

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
COLUMBIA, SOUTH CAROLINA

HEARING #10-11088

FEBRUARY 10, 2010

10:30 A.M.

ALLOWABLE EX PARTE BRIEFING

REQUESTED BY OFFICE OF REGULATORY STAFF - Lifeline Services

**TRANSCRIPT OF
PROCEEDING**

COMMISSIONERS PRESENT: Elizabeth B. 'Lib' FLEMING, *CHAIRMAN*;
and COMMISSIONERS David A. WRIGHT, G. O'Neal HAMILTON, Randy
MITCHELL, and Swain E. WHITFIELD.

ADVISOR TO COMMISSION: Joseph Melchers, Esq.

STAFF: Jocelyn B. Boyd, Interim Chief Clerk/Administrator; F. David
Butler, Jr., Senior Counsel; James Spearman, Ph.D., Executive
Assistant to the Commissioners; Josh Minges, Esq., and B. Randall
Dong, Esq., Legal Staff; Tom Ellison, and Lynn Ballentine, Advisory
Staff; Jo Elizabeth M. Wheat, CVR-CM-GNSC, Court Reporter; and Deborah
Easterling, Hearing Room Assistant.

APPEARANCES:

NANETTE S. EDWARDS, ESQUIRE, along with *DAWN
HIPP, ELIZABETH FORD, LYNDA STUTLER, AND CHRIS
ROZYCKI*, presenters, representing **SOUTH CAROLINA OFFICE OF
REGULATORY STAFF**

JOHN J. FANTRY, JR., ESQUIRE, acting as non-staff
certificator

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Please note: PowerPoint presentation is attached hereto.

P R O C E E D I N G S

1
2 **CHAIRMAN FLEMING:** Please be seated. This ex
3 parte briefing will now come to order. At this
4 time, I'd like to ask Attorney Joseph Melchers for
5 the reading of the docket.

6 **MR. MELCHERS:** Thank you, Madam Chairman and
7 Commissioners. This is an allowable ex parte
8 proceeding scheduled for February 10, 2010, and
9 requested by the Office of Regulatory Staff, and it
10 is a presentation by the ORS regarding the Lifeline
11 program.

12 **CHAIRMAN FLEMING:** Thank you. Who will speak
13 on behalf of ORS?

14 **MS. EDWARDS:** Good morning, Madam Chairman,
15 Mr. Vice Chairman, members of the Commission. I am
16 here, Nanette Edwards, as attorney for the Office
17 of Regulatory Staff. We have four presenters: Ms.
18 Hipp will begin the presentation, followed by Ms.
19 Elizabeth Ford, Ms. Lynda Stutler, and Mr. Rozycki
20 will conclude.

21 **CHAIRMAN FLEMING:** All right. Very good.

22 **MR. FANTRY:** Madam Chairman, my name is John
23 Fantry, and I have the distinct pleasure this
24 morning of serving as the neutral or hearing
25 officer for compliance on the ex parte briefing.

1 And I would ask everyone who has completed their
2 form or is in the process of doing that, before
3 leaving if they would give that to me, and I will
4 proceed to document the fact that all of us are in
5 compliance with South Carolina Law.

6 **CHAIRMAN FLEMING:** Very good. And we are
7 happy to have you back with us again today.

8 **MR. FANTRY:** Thank you, very much, Madam
9 Chairman.

10 **CHAIRMAN FLEMING:** Ms. Edwards, if you would
11 call your first speaker.

12 **MS. EDWARDS:** Okay. Thank you, Madam
13 Chairman. With that, we will begin. Ms. Hipp is
14 the director of the Telecommunications,
15 Transportation, and Water and Wastewater Division,
16 and I'll let Ms. Hipp lead off.

17 **MS. HIPPI:** Good morning, Madam Chairman and
18 Commissioners. It is an honor to come this morning
19 and talk to you about the Lifeline program. While
20 I'm always excited to come before the Commission in
21 docketed matters, today is especially exciting for
22 us to share with you what your regulations and what
23 our ETCs and what our office, the Office of
24 Regulatory Staff, is doing on behalf of the
25 Lifeline program.

1 So, today our goal is to talk to you and
2 provide you some education as to how the Lifeline
3 program works in South Carolina, a little hint as
4 to what's going on on the Federal side today.
5 We'll be talking to you about what our
6 participation goals are, what the ETCs and the
7 consumers are actually experiencing as benefits of
8 the program. We'll be documenting the comparison
9 with other states, what's going on in South
10 Carolina compared to some other states that you
11 might be interested in seeing what the progress is
12 there. Each of our staff members in the Lifeline
13 Department will speak to you this morning.

14 As an introduction, we've got Ms. Elizabeth
15 Ford, who is the Lifeline manager; Ms. Lynda
16 Stutler, who is a Lifeline specialist; and Mr.
17 Chris Rozycki, who is the program manager over the
18 Lifeline Department.

19 I'm going to start this morning with a brief
20 history of the Lifeline program, so that you have
21 an understanding of what the components are. To
22 frame it all up, I'd just like to let you know that
23 the eligible population in South Carolina is
24 growing tremendously for the Lifeline program.
25 It's now at roughly 334,000 households as of

1 December 2009.

2 The term "universal service" describes a
3 national objective to provide all consumers access
4 to affordable communications, and this concept,
5 universal service, has been supported both at the
6 Federal and at the State level in two ways: One is
7 support for high-cost investment by our carriers of
8 last resort, which are traditionally ILECs in the
9 State, and the other is the reduction in cost for
10 telephone service to qualifying low-income
11 consumers. Today, we're going to talk about that
12 second component, that reduction in cost to the
13 low-income consumer, and that comes in the form of
14 both Lifeline and Link-Up.

15 The Federal Telecom Act of 1996 reiterated the
16 goal of universal service by creating a Federal
17 Universal Service Fund. And one of the goals of
18 that fund was to reduce the burden on low-income
19 consumers and establish the Lifeline program.
20 Lifeline provides a discount to low-income
21 consumers of \$13.50. And we'll talk about what
22 makes up those two components in a minute. The
23 Link-Up program, on the other hand, provides a
24 discount of 50 percent on the installation charges,
25 up to a cap of \$30. And you've heard those two

1 terms in proceedings, both Lifeline and Link-Up, so
2 I wanted you to have an understanding of the
3 difference. One is a discount on monthly service,
4 Lifeline. The other is a discount on installation.

5 ETCs provide those discounts directly to their
6 eligible consumers and are reimbursed out of both
7 the Federal Universal Service Fund and the State
8 Universal Service Fund. And if I may, I just want
9 to interject one thing I didn't frame up at the
10 beginning, which is, if you have questions -- I'm
11 more of an informal presenter. If you have
12 questions along the way, Commissioners, feel free
13 to ask any one of our presenters. You don't have
14 to wait until the end, but feel free to ask those.

15 Let's talk a little bit about how Lifeline is
16 funded, and I touched briefly on that. The benefit
17 to the consumer for the Lifeline program, the
18 monthly discount, is \$13.50.

19 [Ref: PowerPoint Page 2]

20 \$10 of that comes from the Federal Universal
21 Service Fund and \$3.50 comes from the State
22 Universal Service Fund if the consumer is a
23 customer of an ILEC or a carrier of last resort.
24 In this State, you have designated competitive
25 ETCs. They do not receive the State Universal

1 Service Fund component of \$3.50 from the State
2 Universal Service Fund; they receive it from the
3 company. The company puts up that \$3.50 in order
4 for the consumer to have a full \$13.50 benefit.

5 Also on funding, the FCC, in establishing the
6 Lifeline program, told states that they had the
7 opportunity to create their own rules and
8 regulations, or you could become a Federal default
9 state. This state has chosen to have its own rules
10 and regulations, mirroring some of the Federal
11 rules, as well.

12 [Ref: PowerPoint Page 3]

13 One important note to make is that this State
14 also does allow income-based -- consumers to
15 qualify on income, if they are an AT&T customer,
16 and that's the result of a settlement that came
17 before this Commission some time ago. At that
18 time, ORS came into the picture, and requested
19 consent to assist consumers, who were going to
20 qualify based on income, with that verification
21 process, and assist AT&T with the verification
22 process, as well.

23 Our goal since that time has been to increase
24 awareness of the Lifeline program and to provide
25 another avenue for the consumer to get their

1 application into the process, while we balance the
2 cost impact to consumers in the State. This slide
3 talks about the difference in consumer eligibility.
4 Federal default states -- while they start with the
5 basis of Medicaid and Food Stamps and TANF, which
6 is Temporary Assistance to Needy Families -- they
7 expand on that to move on to Section 8 Housing and
8 you can see the other qualifiers. The State of
9 South Carolina consumers are eligible if they meet
10 one of the criteria that you see on the right-hand
11 side of the screen. Medicaid, Food Stamps, TANF,
12 or, if they're an AT&T consumer, if they fall below
13 125 percent of the Federal poverty level, they
14 would be eligible on income alone. That qualifier
15 brings about the fact that consumers need to be
16 certified to be eligible for the program. And on a
17 yearly basis, the ETCs that operate in the State
18 verify the eligibility of those consumers and ORS
19 assists the income-based consumers, or the AT&T
20 consumers, with that verification.

