

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TW-2014-0012

From: Kari Salsman, Research Data Analyst
Telecommunications Department

Subject: Form 555 Continued Eligibility of Existing Lifeline Subscribers

Date: May 6, 2021

The Lifeline program is a discounted phone service available to qualifying low-income consumers.¹ Each year all existing Lifeline subscribers are required to verify their continued eligibility in the Lifeline program.² This annual verification process will de-enroll a Lifeline subscriber for failing to respond to a verification request or if the subscriber responds by indicating they are no longer eligible.

All Lifeline providers must submit their annual Lifeline verification results to the FCC, the federal universal service fund administrator (USAC) and the applicable state commission.³ Results are submitted using a standardized form developed by the FCC. The FCC labels the form “Form 555”, the “Annual Lifeline Eligibility Telecommunications Carrier Certification Form”. The FCC initiated Form 555 in 2012 and subsequently revised this form in 2013, 2014 and 2017. A significant change with the 2017 form, currently in use, is that recertification results are now reported month-by-month based on the subscriber’s anniversary date, not the yearly aggregate.

Providers offering Lifeline service with no monthly fee must de-enroll a subscriber if the subscriber fails to use the service within a sixty day time period. De-enrollments due to non-usage are identified on a monthly basis for the calendar year in a Form 555 report of a company offering Lifeline service with no monthly fee. Sixteen Missouri providers were subject to the non-usage requirement in 2020 and the results of the report indicate these companies are de-enrolling subscribers for non-usage as required.⁴

Only 366 Missouri lifeline subscribers were contacted to verify eligibility in 2020 with no de-enrollments reported. The numbers being reported on Form 555 this year are mostly zero as companies are no longer handling the verifications and recertification. The National Verifier has taken over these functions for Missouri companies. Per USAC’s

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 This requirement is codified at the federal level in 47 CFR §54.410(f).

³ 47 CFR §54.416(b)

⁴ The results only cover January through March. The FCC temporarily paused de-enrollment for non-usage due to the Covid-19 pandemic through May 1, 2021.

instructions, companies are still to complete and file the Form 555 reports; however they are filling them in with zeros where the National Verifier has taken over.

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.⁵ A total of 73 Form 555 reports were filed with the Missouri Commission for the 2020 recertification process. The deadline for filing Form 555 is January 31. One company failed to file its report. Results from Form 555 reports for the 2020 verification process are provided in Attachment A.

Attachment A - Confidential

⁵ The Missouri Commission maintains these reports in EFIS as a non-case related submission.

INFORMATION CONTAINED IN
ATTACHMENT A
OF THIS STAFF MEMORANDUM
HAS BEEN DEEMED
CONFIDENTIAL
IN ITS ENTIRETY