

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET, N.W., SUITE 800
WASHINGTON, DC 20005**

ORDER

November 18, 2020

**FORMAL CASE NO. 988, IN THE MATTER OF THE DEVELOPMENT OF UNIVERSAL
SERVICE STANDARDS AND THE UNIVERSAL SERVICE TRUST FUND FOR THE
DISTRICT OF COLUMBIA, Order No. 20661**

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) grants Verizon Washington, DC Inc.’s (“Verizon DC”) Request for DC Universal Service Trust Fund (“DC USTF”) Funding Application for the Third Quarter of 2020 (“Request for the Third Quarter of 2020”),¹ for the provision of Lifeline telephone service to low-income District of Columbia customers. The Commission directs the DC USTF Administrator to reimburse Verizon DC for the \$11,964.24 requested by Verizon DC for the Third Quarter of 2020 within 15 days of the date of this Order.

II. BACKGROUND

2. On October 23, 2020, Verizon DC filed its Request for the Third Quarter of 2020. In this Request, Verizon DC seeks reimbursement of \$11,964.24 for the provision of Lifeline service to 1,338 qualifying low-income customers² from July through September 2020. In its Request, Verizon DC submits the data and methodology used to calculate the reimbursement amount as well as the confidential client lists of its Lifeline customers.³ Verizon DC also includes information on the Economy II Lifeline applications processed by Verizon DC during the Third Quarter of 2020.⁴ Verizon DC requests that Solix, Inc., (“Solix”) the DC USTF Administrator, confirm that the documentation provided by Verizon DC in support of its current request is sufficient and that the Commission issue an order granting the request for reimbursement.⁵

¹ *Formal Case No. 988, In the Matter of the Development of Universal Service Standards and the Universal Service Trust Fund for the District of Columbia* (“Formal Case No. 988”), Verizon Washington, DC Inc.’s Request for DC Universal Service Trust Fund Funding Application for the Third Quarter of 2020 (“Request for the Third Quarter of 2020”), filed October 23, 2020.

² Because Verizon DC counts each customer for each month in which the customer qualifies for Lifeline, the actual Lifeline customer count was lower than 1,338 for the Third Quarter of 2020.

³ Request for the Third Quarter of 2020 at 1, Exhibit A.

⁴ Request for the Third Quarter of 2020 at 1, Exhibits B and C.

⁵ Request for the Third Quarter of 2020 at 2.

3. Solix filed its Recommendation on November 4, 2020.⁶ Solix recommends reimbursement of \$11,964.24 because it can validate the eligibility of all the Verizon DC Lifeline customers. Solix bases this recommendation on its review of the customer data presented by Verizon DC in the Request for the Third Quarter of 2020, and a comparison of this data with the customer data in the National Lifeline Accountability Database (“NLAD”) operated by the Universal Service Administrative Company (“USAC”). Solix represents that its analysis showed that NLAD’s list matched the list provided by Verizon DC. Solix recommends reimbursement for the entire amount requested by Verizon DC in its Request for the Third Quarter of 2020.⁷

III. DISCUSSION

4. In Order No. 15303,⁸ the Commission established the standard for ruling on DC USTF reimbursement requests. In that Order, the Commission reviewed a prior version of Title 15 of the *District of Columbia Municipal Regulations* (“DCMR”) § 2803.2, and determined that the language permits reimbursement for “each eligible customer.”⁹ Since the District Department of Environment and Energy Administration’s (“DOEE”)¹⁰ verified customer eligibility at that time,¹¹ the Commission reasoned that only those customers on DOEE’s customer lists would be eligible for reimbursement by the DC USTF.¹² The Commission directed the DC USTF Administrator to compare DOEE’s customer lists with customer lists submitted by Verizon DC and to recommend reimbursement for only those Verizon DC customers found on DOEE’s lists.¹³ The Commission permitted the DC USTF Administrator to recommend a partial reimbursement for those customers who were on both DOEE’s and Verizon DC’s customer lists, after specifying which portions of the request were to be reimbursed, and which portions were to be denied. The Commission permitted the DC USTF Administrator to recommend additional reimbursement upon additional verification of customer eligibility for Lifeline service.¹⁴ Although the Lifeline Eligibility Verification Administrator (“LEVA”) changed from DOEE to Solix, and now, as of

⁶ *Formal Case No. 988*, Letter to Brinda Westbrook-Sedgwick, Commission Secretary, from Sal Cooper, Customer Relations Manager, State Programs, Solix, Inc. (“Recommendation”), filed November 4, 2020.

⁷ Recommendation at 1.

⁸ *Formal Case No. 988*, Order No. 15303, rel. June 18, 2009 (“Order No. 15303”).

⁹ 15 DCMR § 2803.2 (2012).

¹⁰ The District Department of the Environment is now the District Department of Energy and Environment (“DOEE”). See, *Formal Case No. 1125, In the Matter of the Promotion of the Utility Discount Programs*, Letter to Brinda Westbrook-Sedgwick, Commission Secretary, from Brian R. Caldwell, Assistant Attorney General, on behalf of the Department of Energy and Environment, filed August 18, 2015.

¹¹ As of October 1, 2013, DOEE no longer provides customer eligibility verification services for the Lifeline program. Solix was the Lifeline Eligibility Verification Administrator, but was replaced by USAC on May 7, 2019.

¹² Order No. 15303, ¶ 5.

¹³ Order No. 15303, ¶ 5.

¹⁴ Order No. 15303, ¶ 15.

May 7, 2019, to USAC,¹⁵ it does not change the requirement that an eligible telecommunications carrier may only be reimbursed for those customers previously determined to be eligible for Lifeline service.¹⁶

5. The Commission finds that Solix has followed the procedures set forth in Order No. 15303 and has compared the Verizon DC and NLAD customer lists in the third quarter of 2020. Solix recommends reimbursement only for the customers found on both lists, consistent with the Commission's requirements. The Commission agrees with Solix that Verizon DC should be reimbursed \$11,964.24 for the Third Quarter of 2020. Solix shall pay Verizon DC this amount within 15 days of the date of this Order.

THEREFORE, IT IS ORDERED THAT:

6. Verizon Washington, DC Inc.'s Request for DC Universal Service Trust Fund Funding Application for the Third Quarter of 2020 is **GRANTED**; and

7. The District of Columbia Universal Service Trust Fund Administrator shall pay Verizon Washington, DC Inc. for the \$11,964.24 requested by Verizon Washington, DC Inc. for the Third Quarter of 2020 within 15 days of the date of this Order.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:



CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

¹⁵ On May 7, 2019, eligibility verification responsibilities were transferred from Solix to USAC as part of a national transition plan mandated by the Federal Communications Commission ("FCC"). See, *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order and Order on Reconsideration, rel. April 27, 2016. After May 7, 2019, USAC is now responsible for determining the eligibility of Lifeline applicants in the District of Columbia and for maintaining the customer information for Lifeline service customers in NLAD.

¹⁶ The Commission notes that the FCC is working to eliminate waste, fraud, and abuse through the *Lifeline and Link Up Reform and Modernization; Lifeline and Link UP; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, 12-23, and CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, released February 6, 2012. The requirement that an eligible telecommunications carrier may be reimbursed for only those customers that are on the LEVA's list is consistent with the reforms mandated by this FCC order.