21 [Ref: PowerPoint Page 4]

22 Just some highlights of what the roles are.
23 We see this as our global picture. Who are the
24 players in Lifeline? And you see all roads kind of
25 lead back to our eligible telecommunications

1 carriers. The funding flow, as we talked about,
2 comes from the Federal government or from this
3 Commission to an ETC in the form of a
4 reimbursement. ORS's role in Lifeline is to
5 provide, as you're aware, to provide outreach and
6 intake services. And our outreach is done
7 primarily by site visits, training coordination,
8 delivering supplies -- such as applications,
9 brochures, posters to our partners -- and
10 presentations. Doing those things, we are
11 promoting Lifeline, we are identifying and
12 developing different partnerships, designing and
13 distributing materials. We educate both the ETC
14 and the consumer on what benefit is available to
15 them, either by presentations or, in the case of
16 our ETCs operating in the State, a forum. We have
17 a forum scheduled with our ETCs for May of this
18 year, and we've had one -- we had one in March of
19 2008.

20 On the intake side, ORS's role is to process
21 applications that come in either from our partners,
22 such as the food banks, Harvest Hope Food Bank
23 system, possibly DHHS, and public housing. And
24 we'll talk a little bit -- Elizabeth will talk to
25 you a little bit more about those partnerships. We

1 handle approximately 3-5,000 applications in a
2 year. However, the lines that receive -- the
3 access lines that receive Lifeline services are
4 47,000. So you can see ORS is handling a fraction
5 of the actual applications for Lifeline in a year's
6 time frame. We field approximately -- or Lynda
7 fields. I can't take credit for that --
8 approximately 30 to 50 calls a day, depending on
9 what type of outreach we are doing, for the
10 Lifeline program.

11 In performing our intake duties, we certify
12 income-based customers, as I had mentioned, we
13 centralize the location of all the income-based
14 clients' files and complaints. We also handle
15 consumer complaints. We handle approximately 50 to
16 70 consumer complaints a year. And normally, those
17 complaints are about the timeliness of receiving
18 the benefit or follow-up on getting the services
19 installed that the consumer has requested.

20 Our Lifeline partners, as you see to the left
21 of the screen, as I mentioned, are food banks --
22 and Elizabeth will talk a little bit more of food
23 banks -- DHHS, and other government agencies.
24 Those are unpaid partners. There is no grant from
25 the State Universal Service Fund to those partners.

1 Those are partners who are already coming in
2 contact with the low-income population that we are
3 trying to reach. And we'll talk a little bit more
4 about our shift in strategy. We train the
5 partners, provide ongoing training, their
6 materials. We assist -- those partners assist
7 consumers with completing the applications. When
8 you're sitting in your caseworker's office at
9 Harvest Hope Food Bank, it's easy for that
10 caseworker to say to a qualified client, "You know,
11 let me help you with that application," and that
12 helps us reach more people. They also publicize
13 for us by putting up posters, word-of-mouth, that
14 type of thing.

15 The role of the ETC is obvious; they intake --
16 all applications lead into our eligible
17 telecommunications carriers, which are comprised of
18 both the ILECs and the CETCs. So they're going to
19 handle the application for that consumer and get
20 them the discount that they have been qualified
21 for. They provide the service. Our ETCs are doing
22 a good job of publicizing the program in their
23 designated service areas. They're accountable to
24 both the FCC and the State for maintaining
25 compliance, and they do so with a reporting scheme.

1 On the Federal side they report to the FCC or USAC,
2 Universal Service Administrative Company, who
3 handles Lifeline, and they report back on a
4 quarterly basis. With the State, they report back
5 to us on an annual basis. And then, of course,
6 they're responsible for the reimbursement
7 mechanism, as well.

8 And our customer who receives the benefit, or
9 the consumer, is responsible for making sure that
10 they meet the eligibility requirements and that
11 they actually complete the application and get it
12 in, so that they can have the services restored.
13 In addition, they're responsible once a year to
14 verify that they actually receive the benefit.

15 And with that, I will turn it over to
16 Elizabeth, who is going to talk to you about the
17 participation rates and our consumers.

18 **CHAIRMAN FLEMING:** Before you sit down,
19 Commissioners, do you have any questions of Ms.
20 Hipp?

21 **COMMISSIONER MITCHELL:** I have one.

22 **CHAIRMAN FLEMING:** All right. Commissioner
23 Mitchell.

24 **COMMISSIONER MITCHELL:** Ms. Hipp, do you see
25 the economic downturn conditions in South Carolina

1 as -- do you think that has affected the growth of
2 Lifeline over the past year and a half?

3 **MS. HIPP:** It is one -- Commissioner, it's one
4 of those negatives that have affected the Lifeline
5 program in a positive manner. Is that --

6 **COMMISSIONER MITCHELL:** Right, so you
7 attribute some of the growth for the economic
8 downturn?

9 **MS. HIPP:** Yes, we do. We attribute it to the
10 economic downturn, and then also to the -- we need
11 to give credit where credit is due -- the ETCs that
12 are reaching out to those consumers in their
13 service area, as well.

14 **COMMISSIONER MITCHELL:** Thank you.

15 **COMMISSIONER HAMILTON:** Madam Chair, I have
16 one.

17 **CHAIRMAN FLEMING:** Yes, Commissioner Hamilton.

18 **COMMISSIONER HAMILTON:** Ms. Hipp, you
19 mentioned the recertification, annual
20 recertification. What process is followed -- where
21 does the responsibility lie, with the company or
22 the consumer?

23 **MS. HIPP:** It's a twofold process,
24 Commissioner, and I'll take them separately. For
25 the AT&T income-based individuals, that

1 responsibility lies with the Office of Regulatory
2 Staff. We handle that verification process. We
3 verify on an annual basis 100 percent of the
4 clients, and we do so by notifying the client that
5 they must provide proof of their income. And proof
6 can come in many different forms, as the Feds have
7 dictated. They supply that proof back to us, we
8 supply the information and certify them back to
9 AT&T. So that's one. That's one process.

10 On the other process where the consumer is
11 qualifying based on Medicaid, Food Stamps, or TANF,
12 that responsibility lies with the ETC. And there
13 are two ways that they can verify that their
14 clients on an annual basis meet those requirements.
15 One is, they can go directly back to the client,
16 and we do have ETCs that do that. They go back to
17 the client. Either they'll go back to 100 percent
18 of the clients or they'll choose a statistically
19 valid sample, which is an approved FCC method.
20 They'll go back to the client, and then the client
21 will respond back to the company. And ORS is not
22 in that mix at all.

23 Another way an ETC can verify that their
24 client base is meeting the requirements or has the
25 continued requirements is by using a database that

1 was established back in 2004, late 2004, by the
2 Office of Research and Statistics. And it combines
3 information from the Department of Social Services
4 and Health and Human Services -- so you've got
5 Medicaid and Food Stamps -- for the client base.
6 The company sends a file to the Office of Research
7 and Statistics, an electronic file. The consumer
8 information is matched up, and then the results are
9 provided back to the company.

10 **COMMISSIONER HAMILTON:** Thank you, ma'am.
11 Appreciate it.

12 **COMMISSIONER MITCHELL:** I have one other
13 question. Is it true -- you list the eligibility
14 requirements there for both Federal and State? I
15 think that was back a little ways.

16 **MS. HIPPI:** Sure.

17 [Ref: PowerPoint Page 2]

18 **COMMISSIONER MITCHELL:** I guess what my
19 question is -- two-part question: Does an
20 applicant, must only they qualify for one of these
21 categories, any category, and they automatically
22 qualify? Is that the way --

23 **MS. HIPPI:** That is correct. In South
24 Carolina, if a client has Medicaid, that's
25 sufficient to qualify for Lifeline. More than

1 likely, a client will have Medicaid and Food
2 Stamps, Commissioner.

3 **COMMISSIONER MITCHELL:** I just noticed that
4 the South Carolina guidelines, you have 125 percent
5 below the poverty line and the Federal guideline's
6 135. Why would that be a difference there?

7 **MS. HIPP:** The difference in the income
8 guidelines is the income for AT&T, 125 percent
9 level, was reached as part of a settlement --

10 **COMMISSIONER MITCHELL:** Okay.

11 **MS. HIPP:** -- with the consumer advocate and
12 AT&T, and was brought before the Commission.

13 **COMMISSIONER MITCHELL:** Okay, thank you.

14 **CHAIRMAN FLEMING:** Are there any -- yes,
15 Commissioner Whitfield.

16 **COMMISSIONER WHITFIELD:** Yes, Madam Chairman.
17 I wanted to have kind of a follow-up on
18 Commissioner Mitchell's first question talking
19 about the growth of Lifeline. Maybe you said or I
20 just didn't catch it. What kind of percentage
21 growth have you seen in the last year or -- I know
22 you said a negative brought forth a positive in the
23 growth of Lifeline, but what kind of numbers are we
24 looking at?

25 **MS. HIPP:** Let me give you an idea of what

1 we're looking at in terms of access lines. And
2 Elizabeth will cover this with you.

3 **COMMISSIONER WHITFIELD:** Okay.

4 **MS. HIPPI:** We're looking at almost a doubling
5 of access lines that are receiving the Lifeline
6 benefit. We have run an average for you, so you
7 can see in 2005 through 2007 our average there was
8 approximately 27,000 and -- Elizabeth, correct me
9 if I'm wrong -- we're now up to 47,000 lines.

10 **CHAIRMAN FLEMING:** Any other questions?

11 [No response]

12 **CHAIRMAN FLEMING:** All right. Thank you.

13 **MS. HIPPI:** Thank you.

14 [Ref: PowerPoint Page 5]

15 **MS. FORD:** Good morning.

