NOTICE TO ALL SERVICE PROVIDERS OFFERING
CALIFORNIA LIFELINE PROGRAM DISCOUNTS

RE: Adjustments to the California LifeLine Program’s (California LifeLine) Application Process, Clarification on the Method for Using the Application Date, Guidance on the Temporary Extension of Duration of the California LifeLine Discounts, and Resumption of the Renewal Process

Application Process Adjustments
Effective June 1, 2012, the Communications Division adjusted California LifeLine’s application process to allow the California LifeLine Administrator (Administrator) to distribute a second application form to applicants that did not submit their first application form. However, the overall timeframe for the application process remains the same compared to the timeframe pre-June 1, 2012. The adjusted application process is similar to when an applicant receives a correctable denial and also reflects how the renewal process is implemented.

With this adjustment, the Administrator will mail this second application form on the 53rd day after the carrier feed process date. The applicant will then have 22 days to submit the second application form. After which the Administrator will have until the 82nd day to inform the applicant and the service provider of its decision depending on when the applicant submits the second application form.

If the applicant submits the second application form with errors, then the applicant will be denied outright with the relevant denial reasons.

Method for Using the Application Date
According to General Order 153 (G.O. 153), Sections 2.4 and 5.8.1, the application date represents the date by which any back-credits of the California LifeLine discounts can begin after the Administrator approves the applicant’s eligibility or the Consumer Affairs Branch overturns a denial. For consumers trying to participate in the program, the application date is the date when the consumer contacts a service provider and asks for the California LifeLine discounts. G.O. 153, Section 2.48, defines the application date differently from the service start date, which is when a consumer starts to receive and is billed for phone service. According to the California LifeLine Program’s pre-qualification rules, a consumer must always have a service start date on or before the application date.

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1 See the attached timelines.
2 For renewing California LifeLine participants the application date would equal the anniversary date.
If a service start date occurred before the application date, then the California LifeLine discounts shall begin on the application date. However, if the service start date coincided with the application date, then the California LifeLine discounts shall commence on the application date, which happens to also be the same date as the service start date.

On the other hand, if the applicant restarts the application process, the application date must coincide with this subsequent attempt to participate in the program.

Temporary Extension of Duration of the California LifeLine Discounts
On April 26, 2012, the California Public Utilities Commission (CPUC) filed a Petition for Waiver with the Federal Communications Commission requesting a twelve-month extension of time to comply with 47 C.F.R. § 54.410(f) annual re-certification requirements amongst other rules from the Lifeline Reform Order. On May 31, 2012, the FCC issued a Waiver Order ruling on the CPUC’s Petition for Waiver in which it extended the deadline by which the CPUC would be required to comply with 47 C.F.R. § 54.410(f) to December 31, 2013. The CPUC’s Final Resolution T-17366 issued on July 13, 2012 adopted the modification to the California LifeLine Program’s rules to be consistent with our plan to suspend the renewal process. Therefore, the Communications Division suspended the annual renewal process beginning June 1, 2012, and resumed the process by October 31, 2012. California LifeLine participants’ eligibility to receive their California LifeLine discounts on their phone service will not be affected as a result of this temporary suspension.

This temporary suspension of the renewal process allows the program to prolong the duration of the California LifeLine discounts. The Communications Division set forth the following conditions by which the California LifeLine discounts could last longer than one year:

1. if a California LifeLine participant either failed to submit the completed and signed renewal form showing her/his continued eligibility or submitted a renewal form with correctable errors before June 1, 2012, but is still entitled to receive another renewal form;
2. if a California LifeLine participant was scheduled to receive a renewal form between June 1 and October 31, 2012; and/or
3. if the Administrator did not notify the relevant service provider on time of the denial of a renewing participant.

For the first two conditions, the Administrator will send a postcard to the California LifeLine participant informing him/her of the suspended renewal process. Then for the third condition,

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3 See CPUC’s Petition for Waiver, filed April 26, 2012 with the FCC; WC Dkt. Nos. 11-42 et al., CC Dkt. No. 96-45.
6 The California LifeLine Program was in the process of modifying its renewal process, thus renewal forms were temporarily unavailable.
the Administrator will reflect the decision date as the day it actually notifies the service provider of the denial i.e., Field 41 will be equal to Field 44 in the return feed.⁷

Resumption of the Renewal Process
In compliance with Resolution T-17366, the California LifeLine renewal process resume by October 31, 2012. In coordination with the Administrator, we have divided the California LifeLine participants in need of undergoing the renewal process into two major groups. One group consists of those California LifeLine participants whose anniversary dates are 105 days from October 31, 2012 and thereafter. The second group, called “Catch-Up Renewals”, includes those California LifeLine participants that were entitled to or scheduled to receive a renewal form between June 1 and October 31, 2012 as described in the section immediately above.

The Administrator will spread the Catch-Up Renewals into several weeks occurring between October 15, 2012 and December 28, 2012. Additionally, the Administrator will be performing quality control measures before fully ramping up its renewal efforts.

