

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109

COMMENTS OF THE ALABAMA PUBLIC SERVICE COMMISSION

Comments

The Alabama Public Service Commission (the "APSC") thanks the Federal Communications Commission (the "FCC") for this opportunity to submit comments in the above-captioned matters. The APSC is particularly concerned with offering a position relative to the issues of Lifeline/Link Up eligibility verification and duplication avoidance.

The APSC submits that the functions of Lifeline/Link Up eligibility verification and duplication avoidance must merge to provide an all-encompassing and effective fraud prevention program. The APSC further submits that the states are best positioned to develop a real-time database for purposes of verifying the eligibility for all those seeking approval to participate in the Lifeline and Link Up program while the FCC may be best positioned to develop a real-time database for purposes of ensuring that households are not utilizing multiple Lifeline subsidies. The states and the FCC must, therefore, seek a partnership that culminates in an effective and seamless Lifeline fraud management program.

For purposes of simplifying the Lifeline enrollment process, the Alabama Legislature adopted statutes in 2009 requiring state agencies involved in the administration of Lifeline qualifying public assistance programs to share program participant enrollment data with the APSC. The

APSC currently has at its disposal the data necessary for populating a fully functional Lifeline eligibility database, but lacks the funding required to achieve that goal. Therefore, the APSC seeks the financial assistance needed to fully develop, test, implement, and maintain the software required for management of that database.

For purposes of achieving the desired comprehensive Lifeline fraud management partnership between states and the FCC, the APSC urges the FCC to give utmost consideration to establishing financial assistance for states to fully develop and maintain a reliable and effective Lifeline eligibility verification database. The APSC recommends that such funding be predicated upon a demonstration that the state in question has adopted the requisite statutes and implemented all necessary administrative agreements required for the transfer of data from agencies administering Lifeline qualifying public assistance programs to a centralized state Lifeline eligibility verification database. Further, the APSC submits that states must agree to cooperate with the FCC for purposes of achieving a comprehensive Lifeline Fraud Management system with a duplication avoidance capability. We believe the ongoing savings to the Universal Service Fund achieved as a result of this state-FCC Lifeline fraud management partnership will more than justify the financial assistance provided to the states.

Thank you for your consideration of the APSC's comments in these joint dockets.

Respectfully submitted

/s/ John A. Garner

John A. Garner

Executive Director

Alabama Public Service Commission

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