16 **COMMISSIONERS:** Good morning.

17 **MS. FORD:** One of the things that we've tried
18 to focus on at ORS is kind of taking a step back
19 from all of the policy and procedures and getting
20 bogged down with the process so much, and really
21 taking a step and looking at who does this affect,
22 who are the people that this benefit goes to? We
23 took some time over the past few months and went
24 and visited with various consumers who are actually
25 receiving the benefit, to put a face on the

1 program. We think that it's not only important for
2 us but for everyone else who is involved, to really
3 see who benefits from it and what their stories
4 are.

5 One story I'd like to tell you is about Daniel
6 and Stella from Sumter, South Carolina. They have
7 been married for 14 years, and Daniel was
8 previously serving in the military. When he was
9 discharged, he went to work for a moving company
10 there in Sumter that helped move individuals on and
11 off the Air Force Base. And his wife has suffered
12 over the past seven years from a terminal illness,
13 and has struggled in and out of hospital visits.
14 They've had to call 911 multiple times. He has
15 been forced to quit his job and stay at home and
16 take care of his wife. The Lifeline program has
17 been extremely important to them, because not only
18 are they able to keep in touch with their family
19 and friends when they are homebound, virtually, but
20 also allowing them to use their medical alert
21 system when an emergency arises.

22 The medical alert system, I'm sure as you're
23 all aware, is a system that in an emergency they
24 can press a button and it goes directly to 911
25 services. We see a lot of our individuals who have

1 that system, and that system must be present only
2 on a landline. So that is very important for these
3 customers to have a landline, which Lifeline allows
4 them to do so.

5 Another individual I'd like to tell you about
6 is Sarah, and she's from Casey, right here across
7 the river. And she celebrated ten years ago her
8 30th wedding anniversary with her husband. Her
9 husband began to be plagued with heart problems,
10 was in and out of the hospital, receiving
11 pacemakers, multiple surgeries. He was in and out
12 of work. At one time Sarah had mentioned to us
13 that she was going to work with her husband each
14 day to help him to do his job, and in order for him
15 to keep his job.

16 Unfortunately, Ronnie passed away, and at that
17 time Sarah was forced to go back into the working
18 field to provide for herself. Shortly after she
19 began working, within the first year of her
20 working, she too was diagnosed with heart problems
21 and was forced to -- she was fired from her job,
22 unfortunately, because she had missed so many days
23 while working, because of her heart problems, and
24 because it happened within the first year of her
25 employment they let her go. Right now Sarah is

1 trying to get back into the working field. She has
2 had heart surgery and she's trying to get back in.
3 And so Lifeline not only allows her to keep in
4 touch with her daughters and sons that are out of
5 state, but also to wait to hopefully receive a job,
6 and a callback for a job.

7 So these are just two typical stories.
8 Unfortunately, with consumers on Lifeline, this is
9 -- we could really talk about stories on and on and
10 on that Lynda and myself, you know, hear stories
11 after story after story of a mother who has to stay
12 at home with her son who has seizures, while her
13 husband goes to work, and they are low-income, it's
14 a working family, but they are homebound, and so
15 the phone is very, very important to them. So it's
16 just countless stories like these individuals who
17 have tried to continue to work and provide for
18 themselves and provide for their families, and this
19 Lifeline benefit is a huge help, often is the only
20 connection that they have to the outside world, if
21 you will, and then also just allowing them to keep
22 in touch with doctors and that sort of thing.

23 [Ref: PowerPoint Page 6]

24 The second thing I'd like to mention to you is
25 the strategic shift that's happened at ORS from the

1 beginning of Lifeline there at ORS. We initially,
2 with, actually, Brenda Lee and myself, back in
3 2005, we were more focused on a one-on-one type of
4 outreach. This occurred when Brenda would often go
5 out and have a presentation at churches, different
6 expos, any event that might be occurring where
7 individuals would go and sign up for LIHEAP at a
8 certain period of time, and that sort of thing. We
9 would go and present, and the individuals would, in
10 return, come up and apply for Lifeline. Now, this
11 was very successful at the time. It helped to
12 build the foundation of the program and really
13 establish trust in the program with the
14 individuals. But as you can see, one person
15 covering the entire State that way, it became
16 evident that we needed to broaden our horizons in
17 the way that we had a strategic plan.

18 So back in 2007 -- 2008, a new strategic plan
19 was put into place where we would implement the
20 partners much more. As we -- Brenda and myself
21 would go and train the partners that we would work
22 with, and these are partners that we have gone to
23 and asked that they partner along with us, like
24 Dawn mentioned. There is no monetary compensation
25 for them, and so sometimes it takes a little

1 encouragement from us and goodwill on their end
2 that they will partner with us.

3 One of the major partners we've had over this
4 past year has been the food banks, and I'll talk a
5 little bit about that in a moment. But our goal
6 and what we've done with the food banks, as well as
7 DHHS, is we have gone to each of the counties and
8 performed training seminars to train the
9 individuals who are out on a daily basis, that come
10 into contact with the individuals who are eligible
11 for Lifeline. So, for example, we go to a training
12 seminar for Harvest Hope Food Bank and they have 30
13 to 40 individuals who have a food pantry in this
14 county. And we provide them with information, the
15 details of the program, provide them with
16 applications, brochures, and they in turn go out
17 and, whenever individuals come into their food
18 pantry, they are able to pass along information for
19 Lifeline. So this strategic shift has helped us to
20 establish more partners, take advantage of those
21 partners, individuals who are out there on a daily
22 basis and coming in contact with so many people.

23 [Ref: PowerPoint Page 7]

24 Okay. So we have, you know, many partners.
25 Partners vary from food banks to family health

1 centers to community action agencies. The level of
2 -- the extent of the partnership varies among many
3 of these, and we have many more. It varies from
4 individuals -- or, agencies having applications on
5 hand and brochures on hand in their office, to,
6 like I said, the food banks and DHHS, us actually
7 going and performing trainings at their agencies
8 and then them, in turn, going out into the
9 community.

10 One thing that we have really focused on over
11 the past six to eight months is establishing a
12 partnership with the ETCs where it would be
13 apparent to everyone and to them and to ourselves
14 that we are definitely in this together, that we
15 need each other's help in order for this program to
16 be successful. Lynda and myself have gone and met
17 with each of the ILECs over the past few months,
18 and we have one or two left and then we'll have
19 covered all of the ILECs in South Carolina. At
20 that time, we've just gone and talked to them about
21 the program, their processes and their procedures,
22 and really seen ideas that they may have for
23 outreach and for growth, and, in turn, you know,
24 any ideas that we have, as well. And so we've just
25 been really encouraged by that partnership that has

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continued to grow with the ETCs.

[Ref: PowerPoint Page 8]

Here you'll see -- this is the participation rate by the ILECs. The green line is a little difficult to see up there, but that green line is the average target. The ETCs -- the ILECs have requested that we give them, on an individual basis, what a target rate would be. We've come up with a target rate of about 5 percent. That would allow the State to come up to a 30 percent participation rate. And at that 5 percent, you'll see some have already surpassed that and others it seems may have a little more ways to go. The thing to keep in mind with this is, it's difficult to compare companies to each other because of the poverty in each county tends to change. You know, every county and every city is different, so that makes the companies different, as well. So while a goal may be 5 percent for some, and it may seem low, 5 percent is a good goal for others. So the average that we've kind of given them is 5 percent. And of course, other companies who are close to that line or have passed the line, we have, you know, talked with them about what it may be and what it looks like for them as an individual

1 company.

2 [Ref: PowerPoint Page 9]

3 This shows the outreach results that we've
4 seen and it shows, in particular, the change in the
5 strategic plan, the shift. You'll see the dark
6 blue has the three-year average from '05 to '08.
7 Presentations were at 51 during that time, on
8 average, and then this past year it was at 31. And
9 that shows, like I mentioned before, the strategic
10 shift of going and having multiple presentations to
11 now focusing on larger trainings and, in turn,
12 presenting -- giving them more materials to hand
13 out. So you'll see, even though the presentations
14 have gone down over the past year, the previous
15 three-year average, that the distributed material
16 has increased.

17 And then if you will see down there, the ORS
18 -- the applications received by ORS, that has gone
19 down because one of the things we do in the
20 training is try to provide more information to the
21 partners. And when we're able to have the one-on-
22 one training with them, they are able to get more
23 exact information, they're able to learn how to
24 help the individuals complete the applications more
25 correctly and fully, and we help them to direct the

1 individual customers to the ETCs. So you'll see
2 the last section where the subscribers has gone up,
3 even though the applications received by ORS has
4 gone down. And that's showing that many of the
5 customers are now going directly to the ETCs
6 without having to take additional steps to multiple
7 agencies, making it a longer process.

8 I was looking back at my notes from 2005 when
9 Brenda and myself were here and we were discussing
10 the participation rates, and it was -- in 2005, I
11 believe it was around 23,000 and our five-year goal
12 was 37,000. So if you look, the total
13 participation is now at almost 45,000, so we've
14 surpassed what our five-year goal was in less than
15 five years.

16 [Ref: PowerPoint Page 10]

17 While we have had lots of success and help and
18 support by the Commission and the ETCs, there still
19 are always challenges. Some challenges that we see
20 existing here in South Carolina also are existing
21 on a national level; it's not just strictly at our
22 State level. Lynda and myself are part of a NARUC
23 working group, and we are able to discuss with the
24 other agencies from other states their processes
25 and procedures, other frustrations and problems

1 that they may have, that they're seeing come up
2 regarding the Lifeline program. So that's been
3 very helpful to see what challenges have arisen
4 that maybe we haven't dealt with, or vice versa.