With regards to eligibility decisions the Administrator makes for the Catch-Up Renewals, if the Administrator approves the renewal of a California LifeLine participant, the Administrator will maintain the existing anniversary date. However, if the Administrator denies the renewal of a California LifeLine participant falling into the Catch-Up Renewals, the Administrator will reflect the decision date as the day it actually notifies the service provider of the denial i.e., Field 41 will be equal to Field 44 in the return feed, to eliminate the possibility of the back-billing issue.

Another processing change involves when a service provider will receive the notification of either an approval or denial as they relate to the Catch-Up Renewals. Given the service provider notification for the Catch-Up Renewals will not be dependent on the anniversary date since the anniversary date has already passed, the Administrator will send the decision as soon as it determines the final eligibility for those consumers falling in the Catch-Up Renewals process.

For questions, contact Michaela Pangilinan by phone at 415-703-1890 or by e-mail at wow@cpuc.ca.gov.

/s/ JONATHAN LAKRITZ

Jonathan Lakritz, Branch Manager
Communications Division

⁷ If the Administrator transmitted the denial of the renewing participant to the service provider on time, then the decision date would have been the day before the participant’s anniversary date.
California LifeLine Application Process

**CORRECTABLE DENIAL WINDOW**
22 day window
A correctable denial can be issued at any point in the timeline up to day 53 based on how quickly the applicant returns their initial application with at least one error that requires correction. The applicant receives a 22 day window to return the correctable denial from the day the correctable denial is created. The last day to issue a reprint request for a correctable denial is 8 days prior to the due date.

**INITIAL APPLICATION TIME FRAME**
sent day 1 - due day 44
44 day window
Day 1 is the carrier fee process date. Processing of the carrier's data happens within 24hrs of receipt from carrier.

**SOFT DENIAL TIME FRAME**
sent day 53 - due day 74
22 day window
This is another type of correctable denial but is auto-generated for any applicant that did not return the initial application that was mailed to them. Denial code: 6-21

Administrator Review - Administrative review can happen at any point in the time line up to day 81. Administrator has 7 days to review App from date it was received.

Day 3
Outbound call made

Day 21
If form not received
• Post Card Sent
• Outbound Call Made

Day 36
Last day to issue a reprint request (initial app)

Day 53
Last day for Administrator to return initial hard denials to carriers for removal on Day 54
Administrator does not hold decisions until day 53. Decisions will be passed to carriers the day after the decision is made and can be any day prior to day 53.

Day 53
Last day for Administrator to return decisions to carriers for removal on Day 83
Administrator does not hold decisions until day 82. Decisions will be passed to carriers the day after the decision is made and can be any day prior to day 82.
California LifeLine Renewal Process

CORRECTABLE DENIAL WINDOW
22 day window
A correctable denial can be issued at any point in the time line up to day 73 based on how quickly the renewing participant returns their initial renewal with at least one error that requires correction. The participant receives a 22 day window to return the correctable denial from the day the correctable denial is created. The last day to issue a reprint request for a correctable denial is 8 days prior to the due date.

INITIAL RENEWAL TIME FRAME
sent day 1 - due day 44
44 day window
day 1 is 105 days prior to the participants anniversary date.

SOFT DENIAL TIME FRAME
sent day 45 - due day 66
22 day window
This is another type of correctable denial but is auto-generated for any participant that did not return the initial renewal that was mailed to them. Denial code: 22-15

CORRECTABLE DENIAL TIME FRAME
sent day 74 - due day 95
22 day window
This is a correctable denial issued to any participant that returns a renewal that requires correction.

Administrator Review: Administrative review can happen at any point in the time line up to day 103. Administrator has 7 days to review Renewal form from date it was received.

Day 3
Outbound call made

Day 5
Sender call made

Day 10
Sender call made

Day 15
Sender call made

Day 20
Sender call made

Day 25
Sender call made

Day 30
Sender call made

Day 35
Sender call made

Day 40
Sender call made

Day 45
Sender call made

Day 50
Sender call made

Day 55
Sender call made

Day 60
Sender call made

Day 65
Sender call made

Day 70
Sender call made

Day 75
Sender call made

Day 80
Sender call made

Day 85
Sender call made

Day 90
Sender call made

Day 95
Sender call made

Day 100
Sender call made

Day 105
Participant's Anniversary Date

Day 21
If form not received outbound Call Made

Day 36
Last day to issue a reprint request (initial renewal)

Day 58
Last day to issue a reprint request (soft denial)

Day 66
Last day to receive a renewal form and still allow for a correctable denial.
Forms received after this date will be considered late and the participant will be given denial code: 21-5 "Your form was received after the due date"

Day 87
Last day to issue a reprint request (correctable denial)

Day 104
All approvals and denial decisions are sent to the carriers.
Decision letters are mailed to the participants.