³ The company explained these customers were actually verified in 2013 but prior to the company's attempt to contact the subscriber. For instance, these customers might have called the company for other matters and the company official simply requested the subscriber to verify eligibility at that time. The company's belief is these customers should not be included in Column D in the Form 555 report reflecting the number of subscribers contacted because the company did not technically initiate the contact.

³¹ The only written documentation about this restriction appears to be in Form 555 instructions for Columns J, K, and L. Other material such as *FCC Guidance on 2013 Recertification Process* fails to mention this restriction.

³² Recent FCC guidance about the USAC option fails to address how companies should respond to a customer contacting the company after receiving USAC correspondence. Moreover, guidance for 2014 indicates "USAC will not be providing live agent support or training materials to ETCs that have elected to use USAC." See Footnote No. 6 in Public Notice; *Wireline Competition Bureau Provides Guidance to Eligible Telecommunications Carriers on the Process to Elect USAC to Perform Lifeline Recertification*; WC Docket No. 11-42; DA 14-303; released March 5, 2014.

³³ This determination is essentially made based on the following information in a company's Form 555 report: Column D (*subscribers contacted*) = Column A (*subscribers claimed*) – Column C (*subscribers enrolled Jan. & Feb. 2013*) – Column I (*subscribers de-enrolled prior to contact*).

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One company reported using a database to verify the eligibility of 14 subscribers

One company reported using two databases identified as “CHIP” and “TANF” in verifying the eligibility of 14 subscribers.³⁴ The company was contacted for an explanation since the Missouri Commission Staff is unaware any company has access to a database that can verify the eligibility of a Missouri Lifeline subscriber. The company confirmed using a database to verify the eligibility of 14 Lifeline subscribers under the TANF criteria. The database is maintained by a health maintenance organization (HMO) and consists of TANF and CHIP participants. The company claims the HMO is able to obtain a list of TANF and CHIP participants directly from the State of Missouri. The 14 subscribers ignored the company’s initial requests for verification of continued eligibility so the company verified eligibility by obtaining verification through the HMO.³⁵ The company claims the HMO is able to distinguish participants in the TANF and CHIP programs. The company also indicates the initial eligibility of Lifeline applicants qualifying under the TANF program are solely verified by this HMO’s database in lieu of the applicant submitting proof of eligibility. Staff continues to investigate this process.

A minor issue not pursued by the Missouri Commission Staff is the company’s reporting of de-enrollments. That method of reporting may not fully comply with Form 555 instructions.³⁶

One company submitted revised Form 555 results after being questioned about the number of subscribers contacted by the company

The Missouri Commission Staff contacted this company because the company’s Form 555 results suggested the company contacted 2,059 fewer customers than anticipated. The company did not offer an explanation but submitted a revised Form 555.

³⁴ According to company officials CHIP refers to the Children’s Health Insurance Program while TANF refers to Temporary Assistance for Needy Families. (*Missouri Commission Staff note: CHIP is not part the Lifeline eligibility criteria in Missouri.*)

³⁵ The company does not have direct access to the HMO’s database. Instead the company asks the HMO if a particular person is listed in the HMO’s database as a TANF participant. The HMO essentially replies “yes” or “no”.

³⁶ The company used both Columns I and L in Form 555 to report de-enrollments. The company used Column L because some subscribers were de-enrolled through a separate effort by USAC to “weed-out” subscribers receiving duplicate Lifeline support. Such reasoning is irrelevant to instructions for distinguishing Column I and L de-enrollments.

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One company conducts verification on a rolling basis.

The Missouri Commission Staff contacted this company because the company's Form 555 results suggested the company contacted 1,376 fewer customers than anticipated. The company explains this discrepancy by stating the company's verification process is conducted on a rolling basis using the subscriber's last recertification date. The reasonableness of this explanation in resolving this discrepancy remains unclear; however, the FCC does allow companies to verify subscribers on a rolling basis.³⁷ Further guidance may be necessary to clarify the reporting requirements associated with verifications conducted on a rolling basis.³⁸

Most Providers Submit Form 555 in a timely manner

Most companies submit Form 555 results in a timely manner which is on or before January 31st. The 2013 Form 555 results had four companies submit Form 555 results after January 31, 2014. In comparison, the 2012 Form 555 results had eight companies submit Form 555 after January 31, 2013. At this time no action has ever been taken for delinquent companies and the Missouri Commission Staff has never pursued why a company may have been delinquent.

³⁷ Lifeline Reform Order; ¶130. See also Public Notice; *Wireline Competition Bureau Provides Guidance Regarding the 2013 Lifeline Recertification Process*; WC Docket No. 11-42; DA 13-1188, released May 22, 2013; ¶7 whereby the FCC's Wireline Competition Bureau responds to a request by Sprint to recertify subscribers within twelve months from a subscriber's enrollment or anniversary date.

³⁸ Lifeline Reform Order; Footnote No. 338 states, "We delegate to the Wireline Competition Bureau the authority to establish, in coordination with USAC, a process for facilitating the collection of consumer re-certifications on a rolling basis...." The Missouri Commission Staff is unaware of any subsequent action to clarify such a process.

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Missouri's Aggregate Form 555 Results

Form 555 Reported Information³⁹		2012	2013
A	Lifeline subscribers claimed	346,643	195,178
B	Lifeline subscribers claimed but provided to wireline resellers	392	183
C	Lifeline subscribers claimed but recently enrolled in Jan. & Feb. 2013	*	18,257
D	Lifeline subscribers contacted	203,331	123,532
E	Lifeline subscribers responding to ETC contact	112,175	86,592
F	Non-responders ($F=D-E$)	88,163	36,940
G	Lifeline subscribers responding no longer eligible	2,078	671
H	Lifeline subscribers de-enrolled for non-response or ineligibility ($H=(F+G)$)	90,234	37,611
I	Lifeline subscribers de-enrolled prior to recertification attempt	150,714	55,189
J	Lifeline subscribers whose eligibility confirmed by database or USAC	*	1,020
K	Lifeline subscribers de-enrolled as a result of finding of ineligibility by database or by USAC	*	418
L	Lifeline subscribers de-enrolled prior to verification by database or by USAC	*	1,178
Q	De-enroll percentage $((H+K)/A) * 100$	26%	19%
Lifeline subscribers with no monthly fee de-enrolled due to non-usage		151,640	91,847

Attachment A

³⁹ The 2012 and 2013 Form 555 reports differ after the FCC made changes to the 2013 form essentially requiring additional information for the 2013 form. Column letter identification reflects the 2013 Form 555. For fuller descriptions refer to Form 555 instructions available for 2012 and 2013 on USAC's website at www.usac.org.