5 Some of the things that exist are issues with
6 guidelines. Guidelines are present on a national
7 level and here on a State level, as well. Some of
8 the feedback we've received from the ILECs, in
9 particular, when we've met with them, is they are
10 wanting more direction. They are proactive and are
11 wanting to be proactive in the Lifeline program;
12 however, they are wanting to know strictly what are
13 requirements and what is it that we are asking of
14 them. All ETCs across the board are in different
15 levels of their participation. Their outreach
16 looks extremely different, and it's catered to
17 their individual counties. But they are wanting
18 some sort of formal guidelines as to how to
19 continue to proceed in this program.

20 Competitive choices are also a challenge for
21 consumers. In their area, they might not always be
22 able to have a lot of choices in which company they
23 have service, if they are a Lifeline customer.
24 With the exception of maybe areas in the AT&T
25 service area that, you know, it's usually one

1 company that provides Lifeline service.

2 Education is always a challenge, and we have
3 continued the education from ETCs to partnerships,
4 to consumers, and the media. Just the education of
5 knowing about the program in general, how it works,
6 the information that goes along with it, and what
7 it looks like. One of the things that I mentioned
8 before was education with consumers. Now, in
9 particular, fraud is a big thing that individuals
10 are looking at. With the economy the way it is,
11 fraud unfortunately is on the rise. And so we're
12 trying to educate and inform the consumers about
13 the program. They want to know that it's a
14 trustworthy program and that it's a state-run
15 program rather than something that they have to be
16 wary of. So that's always a continuous challenge
17 that we have.

18 Another challenge that consumers have are
19 their credit. The fact of the matter is a lot of
20 these individuals do have credit issues. They have
21 past-due bills with companies. Companies are
22 working with, whenever able, to establish a payment
23 plan, which has helped the individuals establish a
24 payment plan, pay off past-due bills, and to get
25 service. But that's always a continued challenge

1 that these consumers have.

2 Outreach and communication. This is one of
3 the things we discuss on the national level is,
4 what does outreach looks like for this program?
5 What does it look like to be both affordable and
6 creative? This goes along with the trust factor.
7 Literacy is a real issue. The population that
8 receives Lifeline has -- you know, literacy is a
9 big issue, so that we have to learn how to deal
10 with that rather than brochures and stuff being
11 heavy in text and outreach being strictly to phone
12 books, newspaper ads, that sort of thing. We have
13 to find creative and affordable ways to provide
14 outreach for them. And like I mentioned before,
15 the trust factor is always there.

16 And that is the end, if you have any
17 questions.

18 **COMMISSIONER MITCHELL:** I have a question.

19 **CHAIRMAN FLEMING:** Okay. Commissioner
20 Mitchell.

21 **COMMISSIONER MITCHELL:** Going back to the
22 qualification issue -- and you or either Ms. Hipp.

23 **MS. FORD:** Uh-huh.

24 **COMMISSIONER MITCHELL:** -- once again, these
25 people are checked yearly?

1 **MS. FORD:** Yes.

2 **COMMISSIONER MITCHELL:** For their income
3 status?

4 **MS. FORD:** There is a requirement that there's
5 annual reverification.

6 **COMMISSIONER MITCHELL:** Yeah. Does any -- do
7 you have any percentage of people that come off
8 Lifeline?

9 **MS. FORD:** Yes, we do.

10 **COMMISSIONER MITCHELL:** Do you have those
11 numbers available? Is that an area that grows, or
12 stays the same, or --

13 **MS. FORD:** Well, because of the annual
14 verification, the companies are in charge of that.
15 We have the numbers of how many are on there in the
16 previous year, as far as the 125 percent, and we've
17 seen that with that population it is a small number
18 that would be removed. But that population is a
19 small number to begin with.

20 **COMMISSIONER MITCHELL:** Right, but it is a
21 percentage that do come off occasionally.

22 **MS. FORD:** It does happen, yes.

23 **CHAIRMAN FLEMING:** Are there any other
24 questions?

25 [No response]

1 **CHAIRMAN FLEMING:** So as the company -- if the
2 consumer moves from one company to the other, do
3 they have to go back and do the same process again,
4 or --

5 **MS. FORD:** They do, yes.

6 **CHAIRMAN FLEMING:** It won't transfer.

7 **MS. FORD:** No. Right now, the way that the
8 program is set up, it will not transfer. They
9 would have to go and establish new service and
10 hopefully be able to benefit from the Link-Up
11 portion of it, but then they would have to fill out
12 a new application with the new company.

13 **CHAIRMAN FLEMING:** Okay. So the company -- I
14 mean, the consumers that have to drop off because
15 they go above the 125 percent, then they would have
16 to go to another company; is that correct?

17 **MS. FORD:** No. No.

18 **CHAIRMAN FLEMING:** To continue receiving it?
19 They don't lose it?

20 **MS. FORD:** The individuals who -- let me make
21 sure I understand your question. The individuals
22 who receive the 125 --

23 **CHAIRMAN FLEMING:** They have a lower standard
24 to meet than the others do.

25 **MS. FORD:** It's actually higher. Because when

1 you look at the percentages of -- for the income
2 participation, or the level for income, with Food
3 Stamps and Medicaid it's actually higher than 125
4 percent. That's why the -- one of the reasons why
5 the participation in the income-based is so low,
6 because usually if their income is already that
7 low, then they are receiving Medicaid or Food
8 Stamps. Does that --

9 **CHAIRMAN FLEMING:** Okay. Well, I thought --
10 All right. I'm --

11 **MS. HIPP:** Do you mind if I --

12 **MS. FORD:** No, please.

13 **MS. HIPP:** Can I put my two cents in?

14 **CHAIRMAN FLEMING:** Yeah. I was thinking it
15 was the other way, and then I thought, from what
16 you said, I was --

17 **MS. HIPP:** The verification process on the
18 AT&T customers who qualify using the income
19 criteria alone is much more stringent than that of
20 those that qualify based on Medicaid and Food
21 Stamps. Those individuals have to provide to our
22 office verification that their income remains below
23 or at the 125 percent, and then we check that. For
24 those that qualify based on Medicaid and Food
25 Stamps, the companies can either choose to use the

1 Office of Research and Statistics database, which
2 verifies continued reception of Medicaid or Food
3 Stamps; they can request the consumer send them a
4 copy of a card or verification; and they can use a
5 statistically valid sample, which is not 100
6 percent of their client base.

7 Does that help? Traditionally, what we see on
8 the income-based verification is that individuals'
9 income is not increasing, and they're not falling
10 off the program at a high rate. Same with Medicaid
11 and Food Stamps. Based on the rules, the trends
12 that we've been watching over the past five years,
13 once you're a Lifeline customer you usually remain
14 a Lifeline customer. However, in South Carolina,
15 if you switch phone providers, you will have to go
16 through the application process again.

17 Lynda is going to tell you about some states
18 where they have auto-enrollment and if you are
19 qualified and you move around the system, you move
20 to a different provider for whatever reason you've
21 moved, you don't have to reapply. It's
22 automatically in the system that you're eligible,
23 and that new provider can check the system and sign
24 you up automatically with very little delay.

25 **CHAIRMAN FLEMING:** Okay, thanks.

1 **MS. HIPP:** Did that answer your question?

2 **CHAIRMAN FLEMING:** Yes. And Ms. Ford, you're
3 right, putting a face on this certainly is a
4 powerful statement as to the good work that it
5 does.

6 **MS. FORD:** Thank you.

7 [Ref: PowerPoint Page 11]

8 **MS. STUTLER:** Good morning. Pleasure to be
9 speaking to the Commission, and it's an honor to be
10 here as part of the Office of Regulatory Staff. My
11 name again is Lynda Stutler, and since we haven't
12 met, I thought it might be helpful to reintroduce
13 myself.

14 Well, I know one thing that is of interest to
15 people who are looking at the South Carolina
16 Lifeline program is how it compares to Lifeline
17 programs around the country. So this is the USAC
18 data for 2008. The 2009 numbers aren't in yet, so
19 this is the most recent data we have. And I
20 thought we would take a look at a few states that
21 we can learn from.

22 Right away you'll see that the green states
23 are the highest Lifeline participation rate. I
24 haven't done the playing with the laser pointer to
25 know how it works. Okay. There we go. The green

1 states -- Alaska, Montana, Colorado, Oklahoma, and
2 California -- all have about 50 percent of their
3 eligible consumers enrolled in Lifeline. You'll
4 notice that of those five states, four of them have
5 large Native American populations. This is
6 significant because tribal lands have extra
7 Lifeline incentives. They get a higher Link-Up
8 subsidy, up to \$100, as opposed to ours is only up
9 to \$30. They get up to \$30 a month in Lifeline
10 credit; ours is only \$13.50. So it attracts CLECs
11 -- those tribal lands attract CLECs who cater
12 specifically to that Native American population,
13 and it's really easy to sign them up. If they're a
14 resident on the tribal lands, they almost all
15 qualified.

16 California is the only exception to that rule,
17 and California has the highest Lifeline enrollment
18 in the country -- and we'll talk more about them in
19 just a second. The other states I think we can
20 learn from are Mississippi -- as you see, in the
21 Southeast, Mississippi is the yellow state, and
22 that means that their enrollment surpasses 20
23 percent. Then there's Virginia. Virginia is a
24 blue state in this map, but last year it was a red
25 state, which is the lowest category. So they

1 managed a massive improvement, and I think it would
2 be to our advantage to take a look at it. And then
3 Maine. Maine is tucked up there in the corner, and
4 it is always a good solid state for Lifeline
5 participation. So we'll look at those states in
6 particular.

7 [Ref: PowerPoint Page 12]

8 The first thing we should take a look at is
9 the eligibility criteria. Now, South Carolina's
10 eligibility criteria, as set by the Commission, is
11 Medicaid, Food Stamps, and TANF. Those were very
12 wise choices. They're easy to verify, and
13 encompass a large percentage of South Carolina's
14 poor. It manages to blanket the target demographic
15 well. You'll see that every other state has the
16 same qualifications.

17 Now, Mississippi, prior to 2008, expanded
18 their Lifeline eligibility to include Section 8 and
19 Free Lunch. What this did for the State of
20 Mississippi, it did not necessarily expand the
21 number of people that were eligible. Most people
22 who are in Section 8 Housing are already enrolled
23 in Medicaid. Every family that receives Free Lunch
24 is already enrolled in Food Stamps. So it doesn't
25 increase the number of people that can get the

1 Lifeline discount, but it did manage to give them
2 new venues for promoting the Lifeline discount.

3 So now they can promote Lifeline through the
4 schools. They can promote Lifeline by neighborhood
5 with Section 8. So that was a great help for
6 Mississippi, to actually reach its eligible
7 population.

8 In addition to that, Mississippi began a
9 streamlined enrollment process. Right now, when we
10 want to give the Lifeline credit or the Link-Up
11 credit, the consumer has to jump through a few
12 hoops. They have to talk to the ETC first, then
13 they have to provide documentation, then they go
14 back to the ETC to actually get their service
15 installed. Or they come to us, we steer them to
16 the ETC, the ETC steers them through the
17 verification, and it's a complicated process. In
18 Mississippi, the Public Service Commission collects
19 applications from people who don't have service,
20 forwards those applications to the ETCs, and
21 basically says, "We have a potential customer for
22 you." The ETC contacts them and sets up
23 enrollment. It's a one-step process for the
24 consumer, which makes it easier for them to enroll.

25 In Maine, Maine ETCs advertise heavily in

1 underserved areas, and then they report their
2 quarterly advertising to the PSC on an annual
3 basis. So because of that, they've been able to
4 target areas that did not have good Lifeline
5 enrollment and boost their enrollment in those
6 areas. Another thing that the ETCs do that's
7 interesting is they inform every new customer about
8 the Lifeline program. So when a potential customer
9 calls their customer service representative and
10 finds out about different plans that they might
11 qualify for, or discounts they might qualify for,
12 the Lifeline discount is included in that, so they
13 can get signed up at the time they begin their
14 service. That helps to promote awareness and
15 that's why Maine is consistently high from year to
16 year.

17 Virginia is consistently low from year to
18 year, but during this particular year, they adopted
19 SafeLink from TracFone, and their numbers jumped
20 from 9 percent to about 18 percent. Another thing
21 that Virginia has done, which was interesting to
22 me, is the Public Service Commission there has set
23 baseline standards, exactly the same as ours, and
24 told every company, as do we, that they are
25 required if they are an ETC to offer Lifeline to

1 these companies [sic]. But they left it open,
2 since Virginia doesn't have a State USF, that if
3 the company would like to enroll people based on
4 the Federal default standard, that they are able
5 to. As of right now, the only company that has
6 opted to do that is CenturyLink, but they have
7 managed to improve their enrollment by doing it.

8 Now, California. California is a unique
9 situation. They have very broad enrollment
10 criteria, and they outsource all their Lifeline
11 work to third parties. So they have a company that
12 does their administration, their verifications,
13 their company audits, and their marketing. And
14 California is one of those automatic-enrollment
15 states that Dawn was talking about earlier, where,
16 once someone enrolls in, let's say, Food Stamps,
17 they get a PIN number that they can then take to
18 all their other companies, their utility companies,
19 their telephone companies, give them their PIN
20 number and they're automatically enrolled in
21 everything.

22 [Ref: PowerPoint Page 13]

23 So let's take a look at California. Since
24 they are consistently high, it's a good idea to
25 figure out what they're doing. In 2007, see,

1 that's a suspicious looking number there, 102.9
2 percent of their eligible population was enrolled,
3 which probably prompted the double-digit true-up
4 that they had in 2008. Their levels have
5 stabilized around 75 percent, which is three or
6 four times higher than our levels at the same time.
7 Their budget is significantly higher. You can see
8 our budget, as set by the Commission, is around
9 \$213,000, and we use that sparingly. The
10 California budget is \$39 million for one year of
11 Lifeline administration. \$11 million of that is
12 for marketing. We have about \$20,000 earmarked for
13 marketing.

14 **CHAIRMAN FLEMING:** What is that per capita,
15 though?

16 **MS. STUTLER:** Well, the last number down there
17 is --

18 **CHAIRMAN FLEMING:** Oh, I'm sorry. I see it.

19 **MS. STUTLER:** -- the dollars they spent per
20 eligible consumer, so in California in 2008 that
21 was about 3.4 million Californians; they spent
22 approximately \$11.46 per person, compared to our
23 \$.74 per person. So what we can see by comparing
24 our program to California's is that we are running
25 a very efficient program; and while their numbers

1 are admirable, I don't think that we can learn a
2 lot from the way they run their program. It's just
3 not a fit for South Carolina.

4 **COMMISSIONER MITCHELL:** Tell -- could I --
5 tell me about the 2007 figure again. You said that
6 was a true-up? Or how do you get more numbers than
7 you have eligible people, I mean?

8 **MS. STUTLER:** Well, what it means is that they
9 signed people up that weren't eligible. Now,
10 they've had this third-party, SOLIX, that was doing
11 their administration. And SOLIX does the
12 administration for other states, too. But there
13 were some discrepancies in the reporting.

14 **COMMISSIONER MITCHELL:** I would see -- yeah,
15 it would be quite obvious with 102 percent.

16 **MS. STUTLER:** And they got a lot of attention
17 for those numbers, and so --

18 **COMMISSIONER MITCHELL:** I would think so, in
19 the economic status that the country is in now. I
20 would think they probably got a lot of looks.

21 **COMMISSIONER HAMILTON:** That's real unusual
22 for California.

23 [Laughter]

24 **MS. STUTLER:** What we see from comparing South
25 Carolina to California and other states is, it's

1 hard to compare. The programs are run differently,
2 they're run by different agencies, they offer it
3 under different criteria, their ETCs are different.
4 It's really hard to benchmark South Carolina to
5 other states. Instead, what we would rather do is
6 figure out what the good states are doing and just
7 steal their ideas. Any questions?

8 **COMMISSIONER WRIGHT:** So you're saying that
9 California is not a good state.

10 [Laughter]

11 **MS. STUTLER:** Not a good state for us to
12 pattern. Although, if you would like to give us
13 the \$39 million budget, we'd find a way to spend
14 it.

15 **VICE CHAIRMAN HOWARD:** Are your statistics
16 based on -- your first number, 334,000, based on
17 households. Are all these numbers based on
18 household statistics, or are some of them
19 individual population?

20 **MS. HIPP:** Households.

21 **MS. STUTLER:** Households.

22 **VICE CHAIRMAN HOWARD:** Okay. Thank you.

23 **COMMISSIONER MITCHELL:** And Ms. Hipp stated
24 earlier the number of households, 334,000 -- is
25 that the amount of households eligible, that you

1 know that that's the amount of households eligible
2 in South Carolina?

3 **MS. HIPPI:** That's correct, yes. As of
4 December 2009, that was a statistic that we had
5 received from the Department of Social Services, of
6 households that were receiving Food Stamp
7 assistance.

8 **COMMISSIONER MITCHELL:** Okay, Food Stamps.

9 **MS. HIPPI:** And so when we benchmark and we
10 take a look at who's eligible, it's easy for us to
11 look at Food Stamps. If you're receiving Food
12 Stamps, you're receiving Medicaid. And the reason
13 we use households as a benchmark and not
14 individuals is because the Federal rules only allow
15 one Lifeline discount per household, and it can
16 either be a wireline discount or a wireless. It
17 cannot be both. So that's the reason for
18 "household."

19 **COMMISSIONER MITCHELL:** And you're at 45,000,
20 now, households?

21 **MS. HIPPI:** 47, yes.

22 **COMMISSIONER MITCHELL:** 47,000, okay.

23 **VICE CHAIRMAN HOWARD:** What is your breakdown
24 between wireline and wireless?

25 **MS. HIPPI:** The breakdown of the 47,000,

1 Commissioner?

2 **VICE CHAIRMAN HOWARD:** Yeah, what percentage
3 of your -- just say your customers, for lack of a
4 better word, is wireline versus wireless?

5 **MS. HIPP:** Less than 1 percent are wireless.
6 And remember, wireless only came into being with
7 the ETC designation recently, and so we've only
8 been able to gather one year's worth of
9 information. And those companies who are wireless
10 have recently come into that market. So we expect
11 that to grow as consumers find out that those
12 wireless choices are available.

13 **COMMISSIONER WRIGHT:** Is there any data that
14 points to that, or trends in other states that
15 point to that?

16 **MS. HIPP:** That --

17 **COMMISSIONER WRIGHT:** The wireline versus --

18 **MS. HIPP:** I think Virginia, which Lynda
19 touched on, was a good indicator that wireless
20 really causes a large uptick, especially with
21 SafeLink.

22 **COMMISSIONER WRIGHT:** Yeah. That's exactly
23 where I was going, so thank you.

24 **MS. HIPP:** Commissioner, Florida has
25 experienced that same growth.

1 **COMMISSIONER WRIGHT:** Okay.

2 **COMMISSIONER MITCHELL:** You don't have a
3 regional breakdown of the state, do you? I saw
4 your charts, it was mostly just the companies and
5 their percentages, because you have the 47,000 out
6 of 334,000 are some pretty significant numbers.
7 You don't have any charts showing a regional area
8 or percentage?

9 **MS. HIPP:** We do not. But we have wrestled
10 with trying to overlay our ETC service areas with
11 poverty statistics in the State. We have not
12 completed that analysis. We do have chart
13 information as to the poverty level and number of
14 households by County that would be eligible.

15 **MS. STUTLER:** All right. Chris?

16 **VICE CHAIRMAN HOWARD:** Let me play with the
17 wireless one more time.

18 **MS. HIPP:** Sure.

19 **VICE CHAIRMAN HOWARD:** How do you verify
20 wireless in relation to the household? There are
21 probably some households that you've got ten
22 different wireless numbers, theoretically. How can
23 you make that transition of eligibility versus
24 wireless?

25 **MS. HIPP:** Whether or not they receive

1 wireline and wireless, to prevent that? There is
2 not a safeguard for that, even at the Federal
3 level. Those states, such as California, that use
4 the automatic enrollment and you receive a PIN
5 number as a customer have that locked down. Texas
6 also uses that process, so they have a state
7 database that is maintained to document, and the
8 ETCs bump up on that database every time they get a
9 new client, and that's how they prevent that dual
10 reception of the benefit.

11 South Carolina, we do not have that.
12 Traditionally, what we're seeing, again, wireless,
13 very low participation at this moment. The company
14 -- if a company -- let's use Farmers, for example.
15 A Farmers wireless customer comes in, or FTC, and
16 asks for the benefit. Chances are, if they had a
17 Farmers wireline, the company's going to know that
18 and prevent the benefit on each line, but there is
19 not a safeguard right now.

20 Other states are struggling with that issue,
21 as well. And there is some discussion at the
22 Federal level -- I don't think Chris will get into
23 it -- of a Federal database for Lifeline. But
24 that's down the road.

25 **CHAIRMAN FLEMING:** I want to go back to my

1 question -- I'm still not clear on this. The
2 Federal guidelines say that if you are 135 percent
3 above the poverty level, you are eligible, correct?

4 **MS. HIPPI:** 135 percent, or below. If you fall
5 below --

6 **CHAIRMAN FLEMING:** You're eligible.

7 **MS. HIPPI:** -- you are eligible, yes, for the
8 Federal default states.

9 **CHAIRMAN FLEMING:** Okay. In South Carolina,
10 it only applies -- the 125 percent only applies to
11 AT&T.

12 **MS. HIPPI:** That is correct.

13 **CHAIRMAN FLEMING:** All the others use the
14 Federal standard.

15 **MS. HIPPI:** No, all of the others only -- the
16 consumers that receive service from the other ILECs
17 can only qualify if they receive Medicaid, Food
18 Stamps, or TANF.

19 **CHAIRMAN FLEMING:** Okay, thank you.

20 **MS. HIPPI:** Yeah, the income --

21 **CHAIRMAN FLEMING:** Because I was under the
22 impression that either one, but --

23 **MS. HIPPI:** No.

24 **MR. ROZYCKI:** If we look back at that slide,
25 it is an either/or. Either you're a Federal

1 default state or, like South Carolina, you have
2 established your own criteria.

3 **CHAIRMAN FLEMING:** Okay.

4 **MR. ROZYCKI:** South Carolina has established
5 their own -- our own criteria; we don't have the
6 135 percent income eligibility requirement.

7 **CHAIRMAN FLEMING:** Thank you.

8 **MR. ROZYCKI:** Yes.

9 **CHAIRMAN FLEMING:** I was -- that was confusing
10 to me. I appreciate that.

11 **MR. ROZYCKI:** Good morning.

12 **CHAIRMAN FLEMING:** Good morning.

13 **MR. ROZYCKI:** A couple of things I will just a
14 touch on before I go to the next slide. We've
15 talked about the success that we've had, and a lot
16 of that success is due to our ETCs and their
17 participation, but a great deal of the success and
18 a great deal of the responsibility of this program
19 lies with ORS, coming from the Commission, of
20 course. And we would like to say that our change
21 in strategy has caused a significant uptick in the
22 participation in South Carolina.

23 Two, three years ago, we were looking at down
24 below 10 percent. South Carolina was one of those
25 companies [sic] that was in the bottom group. Now

1 we're up in the blue group; we're at 19 percent,
2 and hoping to go over 20 percent next year, just to
3 keep that in your minds.

4 One of the ways we've done this is to move our
5 focus from talking one-on-one with consumers to an
6 awareness program where we try to educate as many
7 consumers as possible. And we do that through the
8 partnerships that we have developed.

9 [Ref: PowerPoint Page 14]

10 Outside South Carolina, we are looking at what
11 the Feds may be doing, particularly the FCC, in
12 terms of Universal Service reform and Lifeline.
13 Lifeline, as you know, is integrally tied to
14 Universal Service. It's part of that program, both
15 at the Federal level and at the State level. So as
16 the FCC is looking at changing Universal Service,
17 that may affect Lifeline as we know it in South
18 Carolina. The national broadband plan also may
19 affect Lifeline as we know it in South Carolina,
20 and we'll talk about that in just a minute.

21 So, how might these changes and what the
22 Federal government is doing affect us? USF reform,
23 of course, may lead to changes in the Lifeline
24 program for us. And that's the Federal level. In
25 addition to that, the national broadband plan that

1 I've mentioned is being looked at. The FCC is
2 planning to come out with something momentarily.
3 Don't know when they are really expecting that, but
4 soon. And they're getting a lot of input from
5 players in the industry.

6 Our own AT&T in this State has put forth a
7 substantive proposal before the FCC and talked
8 about Lifeline. They would like the FCC to
9 bifurcate Lifeline, to not only have Lifeline as it
10 is today available for basic telephone lines, but
11 also Lifeline available for broadband service. And
12 in their scenario, their model, they would suggest
13 \$10 for the traditional phone-service type of
14 Lifeline and up to \$20 for a broadband Lifeline
15 connection. It would be an either/or situation, so
16 a household would get one or the other, but not
17 both.

18 The question for us is, I think, how should
19 South Carolina consider responding, if there are
20 changes. Is there anything we will need to do?
21 Will those Federal changes in these programs be in
22 any way prescriptive for the State and require us
23 to do anything?

24 [Ref: PowerPoint Page 15]

25 Purely just questions. There's no thoughts on

1 our part as to what we ought to do on that. We
2 just know there's change coming and it may affect
3 us.

4 We talked about -- sort of summarizing and
5 going back to what we've talked about -- what other
6 states are doing. I've used the term on this slide
7 "Lifeline Leaders," and by that I mean those states
8 that are delivering the highest percentages of
9 Lifeline. For those states, things they have done
10 include, for instance, expanding consumer
11 eligibility to include, most notably, the School
12 Free Lunch program and the Section 8 Housing
13 program. As we mentioned, this does not increase
14 the number of eligible participants; it increases
15 the number of avenues that ORS might have to get at
16 those participants, to make them aware of Lifeline.

17 One of the things that we found out in
18 researching Lifeline with other states is that many
19 people are not aware that the Lifeline program
20 exists. When they become aware -- and that's why
21 we focus on awareness -- when they become aware,
22 they're interested. So awareness helps them to be
23 knowledgeable that this assistance is available to
24 them.

25 ETC requirements. Some of the states have

1 added ETC requirements into their mix, and that has
2 caused them to have higher rates of participation.
3 Lynda mentioned Maine. Advertising is one of the
4 things that the Commission has done, required
5 companies to more significantly increase their
6 advertising.

7 Streamlining the Link-Up process. In
8 Mississippi, applications that are taken in by the
9 Commission, when the Commission realizes that this
10 consumer does not have phone service with the local
11 phone company, they forward that right away to that
12 phone company and say, "This is a Link-Up
13 candidate. Get them signed up for service first,
14 and then they will qualify for Lifeline." So that
15 helps in speeding the process.

16 And then finally, under ETC requirements,
17 customer service representative requirements. Some
18 of the states require the ETC CSRs, customer
19 service representatives, to inform people calling
20 them and asking for new service that Lifeline may
21 be something they are interested in and that it is
22 available. Also as other customers may call in for
23 various issues, if they're having problems paying
24 their bill, they may be able to let them know that
25 Lifeline might be an option for them.

1 Lastly, I will talk briefly about auto-
2 enrollment. Some states have included this. I
3 think California is one. In essence, it says -- it
4 works this way. If you are on Food Stamps and you
5 are provided that Food Stamp benefit, you are
6 automatically eligible for Lifeline in those
7 states. You may be given a PIN number, you may be
8 given a voucher that you can, in turn, then use to
9 go to your telephone company and initiate Lifeline
10 service.

11 So those are some of the things that the other
12 states are doing.

13 [Ref: PowerPoint Page 16]

14 So let's kind of wrap up where we are here.
15 I'm standing in front of lunch.

16 What might the Commission think about as next
17 steps? Does the Commission want to consider
18 expanding the program? Are we fine with where it
19 is and how it operates in South Carolina? One
20 thing we might want to talk about, think about, the
21 inclusion of Section 8. Is that something to
22 consider? School Free Lunch program, those sorts
23 of things, things you might want to consider as
24 next steps.

25 Goals. Should we set goals? I think several

1 of you have asked about goals. Goals can be looked
2 at in terms of goals for the ETCs, whether there
3 should be an average that they should aspire to in
4 terms of the numbers of their customers that they
5 are providing Lifeline to; goals for ORS, whether
6 we should be given goals in terms of the numbers we
7 should aspire to for the State. And within that,
8 how should those goals be developed? What should
9 be the basis of those goals? Those sorts of
10 things, we might want to think about.

11 Guidelines. Some of the companies, as was
12 mentioned, have asked us, specifically, "We'd like
13 guidelines. We'd like to have a set of rules, a
14 set of instructions to go by, so we know what we
15 should be doing." Today they have to go to various
16 places in Commission orders to really pull out
17 exactly how they should be handling Lifeline. We
18 try to give them as much training and guidance as
19 we can, but we're limited somewhat by those
20 regulations ourselves.

21 One thought, ORS could basically invite all of
22 the ETCs to an open forum where we would sit down
23 and talk about, discuss, establishing guidelines
24 for the State in a way that we at ORS and the
25 companies that are actually providing Lifeline

1 service can all come to agreement on. That's a
2 good idea, I think. Improving on that idea might
3 involve the Commission actually giving guidance,
4 direction, to us and those ETCs as we step forward
5 in that.

6 Performance measurements or measuring
7 performance. Again, we can -- it can be the ETCs
8 themselves, whether they are meeting some
9 objective; it could be -- we could measure
10 performance by company, by service area, by the
11 State, however we want to do that. There are
12 different things you might want to look at.

13 In all of this, it's important to keep in mind
14 the impact that this will have on the State's USF
15 program. All of this is paid for by residents and
16 businesses in the State, so we need to be cognizant
17 that that's where the money comes to fund this
18 program, and its funded through the State's USF
19 program right now.

20 As an example, if we were to raise
21 participation from the 19 percent we show today to,
22 say, 29 percent, a 10 percent increase, that would
23 impact consumers and businesses to the tune of
24 about \$0.05 a month on their bill. So that is the
25 cost of raising it 10 percent.

1 And finally, cost. When we talk about cost,
2 it includes the program cost, our cost at ORS. You
3 know, making changes may require us to come back
4 and ask for additional funding. But those things
5 need to be put in the mix of things to be
6 considered, if change is in the offing.

7 And that, I think, wraps it up, unless Dawn
8 would like to say anything else. Any questions?

9 **COMMISSIONER MITCHELL:** I have a question.

10 **MR. ROZYCKI:** Sure.

11 **COMMISSIONER MITCHELL:** You mentioned both --
12 in reference to the State Universal Service Fund
13 and the Federal Universal Service Fund, you also
14 had a comment there that the FCC might be looking
15 at the Federal Universal Service Fund. Let's
16 suppose that happens, and your numbers here that
17 you computed earlier about the Fund provides what
18 portion of this, and what -- that would directly
19 affect how we're using the State Universal Service
20 Fund, wouldn't it? Or would it not?

21 **MR. ROZYCKI:** Be a little more specific --
22 I'm --

23 **COMMISSIONER MITCHELL:** I guess what I'm
24 saying, you said the \$3.50, or whatever, \$3.30, was
25 put up by the State Universal Service Fund.

1 **MR. ROZYCKI:** Yes, yes.

2 **COMMISSIONER MITCHELL:** I'm saying, on the
3 Federal level, if the FCC changes any format with
4 the Federal Universal Service Fund, then --

5 **MR. ROZYCKI:** Currently --

6 **COMMISSIONER MITCHELL:** -- wouldn't that
7 filter down to probably some concerns of how the
8 State Universal Service Fund is going to fit into
9 the picture?

10 **MR. ROZYCKI:** Yes. Currently, our \$3.50 is
11 not a number we just sort of pulled out of the air.
12 The idea behind the \$3.50 is by putting \$3.50 in
13 our Universal Service Fund, we maximize the Federal
14 funding coming to us. So, by -- and we maximize it
15 to the tune of \$1.75. There's a tier -- there are
16 tiers within the Federal Fund. The first tier
17 covers the \$6.50 that is the --

18 **MS. HIPPEL:** SLC.

19 **MR. ROZYCKI:** -- SLC charge. Thank you. The
20 second \$1.75 is another area, and the third is
21 basically a Federal matching amount and it requires
22 the State to put up \$3.50 of its own money in order
23 to get that maximized benefit and get the Federal
24 money to \$10.

25 **COMMISSIONER MITCHELL:** And this is a question

1 that -- well, that I think should fit into it. The
2 State Universal Service Fund now is at what, in
3 South Carolina? Is it \$66 million?

4 **MS. HIPP:** It's \$47 million.

5 **COMMISSIONER MITCHELL:** \$47 million.

6 **MS. HIPP:** Yes, sir.

7 **COMMISSIONER MITCHELL:** So, would you
8 summarize that the State Universal Service Fund,
9 then, has worked very well with all these programs
10 -- because I remember when the State Universal
11 Service Fund was being talked about many years ago,
12 and suggesting that going with -- \$300 million was
13 a number that came out, and it has operated doing
14 these programs far less -- would you make that
15 summarization? -- than projected maybe with all
16 these programs?

17 **MS. HIPP:** The State has been very efficient
18 with their -- if you look at the consumer benefit,
19 Commissioner, the Commissioners in South -- or, the
20 consumers in South Carolina receive a very nice
21 benefit from the State Universal Service Fund,
22 having that ability to match. Of the \$47 million
23 that is the Fund value this year, \$1.9 million will
24 go to support Lifeline services in the State.
25 Other states that do not have the state match

1 aren't realizing the full Federal benefit.

2 To get back to your question, if the Feds
3 change the structure of the Federal Universal
4 Service Fund and they change the dollar amount or
5 they change the tiers in some way, that affects
6 that \$10 coming to the consumer, and then the State
7 will have to decide how it wants to handle its
8 State matching portion of \$3.50. So Chris was
9 trying to just tee up an idea, if the regulatory
10 scheme on the Universal Service Fund changes for
11 the Federal \$10 proportion, you know, the State's
12 \$3.50 remains the same -- because that's through
13 law, State Law here -- but, you know, there is
14 going to be an impact to the consumers,
15 specifically.

16 **COMMISSIONER MITCHELL:** So the whole revenue-
17 neutral formula that fits into the State Universal
18 Service Fund has -- would you summarize -- has
19 served the purpose well in South Carolina, as far
20 as what the Fund was originally projected to be,
21 where it's at now, and all that we have obtained
22 from the Universal Service Fund?

23 **MS. HIPP:** In terms of Lifeline, it's doing
24 very well for the consumer.

25 **COMMISSIONER MITCHELL:** Thank you.

1 **CHAIRMAN FLEMING:** Just for clarification, you
2 are asking us for recommendations on the direction
3 of --

4 **MR. ROZYCKI:** No, we're just alerting --

5 **CHAIRMAN FLEMING:** Or guidelines?

6 **MR. ROZYCKI:** -- you -- pardon?

7 **CHAIRMAN FLEMING:** Or guidelines? I thought
8 that's what I understood you to say.

9 **MS. EDWARDS:** If I may interject, Madam
10 Chairman, as part of the allowable ex parte
11 briefing we are a little bit hemmed in, in the
12 sense that we actually cannot make a request of the
13 Commission for you to look at or rule in a certain
14 way at this time. And consequently, or conversely,
15 you guys cannot give us that, either. But I think
16 what we're trying to do, in a very nice way, is to
17 let you know that there are questions out there,
18 and these are questions that ORS is looking at and,
19 frankly, through this allowable ex parte briefing,
20 we are trying to bring those questions to the
21 forefront in the sense of where should this go in
22 the future? And in the right forum, in the right
23 way, certainly ORS would like to see that
24 direction from the Commission.

25 **CHAIRMAN FLEMING:** And let me follow up, and

1 you can tell me if I'm going farther than I should.
2 It seems that there is a body in place that has
3 addressed other issues and has come up with
4 recommendations that have moved things forward,
5 like the complaint system for consumers and all.
6 The advisory council, I know there are a lot of
7 people on there that wouldn't directly be involved
8 in this, but just those members of the advisory
9 council that this would pertain to their companies,
10 is that an area that could be convened to maybe do
11 some problem-solving with this?

12 **MS. EDWARDS:** Is that the advisory group that
13 we've discussed?

14 **CHAIRMAN FLEMING:** Uh-huh.

15 **MS. EDWARDS:** I mean, certainly --

16 **CHAIRMAN FLEMING:** I'm talking about the
17 advisory group that ORS is a part of, and all of
18 the different agencies that come before us.

19 **MS. EDWARDS:** Is that the PERC Committee? I'm
20 sorry, ma'am.

21 **CHAIRMAN FLEMING:** No. There --

22 **MR. MELCHERS:** The attorney advisory
23 committee.

24 **MS. EDWARDS:** The attorney advisory -- okay.
25 Yes. Yes, I understand the attorney advisory --

1 yes, certainly that's one area. We could look at
2 that. I think, you know, it may be that -- I think
3 Chris mentioned this -- what I think ORS would like
4 to do is try and get an industry consensus, and
5 maybe figure out a way through that industry
6 consensus to come back before the Commission -- and
7 I'm not sure what vehicle that would be, in terms
8 of, you know, whether that's some sort of pleading,
9 or something that ORS would file with the
10 Commission, or maybe jointly file with this
11 industry group. But I do think one of the things
12 we've been talking about very recently has been
13 getting together an industry consensus on perhaps,
14 for example, putting together some guidelines and
15 coming in to the Commission and making a filing,
16 attaching those guidelines, and maybe through
17 opening that proceeding it could be broad enough
18 that we could talk about various issues.

19 **CHAIRMAN FLEMING:** And that's what I had in
20 mind with this particular group.

21 **MS. EDWARDS:** With the attorney advisory
22 group?

23 **CHAIRMAN FLEMING:** Right.

24 **MS. EDWARDS:** The only thing I would point out
25 there is whether we would get all the interested

1 parties. That's the only -- this Lifeline program
2 obviously affects the COLRs, but it also affects
3 ETCs and as I know you are aware from the numerous
4 hearings we've been having lately, we've got a lot
5 more participants that are now ETCs that are CLECs
6 than we've ever had before.

7 **CHAIRMAN FLEMING:** And they're not represented
8 in this group.

9 **MS. EDWARDS:** I don't know that they would be.
10 Typically, there's only one or two attorneys that
11 represent that group, and that group tends not to
12 necessarily have the extra financial wherewithal to
13 always attend those attorney advisory group
14 meetings. My only concern, Madam Chairman, is, you
15 know, if we have an open proceeding before this
16 Commission, that way everybody gets to participate,
17 nobody can say they didn't know about it, nobody
18 can say, "We were left out."

19 **CHAIRMAN FLEMING:** And we've done that, too,
20 for other issues.

21 **MS. EDWARDS:** That's the only thing I would
22 say, other, about that process. Again, you know,
23 we've walked away, and we've been asking ourselves
24 these questions, how do we move forward. You know,
25 and we're not -- in all candor -- we're not certain

1 where the desires -- and I'm not asking you to tell
2 me -- where the desires of the Commission are in
3 terms of bigger, smaller. We don't know. And so
4 we're hopeful that by getting together an industry
5 consensus, maybe we can get everybody's ideas
6 together and come back to you and open that
7 proceeding and -- you know, if you can figure out a
8 way to let us know what your desires are, that's
9 also -- that would be very helpful to us, as well,
10 but we --

11 **CHAIRMAN FLEMING:** Well, I think we need to --

12 **MR. MELCHERS:** That wasn't a request.

13 **CHAIRMAN FLEMING:** -- understand --

14 **MS. EDWARDS:** And that was a rhetorical
15 question.

16 **CHAIRMAN FLEMING:** -- what the thinking is out
17 there, too.

18 **MS. EDWARDS:** But, you know, we want -- we are
19 the administrator of this Fund and, as you can see,
20 these individuals work really hard, and so -- but
21 we -- at the end of the day, we are here to fulfill
22 the Commission's objectives on this program. At
23 the end of the day, you know, that's our goal, is
24 to fulfill the desires and the requirements that
25 the Commission has laid down for this program. And

1 that's where we want to go and where we want to be.

2 If there's any other question, you know,

3 please let -- we're all here, and --

4 **COMMISSIONER WRIGHT:** I do have -- I do. And

5 I guess maybe just to clear it for me in my own

6 mind. We've got, what -- based on the 45,000,

7 roughly, we've got signed-up available, or eligible

8 households, of the 334,000, or so, that's, what,

9 about 13 percent or so? Is that right?

10 **MS. EDWARDS:** That sounds about right. Dawn,

11 I think I'm going to let you take this question.

12 **COMMISSIONER WRIGHT:** And I think I just heard

13 that if we increased it another 10 percent we'd be

14 affecting a bill by a nickel?

15 **MS. HIPPI:** That's correct, but that's our

16 rough, back-of-the-envelope --

17 **COMMISSIONER WRIGHT:** Right. Then if you're

18 doing outreach and you're doing all this stuff to

19 try to get -- you know who the big pot is, but you

20 don't really know how to get to them the best way

21 -- I guess that's one thing you're trying to do,

22 and that's why you've increased over the last five

23 years, but then if you get too far up, you know,

24 you hit a certain number and you're kind of worried

25 about the program, okay? How far are we going? Is

1 there a reason why one person, a person, would not
2 want to sign up?

3 **MS. HIPP:** That's a very good question,
4 Commissioner. And I'll tell you, we have practiced
5 in the Office of Regulatory Service controlled
6 growth measures, because we realize that with the
7 staffing that we have and the budget that we have
8 and the structure of the State Universal Service
9 Fund, that we want to reach those who need the
10 program the most.

11 There are several reasons why a consumer would
12 not want Lifeline, and one is the competitive
13 choice that Elizabeth mentioned. They want
14 Lifeline with Time Warner Cable. Time Warner Cable
15 is not an ETC. Therefore, that client is not going
16 to receive Lifeline. They would like Lifeline with
17 Boost Mobile. Boost Mobile, not an ETC. So they
18 are limited by competitive choices. They're also
19 limited somewhat by a temporary nature. You're
20 seeing a lot of -- as you see by the uptick in
21 those living underneath the poverty level, they
22 could be there temporarily, so less than 12 months.
23 It's up to the client to disclose to the ETC that
24 their income status has changed, as well.

25 **COMMISSIONER WRIGHT:** So within the number of

1 the 334,000 eligible households, the 45,000 that
2 you've signed up, there's an additional number
3 between -- above that 45, who you've made contact
4 with but for some reason or another have opted out.

5 **MS. HIPP:** That's correct.

6 **COMMISSIONER WRIGHT:** Do you have any idea how
7 many that is?

8 **MS. HIPP:** No, we don't. When you start
9 talking about the application process, we will
10 distribute -- you see how many we distribute, how
11 much material --

12 **COMMISSIONER WRIGHT:** Right.

13 **MS. HIPP:** -- and then the resulting number of
14 access lines. It is on the consumer to sign up for
15 that benefit, and you see in the states where they
16 have automatic enrollment, their numbers are up so
17 that kind of fills that gap. That automatic
18 enrollment mechanism will fill that gap.

19 **COMMISSIONER WRIGHT:** Okay. Thank you.

20 **MS. HIPP:** Are there any other questions?

21 **COMMISSIONER MITCHELL:** The only thing I'd
22 like to say is I think it was a very good
23 presentation being tied in with -- for a long time
24 with the telecom, and what we are receiving in
25 South Carolina for what we're spending is very,

1 very good. And it showed it through your graphs.
2 And I would just like to commend all of you who
3 have had a part in administering it. It seems to
4 be working real well.

5 **MS. HIPP:** Thank you. It is a program that
6 this Commission should be proud of, proud of for
7 the effort you've put in to have the vision to see
8 that individuals in the State do need some
9 assistance with their phone bills, and you have the
10 mechanism to do that and you've laid a very nice
11 framework; proud that the ETCs that are regulated
12 by you have embraced the program. In the past five
13 years, we have seen such a good reception and such
14 unique ideas from some of those ETCs to reach their
15 eligible population -- there isn't a resistance to
16 offering the program. There are concerns, and
17 we've addressed some of those, and you've had some
18 of those questions, as well. And we, as ORS, are
19 proud to be a part of it. Even just to meet with,
20 you know, Ms. Stella that we talked about, or Ms.
21 Sarah, some of those days are the best days that we
22 have in this program. And we just appreciate the
23 opportunity to come before you and give you a
24 little insight as to what we work on, on your
25 behalf, provide some education, and if there are

1 any other questions, we'll be glad to answer those.

2 **CHAIRMAN FLEMING:** Are there any other
3 questions?

4 [No response]

5 **CHAIRMAN FLEMING:** Mr. Fantry, do you have any
6 comments to make?

7 **MR. FANTRY:** No, Madam Chairman. I have no
8 questions, but I did enjoy the program very much.

9 **CHAIRMAN FLEMING:** Okay. Well, I also want to
10 thank all of you for being here today in the
11 presentation. It was very helpful. I know when we
12 have had ETC hearings, we've had some questions
13 about things that certain issues were brought up,
14 and thank you, very much, and we really appreciate
15 the work that you're doing so far and look forward
16 to seeing ways that we may improve this program in
17 the future.

18 **MS. HIPPI:** Thank you.

19 **CHAIRMAN FLEMING:** Thank you. This hearing is
20 now adjourned.

21 [WHEREUPON, at 11:58 a.m., the
22 proceedings in the above-entitled matter
23 were adjourned.]

24

25

C E R T I F I C A T E

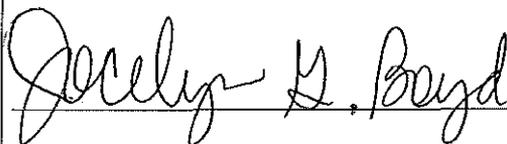
I, Jo Elizabeth M. Wheat, CVR-CM-GNSC, do hereby certify that the foregoing is, to the best of my skill and ability, a true and correct transcript of all the proceedings had in an allowable ex parte briefing held in the above-captioned matter before the Public Service Commission of South Carolina.

Given under my hand, this the 12th day of February, 2010.



Jo Elizabeth M. Wheat, CVR-CM-GNSC

ATTEST:



Jocelyn G. Boyd

INTERIM CHIEF CLERK/ADMINISTRATOR